



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEDERAL EXPRESS

Captain J.C. Scorby, Jr.
Commanding Officer
NAS Jacksonville
Box 2
Yorktown Avenue Building 1
Jacksonville, Florida 32212

Re: Consent Agreement and Final Order In the Matter of the Naval Air Station
Jacksonville, Florida, Docket No. CAA-04-2007-1516(b)

Dear Captain Scorby:

Enclosed is a copy of the ratified Consent Agreement and Final Order (CAFO) in this matter. The original CAFO has been filed with the Regional Hearing Clerk as directed in Section 22.05(a) of the Consolidated Rules of Practice, as amended. Please refer to Section IV, Final Order, for the terms and instructions regarding your final payment on the penalty due.

Also enclosed is a copy of the "Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings." This document puts you on notice of your potential duty to disclose to the Securities and Exchange Commission (SEC) any environmental enforcement actions taken by the Environmental Protection Agency. If you have any questions with regard to the SEC's environmental disclosure requirements, you may refer to the contact phone number at the bottom of the Notice.

Should you have any questions, please contact Mr. Chetan Gala at (404) 562-9746.

Sincerely,

A handwritten signature in cursive script, appearing to read "Beverly H. Banister for".

Beverly H. Banister
Director
Air, Pesticides and Toxics
Management Division

Enclosures

cc: Trina Vielhauer, FL DEP
Dana Brown, Environmental Quality Division, Jacksonville

Internet Address (URL) • <http://www.epa.gov>

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

IN THE MATTER OF:

Naval Air Station
Jacksonville, FL

Respondent.

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Docket No. CAA-04-2007-1516(b)

2008 FEB -11 AM 11:19
HEARING ROOM
EPA REGION 4

CONSENT AGREEMENT AND FINAL ORDER

I. Nature of the Action/Jurisdictional Statements

1. This is a civil penalty proceeding pursuant to Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d), and pursuant to the Consolidated Rules of Practice Governing Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, codified at 40 C.F.R. Part 22. Complainant is the Director of the Air, Pesticides and Toxics Management Division, Region 4, United States Environmental Protection Agency (EPA). Respondent is the Naval Air Station located in Jacksonville, Florida (Respondent).

2. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order (CAFO) will simultaneously commence and conclude this matter.

3. The authority to take action under Section 113(d) of CAA, 42 U.S.C. § 7413(d), is vested in the Administrator of EPA. The Administrator of EPA has delegated this authority under the CAA to the Regional Administrators by EPA Delegation 7-6-A. The Regional Administrator, Region 4, has redelegated this authority to the Director, Air, Pesticides, and Toxics Management Division, by EPA Region 4 Delegation 7-6-A. Pursuant to that delegation, the Director of the Air, Pesticides and Toxics Management Division has the authority to commence an enforcement action as the Complainant in this matter.

4. Pursuant to Section 113(d) of the CAA, before EPA initiates an administrative penalty action for CAA violations which occurred more than 12 months before the commencement of EPA's civil administrative penalty action, or in which the total penalty sought exceeds \$200,000, EPA and the U.S. Department of Justice (DOJ) must make a joint determination that the matter is appropriate for an administrative penalty action. The requisite determinations for this case were made by EPA and DOJ.

5. Respondent is a branch of the Federal government located in Jacksonville, Florida.

6. Respondent is a "person" as defined in CAA § 302(e), 42 U.S.C. § 7602(e).

7. Section 110 of the CAA, 42 U.S.C. § 7410, gives the states the responsibility of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) through a State Implementation Plan (SIP), consisting of rules and regulations, submitted to EPA for approval.

8. Respondent is subject to CAA Sections 110, 112, and 502; 42 U.S.C. §§ 7410, 7412, and 7661a(a), respectively; and the regulations promulgated at 40 C.F.R. Part 52, Subpart K (Florida SIP – which includes Reasonable Available Control Technology (RACT) requirements to conduct regular inspections of particulate matters sources) and 40 C.F.R. Part 63, Subparts A (General Provisions), N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, or “Chrome NESHAP”), and GG (National Emission Standards for Aerospace Manufacturing and Rework Facilities, or “Aerospace MACT”).

9. Section 112(d) of the CAA, 42 U.S.C. § 7412(d), authorizes EPA to promulgate emission standards for categories of sources of hazardous air pollutants, listed in Section 112(b)(1) of the CAA. Those regulations have been promulgated at 40 C.F.R. Part 63, and these standards regulate specific categories of stationary sources that emit (or have the potential to emit) one or more hazardous air pollutants (HAPs). These standards contain general provisions in subpart A and special provisions for specific categories in the subparts to Part 63.

10. Title V of the CAA, 42 U.S.C. § 7661-7661e, establishes an operating permitting program designed to include all applicable requirements of the CAA and a SIP into a single permit, and to provide for permitting for sources of hazardous air pollutants. Major sources of air pollution are subject to permitting under the Jacksonville Environmental Quality Department (EQD) title V program. Respondent is a major source for criteria pollutants and HAPs and currently has a title V permit, number 0310215-023-AV, with an effective date of April 27, 2005, and an expiration date of July 31, 2009, from EQD.

II. Allegations

11. On or about January 26, 2004, EQD issued an air construction permit, number 0310215-020-AC, for the construction of an abrasive blast booth (Emission Unit 105) which would increase particulate matter (PM) emissions, limited to 3.0 pounds per hour and 6.24 tons per year. This construction permit required that an initial compliance test be conducted within 45 days after reaching maximum rate at which the EU will be operated, but not later than 90 days after initial start-up. Respondent performed an initial compliance test on Emission Unit 105’s fabric filter on June 30, 2004, and the PM emission rate was found to be 6.19 pounds per hour, above the limit of 3.0 pounds per hour. Prior to receiving the test results, Respondent operated the abrasive blast booth on July 1, 8, 9 and 13, 2004, for a total of 12.6 hours, resulting in approximately 42.8 pounds of excess PM emissions.

12. Florida Administrative Code rule 62-297.310 is a part of the federally-approved and federally enforceable Florida SIP (40 C.F.R. Part 52 § 52.520). FAC rule 62-297.310(8)(b),

requires test reports to be filed with EQD no later than 45 days after each test is completed. On August 10, 2004, Respondent tested Emission Unit 015 to demonstrate compliance with their title V permit. Respondent filed its test report with EQD on September 30, 2004, 51 days after the test was completed.

13. Emission Unit 043, the chrome electroplating shop, is subject to the Chrome NESHAP. A chrome scrubber is used to control air emissions from emission unit 043, and the pressure drop across the scrubber is required to be monitored and maintained between 2.41 to 4.41 inches water gauge. The Chrome NESHAP (40 C.F.R. § 63.342(f)(1)(ii)) requires that malfunctions be corrected as soon as practicable after their occurrence. On February 7, 2003, a malfunction of the chrome scrubber pressure gauge occurred when condensation built up in the pressure sensing line and impeded the correct functioning of the pressure gauge monitor. From February 7 to 10, 2003, Respondent recorded the chrome scrubber pressure daily reading as -0.06 inches water gauge in the daily pressure log. Corrective action was taken to clear the condensation out of the line on February 10, 2003.

14. The Chrome NESHAP (40 C.F.R. § 63.342(f)(3)(i)) requires that operation and maintenance (O&M) plans include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions. 40 C.F.R. § 63.342(f)(3)(ii) states that if the plan fails to adequately address a malfunction at the time the plan is initially developed, the owner or operator shall revise the O&M plan within 45 days after the malfunction. As described in Paragraph 13 above, the chrome scrubber pressure gauge malfunctioned on Emission Unit 043 from February 7 to 10, 2003. The chrome scrubber O&M plan was first created in July 1996 and subsequently revised on June 3, 2000, June 24, 2000, December 7, 2000, and May 2005. Prior to the May 2005 revision, the O&M plan did not include adequate procedures for the identification of and a corrective action plan for malfunctions of the chrome scrubber pressure monitor.

15. Emission Unit 012, an abrasive blasting booth for aircraft, uses a dry particulate filter system as a control device. Emission Unit 012 is subject to the Aerospace MACT and Respondent is required by 40 C.F.R. § 63.746(b)(4)(iii)(C) to continuously monitor the pressure drop of the dry particulate filter system. The Respondent's Title V permit requires that the pressure drop be recorded once per shift. On September 3, 2002, Respondent reported to EQD that it failed to record pressure drops on the B shift on 14 occasions between February 9, 2002 and August 3, 2002.

16. Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), and 40 C.F.R. Part 19, EPA may assess a penalty of not more than \$32,500 for each violation of the CAA, 42 U.S.C. § 7671h, that occurred after March 15, 2004, and no more than \$27,500 for each violation that occurred between January 30, 1997, and March 15, 2004.

17. EPA alleges that Respondent violated its construction permit (# 0310215-020-AC) and CAA § 502 by operating Emissions Unit 105 in July of 2004 before demonstrating

compliance with the permit and which resulted in excess PM emissions.

18. EPA alleges that Respondent violated the Florida SIP, FAC rule 62-297.310(8)(b), by failing to submit a test report for Emission Unit 015 by the required deadline.

19. EPA alleges that Respondent violated the Chrome NESHAP requirements found at 40 C.F.R. § 63.342(f)(1)(ii) by failing to take corrective action as soon as possible after a malfunction of the chrome scrubber gauge for Emission Unit 043.

20. EPA alleges that Respondent violated the Chrome NESHAP requirements found at 40 C.F.R. § 63.342(f)(3)(i) by failing to revise the O&M plan for Emission Unit 043 within 45 days after the malfunction.

21. EPA alleges that Respondent violated the Aerospace MACT and its Title V permit by failing to continuously monitor and record the pressure drop for a dry particulate filter system for Emissions Unit 012.

III. Consent Agreement

22. For the purposes of this CAFO, Respondent admits the jurisdictional allegations set out in Paragraphs 1 through 10 above, but Respondent neither admits nor denies the factual allegations set out in Paragraphs 11 to 21 above.

23. As provided in 40 C.F.R. § 22.18(b)(2), Respondent waives any right to contest the allegations listed above and its right to appeal the proposed final order accompanying this consent agreement.

24. Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CAFO.

25. Respondent certifies that as of the date of its execution of this CAFO, it is in compliance with all relevant requirements of the CAA.

26. Compliance with this CAFO shall resolve the alleged violations and factual issues contained herein, and EPA hereby releases Respondent from all liability for the facts and violations alleged herein. This CAFO shall not otherwise affect any liability of Respondent, if any, to the United States. Other than as expressed herein, neither EPA nor Complainant waive any right to bring an enforcement action against Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment, or to pursue criminal enforcement for allegations of violations not contained in this CAFO.

27. Complainant and Respondent agree to settle this matter by their execution of this CAFO. The parties agree that the settlement of this matter is in the public interest and that this CAFO is consistent with the applicable requirements of the CAA, and that Respondent, as a

branch of United States government, is not subject to the Internal Revenue Code and therefore Respondent will neither capitalize into inventory or basis nor deduct any costs or expenditures incurred in performing the Supplemental Environmental Project described below.

IV. Final Order

28. Respondent shall pay a civil penalty of TWENTY THOUSAND EIGHT HUNDRED AND EIGHTY-EIGHT DOLLARS (\$20,888) which is to be paid within thirty (30) days after the date Respondent receives a copy of the fully executed CAFO.

29. Respondent shall pay the penalty identified in Paragraph 28 utilizing a manual Military Interdepartmental Purchase Request (MIPR), DD-Form 448, an intergovernmental electronic payment procedure, which Respondent is requested to attach to this document during review and signature and mailed to:

Mr. Chetan Gala
Air, Pesticides and Toxics Management Division
Air and EPCRA Enforcement Branch
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, Georgia 30303

Upon receipt, EPA will sign the MIPR and a signed copy of the MIPR will be attached to the ratified CAFO. Upon Respondent's receipt of the ratified CAFO and signed MIPR, please mail a copy of the MIPR for processing to:

US Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
PO Box 979077
St. Louis, MO 63197-9000

30. Upon acceptance and then billing of the MIPR by EPA to the address provided in block 13 of the MIPR through the Intra-Government Payment and Collection (IPAC) system, the payment will be remitted to EPA. Respondent shall use EPA Cincinnati's accounting location code 68-01-0727. The MIPR shall reference the name and the Docket Number of the CAFO.

31. This settlement is further supported by, and Respondent also agrees to implement, the Supplemental Environmental Project (SEP) described in Exhibit A, as submitted to EPA on October 9, 2007. Respondent's estimated cost for completing the SEP is NINETY FIVE THOUSAND DOLLARS (\$95,000). In order to meet its SEP obligations, Respondent must spend a minimum of NINETY THREE THOUSAND ONE HUNDRED AND FIFTY NINE DOLLARS (\$93,159). If the SEP is not completed to EPA's satisfaction by not fully completing any part of the SEP in a timely manner, Respondent shall pay a stipulated penalty of SIXTY-

TWO THOUSAND SIX HUNDRED AND SIXTY-FIVE DOLLARS (\$62,265) except as follows:

- a. If the SEP was completed satisfactorily, and Respondent expended at least 90 percent of the total amount required or estimated as mentioned in Paragraph 30, Respondent shall not pay a stipulated penalty;
- b. If the SEP was completed satisfactorily, but Respondent expended less than 90 percent of the total amount required, Respondent shall pay a stipulated penalty in the amount that is the difference between the amount spent on the SEP and the amount agreed upon;
- c. If the SEP was not completed satisfactorily, but Respondent expended at least 90 percent of the total amount required, Respondent shall not pay a stipulated penalty if it made a good faith effort to fully complete the SEP in a timely manner.
- d. For the purposes of this Paragraph, whether Respondent has satisfactorily completed the SEP and whether Respondent made a good faith effort to do so shall be in the sole discretion of EPA; and
- e. The SEP shall be fully implemented and completed within five hundred forty eight (548) days of the effective date of this CAFO.

32. Respondent shall submit a SEP Interim Report. The Interim Report should document the progress of the SEP, state what tasks are remaining, and any anticipated completion dates. The first SEP Interim Report should be submitted six months after the Respondent receives a copy of the fully executed CAFO. The follow up SEP Interim Report(s) should be submitted within six months thereafter until a SEP Completion Report is submitted.

- a. The SEP Interim Report shall be sent to Chetan Gala at the address in Paragraph 29.
- b. If Respondent fails to submit the SEP Interim Report(s) in a timely manner pursuant to this Paragraph, Respondent shall pay to the United States a stipulated penalty of \$100 for each day until required documents or receipts are submitted.

33. Respondent shall submit a SEP Completion Report within 60 days of the completion of the SEP. The SEP Completion Report shall document the completion of the SEP and include copies of receipts or other documentation, that demonstrates the funds expended.

- a. The SEP Completion Report and receipts or other documentation for funds expended shall be sent to Chetan Gala at the address in Paragraph 28.

- b. If Respondent fails to submit copies of the receipts or other documentation for funds expended, or fails to submit the SEP Completion Report in a timely manner pursuant to this Paragraph, Respondent shall pay a stipulated penalty of \$100 for each day until required documents or receipts are submitted.

34. Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Interest will therefore begin to accrue on the civil penalty from the date of entry of this CAFO, if the penalty is not paid by the date required. Interest will be assessed at the rate established by the Secretary of Treasury pursuant to 31 U.S.C. § 3717. A charge will be assessed to cover the costs of debt collection, including processing and handling costs and attorney fees. In addition, a penalty charge of up to six percent per year compounded annually may be assessed on any portion of the debt that remains delinquent more than ninety (90) days after payment is due.

35. It is the expectation of the Parties to this CAFO that all obligations of Respondent arising under this CAFO will be fully funded. Respondent agrees to seek sufficient funding through its budgetary process to fulfill its obligations under this CAFO. Any requirement for the payment or obligation of funds, including stipulated penalties or performance of a SEP by Respondent, established by the terms of this CAFO shall be subject to the availability of appropriated funds, and no provision herein shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 U.S.C. Section 1341. In cases where payment or obligation of funds would constitute a violation of the Anti-Deficiency Act, the dates established requiring the payment or obligation of such funds shall be appropriately adjusted.

36. Complainant and Respondent shall bear their own costs and attorney fees in this matter.

37. This CAFO shall be binding upon the Respondent, its successors and assigns.

38. The following individual represents EPA in this matter and is authorized to receive service for EPA in this proceeding:

Mr. Chetan Gala
Air, Pesticides and Toxics Management Division
Air and EPCRA Enforcement Branch
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-9746

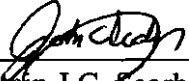
39. Each undersigned representative of the parties to this CAFO certifies that he or she is fully authorized by the party represented to enter into this CAFO and legally bind that party to it.

V. Effective Date

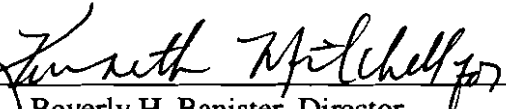
40. The effective date of this CAFO shall be the date on which the CAFO is filed with the Regional Hearing Clerk.

AGREED AND CONSENTED TO:

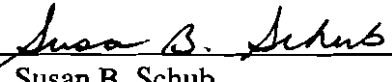
Naval Air Station

By:  Date: 22 Jan 08
Captain J.C. Scorby, Jr.
Commanding Officer
Naval Air Station Jacksonville

U.S. Environmental Protection Agency

By:  Date: 1/11/08
Beverly H. Banister, Director
Air, Pesticides and Toxics Management Division,
Region 4

APPROVED AND SO ORDERED this 4th day of February, 2007.


Susan B. Schub
Regional Judicial Officer

CERTIFICATE OF SERVICE

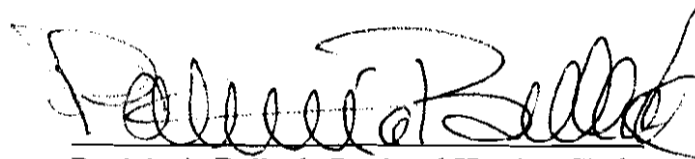
I hereby certify that on the date set out below I filed the original and one copy of the foregoing Consent Agreement and Final Order and served a true and correct copy of the foregoing Consent Agreement and Final Order, in the Matter of: Naval Air Station, Jacksonville, Florida, Docket No. CAA-04-2007-1516(b), on the parties listed below in the manner indicated:

Captain J.C. Scorby, Jr. (Via Certified Mail)
Commanding Officer
NAS Jacksonville
Box 2
Yorktown Avenue Building 1
Jacksonville, Florida 32212

Mr. Leif Palmer (Via EPA internal mail)
Attorney-Advisor
U.S. EPA Region 4
61 Forsyth Street
Atlanta, GA 30303

Mr. Chetan Gala (Via EPA internal mail)
Air, Pesticides and Toxics Management Division
Air and EPCRA Enforcement Branch
U.S. EPA Region 4
61 Forsyth Street
Atlanta, Georgia 30303

Date:

2-5-08

Patricia A. Bullock, Regional Hearing Clerk
United States Environmental Protection
Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 30303
(404) 562-9511

EXHIBIT A



DEPARTMENT OF THE NAVY

NAVAL AIR STATION
JACKSONVILLE, FLORIDA 32212-5000

IN REPLY REFER TO:

5090

Ser 064/045

September 25, 2007

Mr. Chetan Gala
Air, Pesticides and Toxics Management Division
Air and EPCRA Enforcement Branch
US EPA Region 4
61 Forsyth Street
Atlanta, GA 30303

Dear Mr. Gala:

SUBJECT: NAVAL AIR STATION JACKSONVILLE, TITLE V FACILITY ID NO.
0310215

Enclosed is the proposed Supplemental Environmental Project (SEP) for the Fleet Readiness Center Southeast (FRCSE) to reduce particulate emissions from the aircraft component paint booth in Hangar 101-W (emissions unit 082).

Our point of contact is Mr. David Ford, Environmental Department, at (904) 542-5285.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin H. Gartland", is written over the typed name.

KEVIN H. GARTLAND
Director
Environmental Department
By direction of the
Commanding Officer

Enclosure

PROPOSED SUPPLEMENTAL ENVIRONMENTAL PROJECT

FLEET READINESS CENTER SOUTHEAST NAVAL AIR STATION JACKSONVILLE, FLORIDA

Facility and Regulatory Background.

Naval Air Station (NAS) Jacksonville, Florida is located in Duval county of northeast Florida. NAS Jacksonville occupies approximately 3,400 acres along the west bank of the St. Johns River, 13 miles south of downtown Jacksonville.

Fleet Readiness Center Southeast (FRCSE) is a tenant command aboard NAS Jacksonville, Florida. FRCSE performs depot and intermediate level maintenance, repair, and rework of Naval aircraft, engines, components, and ground support equipment. Air pollutant generating activities performed at FRCSE include, but are not limited to, surface coating, repainting, solvent cleaning, abrasive blasting, and engine testing.

NAS Jacksonville is a major source of Hazardous Air Pollutants (HAP) and operates in accordance with Title V Air Operating Permit 0310215-023-AV, issued by the City of Jacksonville, Environmental Resource Management Department (ERMD).

Supplemental Environmental Project (SEP) Description.

Current Operation. FRCSE utilizes a paint booth located in the southeast corner of Hangar 101-W for coating aircraft components with primers and topcoats. The paint booth is designated Regulated Emission Unit 082 (EU082) in the Title V Air Operating Permit and is subject to the requirements of 40 CFR 63 Subpart GG (Aerospace NESHAP). The paint booth is an open-face, cross flow booth where intake air is drawn from the opening at the front of the booth and exhausted through a plenum at the rear of the booth. The exhaust air is filtered using 2-stage dry particulate filtration meeting the efficiency requirements of 40 CFR 63.745(g)(2)(i). The booth is fully compliant with all permit requirements.

Proposed Operation. FRCSE proposes to replace the current paint booth with a new booth equipped with 3-stage dry particulate filtration that exceeds the filtration efficiency requirements of 40 CFR 63.745(g)(2)(ii).

Paint and Primer Usage. The paint booth use was evaluated for the first six months of calendar year 2007 and projected for a full year of operation. Based on the first half of 2007, it is projected that 290 gallons of paint and primer will be sprayed in EU082 during calendar year 2007. Based on the composition of the paints and primers sprayed, it is projected that 2,013 lb of solids (particulate matter), 273 lb of which is inorganic HAP, will be sprayed in EU082 during calendar year 2007.

SEP Pollution Reduction Benefit.

The current 2-stage dry particulate filtration system used in the existing booth removes 86% of solids greater than 2.5 microns. The 3-stage dry particulate filtration system that would be installed in the new paint booth would remove 98% of solids greater than 2.5 microns. [Refer to enclosure (1) for technical data on the third stage filter media to be utilized in the paint booth]. Based on an estimated transfer efficiency of 50% for this surface coating operation, this would result in an estimated air pollution reduction of 120 lb particulate matter and 16 lb inorganic HAP annually.

SEP Cost and Timeline.

Refer to Enclosure (2) for a cost estimate and the projected timeline for completing the SEP.

Additional Project Costs

Air Permit	\$15,000
Installation (In-house work)	\$ 5,000
Demolition of old booths	<u>\$ 5,000</u>
	\$25,000
Total Cost	\$95,000

Project Timeline

Construction Air Permit	6 months
Competitive Procurement - to contract award	6 months
Equipment Manufacture - to delivery	4 months
Booth Installation	<u>2 months</u>
	18 months

Time expended on this project will include:

- Engineering Support – Project planning
 - Equipment specification and procurement
 - Installation design and support
- Plant Maintenance and Base Contractors –
 - Facility/Utility modification & installation
 - Equipment demolition & disposal
- Shop Personnel - Training

Enclosure (2)