



JAN 13 2010

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # C-2106
Project # C-1093594

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Naval Air Station Lemoore is proposing a Title V minor permit modification to incorporate the recently issued ATC C-2106-131-3 into the Title V operating permit. The modifications consist of adding a daily fuel usage limit (1,800 gallons per day) and increasing the annual fuel usage limit from 16,800 gallons per year to 27,800 gallons per year.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-2106-131-3, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



JAN 13 2010

Simeon T. Bugay
Naval Air Station Lemoore
NASL Building 750 (Code N45L)
Lemoore, CA 93246

**Re: Notice of Minor Title V Permit Modification
District Facility # C-2106
Project # C-1093594**

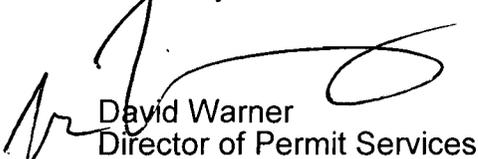
Dear Mr. T. Bugay:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATC C-2106-131-3 into the Title V operating permit. The modifications consist of adding a daily fuel usage limit (1,800 gallons per day) and increasing the annual fuel usage limit from 16,800 gallons per year to 27,800 gallons per year.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-2106-131-3, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Madesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1093594

Engineer: Gurpreet Brar
Date: December 30, 2009

Facility Number: C-2106
Facility Name: Naval Air Station Lemoore
Mailing Address: NASL Building 750 (Code N45L)
Lemoore, CA 93246

Contact Name: Simeon Bugay
Phone: (559) 998-2507

Responsible Official: Rick Bottoms, Ph.D.
Title: Environmental Program Manager

I. PROPOSAL

Naval Air Station Lemoore is proposing a Title V minor permit modification to incorporate the recently issued ATC #C-2106-131-3 into the Title V operating permit. The modifications consist of adding a daily fuel usage limit (1,800 gallons per day) and increasing the annual fuel usage limit from 16,800 gallons per year to 27,800 gallons per year.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

This facility is located on the NAS Lemoore air station, in Lemoore, CA.

III. EQUIPMENT DESCRIPTION

C-2106-131-3: 54.3 MMBTU/HR LPG/PROPANE-FUELED FIRE TRAINING FACILITY

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Naval Air Station Lemoore has an existing fire training school which is a concrete pit with a steel mock jet aircraft. LPG is ignited around the mock jet aircraft through designed propane ports. According to the applicant, there is no consistent operation schedule for the existing operation. The applicant is proposing to modify the operation by limiting daily fuel usage limit and increase the annual usage limit.

The following are the proposed changes to current PTO C-2106-131-1 as a result of implementing ATC C-2106-131-3:

Conditions 1 through 6 on ATC #C-2106-131-3 were not included on the proposed Permit to Operate because they are requirements that the source provide offsets. The District had verified that offsets have been provided. Therefore, conditions 1-6 are extraneous and have been deleted.

Permit conditions 7 and 9 are removed from ATC #C-2106-131-3 as these are included on facility wide permit C-2106-0-1 as condition 22 and 42.

Permit condition 1 was added to the proposed Permit to Operate to prohibit discharge of particulate emissions into the atmosphere by limiting it to 0.1 gr/dscf.

Permit condition 4 was added to the proposed Permit to Operate that specifies the maximum daily LPG fuel usage limit.

Permit condition 3 on the current Permit to Operate was replaced by permit condition 5 on the proposed Permit to Operate. This condition specifies the new maximum annual fuel usage limit.

Permit condition 4 on the current Permit to Operate was replaced by permit condition 6 on the proposed Permit to Operate. This condition specifies the emission factors of all pollutants from fire training operation.

Permit condition 5 on the current Permit to Operate was replaced by permit condition 7 and 8 on the proposed Permit to Operate. These conditions requires to keep records of daily and annual fuel usage limit, and make all records available for at least five years.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-2106-131-4
- B. Authority to Construct No. C-2106-131-3
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No. C-2106-131-1

ATTACHMENT A

**Proposed Modified Title V Operating Permit No.
(C-2106-131-4)**

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-2106-131-4

EXPIRATION DATE: 04/30/2008

EQUIPMENT DESCRIPTION:

54.3 MMBTU/HR LPG/PROPANE-FUELED FIRE TRAINING FACILITY

DRAFT

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The fire training operation shall be fired on LPG gas fuel (propane only). [District Rule 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
3. The fire training operation shall be equipped with a non-resettable fuel flow metering device. [District Rule 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. LPG gas consumption shall not exceed 1,800 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. LPG gas consumption shall not exceed 27,800 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions shall not exceed any of the following limits: 21.45 lb NO_x/1000 gal, 0.094 lb-SO_x/1000 gal, 9.9 lb PM₁₀/1000 gal, 36.43 lb CO/1000 gal, or 28.62 lb VOC/1000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain daily and annual records of the amount of LPG fuel used in the fire training operation. The amount of LPG fuel used shall be taken from the non-resettable fuel flow meter. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

ATTACHMENT B

**Authority to Construct
(C-2106-131-3)**



AUTHORITY TO CONSTRUCT

PERMIT NO: C-2106-131-3

ISSUANCE DATE: 08/25/2009

LEGAL OWNER OR OPERATOR: NAS LEMOORE
MAILING ADDRESS: BUILDING 750 CODE 50800
LEMOORE, CA 93246-5001

LOCATION: NAVAL AIR STATION LEMOORE
LEMOORE, CA 93246-5001

EQUIPMENT DESCRIPTION:
MODIFICATION OF 54.3 MMBTU/HR PROPANE-FUELED FIRE TRAINING FACILITY: ADD DAILY FUEL USAGE LIMIT AND INCREASE ANNUAL FUEL USAGE LIMIT FROM 16,800 GALLONS PER YEAR TO 27,800 GALLONS PER YEAR

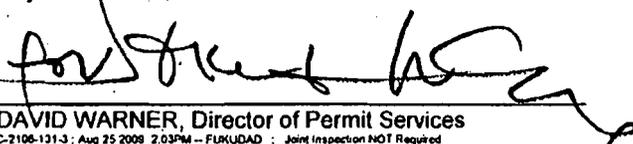
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOx emission reduction credits for the following quantity of emissions: 1st quarter - 59 lb, 2nd quarter - 59 lb, 3rd quarter - 59 lb, and fourth quarter - 59 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201]
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender PM10 emission reduction credits for the following quantity of emissions: 1st quarter - 28 lb, 2nd quarter - 27 lb, 3rd quarter - 27 lb, and fourth quarter - 27 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201]
4. Prior to operating equipment under this Authority to Construct, permittee shall surrender CO emission reduction credits for the following quantity of emissions: 1st quarter - 101 lb, 2nd quarter - 100 lb, 3rd quarter - 100 lb, and fourth quarter - 100 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-6950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-2106-131-3 : Aug 25 2009 2:03PM -- FLK/UDAD : Joint Inspection NOT Required

5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 79 lb, 2nd quarter - 79 lb, 3rd quarter - 79 lb, and fourth quarter - 78 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201]
6. ERC certificate numbers (or any splits from these certificates) C-719-1, C-962-2, C-138-3, or C-138-4 shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
7. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
10. The fire training operation shall be fired on LPG gas fuel (propane only). [District Rule 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. The fire training operation shall be equipped with a non-resettable fuel flow metering device. [District Rule 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. LPG gas consumption shall not exceed 1,800 gallons per day. [District Rule 2201]
13. LPG gas consumption shall not exceed 27,800 gallons per year. [District Rule 2201]
14. Emissions shall not exceed any of the following limits: 21.45 lb NO_x/1000 gal, 0.094 lb-SO_x/1000 gal, 9.9 lb PM₁₀/1000 gal, 36.43 lb CO/1000 gal, or 28.62 lb VOC/1000 gal. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily and annual records of the amount of LPG fuel used in the fire training operation. The amount of LPG fuel used shall be taken from the non-resettable fuel flow meter. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-2106-131-4	236	1	109	401	315
TOTAL	236	1	109	401	315

ATTACHMENT D

Application

RECEIVED

San Joaquin Valley Air Pollution Control District

www.valleyair.org

AUG 27 2009

PLANNING
SJVAPCD

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: NAVAL AIR STATION LEMOORE	
2. MAILING ADDRESS: NASL Building 750 (Code N45L)	
STREET/P.O. BOX: _____	
CITY: <u>Lemoore</u>	STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93246</u>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: <u>Naval Air Station Lemoore</u>	INSTALLATION DATE:
STREET: <u>Naval Air Station Lemoore</u> CITY: <u>Lemoore</u>	<u>August 25, 2009</u>
_____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	
4. GENERAL NATURE OF BUSINESS: MILITARY INSTALLATION	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
FIRE TRAINING FACILITY	
ATC #: 2106 - 131-3, Issued on 08/05/2009	
6. TYPE OR PRINT NAME OF APPLICANT: <u>SIMEON T. BUGAY</u>	TITLE OF APPLICANT: Air program Manager
7. SIGNATURE OF APPLICANT: <u>Simeon T. Bugay</u>	DATE: _____ PHONE: (559) 998-2507 FAX: (559) 998-4077 EMAIL: Simeon.bugay@navy.mil
For APCD Use Only:	
DATE STAMP	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>C-1093594</u> Facility I.D. <u>C-2106</u>

RECEIVED

OCT 13 2009

San Joaquin Valley
Unified Air Pollution Control District

Permits Srvc
SJVAPCD

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION
- MINOR PERMIT MODIFICATION

- ADMINISTRATIVE AMENDMENT

COMPANY NAME: <u>Naval Air Station Lemoore (NASL)</u>	FACILITY ID: <u>-2106</u>
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>Naval Air Station Lemoore</u>	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:

Rick Bottoms
Signature of Responsible Official

8 Oct 2009
Date

Rick Bottoms, Ph.D.
Name of Responsible Official (please print)

Env. Program Manager
Title of Responsible Official (please print)

ENCLOSURE(1)

ATTACHMENT E

Previous Title V Operating Permit
(C-2106-131-1)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-2106-131-1

EXPIRATION DATE: 04/30/2008

EQUIPMENT DESCRIPTION:

54.3 MMBTU/HR PROPANE-FUELED FIRE TRAINING FACILITY

PERMIT UNIT REQUIREMENTS

1. The fire training operation shall be fired on LPG gas fuel (propane) only. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The fire training operation shall be equipped with a nonresettable fuel flow metering device. [District NSR Rule and 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. LPG gas consumption shall not exceed 16,800 gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions shall not exceed any of the following limits: 21.45 lb NO_x/1000 gal, 36.43 lb CO/1000 gal; 28.62 lb VOC/1000 gal, or 9.9 lb PM₁₀/1000 gal. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Records of hours of operation and annual fuel consumption shall be maintained, retained on the premises for at least five years and made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.