

PROPOSED

PERMIT APPLICATION REVIEW COVERED SOURCE PERMIT NO. 0209-01-C Application for Minor Modification No. 0209-07

Company: Navy Region Hawaii – Joint Base Pearl Harbor – Hickam (JBPHH)

Mailing Address: Commander Navy Region Hawaii
850 Ticonderoga Street, Suite 110
JBPHH, Hawaii 96860-5101

Facility: Same as the company name

Location: Joint Base Pearl Harbor – Hickam, Pearl Harbor, Oahu

SIC Code: 9711 (National Security)

Responsible Official: Dean Tufts
Regional Engineer, Navy Region Hawaii
Ph: (808) 471-3926

Site Contact: Darren Chun
Environmental Engineer
Ph: (808) 471-1171 (ext 207)
Email: darren.chun@navy.mil

BACKGROUND

This application is for a minor modification of Covered Source Permit (CSP) No. 0209-01-C issued on July 25, 2005. The type of fuel supplied by the fuel loading facility is proposed to be changed from JP-8 to Jet A. There will be no increase in the emissions resulting from the fuel change because both JP-8 and Jet A are kerosene based fuels with the same physical characteristics.

This modification is considered a minor modification since it:

1. Does not increase the emissions of any air pollutant above the permitted emission limits;
2. Does not result in or increase the emissions of any air pollutant not limited by permit to levels equal to or above:
 - a. 500 pounds per year of a hazardous air pollutant (HAP), except lead;
 - b. 300 pounds per year of lead;
 - c. twenty-five (25) percent of significant amounts of emission as defined in section 11-60.1-1, paragraph (1) in the definition of "significant"; or
 - d. two (2) tons per year of each regulated air pollutant not already identified above;
3. Does not violate any applicable requirement;
4. Does not involve significant changes to existing monitoring requirements or any relaxation or significant change to existing reporting or recordkeeping requirements in the permit. Any

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- change to the existing monitoring, reporting, or recordkeeping requirements that reduces the enforceability of the permit is considered a significant change;
5. Does not require or change a case-by-case determination of an emission limitation or other standard, a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
 6. Does 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 emissions cap assumed to avoid classification as a modification pursuant to any provision of Title I of the Act or subchapter 7; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated pursuant to Section 112(i)(5) of the Act or subchapter 9; and
 7. Is not a modification pursuant to any provision of Title I of the Act.

EQUIPMENT DESCRIPTION

The proposed modification only affects the fuel loading facility. The permit encompasses the following JP-8/Jet A fuel loading facility located at Building no. 12604:

Bottom loading load rack supplying fuel to hydrant loading pits at aircraft ramp areas and five (5) tank truck loading stations; each station with one (1) load arm.

AIR POLLUTION CONTROLS

There are no changes to the air pollution controls previously evaluated for the equipment.

APPLICABLE REQUIREMENTS

Hawaii Administrative Rules (HAR)

Title 11 Chapter 59, Ambient Air Quality Standards

Title 11 Chapter 60.1, Air Pollution Control

Subchapter 1, General Requirements

Subchapter 2, General Prohibitions

11-60.1-31, Applicability

11-60.1-32, Visible emissions

11-60.1-33, Fugitive Dust

11-60.1-35, Incineration

11-60.1-38, Sulfur Oxides from Fuel Combustion

Subchapter 5, Covered Sources

Subchapter 6, Fees for Covered Sources, Noncovered Sources, and Agricultural Burning

11-60.1-111, Definitions

11-60.1-112, General Fee Provisions for Covered Sources

11-60.1-113, Application Fees for Covered Sources

11-60.1-114, Annual Fees for Covered Sources

11-60.1-114, Basis of Annual Fees for Covered Sources

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Subchapter 8, Standards of Performance for Stationary Sources
11-60.1-161, New Source Performance Standards
Subchapter 9, Hazardous Air Pollutant Sources
Subchapter 10, Field Citations

National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, and NESHAP for Source Categories (Maximum Achievable Control Technology (MACT)), 40 CFR Part 63

On October 1, 2010, the ownership of the permit was transferred from the United States Air Force 15th Airlift Wing – Hickam Air Force Base (HAFB) to Navy Region Hawaii. Prior to the joining of the two bases, Pearl Harbor Naval Complex (PHNC) was already determined to be a major source of HAPs. As a result of the joint basing between PHNC and HAFB, the entire JBPHH is a major source of HAPs. The applicability of NESHAP and MACT will be re-evaluated upon issuance of the renewal of the permit.

Prevention of Significant Deterioration (PSD), 40 CFR 52.21

This source is not subject to PSD requirements because the proposed modification will not increase emissions above significant levels.

Compliance Assurance Monitoring (CAM), 40 CFR 64

The purpose of CAM is to provide a reasonable assurance that compliance is being achieved with large emissions units that rely on air pollution control device equipment to meet an emissions limit or standard. Pursuant to 40 CFR Part 64, for CAM to be applicable, the emissions unit must: (1) be located at a major source; (2) be subject to an emissions limit or standard; (3) use a control device to achieve compliance; (4) have potential pre-control emissions that are 100% of the major source level; and (5) not otherwise be exempt from CAM.

There is no change from the previous review (review no. 0209-05) regarding CAM requirements where CAM was determined not to be applicable.

Air Emissions Reporting Requirements (AERR), 40 CFR Part 51, Subpart A

AERR is applicable because NO_x, SO₂, and VOC emissions from the facility exceed reporting levels for type B sources (see table below).

Pollutant	Emissions (TPY) ¹	AERR Triggering Levels (TPY)	
		1 year cycle (type A sources)	3 year cycle (type B sources)
CO	612.7	2500	1000
NO _x	487.7	2500	100
SO ₂	247.7	2500	100
VOC	198.7	250	100
PM ₁₀	56.9	250	100
PM _{2.5}	54.2	250	100

¹ Emissions are referenced from review no. 0209-05.

Department of Health (DOH) In-house Annual Emissions Reporting

The Clean Air Branch requests annual emissions reporting from those facilities that have facility-wide emissions exceeding in-house reporting levels and for all covered sources. This facility is subject to annual emissions reporting requirements as a covered source.

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Best Available Control Technology (BACT)

A BACT analysis is required for new sources or modifications to sources that have the potential to emit or increase emissions above significant levels considering any limitations as defined in HAR, Section 11-60.1-1. This source is not subject to a BACT analysis because the proposed modification will not cause a significant net emissions increase.

Synthetic Minor Source

A synthetic minor source is a facility that is potentially major as defined in HAR 11-60.1-1, but is made non-major through federally enforceable permit conditions. The facility is not a synthetic minor source because it is a major source.

INSIGNIFICANT ACTIVITIES

Insignificant activities will be updated upon issuance of the renewal of the permit.

ALTERNATIVE OPERATING SCENERIOS

There are no proposed changes to the alternate operating scenarios of the permit.

PROJECT EMISSIONS

The proposed modification does not affect emissions from the facility. Emissions remain unchanged from the previous review.

AMBIENT AIR QUALITY ASSESSMENT

An ambient air quality assessment (AAQA) is generally required for new sources or modified sources with emission increases. An AAQA is not conducted for this modification because it will not increase emissions.

SIGNIFICANT PERMIT CONDITIONS

Attachment IIE, Special Conditions Nos. A.1, B.1, and C.2 will be revised to reflect the change in the type of fuel supplied by the fuel loading facility. The Annual Emissions Report Form and Monitoring Report Form for fuel loading facility throughput will be revised accordingly.

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CONCLUSION

The proposed minor modification to CSP No. 0209-01-C affects only the fuel loading facility and does not result in an increase in emissions. The Department has determined that the facility will continue to operate in compliance with all state and federal regulations. The Department recommends issuance of the permit modification subject to the incorporation of the significant permit conditions and forty-five (45) day EPA review.

Jing Hu
June 16, 2015