Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	US Navy	**AI #: 8268**		**TEMPO Activity No:**	**PER20060008**
Facility Name:	NAS JRB New Orleans	**Remarks Submitted by:**	**Kenton Lottinger (Air Program Manager)**		
Permit Writer:	Traci Green	**Permit Writer Email address:**	**Traci.green@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permit Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Letter	The Responsible Official is W. J. Adelmann, Captain, United States Navy. Please revise accordingly.	Change made.
Section I of Air Permit Briefing Sheet	NAS JRB New Orleans is currently operating under Permit No. 2240-00029-07, issued 19 July 2006 not Permit No. 2240-00029-06, issued 10 May 2006. Please revise accordingly.	Change made.
Section IX of Air Permit Briefing Sheet	Since submission of Modification Application Package to LDEQ in 30 Nov 2006, NAS JRB has submitted and was granted approval for a Case-by-Case exemption request for lead emissions from a new Small Arms Range Facility. This unit should be added to the insignificant activities list under Source ID FR001.	Small Arms Range Facility added to insignificant activities list under LAC 33:III.501.B.5.D.
Section IX of Air Permit Briefing Sheet	Please remove all EC units (space heaters) from the insignificant list. These units are already accounted for under the ECGRP01 Equipment capacity and fuel usage caps.	Changes made.

Section IX of Air Permit Briefing Sheet	NASJRB request to have language added to allow for the replacement, deletion or addition of insignificant sources within the already approved insignificant source categories without having to submit a case-by-case determination request and fee every time such action is required. The main group categories are the parts washers, storage tanks, woodworking and welding operations. It is NASJRB understanding that these source categories will retain their insignificant status as long as the emissions stay below 5 tpy for each category.	LAC 33:III.501.B.5. B and C activities need not be included in a permit. The main group categories listed in this remark fall under the LAC 33:III.501.B.5.B section of the regulations. These activities have been removed from the permit per Rafael Depaz. Insignificant activities from LAC 33:III.5001.B.5. Table A and C can be submitted as a Letter of No Objection. The facility will have to wait to perform the requested activity until approval is granted by the Department.
ARE021 on INVENTORIES sheet	The correct operating time as represented in Page B-15 of the Modification Application Package is 8,760 hr/yr, but the draft permit states 2,080 hr/yr. Please change to 8,760 hr/yr in the permit.	Change made.
ARE021 on INVENTORIES sheet	Just a clarification statement: SCGRP01 includes all aircraft related maintenance operations including: SC001, SC002, SC003, SC004, SC005, SC006, SC008, SC010, SC011, SC013, SC014, SC015, SC016, SC019, SC020, SC022, SC023, and any other future aircraft related maintenance surface coating operations at NASJRB. Due to an oversight in the permit application some of these units were not included in the group description. Nevertheless, coating usage and emissions from these sources were considered and included with SCGRP01.	SCGRP01 includes all aircraft related maintenance operations. The specific requirements listed for ARE021 describe record keeping and monitoring requirements that shall be maintained for all current and future aircraft related maintenance surface coating operations.
ARE022 on INVENTORIES sheet	This source is classified and included as an insignificant activity under Section IX of the Air Permit Briefing Sheet. Based on NASJRB's understanding, SCGRP02 should not be included or referenced under the Inventory, Emission Rates, and Specific Requirement Sections of the Permit. Please revise all permit sections accordingly.	SCGRP02 was removed from the permit as an emission source and added as an insignificant activity. Facility Emission totals changed.
EQT237 on INVENTORIES sheet	This source (ST104) should be classified as an insignificant activity under Section IX of the Air Permit Briefing Sheet. It represents eight 12- gal gasoline tanks (not a 90 gal tank) associated with each of the Runway 8 arresting gear engines. Please revise all permit sections accordingly.	EQT237 removed as a permitted source and added to Insignificant activities on the briefing sheet.
EQT241 on INVENTORIES sheet	Please revise as follows: under normal and max operating rate column change to 300 kW (equipment capacity) & 37,500 kW-hr (process rate); under the Operating Time column change to 8,760 hr/yr.	Operating time changed. 37,500 kW-hr limitation is in the specific condition section of the permit.
EQT242 on INVENTORIES sheet	Please revise as follows: under normal and max operating rate column change to 8,890 kW (equipment capacity) & 1,111,250 kW-hr (process rate); under the Operating Time column change to 8,760 hr/yr	Operating time changed. 1,111,250 limitation is in the specific condition section of the permit.
FUG001 on INVENTORIES sheet	Please correct typo under Max Operating Rate column. It should read 33.4 MM gallons/yr instead of 3.34 MM ft^3/yr.	Correction made.
SPECIFIC REQUIREMENTS ARE021 - #5	Due to the non-manufacturing/non-production unique nature of the surface coating operations (mostly touch-up, corrosion control maintenance) conducted at the facility and the low emission rates	Subject to 2123.F.1-F.4 record keeping only. Requirement removed.

	associated with these activities, NASJRB is requesting an exemption from the requirements under LAC 33: III.2123.A and C, as allowed under LAC 33: III.2123.B. NASJRB feels that the limitations on emission rates, the monitoring, recordkeeping, and reporting requirements already imposed by other permit conditions are sufficient to ensure protection of the public and the environment. NASJRB is of the opinion that the installation and operation of VOC controls are not feasible for the surface coating operations at NAS JRB and will result in minimal or no additional net benefit to the environment in addition to being extremely burdensome to comply with. In the event that LDEQ does not grant the exemption and NASJRB cannot meet the exemption criteria thresholds under LAC 33: III.2123.A., a request is made to change the condition language to read "Within 180 days of permit issuance NASJRB shall comply with any applicable coating VOC limits specified under LAC 33: III.2123.C.1-10." This language will allow NASJRB sufficient time to catalog all existing coatings and research and seek alternative compliant materials to replace any non-compliant coatings in use.	
SPECIFIC REQUIREMENTS ARE021 - #6	NASJRB request the incorporation of language in this condition to allow for the use of Manufacturer supplied Material Safety Data Sheets (MSDS) as a compliance demonstration method for the VOC content for coatings and solvents.	Subject to 2123.F.1-F.4 record keeping only. Requirement removed.
SPECIFIC REQUIREMENTS ARE021 - #7	To be consistent with the other permit conditions NASJRB is requesting that the record retention period be changed from 5 to 2 years.	Request denied.
SPECIFIC REQUIREMENTS ARE021 - #8	Request requirement to allow for other means of recordkeeping besides a hand written log (i.e., electronic database report).	Word change from logbook to log.
SPECIFIC REQUIREMENTS ARE021 - #12	In order to allow for year to year fluctuations in coating utilization type and composition, NASJRB is requesting that the annual maximum emission rates for individual TAP/HAP for SCGRP01 be set to 50% of the Minimum Emissions Rate (MER) listed in LAC 33:III.5112, Table 51.1 instead of the limits currently listed in the "Emissions Rates for TAP/HAP & Other Pollutant" section of the permit.	To allow for flexibility between different paint vendors, TAP/Haps listed in SCGRP01 were changed to 50% of their MERs.
SPECIFIC REQUIREMENTS ARE022 –All (#14 to # 23)	This source is classified and included as an insignificant activity under Section IX of the Air Permit Briefing Sheet. Based on NASJRB's understanding, SCGRP02 should not be included or referenced under the Inventory, Emission Rates, and Specific Requirement Sections of the Permit. Please revise all permit sections accordingly.	Requirements removed.
SPECIFIC REQUIREMENTS EQT237 - #32	This source (ST104) should be classified as an insignificant activity under Section IX of the Air Permit Briefing Sheet. It represents eight 12- gal gasoline tanks (not a 90 gal tank) associated with each of the Runway 8 arresting gear engines. Please revise all permit sections accordingly.	Requirements removed. ST104 has been added to Section IX.

SPECIFIC REQUIREMENTS EQT241 - #37 to #44	Since the KW rating is limited by permit condition to under 300 kW (402 Hp) and these requirements only apply to units >500 Hp, NASJRB is of the opinion that specific conditions #37 to #44 are not applicable to this source and should be deleted from the permit. Please revise as appropriate.	Requirements removed. ICGRP-02 ICE Units will not include any engines equal to or greater than 500HP.
SPECIFIC REQUIREMENTS EQT242 - #53 to #60, #64	Base on conversations with Mr. Dustin Duhon (LDEQ), NASJRB understands that it is LDEQ's policy to impose these conditions to IC engines with a horsepower rating greater than 500 that operate for a period longer than 720 hours per year. NASJRB request adding additional language to incorporate the operational limitation threshold of 720 hr/yr into the specific conditions. If concur, please revise as appropriate.	Specific Requirements regarding stack testing have been changed to: For all engines >500hp and operate for a period longer than 720 hours per year:.....
SPECIFIC REQUIREMENTS EQT242 - #62	Request to change the recordkeeping requirement from daily to monthly since these emergency generators primarily run once per week for 30 minutes as part of preventative maintenance testing.	Change made. The recordkeeping requirement changed from daily to weekly.
SPECIFIC REQUIREMENTS EQT242 - #63	Request specific requirement to be deleted from the permit. Tracking the fuel burned at each emergency generator is not practical since although the units are operated monthly for PM testing, fuel is not added to the tanks on a monthly basis. NASJRB is of the opinion that tracking the fuel usage should not be required since tracking monthly operating hours, rated capacity (KW), and process rate (KW-HR) should be sufficient to demonstrate compliance with the permit conditions.	Specific Requirement removed.
SPECIFIC REQUIREMENTS EQT243 - #70	Request condition be modified to read "Total combined equipment input rated capacity limited to <=200MMBtu/hr and total maximum annual natural gas consumption limited to 100 Million cubic feet (MMCft). Noncompliance with this ... Notify the Office of Environmental Compliance....if the combined equipment input capacity or the fuel consumption limit exceeds ..."	Specific Requirement changed to: Total combined input rated capacity <=200MMBtu/hr and total maximum annual natural gas consumption limited to 100 Million cubic feet (MMCft).....
SPECIFIC REQUIREMENTS EQT243 - #71	Request condition to be modified to read "maintain a record of Natural Gas consumption on a monthly and 12-month rolling total basis. In addition, the permittee shall keep a log of the input rated capacity of all affected equipment including the start-up and shut down date of all equipment added to or removed from this group after the issuance date of this permit.	Specific Requirement changed to: Total combined operating rate monitored by technically sound method continuously. Maintain a record of Natural Gas consumption on a monthly and 12-month rolling total basis. In addition, the permittee shall keep a log of the input rated capacity of all affected equipment including the start-up and shut down date of all equipment added to or removed from this group after the issuance date of this permit.
SPECIFIC REQUIREMENTS GRP005 - #s 84-85, 88-94, 99-100	Revise based on concurrence with SPECIFIC REQUIREMENTS ARE021 - #12 request.	No changes made.
SPECIFIC REQUIREMENTS GRP005 - #s 104-105	Is it possible for LDEQ to provide a sample of a Standby Plan from a similar type facility to be use as a template in developing NASJRB's Plan?	There is currently no available template. Standby plan should be a company plan to reduce facility emissions during an air pollution alert. Some examples are shutting down equipment, ensure gas containers are capped tightly, good VOC housekeeping, etc.).
SPECIFIC REQUIREMENTS	ICGRP-02 (condition #45) the same change in recordkeeping from daily to monthly as I did for ICGRP-01 under condition #62. If you	Change made. The recordkeeping requirement changed from daily to weekly.

ICGRP-01 - #s 45	agree with the request please revise condition # 45 accordingly.	

LDEQ-EDMS Document 36044656, Page 34 of 223