



**DES**  
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AND SUSTAINABILITY**



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## **PART 70 OPERATING PERMIT**

**SOURCE ID: 00473**

Creech Air Force Base  
East Highway 95 North  
Indian Springs, Nevada 89018

**ISSUED ON: August 6, 2025**

**EXPIRES ON: August 5, 2030**

**Current action: Renewal**

**Issued to:**

Creech Air Force Base  
1065 Perimeter Road  
Creech AFB, Nevada 89018

**Responsible Official:**

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**NATURE OF BUSINESS:**

SIC code 9711, "National Security"  
NAICS code 928110, "National Security"

**Issued by the Clark County Department of Environment and Sustainability/Division of Air Quality in accordance with Section 12.5 of the Clark County Air Quality Regulations.**

Santosh Mathew, Permitting Manager

## EXECUTIVE SUMMARY

Creech Air Force Base (Creech AFB) is a federally owned military installation located within the city limits of Indian Springs, Nevada. The source is located adjacent to the township of Indian Springs, Nevada, in the Indian Springs Valley (Hydrographic Area 161). The source is classified under SIC code 9711, “National Security” and NAICS code, 928110, “National Security”. The source consists of the flight line and associated industrial infrastructure directly supporting flying operations, along with commercial and industrial uses that support the base’s mission. Hydrographic Area 161 is currently designated as an attainment area for all regulated air pollutants. The source is not a categorical source as defined in AQR 12.2.2(j).

Creech AFB and the Nellis Test and Training Range (NTTR) comprise a single major source for purposes of New Source Review Applicability. However, DAQ issues separate Part 70 Operating Permits to Creech Air Force Base and NTTR for administrative purposes and to facilitate compliance demonstration. Creech Air Force Base operates under the authority of the 432<sup>nd</sup> Air Base Wing Commander.

Creech AFB individually is a major stationary source of NO<sub>x</sub> and a synthetic minor source of PM<sub>10</sub>, PM<sub>2.5</sub>, CO, VOCs, and HAPs. Creech AFB is minor source of SO<sub>2</sub> and greenhouse gas (GHG) pollutants.

The source consists of fuel storage tanks and loading arms, fuel dispensing, external combustion units, internal combustion engines, a mineral processing operation, surface coating operations, and miscellaneous chemical usage. The source also includes the following designated insignificant activities: diesel fuel storage tanks and loading arms, diesel fuel dispensing, abrasive blasting, degreasers, woodworking operations, and fuel cell maintenance.

The source is subject to the requirements of 40 CFR Part 60, Subpart IIII, and 40 CFR Part 63, Subparts ZZZZ and CCCCCC.

The following table summarizes the source’s potential to emit (PTE) of each regulated air pollutant from all emission units addressed by this Part 70 Operating Permit, as well as the PTE for the current Part 70 Operating Permit issued for NTTR.

**Table 1: Source-wide Potential to Emit (tons per year)**

Pollutant	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAPs <sup>1</sup>	Pb	H <sub>2</sub> S	GHG <sup>2</sup>
Storage Tanks	0	0	0	0	0	13.60	1.76	0	0	0
External Combustion Units	1.47	1.47	25.28	15.61	0.15	2.07	0.15	0	0	26,343.35
Internal Combustion Units	2.53	2.53	86.88	13.56	0.72	4.67	0.52	0	0	8,128.14
Surface Coating	0.04	0.04	0	0	0	6.60	4.62	0	0	0
Misc. Chemical Usage	0	0	0	0	0	5.00	2.50	0	0	0

<b>Creech AFB PTE</b>	<b>4.04</b>	<b>4.04</b>	<b>112.16</b>	<b>29.17</b>	<b>0.87</b>	<b>31.94</b>	<b>9.55</b>	<b>0</b>	<b>0</b>	<b>34,471.49</b>
NTTR PTE	16.33	8.09	98.15	46.91	0.17	8.95	0.22	0	0	12,728.55
<b>Source-wide PTE</b>	<b>20.37</b>	<b>12.13</b>	<b>210.31</b>	<b>76.08</b>	<b>1.04</b>	<b>40.89</b>	<b>9.77</b>	<b>0</b>	<b>0</b>	<b>47,200.04</b>

<sup>1</sup> A major source is defined as 10 tons for any individual HAP or 25 tons for combination of all HAPs.

<sup>2</sup> Metric tons per year, CO<sub>2</sub>e.

DAQ received the Title V renewal application on August 6, 2024. This renewal incorporates an Authority to Construct permit issued on June 4, 2024, an application for a minor revision to the Part 70 OP submitted on May 8, 2025, and a Prior Notification Form submitted on April 19, 2023. Based on information submitted by the applicant and a technical review performed by DAQ staff, DAQ proposes the issuance of a renewed Part 70 Operating Permit to Creech Air Force Base.

DAQ will continue to require the permittees to estimate their GHG PTE in terms of each individual pollutant (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub> etc.) during subsequent permitting actions, and the corresponding TSDs will include these PTEs for informational purposes.

Pursuant to AQR 12.5.2, all terms and conditions in Sections 1-11 including all attachments to this permit are federally enforceable unless explicitly denoted otherwise.

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## Common Acronyms and Abbreviations

(These terms may be seen in the permit)

Acronym	Term
ANFO	ammonium nitrate-fuel oil
AQR	Clark County Air Quality Regulation
ATC	Authority to Construct
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CD	control device
DAQ	Division of Air Quality
DES	Clark County Department of Environment and Sustainability
DOM	date of manufacture
dscf	dry standard cubic feet
dscm	dry standard cubic meter
EPA	U.S. Environmental Protection Agency
EU	emission unit
g/gr	gram
HAP	hazardous air pollutant
HOO	Hearing Officer Order
hp	horsepower
kW	kilowatts
MMBtu/hr	Millions of British Thermal Units per Hour
MSP	Minor Source Permit
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standard
NSR	New Source Review
OP	Operating Permit
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PSD	Prevention of Significant Deterioration
PTE	potential to emit
SIP	State Implementation Plan
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxide
TDS	Total Dissolved Solids
U.S.C.	United States Code
VMT	vehicle miles traveled
VEE	Visible Emissions Evaluation
VOC	volatile organic compound

## 1.0 EMISSION UNITS AND APPLICABLE REQUIREMENTS

### 1.1 STORAGE TANKS / LOADING ARMS FUEL DISPENSING

#### 1.1.1 Emission Units

The stationary source covered by this Part 70 OP includes the emission units and associated appurtenances summarized in Tables 1-1 and 1-2. *[AQR 12.5.2.3 and NSR ATC (June 4, 2012), Section IV-A, Condition 1(a), Part 70 Renewal (February 20, 2020); Part 70 OP (June 12, 2023)]*

**Table 1-1: Tanks**

EU	Description	Fuel	Capacity (gallons)	Location
J001	Aboveground Storage Tank	Gasoline	5,000	Building 687
J002	Aboveground Storage Tank	Gasoline	10,000	Building 688

**Table 1-2: Loading Arms**

EU	Description	Fuel	Location
J014	Two Loading Arms (one loading; one unloading)	Gasoline	Building 691

#### 1.1.2 Controls

##### 1.1.2.1 Control Devices

Control devices consist of Phase I vapor recovery systems.

##### 1.1.2.2 Control Requirements

###### General Conditions

1. The permittee shall implement control technology requirements on gasoline-dispensing equipment. *[40 CFR Part 63, Subpart CCCCCC]*
2. The permittee shall install and operate all Phase I vapor recovery system equipment according to certifications specified by the manufacturer, and shall maintain the equipment to be leak-free, vapor-tight, and in proper working order. *[40 CFR Part 63, Subpart CCCCCC]*
3. From October 1 to March 31 every year in the Las Vegas Valley, the Eldorado Valley, the Ivanpah Valley, the Boulder City limits, and any area within three miles of these areas, no gasoline intended as a final product for fueling motor vehicles shall be supplied or sold by any person; sold at retail; sold to a private or a municipal fleet for consumption; or introduced into any motor vehicle by any person unless the gasoline has at least 3.5% oxygen content by weight. *[AQRs 53.1.1 & 53.2.1]*
4. If a gasoline storage tank in the Las Vegas Valley, the Eldorado Valley, the Ivanpah Valley, the Boulder City limits, and any area within three miles of these areas receives its last gasoline delivery with less than 3.5% oxygen content by weight before September 15, gasoline dispensed from that tank will be exempt from enforcement of Section 53.2.1 until the first delivery date after October 1. *[AQR 53.5.1.1]*



5. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Preventative measures to be taken include, but are not limited to (EUs: J001 and J002): *[40 CFR Parts 63.11116 & 63.11117]*
  - a. Minimize gasoline spills;
  - b. Clean up spills as expeditiously as practicable;
  - c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
  - d. Only load into storage tanks using a submerged fill tube where the greatest distance from the bottom of the storage tank to the point of the fill tube opening is no more than 6 inches.

Phase I Vapor Recovery

6. The permittee shall install, maintain, and operate the two gasoline storage tanks with a Phase I vapor recovery system that meets the following requirements (EUs: J001 and J002): *[40 CFR Part 63.11118(b)(1)]*
  - a. The Phase I vapor recovery system shall be rated with at least 95.0% control efficiency when in operation. This system shall be certified by an industry-recognized certification body, i.e., California Air Resources Board (CARB) or equivalent.
  - b. The Phase I vapor recovery system shall be a dual-point vapor balance system, as defined by 40 CFR Part 63.11132, in which the storage tank is equipped with an entry port for a gasoline fill pipe and a separate exit port for a vapor connection.
  - c. All Phase I vapor recovery equipment shall be installed, maintained, and operated in accordance with the manufacturer's specifications and certification requirements.
  - d. All Phase I vapor recovery equipment, including the vapor line from the gasoline storage tanks to the gasoline cargo tank, shall be maintained in good working order and vapor-tight, as defined by 40 CFR Part 63.11132.
  - e. All vapor connections and lines on storage tanks shall be equipped with closures that seal upon disconnect.
  - f. The vapor balance system shall be designed such that the pressure in the cargo tank does not exceed 18 inches water pressure or 5.9 inches water vacuum during product transfer.
  - g. The vapor recovery and product adaptors, and the method of connection with the delivery elbow, shall be designed to prevent the over-tightening or loosening of fittings during normal delivery operations.
  - h. If a gauge well separate from the fill tube is used, it shall be provided with a submerged drop tube that extends the same distance from the bottom of the tank as the fill tube.
  - i. Liquid fill and vapor return adaptors for all systems shall be equipped with vapor-tight caps after each delivery.

- j. A pressure/vacuum (P/V) vent valve on each gasoline storage tank system shall be installed, maintained, and operated according to manufacturer's specifications, including:
  - i. A positive pressure setting of 2.5 to 6.0 inches of water and a negative pressure setting of 6.0 to 10.0 inches of water; and
  - ii. A total leak rate of all PV vent valves at the affected facility, including connections, that shall not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches of water and 0.63 cubic foot per hour at a vacuum of 4 inches of water. *[40 CFR Part 63.11118]*
- k. The vapor balance system shall be capable of meeting the static pressure performance requirement in 40 CFR Part 63, Subpart CCCCC.

#### Fuel Delivery

- 7. The permittee shall comply with the requirements of each management practice during the unloading of cargo as follows (EUs: J001 and J002). *[40 CFR Part 63.11118(d)]*
  - a. All hoses in the vapor balance system shall be properly connected.
  - b. The adapters or couples that attach the vapor line on the storage shall have closures that seal upon disconnect.
  - c. All vapor return hoses, couplers, and adapters used in the gasoline delivery shall be vapor tight, as defined in 40 CFR Part 63.11132.
  - d. All tank truck vapor return equipment shall be compatible in size and form a vapor-tight connection with the vapor balance equipment on the gasoline storage tank.
  - e. All hatches on the tank truck shall be closed and securely fastened.
  - f. The filling of storage tanks shall be limited to unloading from vapor-tight gasoline cargo tanks carrying documentation onboard that the cargo tank has met the specifications of the U.S. Environmental Protection Agency's (EPA) Test Method 27.

### **1.1.3 Limitations and Standards**

#### **1.1.3.1 Operational Limits**

- 1. The permittee shall limit the combined throughput of all gasoline products for the two ASTs, located at Buildings 687 and 688, to 3,640,000 gallons in any consecutive 12-month period (EUs: J001 and J002). *[NSR MSP (October 30, 2010), Section IV-B, Condition 2(a)]*
- 2. The permittee shall limit the throughput of the two gasoline loading arms at Building 691 to 500,000 gallons in any consecutive 12-month period (EU: J014). *[NSR MSP (October 30, 2010), Section IV-B, Condition 2(h)]*
- 3. The permittee shall only store/dispense gasoline in each storage tank/fuel-dispensing unit listed in Tables 1-1 and 1-2. *[NSR MSP (October 30, 2010), Section IV-B, Condition 2(j)]*

### 1.1.3.2 Emission Limits

- The permittee shall not allow the actual emissions from the tanks and loading arms to exceed the PTE listed in Table 1-3. *[AQR 12.5.2.6(a)]*

**Table 1-3: Tanks/Loading Arms PTE (tons per year)**

EU	Building Number	Description	Fuel	Capacity (gallons)	Throughput (gallons/year)	VOC PTE	HAP PTE
Tanks							
J001	687	Horizontal Fixed Roof AST/Rectangular	Gasoline	5,000	3,640,000	10.92	0.57
J002	688	Horizontal Fixed Roof AST/Rectangular	Gasoline	10,000			
Loading Arms							
J014	691	Loading Arms (one loading; one unloading)	Gasoline	N/A	500,000	2.68	1.19

### 1.1.4 **Compliance Demonstration Requirements**

#### 1.1.4.1 Monitoring

##### General Conditions

- The permittee shall monitor and record the throughput of fuel products (EUs: J001, J002, and J014) and calculate, on a monthly basis, the total fuel throughput for each consecutive 12-month period. *[AQR 12.5.2.6(d)(1)]*
- The permittee shall monitor and record the fuel storage and dispensing system to determine if the components of the system are in compliance with the control requirements of this permit. Monitoring shall consist of the following inspections during normal operations (Monday – Friday), and during any fuel deliveries received outside of normal operation hours:
  - Inspecting for gasoline spills, and recording the times and dates the source became aware of a spill and cleaned the spill up; and
  - Inspecting covers on gasoline containers and fill pipes after each respective delivery, and recording the date of fuel deliveries and corresponding inspections.

##### Phase I Vapor Recovery

- The permittee shall conduct and record inspections for the Phase I Vapor Recovery System after each delivery to determine if components of the system are in compliance with the control requirements of this permit, as well as, but not limited to, the items in the following list. The permittee may limit inspections to once daily if multiple deliveries are received in a given day: *[AQR 12.5.2.6(d)(1)]*
  - The condition of the spill pallet and presence of fuel or debris;
  - The condition of the vapor cap and cap seal;
  - The condition of the vapor adapter and adapter seal;

- d. The condition of the fill cap and cap seal;
- e. The tightness of the fill adapter;
- f. The condition of the fill tube seal; and
- g. The condition of the PV valve.

#### 1.1.4.2 Testing

1. The permittee shall conduct Phase I vapor recovery system tests in accordance with the CARB-approved test procedures (as revised) listed in Table 1-4, as applicable (EUs: J001 and J002). *[40 CFR Part 63.11120; AQR 12.5.2.6(d)]*

**Table 1-4: Vapor Recovery System Testing Procedures and Schedules**

<b>Phase I Vapor Balance System</b>	Pressure Decay/Leak Test: CARB procedure TP-201.3B (as revised for AST)	Initial and every three years thereafter
	Static Torque of Rotatable Phase I Adaptors: CARB Procedure TP-201.1B (With swivel adapters only)	Initial and every three years thereafter
	Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves: CARB Procedure TP-201.1E (as revised)	Initial and every three years thereafter
	Flow Rate Test: CC_V RTP_1	Initial and every three years thereafter

2. The permittee shall submit a DAQ-approved vapor recovery test notification form (available on the DAQ website) to schedule each vapor recovery test with the Stationary Sources Section supervisor at least 30 calendar days before the anticipated date of testing, unless otherwise specified in this permit.
3. Any prior approved scheduled vapor recovery system test cannot be canceled and/or rescheduled without the Control Officer's prior approval.
4. The permittee shall conduct Phase I Vapor Recovery System testing on affected gasoline dispensing equipment according to the following requirements:
  - a. The permittee shall conduct an initial system test within 180 days of start-up of new equipment, or when the system's integrity has been affected by a modification or repair. Routine maintenance, including the replacement of hoses, nozzles, and efficiency compliance devices (e.g., bellows, face shield, splash guard, etc.), does not require an initial test.
  - b. The permittee shall conduct and pass subsequent Phase I tests on or before the anniversary date of the previous successful test as specified in Table 1-4.
  - c. Each test may be witnessed by a DAQ inspector.
5. The permittee shall submit a Gasoline Dispensing Operation Certification of Vapor Recovery System Test Results Submittal Form (available on the DAQ website), along with associated test results, to the Control Officer after each test. The submittal form shall be:

- a. Complete and signed by the Responsible Official for the equipment being tested. The Responsible Official must certify that the test results are true, accurate, and complete.
  - b. Submitted by mail, by fax, or in person.
  - c. Submitted by the source, or by the permittee's testing company or consultant. However, the source is the responsible party and must ensure that the test report is delivered to DAQ within the applicable time frame.
6. If the source passes the vapor recovery system test, the permittee shall submit the test results report to the Control Officer within 60 days of the date of the test.
  7. If the source fails a vapor recovery system test: *[Guidelines for Source Testing (9/20/2019)]*
    - a. The permittee shall notify the Control Officer, by email or phone, within 24 hours of equipment test failure. If repairs can be made within five working days of the original scheduled test date, the permittee shall make the repairs and pass the required test(s).
    - b. If the equipment cannot be repaired in five working days, the permittee shall make all necessary repairs and schedule a retest of the affected facility by submitting a new Test Notification Form to the Control Officer by mail, fax, or hand delivery no later than three business days before the new test date.
    - c. After retesting (pass/fail), the permittee shall submit a Test Results Submittal Form (available on the DAQ website) and supporting test documents to the Control Officer within 15 days of completion.
  8. The permittee shall continue retesting until the affected facility successfully passes all aspects of the vapor recovery system test.
  9. The Control Officer may require the permittee to conduct any test after a failed vapor recovery system test in the presence of a DAQ representative.
  10. The permittee shall comply with the general testing requirements identified in Section 3.0.

#### 1.1.4.3 Recordkeeping

1. The permittee is required to comply with the recordkeeping requirements of 40 CFR Part 63, Subpart CCCCCC. *[40 CFR Part 63.11125]*
2. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: *[AQR 12.5.2.6(d)(2)]*

#### Inspections/Maintenance/General

- a. Maintenance on distribution and control (i.e., Phase I) equipment, including a general description of location and parts;
- b. Date and time that distribution and/or control equipment was taken out of service;
- c. Date of repair or replacement of distribution and/or control equipment;

- d. Equipment inspections;
- e. Vapor recovery testing results;

Daily Actions/Throughput

- f. Date and time of gasoline deliveries;
- g. Daily records of nonoperating days;
- h. Daily total combined throughput of gasoline (EUs: J001 and J002);
- i. Monthly combined throughput of gasoline (EUs: J001 and J002) (reported semiannually);
- j. Daily total throughput of the gasoline-loading arm located at Building 691 (EU: J014);
- k. Monthly throughput of the gasoline-loading arms located at Building 691 (EU: J014) (reported semiannually);

Emissions

- l. Vapor recovery system testing results, if applicable (reported as required by Section 1.1.4.2 of this permit);
  - m. Deviations from permit requirements resulting in excess emissions (reported as required by Section 5.0 of this permit);
  - n. Deviations from permit requirements not resulting in excess emissions (reported semiannually);
  - o. Calendar year combined annual gasoline product throughput (EUs: J001 and J002) (reported annually);
  - p. Calendar year throughput of the gasoline loading arms located at Building 691 (EU: J014) (reported annually); and
  - q. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
3. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
4. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

## 1.2 EXTERNAL COMBUSTION

### 1.2.1 Emission Units

The stationary source covered by this Part 70 OP includes the emission units and associated appurtenances summarized in Table 1-5. *[AQR 12.5.2.3; NSR ATC (June 4, 2012), Section IV-B, Condition 1(a); Part 70 Renewal (February 20, 2020); Part 70 OP Renewal Application (August 6, 2024); Part 70 OP Minor Revision Application (May 8, 2025)]*

**Table 1-5: Boilers, Furnaces, and Booth Heaters**

EU	Description	Manufacturer	Fuel	Rating (MMBtu/hr)	Model #	Serial #	Location
W001	Boiler	Ajax	Propane	1.50	WRFP-1500	68237	Bldg. 71
W002	Boiler	Ajax	Propane	1.25	WFP-1250	56872	Bldg. 718
W003	Boiler	RBI	Propane	2.00	Futera III 2000	56024	Bldg. 1000
W005	Boiler	Unilux	Propane	1.05	DZ 100W	3820	Bldg. 1005
W006	Boiler	Unilux	Propane	1.31	VZ 150W	3884	Bldg. 1004
W008	Boiler	Weil McClain	Propane	2.049	WCR2-G-15	072286977	Bldg. 1009
W009	Boiler	Weil McClain	Propane	1.08	WCR1-G-12	080830720	Bldg. 120
W010	Boiler	Camus	Propane	1.50	DFPH-1501-MGI-HVS	121216648	Bldg. 1130
W011	Boiler	Camus	Propane	1.50	DFPH-1501-MGI-HVS	121216647	Bldg. 1130
W015	Boiler	RBI	Propane	1.50	FW1500	122395683	Bldg. 719
W016	Boiler	RBI	Propane	1.00	Futera II 1000	TBD	Bldg. 707
W012	Boilers/Heaters (<1 MMBtu/hr)	Various	Propane	11.83	Various	Various	Various
W013	Furnaces/Heaters (<1 MMBtu/hr)	Various	Propane	9.99	Various	Various	Various
C003	Spray Booth Heater	Weather-Rite	Propane	2.916	TOT221VT	53748-1	Bldg. 230
C004	Spray Booth Heater	Weather-Rite	Propane	2.916	TOT221VT	53748-2	Bldg. 230

### 1.2.2 Controls

#### 1.2.2.1 Control Devices

No add-on controls devices have been identified.

#### 1.2.2.2 Control Requirements

1. The permittee shall implement good combustion practices for all propane-fired boilers. These practices include operating the boilers with an optimum amount of excess air to improve combustion efficiency. *[NSR MSP (October 30, 2010), Section V-B, Condition 3(a)]*
2. The permittee shall combust only propane in the boilers, furnaces, and spray booth heaters. *[NSR ATC (June 4, 2012), Section IV-B, Condition 4(b)]*

3. The permittee shall operate and maintain all boilers, furnaces, and spray booth heaters in accordance with the manufacturer's operations and maintenance (O&M) manual. *[NSR MSP (October 30, 2010), Section V-B, Condition 3(d)]*

### 1.2.3 Limitations and Standards

#### 1.2.3.1 Operational Limits

1. The permittee shall limit the operation of boilers/heaters that are rated less than 1 MMBtu/hr (EU: W012) to a total of 11.83 MMBtu/hr in any consecutive 12 months. *[Part 70 Renewal (February 20, 2020)]*
2. The permittee shall limit the operation of furnaces/heaters that are rated less than 1 MMBtu/hr (EU: W013) to a total of 9.99 MMBtu/hr in any consecutive 12 months. *[Part 70 Renewal (February 20, 2020)]*

#### 1.2.3.2 Emission Limits

1. The permittee shall not allow the actual emissions from the boilers, furnaces, and booth heaters to exceed the PTE listed in Table 1-6 in any consecutive 12-month period. *[AQR 12.5.2.6(a)]*

**Table 1-6: Boilers, Furnaces, and Booth Heaters PTE (tons per year)**

EU	Condition	Propane Gal/yr <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG
W001	8,760 hrs/yr	143,607	0.05	0.05	0.93	0.54	0.01	0.07	0.01	910.63
W002	8,760 hrs/yr	119,672	0.04	0.04	0.78	0.45	0.01	0.06	0.01	758.86
W003	8,760 hrs/yr	191,475	0.07	0.07	0.11	0.72	0.01	0.10	0.01	1,214.18
W005	8,760 hrs/yr	100,525	0.04	0.04	0.65	0.38	0.01	0.05	0.01	637.44
W006	8,760 hrs/yr	125,416	0.04	0.04	0.82	0.47	0.01	0.06	0.01	795.28
W008	8,760 hrs/yr	195,879	0.07	0.07	1.28	0.74	0.01	0.10	0.01	1,243.92
W009	8,760 hrs/yr	103,397	0.04	0.04	0.67	0.39	0.01	0.05	0.01	656.87
W010	8,760 hrs/yr	143,607	0.05	0.05	0.93	0.54	0.01	0.07	0.01	910.63
W011	8,760 hrs/yr	143,607	0.05	0.05	0.93	0.54	0.01	0.07	0.01	910.63
W012	8,760 hrs/yr	1,132,577	0.40	0.40	7.36	4.25	0.01	0.56	0.01	7,181.85
W013	8,760 hrs/yr	956,240	0.34	0.34	6.22	3.59	0.01	0.48	0.01	6,064.80
W015	8,760 hrs/yr	143,607	0.05	0.05	0.93	0.54	0.01	0.07	0.01	910.63
W016	8,760 hrs/yr	95,738	0.03	0.03	0.05	0.36	0.01	0.05	0.01	607.09
C003	8,760 hrs/yr	279,171	0.10	0.10	1.81	1.05	0.01	0.14	0.01	1,770.27
C004	8,760 hrs/yr	279,171	0.10	0.10	1.81	1.05	0.01	0.14	0.01	1,770.27

<sup>1</sup>The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit

2. The permittee shall not discharge into the atmosphere, from any external combustion unit in this section, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. *[AQR 26.1]*



## 1.2.4 Compliance Demonstration Requirements

### 1.2.4.1 Monitoring

1. The permittee shall demonstrate compliance with the combined heat rate (MMBtu/hr) limit for the boilers/heaters (EU: W012) by maintaining a monthly log of each boiler/heater heat rate, along with the total heat rate for all boilers/heaters less than 1 MMBtu/hr.
2. The permittee shall demonstrate compliance with the combined heat rate (MMBtu/hr) limit for the furnaces/heaters (EU: W013) by maintaining a monthly log of each furnace/heater heat rating, along with the total heat rate for all furnaces/heaters less than 1 MMBtu/hr.

### 1.2.4.2 Testing

No performance testing requirements have been identified for the boilers, furnaces, or spray booth heaters.

### 1.2.4.3 Recordkeeping

1. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: [AQR 12.5.2.6(d)(2)]

#### Inspections/Maintenance/General

- a. Manufacturer's O&M manual for boilers, furnaces, and spray booth heaters;

#### Operational Limits

- b. Monthly, consecutive 12-month total MMBtu/hr of all boilers/heaters (EU: W012) less than 1 MMBtu/hr (reported semiannually);
- c. Monthly, consecutive 12-month total MMBtu/hr of all furnaces/heaters (EU: W013) less than 1 MMBtu/hr (reported semiannually);

#### Emissions

- d. Deviations from permit requirements resulting in excess emissions (reported as required by Section 5.0 of this permit);
  - e. Deviations from permit requirements not resulting in excess emissions (reported semiannually); and
  - f. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
  3. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

## 1.3 INTERNAL COMBUSTION UNITS

### 1.3.1 Emission Units

The stationary source covered by this Part 70 OP includes the emission units and associated appurtenances summarized in Table 1-7. [AQR 12.5.2.3; NSR ATC (June 4, 2012), Section IV-C, Condition 1(a), Part 70 Renewal (February 20, 2020); Part 70 OP (November 29, 2021); Part 70 OP (December 1, 2022); and Part 70 OP Renewal Application (August 6, 2024)]

**Table 1-7: Internal Combustion Units**

EU	Description	Manufacturer	Rating	Model #	Serial #	Location
G003	Genset – Emergency	Onan	80 kW	DGDA-5627785	G030520964	Bldg. 83
	Engine – Diesel; DOM: 07/2003	Cummins	170 hp	6BT5.9-G6	46320778	
G005	Genset – Emergency	Cummins	125 kW	DSGAB-7514940	L080224037	Bldg. 89
	Engine – Diesel; DOM: 11/2008		250 hp	QSB7-G3NR3	46964168	
G006	Genset – Emergency	Onan	60 kw	DSFAD-2710150	A100080581	Bldg. 1217
	DOM: 2009	Cummins	145 hp	QSB5-G3NR3	73051603	
G013	Genset – Emergency	Cummins	150 kW	DSHAA-5754455	C060894365	Bldg. 707
	Engine – Diesel; DOM: 02/2006		364 hp	QSL9-G2	46584119	
G014	Genset – Emergency	Cummins	300 kW	DQHAB-5940835	K070135033	Bldg. 718
	Engine – Diesel; DOM: 11/2007		470 hp	QSM11-G4NR3	35212610	
G015	Genset – Emergency	Caterpillar	400 kW	LC6	G6B00485	Bldg. 718
	Engine – Diesel; DOM: 2005		610 hp	3456	7WG02944	
G016	Genset – Emergency	Cummins	350 kW	DFEG-6151105	A080149168	Bldg. 64
	Engine – Diesel; DOM: 10/2007		755 hp	QSX15-G9	79276400	
G017	Genset – Emergency	Cummins	750 kW	DQFAA-2427029	L090075224	Bldg. 718
	Engine – Diesel; 2010 EPA standards		1,490 hp	QST30-G5	37242049	
G019	Genset – Emergency	Cummins	300 kW	DFCB-5694768	K040711736	Bldg. 1001
	Engine – Diesel; DOM: 9/2004		465 hp	NTA-855-G2	30371581	
G020	Fire Pump	Clarke	207 hp	JU6H-UFMO		Bldg. 1001
	Engine – Diesel; DOM: 02/2006	John Deere		6068TF220	PE6068T546292	
G021	Fire Pump	Clarke	207 hp	JU6H-UFMO		Bldg. 1001
	Engine – Diesel; DOM: 2/2006	John Deere		6068TF220	PE6068T547193	
G022	Fire Pump	Clarke	207 hp	JU6H-UFMO		Bldg. 1001
	Engine – Diesel; DOM: 02/2006	John Deere		6068TF220	PE6068T547200	
G027	Genset – Emergency	Cummins	125 kW	DGDK-5784942	A070007980	Bldg. 3951
	Engine – Diesel; DOM: 08/2006		207 hp	6BTAA5.9-G1	46656629	

EU	Description	Manufacturer	Rating	Model #	Serial #	Location
G057	Genset – Emergency	Onan	1,750 kW	DQKAA-5936750	J070113763	Bldg. 1005
	Engine – Diesel DOM: 9/2007	Cummins	2,953 hp	QSKTA60-GE	33170322	
G058	Genset – Emergency	Generac	36 kW	5263390100	2082896	Bldg. 222
	Engine – Diesel; DOM: 2004	John Deere	48 hp	4024TF270D	PE4024T030746	
G117	Genset – Emergency	Cummins	300 kW	DQHAB-2321029	K090067670	Bldg. 85
	Engine – Diesel; DOM: 10/2009		470 hp	QSM11-G4NR3	35260722	
G118	Genset – Emergency	Cummins	1,500 kW	DQGAB-4902071	H100K17846	Bldg. 1009
	Engine – Diesel; DOM: 2010		2,220 hp	QSK50-G4	33181757	
G123	Genset – Emergency	Cummins	125 kW	DSGAB-4507043	D100116376	Bldg. 1052
	Engine – Diesel; DOM: 4/2010		250 hp	QSB7-G3NR3	73089655	
G124	Genset – Emergency	Caterpillar	100 kW	D100-6	CAT00C44ED4B0 1775	Bldg. 820
	Engine – Diesel; DOM: 2010		157 hp	C4.4	E5N019314	
G127	Genset – Emergency	Cummins	150 kW	DSHAA-6174070	A080147422	Bldg. 1000
	Engine – Diesel; DOM: 11/2007		364 hp	QSL9-G2-NR3	21814024	
G130	Fire Pump	Clarke	175 hp	JU6H-UFM8		Bldg. 120
	Engine – Diesel; DOM: 7/2008	John Deere		6068TF220	PE6068T733372	
G131	Fire Pump	Clarke	175 hp	JU6H-UFM8		Bldg. 120
	Engine – Diesel; DOM: 7/2008	John Deere		6068TF220	PE6068T733460	
G133	Fire Pump	Clarke	183 hp	JU6H-UF58		Bldg. 719
	Engine – Diesel; DOM: 2007	John Deere		6068TF220	PE6068T665693	
G134	Fire Pump	Clarke	183 hp	JU6H-UF58		Bldg. 719
	Engine – Diesel; DOM: 2007	John Deere		6068TF220	PE6068T665699	
G136	Genset – Emergency	Cummins	350 kW	DFEG-6195497	L100178507	Bldg. 1003
	Engine – Diesel; DOM: 12/2010		755 hp	QSX15-G9	79452962	
G137	Genset – Emergency	Cummins	125 kW	DSHAE-6748751	A080152619	Bldg. 1019
	Engine – Diesel; DOM: 01/2008		364 hp	QSL9-G2NR3	46852086	
G138	Genset – Emergency	Cummins	300 kW	DQHAB-7235958	I080206592	Bldg. 1022
	Engine – Diesel; DOM: 08/2008		470 hp	QSM11-G4NR3	35238399	

EU	Description	Manufacturer	Rating	Model #	Serial #	Location
G139	Genset – Emergency	Cummins	35 kW	DGGD-5628067	G030523428	Bldg. 1078
	Engine – Diesel; DOM: 2003		56 hp	B3.3G1	68013985	
G140	Genset – Emergency	Onan	35 kW	DGBB-5689864	H040679901	Bldg. 1050
	Engine – Diesel; DOM: 2004	Cummins	68 hp	4B3.9-G2	46418681	
G142	Genset – Emergency	Cummins	200 kW	DSHAC-5770629	H060964339	Bldg. 1210
	Engine – Diesel; DOM: 07/2006		364 hp	QSL9-G2	46646741	
G143	Genset – Emergency	Cummins	35 kW	DGGD-5962267	A080142386	Bldg. 3925
	Engine – Diesel; DOM: 10/2007		81 hp	4BT3.3-G6NR	68088456	
G145	Genset – Emergency	Cummins	7.5 kW	DNAC-5664495	B048598967	Bldg. 279
	Engine – Diesel; DOM: 2004	Onan	35 hp	LPW2	03020639	
G148	Genset – Emergency	Cummins	100 kW	DSGAA-6657732	B110192988	Bldg. 104
	Engine – Diesel; DOM: 2/2011		250 hp	QSB7-G3NR3	73196899	
G149	Genset – Emergency	Cummins	250 kW	DQDAA-8362897	K110268075	Bldg. 1000
	Engine – Diesel; DOM: 9/2011		399 hp	QSL9-G3NR3	7330516	
G150	Genset – Emergency	Cummins	80 kW	DSFAE-1201483	D120322250	Bldg. 1004
	Engine – Diesel; DOM: 3/2012		145 hp	QSB5-G3NR3	73377600	
G151	Fire Pump	Clarke	311 hp	JW6H-UFADF0	RG6090L100155	Bldg. 799
	Engine – Diesel; DOM: 2010	John Deere		6090HFC47A.B.		
G152	Fire Pump	Clarke	311 hp	JW6H-UFADF0	RG6090L100152	Bldg. 799
	Engine – Diesel; DOM: 2010	John Deere		6090HFC47A.B.		
G156	Genset – Emergency	MTU Onsite Energy	900 kW	900-RXC6DT2	357380-1-1-0313	Bldg. 1055
	Engine – Diesel; DOM: 3/2013	MTU-DD Detroit Diesel	1,354 hp	16V2000G45TB	5362010743	
G157	Genset – Emergency	Cummins	40 kW	DGHCC-1322028	B130462367	Bldg. 1033
	Engine – Diesel; DOM: 2012		69 hp	4BT3.3-G5	72007652	
G158	Genset – Emergency	Cummins	200 kW	DSGAE-1336099	H130555078	Bldg. 1150
	Engine – Diesel; DOM: 8/2013		324 hp	QSB7-G5-NR3	73568652	
G159	Genset – Emergency	Cummins	1,250 kW	DQGAA-1217643	A130438099	Bldg. 1130
	Engine – Diesel; DOM: 10/2012		2,220 hp	QSK50-G4	25383751	
G162	Genset – Emergency	Cummins	300 kW	DQHAB-1527253	K150889886	Bldg. 703
	Engine – Diesel DOM: 10/2015		470 hp	QSM11-G4NR3	35335608	

EU	Description	Manufacturer	Rating	Model #	Serial #	Location
G163	Genset – Emergency	Cummins	20 kW	C20 D6	A170142502	Bldg. 1003
	Engine – Diesel; DOM: 2017	Kubota	36 hp	V2203M-BG-ET02	7GA3781	
G164	Genset – Emergency	Cummins	600 kW	DQCA-1995210	H190619133	Bldgs. 1011/1131
	Engine – Diesel; DOM: 06/2019		1,220 hp	QSK23-G7	85006244	
G166	Genset – Emergency	Cummins	125 kW	C125D6C-1870134	L180463376	Bldg. 93
	Engine – Diesel; DOM: 2018		208 hp	QSB5-G6 NR3	74421187	
G167	Genset – Emergency	Cummins	450 kW	DEFJ-1870133	I18046246	Bldg. B1210
	Engine – Diesel; DOM: 04/2021		755 hp	QSX15-G9	80126465	
G168	Genset – Emergency	Cummins	750 kW	DQCB*2110027	F210936351	Bldg. 1057
	Engine, 2021		1,220 hp	QSK23-G7	85009371	
G169	Genset – Emergency	Cummins	750 kW	DQCB*2110027	F210936352	Bldg. 1061
	Engine, 2021		1,220 hp	QSK23-G7	85009381	
G170	Genset – Emergency	Cummins	800 kW	DQCC*2120019	F210939357	Bldg. 1061
	Engine, 2021		1,220 hp	QSK23-G7	85008963	
G171	Genset – Emergency	Cummins	800 kW	DQCC*2120019	F210936353	Bldg. 1057
	Engine, 2021		1,220 hp	QSK23-G7	85009372	
G172	Genset – Emergency	Multiquip	40 kW	DCA-70SSJU4i	7307063	Bldg. 625
	Engine, 2014	John Deere	107 hp	4045HFG92	PE4045R094135	
G173	Fire Pump	Clarke	97 kW	JU4H-UFADP0	S0183167P	Bldg. 3922
	Engine, 2023	John Deere	130 hp	4045HFC28	PE4045N043478	

### 1.3.2 Controls

#### 1.3.2.1 Control Devices

No add-on control devices have been identified.

#### 1.3.2.2 Control Requirements

1. The permittee shall operate all diesel-powered generators and fire pumps greater than or equal to 100 hp with turbochargers and aftercoolers (EUs: G003, G005, G006, G013-G017, G019, G020, G021, G022, G027, G057, G117, G118, G123, G124, G127, G130, G131, G133, G134, G136, G137, G138, G142, G148–G152, G156, G158, G159, G162, G164, G166, G167, G168, G169, G170, G171, and G173). *[NSR ATC (06/04/2012), Section IV-C, Condition 4(a); AQR 12.4 ATC (06/07/2022); AQR 12.4 ATC (06/04/2024);]*
2. The permittee shall operate the diesel-fired emergency generator (EU: G172) with direct injection, turbochargers, and charge air cooled. *[AQR 12.4 ATC (06/07/2022)]*
3. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in each of the diesel-fired emergency generators and fire pumps. *[AQR 12.4 ATC (06/07/2022)]*

4. The permittee shall operate and maintain each of the diesel-fired emergency generator sets and each of the fire pumps in accordance with the manufacturer's O&M manual for emissions-related components.
5. The permittee shall not discharge from any source whatsoever quantities of air contaminants or other material that cause a nuisance. *[AQR 40]*

### 1.3.3 Limitations and Standards

#### 1.3.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generator(s) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generator(s) up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (3.a–e inclusive), the emergency generator(s) cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity (EUs: G003, G005, G006, G013, G014, G015, G016, G017, G019, G027, G057, G058, G117, G118, G123, G124, G127, G136, G137, G138, G139, G140, G142, G143, G145, G148, G149, G150, G156, G157, G158, G159, G162, G163, G164, G166, G167, G168, G169, G170, G171, and G172). *[40 CFR Part 60.4211, 40 CFR Part 63.6640, and AQR 12.4 ATC (June 7, 2022)]*
  - a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.
  - b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
  - c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
  - d. The power is provided only to the facility itself or to support the local transmission and distribution system.
  - e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
2. The permittee shall limit the operation of each diesel-fired fire pump (EUs: G020, G021, G022, G130, G131, G133, G134, G151, G152, and G173) for testing and maintenance purposes to 100 hours/year. The permittee may operate the fire pump(s) up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. *[40 CFR Part 60.4211, 40 CFR Part 63.6640]*

### 1.3.3.2 Emission Limits

- The permittee shall not allow the actual emissions from the internal combustion units to exceed the PTE listed in Tables 1-8 and 1-9 in any consecutive 12-month period, except for emission units intended only for use in emergencies. *[AQR 12.5.2.6(a); AQR 12.4 ATC (June 7, 2022)]*

**Table 1-8: Internal Combustion Units**

EU	Rating	Condition <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
G003	170 hp	500 hrs/yr	0.09	0.09	1.32	0.28	0.01	0.11	0.01
G005	250 hp	500 hrs/yr	0.01	0.01	0.41	0.05	0.02	0.01	0.01
G006	145 hp	500 hrs/yr	0.01	0.01	0.19	0.04	0.01	0.01	0.01
G013	364 hp	500 hrs/yr	0.20	0.20	2.82	0.61	0.01	0.23	0.01
G014	470 hp	500 hrs/yr	0.01	0.01	0.67	0.02	0.01	0.02	0.01
G015	610 hp	500 hrs/yr	0.11	0.11	3.66	0.84	0.01	0.11	0.01
G016	755 hp	500 hrs/yr	0.02	0.02	1.80	0.12	0.01	0.12	0.01
G017	1,490 hp	500 hrs/yr	0.10	0.10	3.26	0.38	0.01	0.07	0.01
G019	465 hp	500 hrs/yr	0.26	0.26	3.60	0.78	0.01	0.29	0.01
G020	207 hp	500 hrs/yr	0.11	0.11	1.60	0.35	0.01	0.13	0.01
G021	207 hp	500 hrs/yr	0.11	0.11	1.60	0.35	0.01	0.13	0.01
G022	207 hp	500 hrs/yr	0.11	0.11	1.60	0.35	0.01	0.13	0.01
G027	207 hp	500 hrs/yr	0.06	0.06	0.78	0.26	0.01	0.02	0.01
G057	2,953 hp	500 hrs/yr	0.03	0.03	9.44	0.62	0.18	0.15	0.01
G058	48 hp	500 hrs/yr	0.03	0.03	0.37	0.08	0.01	0.03	0.01
G117	470 hp	500 hrs/yr	0.01	0.01	0.67	0.02	0.01	0.02	0.01
G118	2,220 hp	500 hrs/yr	0.07	0.07	5.28	1.09	0.01	0.28	0.01
G123	250 hp	500 hrs/yr	0.01	0.01	0.41	0.05	0.02	0.01	0.01
G124	157 hp	500 hrs/yr	0.01	0.01	0.24	0.07	0.01	0.10	0.01
G127	364 hp	500 hrs/yr	0.03	0.03	0.60	0.52	0.01	0.23	0.01
G130	175 hp	500 hrs/yr	0.10	0.10	1.36	0.29	0.01	0.11	0.01
G131	175 hp	500 hrs/yr	0.10	0.10	1.36	0.29	0.01	0.11	0.01
G133	183 hp	500 hrs/yr	0.10	0.10	1.42	0.31	0.01	0.12	0.01
G134	183 hp	500 hrs/yr	0.10	0.10	1.42	0.31	0.01	0.12	0.01
G136	755 hp	500 hrs/yr	0.05	0.05	1.62	0.37	0.01	0.04	0.01
G137	364 hp	500 hrs/yr	0.03	0.03	0.60	0.52	0.01	0.23	0.01
G138	470 hp	500 hrs/yr	0.01	0.01	0.67	0.02	0.01	0.02	0.01
G139	56 hp	500 hrs/yr	0.03	0.03	0.43	0.09	0.01	0.04	0.01
G140	68 hp	500 hrs/yr	0.04	0.04	0.53	0.11	0.01	0.04	0.01
G142	364 hp	500 hrs/yr	0.01	0.01	1.22	0.05	0.01	0.02	0.01
G143	81 hp	500 hrs/yr	0.01	0.01	0.18	0.02	0.01	0.02	0.01
G145	35 hp	500 hrs/yr	0.02	0.02	0.27	0.06	0.01	0.02	0.01
G148	250 hp	500 hrs/yr	0.01	0.01	0.28	0.07	0.02	0.01	0.01
G149	399 hp	500 hrs/yr	0.02	0.02	0.59	0.38	0.01	0.03	0.01
G150	145 hp	500 hrs/yr	0.01	0.01	0.23	0.03	0.01	0.01	0.01

EU	Rating	Condition <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
G151	311 hp	500 hrs/yr	0.02	0.02	0.45	0.14	0.01	0.02	0.01
G152	311 hp	500 hrs/yr	0.02	0.02	0.45	0.14	0.01	0.02	0.01
G156	1,354 hp	500 hrs/yr	0.02	0.02	3.25	0.26	0.01	0.24	0.01
G157	69 hp	500 hrs/yr	0.01	0.01	0.13	0.06	0.01	0.04	0.01
G158	324 hp	500 hrs/yr	0.03	0.03	0.54	0.35	0.01	0.20	0.01
G159	2,220 hp	500 hrs/yr	0.07	0.07	5.28	1.09	0.01	0.28	0.01
G162	470 hp	500 hrs/yr	0.01	0.01	0.67	0.02	0.01	0.02	0.01
G163	36 hp	500 hrs/yr	0.01	0.01	0.04	0.01	0.01	0.01	0.01
G164	1,220 hp	500 hrs/yr	0.05	0.05	2.89	0.27	0.01	0.22	0.01
G166	208 hp	500 hrs/yr	0.11	0.11	1.61	0.35	0.01	0.13	0.01
G167	755 hp	500 hrs/yr	0.01	0.01	2.14	0.17	0.01	0.03	0.01
G168	1,220 hp	500 hrs/yr	0.03	0.03	3.95	0.19	0.01	0.08	0.01
G169	1,220 hp	500 hrs/yr	0.03	0.03	3.95	0.19	0.01	0.08	0.01
G170	1,220 hp	500 hrs/yr	0.03	0.03	4.37	0.22	0.01	0.07	0.01
G171	1,220 hp	500 hrs/yr	0.03	0.03	4.37	0.22	0.01	0.07	0.01
G172	107 hp	500 hrs/yr	0.01	0.01	0.11	0.01	0.01	0.01	0.01
G173	130 hp	500/hrs/yr	0.01	0.01	0.18	0.07	0.01	0.01	0.01

<sup>1</sup>The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit

- The permittee shall not discharge into the atmosphere, from any internal combustion unit in this section, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. *[NSR MSP (October 30, 2010), Section VI-B, Condition 1(a); AQR 12.4 ATC (June 7, 2022)]*

### 1.3.4 Compliance Demonstration Requirements

#### 1.3.4.1 Monitoring

##### Visible Emissions

See Section 2.0.

##### Generators/Engines/Fire Pumps

- The permittee shall demonstrate compliance with the hourly emissions limitations for the internal combustion emission units by maintaining a log of the maintenance and testing activities that includes the date, the type of fuel consumed, and the start and stop time of each generator and each fire pump. *[AQR 12.5.2.6(d)(1)]*
- The permittee shall operate each diesel-fired emergency generator engine and each fire pump with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the generators or fire pumps are used for an emergency, the permittee shall monitor monthly their operation and document the nature of the emergency. *[AQR 12.5.2.6(d)(1)]*
- The permittee shall monitor the sulfur content and the cetane index or aromatic content of the fuel burned in each diesel-fired emergency generator and fire pump by retaining a copy of vendor fuel specifications. *[40 CFR 60.4207(b); AQR 12.4 ATC (06/07/2022)]*



4. All emergency engines and fire pumps subject to 40 CFR Part 63, Subpart ZZZZ shall comply with the following (EUs: G003, G013, G015, G019, G020, G021, G022, G058, G139, G140, and G145): *[40 CFR Part 63.6640]*
  - a. Change the oil and filter every 500 hours of operation or annually, whichever comes first. The permittee may use an oil analysis program, as described in 40 CFR Part 63.6625(i), to extend the specified oil-change requirement. Pursuant to 40 CFR Part 63.6(g), the permittee can petition the Control Officer for alternative work practices;
  - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first;
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first; and
  - d. Follow manufacturer's O&M instructions or implement a maintenance plan that must provide, to the extent practicable, for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
5. The permittee shall label and maintain a list of all engines that meet the exemption criteria for national security. *[40 CFR Part 1068.225]*

#### 1.3.4.2 Testing

No performance testing has been identified for the generators in this section at this time.

#### 1.3.4.3 Recordkeeping

1. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: *[AQR 12.5.2.6(d)(2)]*

#### Opacity

- a. Dates and time when visible emissions checks and observations are performed, and the steps taken to make any necessary corrections to bring opacity into compliance;

#### Inspections/Maintenance/General

- b. Equipment inspections and maintenance;
- c. Manufacturer's O&M manual for each diesel-fired generator and each fire pump;

#### Emergency Generators

- d. Date and duration of operation of each diesel-fired emergency generator and each fire pump for testing, maintenance, and nonemergency use;
- e. Monthly duration of operation of each emergency generator and fire pump for emergency use, including documentation justifying use during the emergency;
- f. Monthly, consecutive 12-months total hours of operation of each diesel-fired emergency generator and fire pump; (reported semiannually)

- g. Sulfur content and cetane index or aromatic content of diesel fuel used to power each emergency generator and fire pump, as certified by the supplier;

#### Nonroad Engines

- h. Records of location changes for nonroad engines, if applicable;

#### Emissions

- i. Deviations from permit requirements that result in excess emissions (reported as required in Section 5 of this permit);
  - j. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
  - k. Calendar year annual emissions for each emission unit in this section not operating under the fuel cap (reported annually).
2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
  3. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

## 1.4 SURFACE COATING

### 1.4.1 Emission Units

The stationary source covered by this Part 70 OP includes the emission units and associated appurtenances summarized in Table 1-9. *[AQR 12.5.2.3 and NSR ATC (June 4, 2012), Section IV-E, Condition 1(a)]*

**Table 1-9: Surface Coating Emission Units**

EU	Description	Manufacturer	Model #	Serial #	Location
C001	Spray Booth; 20.0' x 22.0' x 62.5' L	DeVilbis			Bldg. 230
C002	Spray Booth; 34' W x 43' L x 20' H	Global Finishing Solutions	CDW-4218PDT-24-AR	91152B	Bldg. 1004
C003 <sup>1</sup>	Weather-Rite, Inc. Propane-Fired Spray Booth Heater; 2.916 MMBtu/hr	Weather-Rite	TOT221VT	53748-1	Bldg. 230
C004 <sup>1</sup>	Weather-Rite, Inc. Propane-Fired Spray Booth Heater; 2.916 MMBtu/hr	Weather-Rite	TOT221VT	53748-2	Bldg. 230

<sup>1</sup>The PTE and all permitting requirements for this emission unit are described in Section 1.2 of this permit.

### 1.4.2 Controls

#### 1.4.2.1 Control Devices

No add-on controls have been identified.

#### 1.4.2.2 Control Requirements

##### Particulates and Overspray

1. The permittee shall perform all spray-applied coating in the spray booths.
2. The permittee shall operate the DeVilbiss spray booth (EU: C001) with appropriate filter media having a particulate control efficiency of at least 99.0% for exhaust air particulates. The dry filter media must cover all openings in the spray booth (EU: C001). *[NSR MSP (October 30, 2010), Section VIII-B, Condition 3(a)]*
3. The permittee shall operate the Global Finishing Solutions spray booth with appropriate filter media having a particulate control efficiency of at least 98.0% for exhaust air particulates. The dry filter media must cover all openings in the spray booth (EU: C002). *[NSR MSP (October 30, 2010), Section VIII-B, Condition 3(b)]*
4. The permittee shall follow the manufacturer's operation and maintenance (O&M) manual for use and operation of filtration systems. Filters should be replaced when the pressure drop exceeds 0.25 inches (6.35 millimeters) of water unless the manufacturer's specifications indicate a different pressure drop value for the spray booth identified as EU: C001.
5. The permittee shall follow the manufacturer's O&M manual for use and operation of filtration systems. Filters should be replaced when the pressure drops exceeds the following per manufacturer's specifications for the stages of filter for the spray booth identified as EU: C002:
  - a. 1<sup>st</sup> Stage – 0.74 inches of water;
  - b. 2<sup>nd</sup> Stage – 1.16 inches of water; and
  - c. 3<sup>rd</sup> Stage – 1.12 inches of water.
6. The permittee shall perform all painting in the two spray paint booths (EUs: C001 and C002) using a high-volume, low-pressure (HVLP) gun having at least 65% transfer efficiency. *[NSR MSP (October 30, 2010), Section VIII-B, Condition 3(e)]*
7. The permittee shall employ good housekeeping practices to prevent the accumulation and/or dispersal of particulate matter from sanding and other surface preparation carried out in conjunction with surface coating operations. No more than 0.25 inches of particulate matter shall accumulate on surrounding surfaces at any time. *[NSR MSP (October 30, 2010), Section VIII-B, Condition 3(h)]*
8. The permittee shall equip the spray booths with dry filter media and shall not operate the spray booths unless all exhaust air passes through a filter media with control equivalence of 2 inches thick unless the manufacturer's specifications indicate differently. The filters must cover all openings leading to the fan. All filters or other control equipment shall follow manufacturer's recommendations for use and operation. Dry filters must be changed at sufficient intervals to prevent a decrease in their effectiveness, and to prevent them from clogging. *[NSR MSP (October 30, 2010), Section VIII-B, Condition 3(i)]*

#### 1.4.3.2 Emission Limits

2. The permittee shall not discharge into the atmosphere, from any emission unit in this section, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. [AQR 26.1]

#### 1.4.4 Compliance Demonstration Requirements

##### 1.4.4.1 Monitoring

###### Surface Coating Equipment

1. The permittee shall monitor the pressure drops across the two spray booth filters using a manometer (or equivalent). [AQR 12.5.6(d)(1)]
2. The permittee shall monitor the spray booths and all ancillary equipment for leaks, malfunctions, proper operation of gauges, and pressure drops each day the booth is operated. A log must be kept of such inspections, as well as of any corrective actions taken to repair the equipment regarding leaks, malfunctions, operation of gauges, pressure drops, or other parameter(s) that may result in excess emissions. [AQR 12.5.2.6(d)(1)]
3. The permittee shall monitor the consumption of each VOC/HAP-containing compound (e.g., paint, strippers, paint basecoats, primers, reducers, thinners, solvents, etc.) in gallons.

##### 1.4.4.2 Testing

No performance testing requirements have been identified for the surface coating operations at this time.

##### 1.4.4.3 Recordkeeping

1. The permittee shall keep and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: [AQR 12.5.2.6(d)(2)]

###### Inspections/Maintenance/General

- a. Equipment inspections, maintenance, and repair;
- b. Safety data sheets or records demonstrating the VOC and HAP content of each VOC-containing compound (paints, basecoats, primers, reducers, thinners, solvents, etc.);
- c. Spray booths pressure drop readings;

###### Product Consumption

- d. Monthly, consecutive 12-month total consumption (in gallons) of each VOC/HAP-containing compound (paints, basecoats, primers, reducers, thinners, solvents, etc.) (reported semiannually);

###### Emissions

- e. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);

- f. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
  - g. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
3. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

## 1.5 MISCELLANEOUS CHEMICALS

### 1.5.1 Emission Units

The stationary source covered by this Part 70 OP includes the emission units and associated appurtenances summarized in Table 1-11. [AQR 12.5.2.3]

**Table 1-11: Miscellaneous Chemical Usage**

EU	Description
M001	Source-wide Miscellaneous Chemical Usage

### 1.5.2 Controls

#### 1.5.2.1 Control Devices

No control devices have been identified.

#### 1.5.2.2 Control Requirements

1. The permittee shall implement the following procedures to reduce VOC emissions:
  - a. Minimize chemical usage, where possible;
  - b. Substitute low vapor pressure cleaners, where possible; and
  - c. Substitute low VOC alternatives, where possible.
2. The permittee shall ensure all containers with VOC/HAP-containing products remain securely closed except during product transfer.

### 1.5.3 Limitations and Standards

#### 1.5.3.1 Operational Limits

The permittee shall limit the miscellaneous chemical usage so that the actual emissions do not exceed the PTE listed in Table 1-12 in any consecutive 12-month period. [AQR 12.5.2.6(a)]

### 1.5.3.2 Emission Limits

The permittee shall not allow the actual emissions from miscellaneous chemical usage to exceed the PTE listed in Table 1-12 in any consecutive 12-month period. *[AQR 12.5.2.6(a)]*

**Table 1-12: PTE Cap for Miscellaneous Chemical Usage**

EU	VOC (tons/year)	HAP (tons/year)
M001	5.0	2.5

### 1.5.4 **Compliance Demonstration Requirements**

#### 1.5.4.1 Monitoring

The permittee shall maintain a centralized database for tracking miscellaneous chemicals used, as well as the total consumption for each chemical not specified in the surface coating operations.

#### 1.5.4.2 Testing

No performance testing requirements for miscellaneous chemical usage have been identified.

#### 1.5.4.3 Recordkeeping

1. The permittee shall keep and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: *[AQR 12.5.2.6(d)(2)]*

#### Inspections/Maintenance/General

- a. Maintain safety data sheets or records demonstrating the VOC and HAP content for each miscellaneous chemical consumed but not specified in Section 1.5, "Surface Coating Operations";

#### Product Consumption

- b. Monthly, consecutive 12-month total consumption of each VOC/HAP-containing compound or chemical (in gallons); (reported semiannually)

#### Emissions

- c. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
  - d. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
  - e. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable. *[AQR 12.5.2.6(d)]*

3. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

## **1.6 INSIGNIFICANT ACTIVITIES**

The units or activities, identified in Section 11.2 of this permit, are present at this source, but are insignificant activities pursuant to AQR 12.5.2.5. The emissions from these units or activities, when added to the PTE of the source, will not make the source major for any additional pollutant.

## **1.7 NONROAD ENGINES**

Pursuant to Title 40, Part 1068.30 of the Code of Federal Regulations (40 CFR Part 1068.30), nonroad engines that are portable or transportable (i.e., not used on self-propelled equipment) shall not remain at a location for more than 12 consecutive months; otherwise, the engine(s) will constitute a stationary reciprocating internal combustion engine (RICE) and be subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 60, Subpart IIII; and/or 40 CFR Part 60, Subpart JJJJ. Stationary RICE shall be permitted as emission units upon commencing operation at this stationary source.

Records of location changes for portable or transportable nonroad engines shall be maintained, and shall be made available to the Control Officer upon request. These records are not required for engines owned and operated by a contractor for maintenance and construction activities as long as records are maintained demonstrating that such work took place at the stationary source for periods of less than 12 consecutive months.

Nonroad engines used on self-propelled equipment do not have this 12-month limitation or the associated recordkeeping requirements.



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## **2.0    *VISIBLE EMISSIONS REQUIREMENTS***

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### **2.1    *VISIBLE EMISSIONS [AQR 12.5.2.6(D) & AQR 12.5.2.8]***

1. The Responsible Official shall sign and adhere to the *Visible Emissions Check Guidebook* and keep a copy of the signed guide on-site at all times.
2. The permittee shall conduct a visual emissions check of each diesel-fired emergency generator and each fire pump whenever it is operated for testing and maintenance, but at least quarterly.
3. If no plume appears to exceed the opacity standard during the visible emissions check, the date, location, and results shall be recorded, along with the viewer's name.
4. If a plume appears to exceed the opacity standard, the permittee shall do one of the following:
  - a. Immediately correct the perceived exceedance, then record the first and last name of the person who performed the emissions check, the date the check was performed, the unit(s) observed, and the results of the observation; or
  - b. Call a certified Visible Emissions Evaluation (VEE) reader to perform an EPA Method 9 evaluation.
    - i. For sources required to have a certified reader on-site, the reader shall start Method 9 observations within 15 minutes of the initial observation. For all other sources, the reader shall start Method 9 observations within 30 minutes of the initial observation.
    - ii. If no opacity exceedance is observed, the certified VEE reader shall record the first and last name of the person who performed the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each emission unit that was initially perceived to have exceeded the opacity limit, and the record shall also indicate:
      - (1) The cause of the perceived exceedance;
      - (2) The color of the emissions; and
      - (3) Whether the emissions were light or heavy.
    - iii. If an opacity exceedance is observed, the certified VEE reader shall take immediate action to correct the exceedance. The reader shall then record the first and last name of the person performing the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each reading identified, and the record shall also indicate:
      - (1) The cause of the exceedance;
      - (2) The color of the emissions;
      - (3) Whether the emissions were light or heavy;

- (4) The duration of the emissions; and
  - (5) The corrective actions taken to resolve the exceedance.
- 5. Any scenario of visible emissions noncompliance can and may lead to enforcement action.

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### 3.0 GENERAL TESTING

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#### 3.1 GENERAL TESTING

1. At the Control Officer's request, the permittee shall test (or have tests performed) to determine emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of those allowed by the AQRs is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. *[AQR 4.2]*
2. At the Control Officer's request, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, except instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. *[AQR 4.2]*
3. The permittee shall submit to the Control Officer for approval a performance testing protocol that contains testing, reporting, and notification schedules, test protocols, and anticipated test dates no less than 45 days, but no more than 90 days, before the anticipated date of the performance test unless otherwise specified in this permit. *[AQR 12.5.2.8]*
4. The permittee shall submit to EPA for approval any alternative test methods EPA has not already approved to demonstrate compliance with a requirement under 40 CFR Part 60. *[40 CFR Part 60.8(b)]*
5. The permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days of the end of the test. *[AQR 12.5.2.8]*
6. Performance testing is subject to 40 CFR Part 60.8 (as amended), Subpart A and DAQ's *Guidelines for Source Testing (9/19/2019)*. Performance testing shall be the instrument for determining initial and subsequent compliance with the emission limitations set forth in sections specified in this permit. *[AQR 12.5.2.8(a)]*
7. The Control Officer will consider approving the permittee's request for alternative performance test methods if proposed in writing in the performance test protocols. *[AQR 12.5.2.8(a)]*
8. The permittee of any stationary source that fails to demonstrate compliance with emissions standards or limitations during any performance test shall submit a compliance plan to the Control Officer within 90 days of the end of the performance test. *[AQRs 10.1 & 12.5.2.8(a)]*
9. The Control Officer may require additional performance testing when operating conditions appear inadequate to demonstrate compliance with the emissions and/or limitations in this permit. *[AQRs 4.2 & 12.5.2.8(a)]*

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## **4.0 GENERAL RECORDKEEPING**

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### **4.1 GENERAL RECORDKEEPING**

1. The permittee shall keep records of all inspections, maintenance, and repairs, as required by this permit. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
2. The permittee shall comply with all applicable recordkeeping requirements of 40 CFR Part 60.7; 40 CFR Part 63, Subpart IIII; 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 63, Subpart CCCCCC; and any other applicable regulations.
3. All records, logs, etc., or copies thereof, shall be kept on-site for a minimum of five years from the date the measurement, or data was entered. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
4. Records and data required by this permit to be maintained by the permittee may be audited at any time by a third party selected by the Control Officer. *[AQR 4.1]*
5. All records the permittee shall create and maintain must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

### **4.2 MITIGATION**

The source has no federal offset requirements. *[AQR 12.7]*

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## 5.0 REPORTING AND NOTIFICATIONS

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### 5.1 REPORTING AND NOTIFICATIONS

1. The permittee shall certify compliance with the terms and conditions contained in this Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. *[AQR 12.5.2.8(e)]*
2. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, NV 89118) and the Region 9 Administrator (Director, Air and Radiation Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each calendar year will be due on January 30 of the following year, and shall include the following: *[AQR 12.5.2.8(e)]*
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period. These methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR Part 70.6(a)(3). If necessary, the permittee shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information; and
  - c. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in (b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance was required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
3. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of any limits set by regulations or this permit. The report shall be in two parts, as specified below: *[AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]*
  - a. Within 24 hours of the time the permittee learns of the excess emissions, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at [airquality@clarkcountynv.gov](mailto:airquality@clarkcountynv.gov).
  - b. Within 72 hours of the notification required by paragraph 3.a above, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.

4. With the semiannual monitoring report, the permittee shall report to the Control Officer all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B)]*
5. The owner or operator of any source required to obtain a permit under AQR 12 shall report to the Control Officer emissions in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health and safety or the environment as soon as possible, but no later than 12 hours after the deviation is discovered, and submit a written report within two days of the occurrence. *[AQR 25.6.2]*
6. The permittee shall submit all compliance certifications to the U.S. Environmental Protection Agency (EPA) and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*
7. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the permit or the AQRs, shall contain a certification by a Responsible Official, with an original signature, of truth, accuracy, and completeness. This certification, and any other required under AQR 12.5, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*
8. The permittee shall furnish to the Control Officer, in writing and within a reasonable time, any information that the Control Officer may request to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Control Officer copies of records that the permit requires keeping. The permittee may furnish records deemed confidential directly to the Administrator, along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*
9. At the Control Officer's request, the permittee shall provide any information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, and the type or nature of control equipment in use. The Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to this report, the Control Officer may designate an authorized agent to make an independent study and report on the nature, extent, quantity, or degree of any air contaminants that are or may be discharged from the source. An agent so designated may examine any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.1]*
10. The permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1 and AQR 12.5.2.4]*
  - a. The annual emissions inventory must be submitted to DAQ by March 31 of each calendar year (if March 31 falls on a state or federal holiday, or on any day the office is not normally open for business, the submittal is due on the next business day);
  - b. The calculated actual annual emissions from each emission unit shall be reported even if there was no activity, along with the total calculated actual annual emissions for the source based on the emissions calculation methodology used to establish the potential to emit (PTE) in the permit or an equivalent method approved by the Control Officer prior to submittal; and

- c. As the first page of text, a signed certification containing the sentence: “I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate, and complete.” This statement shall be signed and dated by a Responsible Official of the company (a sample form is available from DAQ).
11. Stationary sources that emit 25 tons or more of nitrogen oxide (NOX) and/or emit 25 tons or more of volatile organic compounds (VOC) from their emission units, insignificant activities, and exempt activities during a calendar year shall submit an annual emissions statement for both pollutants. Emissions statements must include actual annual NOX and VOC emissions from all activities, including emission units, insignificant activities and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (aka Emissions Inventory). *[AQR 12.9.1]*
12. The permittee shall submit to the Control Officer, within 15 days after commencing operation, any outstanding identification and/or description that was not previously available for new emission unit(s), as noted in this permit with “TBD.” (Use this condition if there is emission unit information in the permit that is incomplete and noted with “TBD.”)
13. The permittee shall comply with all applicable notification and reporting requirements of 40 CFR Part 60.7; 40 CFR Part 63, Subpart IIII; 40 CFR Part 63, Subpart ZZZZ; and 40 CFR Part 63, Subpart CCCCCC. *[AQR 12.5.2.6(d)]*
14. The permittee shall submit semiannual monitoring reports to DAQ. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
15. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
  - a. The report shall include item(s) listed in recordkeeping subsections of corresponding processes in Section 1.
  - b. The report shall be based on a calendar semiannual period, which includes partial reporting periods.
  - c. The report shall be received by DAQ within 30 calendar days after the semiannual period.
16. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table 4-1. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

**Table 4-1: Required Submission Dates for Various Reports**

Required Report	Applicable Period	Due Date
Semiannual report for 1 <sup>st</sup> six-month period	January, February, March, April, May, June	July 30 each year <sup>1</sup>
Semiannual report for 2 <sup>nd</sup> six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year <sup>1</sup>
Semiannual report for 1 <sup>st</sup> six-month period	January, February, March, April, May, June	July 30 each year <sup>1</sup>

Required Report	Applicable Period	Due Date
Semiannual report for 2 <sup>nd</sup> six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year <sup>1</sup>
Annual Compliance Certification	Calendar year	January 30 each year <sup>1</sup>
Annual Emissions Inventory Report	Calendar year	March 31 each year <sup>1</sup>
Annual Emissions Statement <sup>2</sup>	Calendar year	March 31 each year <sup>1</sup>
Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 24 hours of the permittee learns of the event
Excess Emissions that Pose a Potential Imminent and Substantial Danger	As required	Within 12 hours of when permittee learns of event
Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 72 hours of the notification <sup>1</sup>
Deviation Report without Excess Emissions	As required	Along with semiannual reports <sup>1</sup>
Performance Testing Protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date <sup>1</sup>
Performance Testing Results	As required	Within 60 days of end of test <sup>1</sup>

<sup>1</sup>If the due date falls on a federal or Nevada holiday, or on any day the office is not normally open for business, the submittal is due on the next regularly scheduled business day.

<sup>2</sup> Required only for stationary sources that emit 25 tons or more of nitrogen oxide (NO<sub>x</sub>) and/or emit 25 tons or more of volatile organic compounds (VOC) during a calendar year.

17. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. *[AQR 4.1]*



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## **6.0    *MITIGATION***

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The source has no federal offset requirements. *[AQR 12.7]*

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## **7.0 PERMIT SHIELD**

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The source has not requested a permit shield. *[AQR 12.5.2.9]*

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## ***8.0 ACID RAIN REQUIREMENTS***

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The source is not subject to Acid Rain Program requirements.

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## 9.0 OTHER REQUIREMENTS

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1. Any person who violates any provision of the AQRs, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any requirements from DAQ is guilty of a civil offense and shall pay a civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1; NRS 445B.640]*
2. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review, as provided in Chapter 233B of the NRS. *[AQR 9.12]*
3. The permittee shall comply with the requirements of Title 40, Part 61 of the Code of Federal Regulations (40 CFR Part 61), Subpart M—the National Emission Standard for Asbestos—for all demolition and renovation projects. *[AQR 13.1(b)(8)]*
4. The permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a Class I or Class II ozone-depleting substance or any nonexempt substitute refrigerant as a working fluid, unless such fluid has been approved for sale in such use by the EPA Administrator. The permittee shall keep records of all paperwork relevant to the applicable requirements of 40 CFR Part 82 on-site. *[40 CFR Part 82]*
5. A risk management plan is required for the storing, handling and use of an applicable “Highly Hazardous Chemical” pursuant to 40 CFR Part 68. The permittee shall submit revisions of the risk management plan to the appropriate authority and a copy to DAQ. *[40 CFR Part 68.150(b)(3)]*

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## ***10.0 ADMINISTRATIVE REQUIREMENTS***

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### **10.1 GENERAL**

1. The permittee shall comply with all conditions of the Part 70 OP. Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations (AQRs), Nevada law, and the Clean Air Act, and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a renewal application. *[AQR 12.5.2.6(g)(1)]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall be unaffected and remain valid. *[AQR 12.5.2.6(f)]*
3. The permittee shall pay all permit fees pursuant to AQR 18. *[AQR 12.5.2.6(h)]*
4. This permit does not convey property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
5. The permittee agrees to allow inspection of the premises to which this permit relates by any authorized representative of the Control Officer at any time during the permittee's hours of operation without prior notice. The permittee shall not obstruct, hamper, or interfere with any such inspection. *[AQR 4.1; AQR 5.1.1; and AQR 12.5.2.8(b)]*
6. The permittee shall allow the Control Officer, upon presentation of credentials, to: *[AQR 4.1 and AQR 12.5.2.8(b)]*
  - a. Access and copy any records that must be kept under the conditions of the permit;
  - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
  - d. Document alleged violations using such devices as cameras or video equipment.
7. Any permittee who fails to submit relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit the needed supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. A Responsible Official shall certify the additional information consistent with the requirements of AQR 12.5.2.4. *[AQR 12.5.2.2]*
8. Anyone issued a permit under AQR 12.5 shall post it in a location where it is clearly visible and accessible to facility employees and DAQ representatives. *[AQR 12.5.2.6(m)]*
9. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*

## 10.2 MODIFICATION, REVISION, AND RENEWAL REQUIREMENTS

1. No person shall begin actual construction of a new Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an Authority to Construct (ATC) from the Control Officer. *[AQR 12.4.1.1(a)]*
2. The permit may be revised, revoked, reopened and reissued, or terminated for cause by the Control Officer. The filing of a request by the permittee for a permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, does not stay any permit condition. *[AQR 12.5.2.6(g)(3)]*
3. The permit shall be reopened under any of the following circumstances and when all applicable requirements pursuant to AQR 12.5.2.15 are met: *[AQR 12.5.2.15(a)]*
  - a. New applicable requirements become applicable to a stationary source considered “major” (per the definition in AQR 12.2, AQR 12.3, or 40 CFR Part 70.3(a)(1)) with a remaining permit term of three or more years;
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the Acid Rain Program;
  - c. The Control Officer or U.S. Environmental Protection Agency (EPA) determines that the permit contains a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. The EPA Administrator or the Control Officer determines that the permit must be revised or revoked to assure compliance with applicable requirements.
4. A permit, permit revision, or renewal may be approved only if all of the following conditions have been met: *[AQR 12.5.2.10(a)]*
  - a. The permittee has submitted to the Control Officer a complete application for a permit, permit revision, or permit renewal (except a complete application need not be received before a Part 70 general permit is issued pursuant to AQR 12.5.2.20); and
  - b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of AQR 12.5.
5. The permittee shall not build, erect, install, or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission that would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR Part 60.12]*
6. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*
7. Permit expiration terminates the permittee’s right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*

8. For purposes of permit renewal, a timely application is a complete application that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

## 11.0 ATTACHMENTS

### 11.1 APPLICABLE REGULATIONS

#### Requirements Specifically Identified as Applicable

1. NRS, Chapter 445B.
2. Applicable AQRs listed in Table 11-1.

**Table 11-1: Applicable Clark County AQRs**

Citation	Title
AQR 00	"Definitions"
AQR 02	"Air Pollution Control Board"
AQR 04	"Control Officer"
AQR 05	"Interference with Control Officer"
AQR 08	"Persons Liable for Penalties – Punishment: Defense"
AQR 09	"Civil Penalties"
AQR 12.0	"Applicability and General Requirements"
AQR 12.2	"Permit Requirements for Major Sources in Attainment Areas"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
AQR 12.6	"Confidentiality"
AQR 12.7	"Emission Reduction Credits"
AQR 12.9	"Annual Emissions Inventory Requirement"
AQR 12.10	"Continuous Monitoring Requirements for Stationary Sources"
AQR 12.12	"Transfer of Permit"
AQR 12.13	"Posting of Permit"
AQR 13.2(b)(1)	"Subpart A - General Provisions"
AQR 13.2(b)(82)	"Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
AQR 13.2(b)(106)	"Subpart CCCCCC - National Emissions Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities"
AQR 14.1(b)(1)	"Subpart A – General Provisions"
AQR 14.1(b)(81)	"Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
AQR 18	"Permit and Technical Service Fees"
AQR 25	"Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown"
AQR 26	"Emission of Visible Air Contaminants"
AQR 28	"Fuel Burning Equipment"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust", AQR 41.1.2 only
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"



Citation	Title
AQR 50	"Storage of Petroleum Products"
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"
AQR 81	"Provisions of Regulations Severable"

3. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)

4. Applicable 40 CFR sections are listed in Table 11-2.

**Table 11-2: Federal Standards**

Citation	Title
40 CFR Part 52.21	"Prevention of significant deterioration of air quality"
40 CFR Part 52.1470	"Approval and Promulgation of Implementation Plans, Subpart DD—Nevada"
40 CFR Part 60, Subpart A	"General Provisions"
40 CFR Part 60, Subpart IIII	"Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 63, Subpart A	"General Provisions"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
40 CFR Part 63, Subpart CCCCCC	"National Emissions Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities"
40 CFR Part 70	"State Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"

## 11.2 INSIGNIFICANT ACTIVITIES

**Table 11-3: Insignificant Activities and Processes (Tanks/Loading Racks)**

Building Number	Description	Capacity (gal)	Fuel	Throughput (gal/year)
<b>Insignificant Jet Fuel Tanks</b>				
121	AST	1,000	Jet Fuel	365,000
121	AST	120	Jet Fuel	43,800
121	AST	250	Jet Fuel	91,255
121	AST	75,000	Jet Fuel	2,000,000
121	AST	26,496	Jet Fuel	2,000,000
121	AST	26,496	Jet Fuel	2,000,000
<b>Insignificant Jet Fuel Loading Racks and Fuel Dispensing</b>				
121	Loading Arms (one loading; one unloading)	NA	Jet Fuel	2,000,000
682	Loading Arms (one loading; one unloading)	NA	Jet Fuel	2,000,000

Building Number	Description	Capacity (gal)	Fuel	Throughput (gal/year)
1011	Loading Arms (one loading; one unloading)	NA	Jet Fuel	500,000
<b>Insignificant Waste Fuel Tanks</b>				
255-2	AST	5,000	Jet Fuel	1,825,000
<b>Insignificant Diesel Tanks</b>				
64	AST	1,500	Diesel	547,500
83	AST	127	Diesel	46,355
85	AST	1,700	Diesel	620,500
89	AST	308	Diesel	112,420
93	AST	400	Diesel	146,000
93	AST	256	Diesel	93,440
104	AST	700	Diesel	255,500
120	AST	240	Diesel	87,600
120	AST	240	Diesel	87,600
121	AST	5,000	Diesel	150,000
121	AST	5,000	Diesel	150,000
121	AST	5,000	Diesel	1,825,000
121	AST	5,000	Diesel	1,825,000
222	AST	145	Diesel	52,925
279	AST	428	Diesel	156,220
279	AST	428	Diesel	156,220
279	AST	428	Diesel	156,220
279	AST	272	Diesel	99,280
279	AST	272	Diesel	99,280
279	AST	272	Diesel	99,280
279	AST	103	Diesel	37,595
279	AST	103	Diesel	37,595
279	AST	103	Diesel	37,595
625	AST	103	Diesel	37,595
703	AST	1,700	Diesel	620,500
707	AST	366	Diesel	133,590
718	AST	1,000	Diesel	365,000
718-1	AST	2,000	Diesel	730,000
718-A	AST	4,000	Diesel	1,460,000
719	AST	240	Diesel	87,600
719	AST	240	Diesel	87,600
799	AST	350	Diesel	127,750
799	AST	350	Diesel	127,750
820	AST	650	Diesel	237,250
1000	AST	2,300	Diesel	839,500
1000	AST	50	Diesel	18,250
1001	AST	317	Diesel	115,705
1001	AST	317	Diesel	115,705
1001	AST	317	Diesel	115,705
1001	AST	500	Diesel	182,500

Building Number	Description	Capacity (gal)	Fuel	Throughput (gal/year)
1003	AST	195	Diesel	71,175
1003	AST	195	Diesel	71,175
1004	AST	559	Diesel	204,035
1005	AST	1,808	Diesel	659,920
1005	AST	8,000	Diesel	2,920,000
1009	AST	1,575	Diesel	574,875
1011	AST	2,460	Diesel	897,900
1019	AST	366	Diesel	133,590
1022	AST	600	Diesel	219,000
1033	AST	195	Diesel	71,175
1050	AST	145	Diesel	52,925
1052	AST	308	Diesel	112,420
1055	AST	4,615	Diesel	1,684,475
1068	AST	2,460	Diesel	897,900
1078	AST	500	Diesel	182,500
1109	AST	43	Diesel	15,695
1130	AST	1,280	Diesel	467,200
1130	AST	10,000	Diesel	3,650,000
1150	AST	1,161	Diesel	423,765
1210	AST	500	Diesel	182,500
1217	AST	145	Diesel	52,925
3922	AST	150	Diesel	54,750
3925	AST	140	Diesel	51,100
<b>Insignificant Diesel Loading Racks and Fuel Dispensing</b>				
661	Single Product Dispensing Nozzles (4)	NA	Diesel	1,000,000
692	Loading Arms (2 loading; 2 unloading)	NA	Diesel	150,000

**Table 11-4: Insignificant Activities (Abrasive Blasting)**

Location	Description	Manufacturer	Model #	Serial #
Bldg. 227	Media Blasting Booth; 10.0' x 25" x 65"	Custom-Made		
Bldg. 227	Media Blasting Booth; 5.0' x 4.0' x 4.0'	Custom-Made		
Bldg. 791	Media Blasting Booth; 5.0' x 4.0' x 3.0'	Pauli Systems	RAM 35-ACGIH	11531

**Table 11-5: Insignificant Activities (Degreasers)**

Location	Description	Manufacturer	Model #	Serial #
Bldg. 52	Parts Washing Unit; 25 Gallons	Spray Master	SM9400	19099187
Bldg. 115	Parts Washing Unit; 17.5 Gallons	Clarus	PCS-15	
Bldg. 225	Parts Washing Unit; 27.5 Gallons	Clarus	PCS-25	5569
Bldg. 279	Parts Washing Unit; 85 Gallons	Aladin	2085E	71533
Bldg. 1011	Parts Washing Unit; 30 Gallons	Smart washer	28	2106049
Bldg. 3953	Parts Washing Unit; 25 Gallons	Power Master-Kleen Tec	28-1	02145

**Table 11-6: Insignificant Activities (Woodworking)**

Location	Description
Bldg. 231	Woodworking Shop; Cyclone\Fabric Filter; 99% control efficiency (formerly EU: H001)

**Table 11-7: Insignificant Activities (Fuel Cell Maintenance)**

Location	Description
Various	Fuel Cell Maintenance (formally EU: L001)