



STATEMENT OF BASIS
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 BAQ Engineering Services Division

Company Name:	Marine Corps Air Station (MCAS) Beaufort	Permit Writer:	Wanda Parnell
Permit Number:	TV-0360-0004	Date:	March 25, 2014

DATE APPLICATION RECEIVED: August 17, 2010 (Update received 12/28/2011)

FACILITY DESCRIPTION

The U.S. Marine Corps Air Station facility, which is located on Port Royal Island, supports flight operations and maintenance of assigned aircraft. The Air Station also provides services and materials to support all necessary operations of the Marine Aircraft Wing.

PROJECT DESCRIPTION

The facility has requested renewal of their Title V Operating Permit (OP).

COLLOCATION DETERMINATION

The facility is not co-located with any other facility.

CHANGES SINCE LAST OP ISSUANCE

- 06/09/2006 Minor source construction permit application for a Plastic Media Blast Booth (PMBB)
- 08/15/2006 Construction Permit (CP) –CL was issued to construct a PMBB.
- 09/26/2006 Responsible Official notification
- 12/27/2006 502(b)(10) to add 60 kW & 250 kW diesel-fired emergency generators (Equip IDs EG58, 1271-1 & EG59, 616-1) & change building location for 400 kW diesel-fired emergency generator (Equip ID EG55, 598-1)
- 01/22/2007 502(b)(10) to add plastic media blast booth (Equip ID PMBB-2, 1051-2) to Insignificant Activity (IA) list (Reference CP -CL)
- 01/29/2007 502(b)(10)s to add 35kW, 60 kW, & 100 KW diesel-fired emergency power generators (Equip IDs EG-P-0 thru EG-P-7, 843 thru 843-7) & to remove multiple units (Equip IDs CCF-5, CS-2, EG-5, EG-9, EG-10, EG-11, EG-14, EG-17, EG-19, EG-35, EG-37, FC-7, FC-8, FC-12, ST-35, ST-39, ST-40, ST-44, PB-1040, FC-25, FC-4, CM-1/SPB-4, PC-12, FC-15, & EG-36)
- 03/07/2007 502(b)(10) to correct the capacity of 150 kW diesel-fired emergency generator (Equip ID EG-34, 607-1) & 100 kW diesel-fired emergency power generator (Equip ID EG-41, 958-1), & to confirm 230 kW diesel-fired emergency power generator (Equip ID EG-56, 595-1)
- 06/22/2007 502(b)(10) to move diesel-fired emergency generators, to remove duplicates from the IA list, & to add 35 kW diesel-fired emergency generators (Equip ID EG64, 808-1)
- 09/07/2007 502(b)(10) to remove bioslurper (Equip ID BR-2, BR 2)
- 08/27/2008 502(b)(10) to remove emergency unit (Equip ID EG41, 958-1)
- 09/22/2008 502(b)(10)s to add a 10,000-gal capacity gasoline tank (Equip ID ST73, E85) & to remove emergency units (Equip IDs FC5, 556-2 & FC6, 556-1)
- 01/23/2009 Letter to add 5 MMBtu/hr natural gas-fired boiler as a temporary unit at the Central Heating Plant (CHP)
- 02/23/2009 502(b)(10) to remove 50.5 MMBtu/hr natural gas/propane boilers (Equip IDs FC1 & FC2) & 275 kW emergency generator (Equip ID EG13) & to add 450 kW emergency generator (Equip ID EG58)
- 03/11/2009 502(b)(10) to revise the emissions calculation & provide model/serial numbers, and brake horsepower for emergency generator (Equip ID EG58)
- 06/24/2009 502(b)(10) to add 25 kW emergency generator (Equip ID EG59)
- 09/23/2009 502(b)(10) to add equipment to IA list & renumber some equipment
- 10/23/2009 502(b)(10) to add 5.7 MMBtu/hr natural gas-fired boiler/water heater (Equip ID FC37) & 6.3 MMBtu/hr natural gas-fired boiler/water heater (Equip ID FC38)
- 12/08/2009 Construction Permit application was received to add a natural gas-fired engine to the CHP
- 01/27/2010 502(b)(10) to remove the 15 microturbines from the CHP
- 05/18/2010 502(b)(10) to remove temporary boiler from the CHP
- 07/20/2010 CP –CM was issued to install a Natural Gas-Fired Reciprocating Engine to replace the Microturbine Plant
- 10/15/2010 502(b)(10) to add 200 kW (331 bhP) diesel-fired emergency generator (Equip ID EG61, 2085), renumber emergency generator (change Equip ID EG58 to EG60), & add natural gas-fired space heaters (Equip IDs SH1-SH4, EUH1-EUH4 & SH5-SH6)
- 11/16/2010 Notification of installation & start-up of engine at CHP
- 11/29/2010 502(b)(10) to remove 1.26 MMBtu/hr natural gas-fired boiler (Equip ID FC 27) & add 50 kW (132 bhP) diesel-fired emergency generator (Equip ID EG63)
- 12/16/2010 502(b)(10) to add a 200 kW (330 bhP) diesel-fired emergency generator (Equip ID EG62/584-2), renumber the 60 kW



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- diesel-fired emergency generator (Equip ID EG18 to EG-P-8), & remove 60 kW diesel-fired emergency generator (Equip ID EG-P-3)
- 01/07/2011 502(b)(10) to remove the bioslurper at the Fuel Pier storage tank farm (Equip ID Fuel Pier 1)
- 04/07/2011 502(b)(10) to change Unit ID 04, Equip ID TS6 (1282) to TS6 (1331-1) & 800-gal AST (Equip ID ST 85, 1282) to ST 85/1331-2)
- 04/11/2011 502(b)(10) to change 2500 gal AST (Equip ID ST 60, 1282) to (Equip ID ST 60, 1331-3)
- 05/09/2011 502(b)(10) to add 200 kW (330 bhP) diesel-fired emergency generator (Equip ID EG-P-9) & renumber emergency generator (Equip ID EG56, 595-1) to (Equip ID EG-P-10, 843-10)
- 07/05/2011 Notification of MACT JJJJJ applicability was received from the facility.
- 10/14/2011 502(b)(10) to add 450 kW (691 bhP) diesel-fired emergency generator (Equip ID EG60, EG1283) & to replace three, old diesel-fired emergency generators with like-kind units, 50 kW (85.8 bhP) emergency generator (Equip ID EG31); 250 kW, 297 bhP emergency generator (Equip ID EG39); & 300 kW, 445.9 bhP emergency generator (Equip ID EG43)
- 12/28/2011 502(b)(10) to renumber diesel-fired emergency generator (Equip ID EG60, EG1283) to (Equip ID EG64, EG1283)
- 05/14/2012 502(b)(10) to add a 100 kW (174.3 bhP) diesel-fired emergency generator (Equip ID EG65) & a 150 kW (335.1 bhP) diesel-fired emergency generator (Equip ID EG66 (Equip ID EG403)
- 07/25/2012 The BAQ granted exemption request for temporary vehicle maintenance (painting) activity.
- 08/20/2012 502(b)(10) to add a new, 100 kW (156.7 bhP) diesel-fired emergency generator (Equip ID EG67)
- 09/12/2012 The BAQ received start-up notification letter for temporary vehicle maintenance (painting) activity.
- 12/17/2012 502(b)(10) to add a new, natural-gas fired 0.500 MMBtu/hr domestic water heater (Equip ID WH2, WH3012) at Bldg 3012
- 01/04/2013 The BAQ granted extension for temporary vehicle maintenance (painting) activity.
- 01/10/2013 502(b)(10) to replace a 100 kW diesel-fired emergency generator ((Equip ID EG30) with a new 200 kW (324 bhP) diesel-fired emergency generator (Equip ID EG30/EG601)
- 02/14/2013 2nd extension granted for temporary vehicle maintenance (painting) activity (exempt)
- 03/07/2013 DHEC 2959 Facility Information Update form was received.
- 03/21/2013 Notification of cessation of operations at temporary maintenance painting activity (565)
- 05/20/2013 502(b)(10) to remove 0.35 MMBtu/hr natural gas-fired water heater (Equip ID FC11) from service & replace with an on-dem& electric unit
- 08/02/2013 502(b)(10) to add a 280 kW diesel-fired emergency generator (Equip ID EG69), 0.20 MMBtu/hr NG-fired domestic water heater (Equip ID WH-3), & infrared NG-fired space heaters, 0.20 MMBtu/hr each (Equip IDs IRH-1 to IRH-18)
- 08/28/2013 502(b)(10) to add a 3.0 MMBtu/hr NG-fired domestic water heater (Equip ID WH-4)
- 01/08/2014 The facility requested that Unit ID 01 be changed from Central Heating Plant to Combustion Units to provide a more accurate, overall description for the equipment in this location.

EMISSIONS

UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)					
Unit ID	Equip ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
01	E01	PM	0.0940	0.412	AP 42, 5 th ed., Vol. I, Table 3.2-2, 7/00 Update
		PM ₁₀	0.0324	0.1417	
		PM _{2.5}	0.0324	0.1417	
		SO ₂	0.0056	0.0244	AP 42, 5 th ed., Vol. I, Table 3.2-2, 7/00 Update
		NO _x	1.94	8.50	Vendor specifications, LEANOX
		CO	8.09	35.4	
		VOC	1.21	5.31	
		Acetaldehyde	0.079	0.347	
		Acrolein	0.048	0.213	AP 42, 5 th ed., Vol. I, Table 3.2-2, 7/00 Update
		Formaldehyde	0.501	2.19	
		Benzene	0.004	0.018	
		1,3-Butadiene	0.003	0.011	
		Ethylbenzene	1.04E-04	0.002	
		Methanol	0.024	0.104	



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UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)					
Unit ID	Equip ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
02	FC3	PM	0.0459	0.2009	AP 42, 5 th ed., Vol. I, Table 1.3-1, -2, -3, -7, 9/98 Update
		PM ₁₀	0.0252	0.1105	
		PM _{2.5}	0.0193	0.0844	
		SO ₂	1.7138	7.5066	AP 42, 5 th ed., Vol. I, Table 1.4-1, -2, 7/98 Update
		NO _x	0.4345	1.9031	
		CO	0.2678 (NG)	1.1731 (NG)	Emissions shown are worse case. Natural gas is designated NG; all others are for #2 fuel oil.
		VOC	0.0175 (NG)	0.0768 (NG)	
		Pb	0.0000	0.0000	
04	TS5	PM/PM ₁₀ /PM _{2.5}	3.02	3.14	Best Engineering Estimates
		SO ₂	0.38	0.39	
		NO _x	8.99	9.35	
		CO	12.95	13.47	
		VOC	3.64	3.78	
	TS6	PM/PM ₁₀ /PM _{2.5}	3.02	3.14	Best Engineering Estimates
		SO ₂	0.38	0.39	
		NO _x	8.99	9.35	
		CO	12.95	13.47	
		VOC	3.64	3.78	
	TS3	PM/PM ₁₀ /PM _{2.5}	3.02	3.14	Best Engineering Estimates
		SO ₂	0.38	0.39	
		NO _x	8.99	9.35	
		CO	12.95	13.47	
VOC		3.64	3.78		
05	CCF1	PM/PM ₁₀ /PM _{2.5}	0.045	0.073	Best Engineering Estimates (materials, use)
		VOC	10.43	10.43	
	CCF2	PM/PM ₁₀ /PM _{2.5}	0.045	0.073	Best Engineering Estimates (materials, use)
		VOC	10.43	10.43	

- Note: (1) This table reflects updated emissions through 08/29/2013.
 (2) Jet engine testing (Equip IDs TS3, TS5, & TS6) is the largest source of emissions at the site, however only one engine is tested at a time.
 (3) The testing locations are currently idle due to relocation of staff who conducts engine maintenance & testing.
 (4) Emissions from jet engine testing are based on MOBILE4 emission rates for the GE-404 engine at various power levels. Because engine test stands are used to evaluate engines at various power settings for specific time intervals before approving the engine for reinstallation into an aircraft, emissions from the engine test facilities were developed based on that test cycle & the various emissions for the different power levels (afterburner, intermediate run power, flight idle, & ground idle). In addition, to determine the PTE, the annual emissions were based on the maximum number of engines that could be tested in a week, then taken to a full year.
 (5) Emissions from painting operations are estimated using the characteristics of the coatings and estimated use for the painting activities. Because the emissions from the facility will largely be VOCs, the emissions are estimated from the total material consumption and the constituents in the coatings.

CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)					
Unit ID	Equip ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
05	CCF1	PM/PM ₁₀ /PM _{2.5}	0.00045	0.00073	Best engineering estimate (materials, use)
	CCF2	PM/PM ₁₀ /PM _{2.5}	0.00045	0.00073	Best engineering estimate (materials, use)

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	
	TPY	Controlled Emissions TPY
PM	168.3	N/A
PM ₁₀	167.9	N/A



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FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled Emissions
	TPY	TPY
PM _{2.5}	167.8	N/A
SO ₂	75.7	N/A
NO _x	1,137.5	N/A
CO	2,770.8	N/A
VOC	192.2	N/A
Acetaldehyde (H, T, V, 112(r))	0.348	N/A
Acrolein (H, T, V, 112(r))	0.214	N/A
Arsenic (H, T)	0.9E-04	N/A
Benzene (H, T, V)	2.99	N/A
Beryllium (H, T)	0.6E-04	N/A
1,3-Butadiene (H, T, V, 112(r))	4.72	N/A
Cadmium (H, T)	2.4E-04	N/A
Chromium (H)	0.013	N/A
Chromium-6 (H, T)	3.8E-06	N/A
Cobalt (H)	3.4E-04	N/A
Ethylbenzene (H, T, V)	0.271	N/A
Formaldehyde (H, T, V, 112(r))	2.227	N/A
HDI Monomer (H, T, V)	0.0166	N/A
Hexane (H, T, V)	0.087	N/A
Lead (H)	0.0043	N/A
Manganese (H)	3.1E-04	N/A
Mercury (H, T)	0.7E-04	N/A
Methanol (H, T, V)	0.104	N/A
Methyl Ethyl Ketone (T, V)	1.269	N/A
MIBK (H, T, V)	0.305	N/A
Naphthalene (H, T, V)	0.448	N/A
Nickel (H, T)	0.00380	N/A
Phenol (H, T, V)	0.231	N/A
POM (H, T, V)	8.9E-04	N/A
Selenium (H)	0.0189	N/A
Styrene (H, T, V)	0.346	N/A
Toluene (H, T, V)	1.374	N/A
Xylenes (H, T, V)	1.646	N/A
CO ₂	29,420	N/A
Methane	0.456	N/A
N ₂ O	0.437	N/A
Ethane	0.615	N/A
HAP (single greatest-1,3-Butadiene)	4.72	N/A
HAP (total)	13.27	N/A

Note: (a) N/A = Not Applicable
 (b) H=HAP, T=TAP, V=VOC
 (c) Facility-wide emissions include emissions from insignificant activities.

OPERATING PERMIT STATUS

The facility is major for PM₁₀, PM_{2.5}, NO_x, CO, & VOC & has submitted timely, appropriate Title V permit renewal applications.



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REGULATORY APPLICABILITY REVIEW

Regulation	Comments/Periodic Monitoring Requirements																						
Section II.E – Synthetic Minor	There are no synthetic minor limits established for the facility, therefore this regulation does not apply.																						
Standard No. 1	<p>Unit ID 01, Equip ID E01 engine is direct-fired, therefore not a fuel burning operation by definition. Unit ID 02, Equip ID FC3 boiler has opacity (Section I), PM (Section II), & SO₂ (Section III) limits imposed by this standard. The boiler was constructed after 02/11/1971.</p> <table border="1"> <thead> <tr> <th rowspan="2">Equip ID</th> <th rowspan="2">Opacity (%)</th> <th rowspan="2">PM Allowable (0.6 lb/10⁶ BTU) lb/hr</th> <th rowspan="2">SO₂ Allowable (3.5 lb/10⁶ BTU) lb/hr</th> <th colspan="2">Uncontrolled Emissions (lb/hr)</th> <th colspan="2">Controlled Emissions (lb/hr)</th> <th rowspan="2">Monitoring</th> </tr> <tr> <th>PM</th> <th>SO₂</th> <th>PM</th> <th>SO₂</th> </tr> </thead> <tbody> <tr> <td>FC3</td> <td>20</td> <td>2.01</td> <td>11.72</td> <td>0.05</td> <td>1.71</td> <td>N/A</td> <td>N/A</td> <td>Visual inspections required semiannually when burning fuel oil. No other monitoring is required when burning natural gas.</td> </tr> </tbody> </table>	Equip ID	Opacity (%)	PM Allowable (0.6 lb/10 ⁶ BTU) lb/hr	SO ₂ Allowable (3.5 lb/10 ⁶ BTU) lb/hr	Uncontrolled Emissions (lb/hr)		Controlled Emissions (lb/hr)		Monitoring	PM	SO ₂	PM	SO ₂	FC3	20	2.01	11.72	0.05	1.71	N/A	N/A	Visual inspections required semiannually when burning fuel oil. No other monitoring is required when burning natural gas.
Equip ID	Opacity (%)					PM Allowable (0.6 lb/10 ⁶ BTU) lb/hr	SO ₂ Allowable (3.5 lb/10 ⁶ BTU) lb/hr	Uncontrolled Emissions (lb/hr)			Controlled Emissions (lb/hr)		Monitoring										
		PM	SO ₂	PM	SO ₂																		
FC3	20	2.01	11.72	0.05	1.71	N/A	N/A	Visual inspections required semiannually when burning fuel oil. No other monitoring is required when burning natural gas.															
Standard No. 3 (state only)	This process does not contain waste combustion or reduction sources, therefore this regulation does not apply.																						
Standard No. 4	<p>Unit ID 01, Equip ID E01 engine & Unit ID 04, Equip IDs TS3, TS5, & TS6 facilities have opacity limits (including any fugitives) imposed by this standard. Unit ID 05, Equip IDs CCF1 & CCF2 facilities have opacity limits (including any fugitives) & Particulate Matter (PM) allowable emissions rates (based on a process weight rate in tons per hour) imposed by this standard.</p> <table border="1"> <thead> <tr> <th>Equip ID</th> <th>Opacity (%)</th> <th>PM Allowable (lb/hr)</th> <th>Process Weight Rate (tons/hr)</th> <th>Uncontrolled PM Emissions (lb/hr)</th> <th>Controlled PM Emissions (lb/hr)</th> <th>Monitoring</th> </tr> </thead> <tbody> <tr> <td>E01</td> <td>20</td> <td>N/A</td> <td>N/A</td> <td>0.0940</td> <td>N/A</td> <td>No monitoring is required since firing NG or LPG.</td> </tr> <tr> <td>TS3, TS5, TS6</td> <td>20</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>Visual inspection shall be performed semiannually. Reports shall be submitted semiannually.</td> </tr> </tbody> </table>	Equip ID	Opacity (%)	PM Allowable (lb/hr)	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Controlled PM Emissions (lb/hr)	Monitoring	E01	20	N/A	N/A	0.0940	N/A	No monitoring is required since firing NG or LPG.	TS3, TS5, TS6	20	N/A	N/A	N/A	N/A	Visual inspection shall be performed semiannually. Reports shall be submitted semiannually.	
Equip ID	Opacity (%)	PM Allowable (lb/hr)	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Controlled PM Emissions (lb/hr)	Monitoring																	
E01	20	N/A	N/A	0.0940	N/A	No monitoring is required since firing NG or LPG.																	
TS3, TS5, TS6	20	N/A	N/A	N/A	N/A	Visual inspection shall be performed semiannually. Reports shall be submitted semiannually.																	



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Regulation	Comments/Periodic Monitoring Requirements						
	CCF1, CCF2	20	22.3	12.5	0.09, combined	0.0009, combined	Visual inspection shall be performed daily & dry filters installed when operating. Records shall be kept onsite.
Standard No. 5	None of the processes which are regulated by this standard apply.						
Standard No. 5.1 (state only)	The facility was built before 07/01/1979 (built 1943, USMC 1956). The facility's baseline VOC emissions are 109.78 TPY (according to Statement of Basis dated 12/28/2005), current actual VOC emissions, & current PTE VOC emissions are 9.3 TPY (from routine emission inventory record) & 192.2 TPY, respectively. The facility's limit is the baseline + 100 TPY. The facility is not subject to BACT/LAER at this time.						
Standard No. 5.2	<p>Unit ID 01, Equip ID E01 engine is a stationary source constructed after 06/25/2004 that emits or has the potential to emit NO_x generated from fuel combustion. As a result, the engine has control technology &/or emission limit imposed by this standard. The engine is subject to the limitation of 1.0 gm/bhp-hr for NO_x, which is more stringent than the limitation in NSPS Subpart JJJJ.</p> <p>Unit ID 02, Equip ID FC3 boiler was permitted to construct before 06/25/2004 & none of the burners have been replaced. Therefore, this source is not subject to this regulation.</p>						
Standard No. 7	<p>The PSD major source threshold limit for this facility is 250 TPY. Since this facility has the potential to emit more than 250 TPY of CO & NO_x, it is an existing major source subject to the provisions of this regulation.</p> <p>The test facilities (Equip IDs TS3, TS5, & TS6) are the major source category (in terms of emissions), but were either installed before 1977 or have been replaced with like-for-like or smaller size units. Additionally, two (2) 50.5 MMBtu/hr boilers, which contributed to the major status, have since been removed. The most recent major construction projects below have not triggered a PSD review.</p> <ul style="list-style-type: none"> ▪ Construction of the new, enclosed T-10 test cell (Equip ID TS5) in 2001 replaced the enclosed, T-6 jet engine test cell (Equip ID TS2). The T-6 facility was built in the mid-1960s & is now demolished. ▪ The acoustical enclosure/hush house (Equip ID TS6) was constructed in 2005 & replaced an open test stand (Equip ID TS4). The hush house is used to test jet engines mounted in an operational aircraft. This project was deemed exempt from permitting but with stipulation, since an operational aircraft is considered to be a mobile source. Equip ID TS3 test stand was moved inside the hush house for the purpose of noise abatement, thus rendering it an enclosed test cell. Reference BAQ letters dated 06/23/2003 & 07/25/2005. ▪ The natural gas-fired RICE (Equip ID E01) was constructed in 2009 to replace the Microturbine Plant (15 each, Equip ID FC24). Reference CP -CM. <p>In summary, there have been no new construction projects over the last 15 to 20 years that would constitute a major modification under PSD regulations. Any future major modifications or construction projects shall continue to be reviewed for potential PSD applicability.</p>						
61-62.6	This facility does not have fugitive PM (dust) emissions, therefore this regulation does not apply.						
40 CFR 60 and 61-62.60	Unit ID 01, Equipment ID E01 NG/LPG-Fired Engine is an existing affected source subject to Subpart A General Provisions & Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal						



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Regulation	Comments/Periodic Monitoring Requirements
	<p>Combustion Engines.</p> <p>The newly installed emergency power generators (IAs) are existing affected sources subject to NSPS Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.</p> <p>These sources are not subject to any NSPS regulations.</p> <ul style="list-style-type: none"> ▪ All of the boilers are not subject to Subparts D, Da, Db Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units based on construction dates (prior to 1989) & heat input rates (smaller than 10 MMBtu/hr). ▪ All of the tanks are not subject to any NSPS Subparts based on installation dates (prior to the effective date), capacity (less than 10, 000 gallons), or vapor pressure of the stored liquid. ▪ Boiler IA-FC 4 is not subject to any NSPS subparts based on heat input rate.
40 CFR 61 and 61-62.61	This facility does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride), therefore these regulations do not apply.
40 CFR 63 and 61-62.63	<p>The facility is a minor source for HAPs & contains emission sources that are subject to area source MACT standards.</p> <ul style="list-style-type: none"> • The boilers (Equip IDs FC3, IA-FC4, & IA-FC9) fire something other than gaseous fuels, using No. 2 oil (low-sulfur) as back-up fuel only. No. 2 fuel oil is only used when natural gas is curtailed or there is a gas supply emergency. Therefore, the boilers are defined as gas-fired units (40 CFR §63.11237) & are not subject to Subpart JJJJJ NESHAP for Industrial, Commercial, & Institutional Boilers Area Sources. • The facility has numerous diesel-fired engines & emergency generators that are existing affected sources subject to Subpart A & Subpart ZZZZ NESHAP For Stationary Reciprocating Internal Combustion Engines. The smaller generators are exempt from permitting based on size; the larger ones are exempt from permitting based on total operating hours & emissions. Units that require replacement are changed out as an entire unit (engine & generator).
61-62.68	The facility does not store or use chemicals subject to 112(r) above the threshold quantities), therefore this regulation does not apply.
40 CFR 64	The process PTE exceeds Title V threshold limit of 100 TPY criteria pollutants, but the process does not have control equipment associated with it.
Other	The Mandatory Greenhouse Gas Reporting Rule (40 CFR 98) requires monitoring & reporting of annual greenhouse gas (GHG) emissions from large GHG emitters & suppliers. This facility is subject to Subpart A General Provision & Subpart C General Stationary Fuel Combustion Sources of this regulation. The total actual emissions from the boilers & heaters are less than 25,000 TPY, so there is no GHG reporting required.

MODELING REVIEW

Regulation	Comments/Periodic Monitoring Requirements
Standard No. 2	The facility has demonstrated compliance through modeling; see Modeling Summary dated 10/04/2013. No operational restriction has been established to ensure compliance with modeled emission rates.
Standard No. 7.c	The facility has demonstrated compliance through modeling for the PSD Class II increments; see Modeling Summary dated 10/04/2013. No operational restriction has been established to ensure compliance with modeled emission rates.
Standard No. 8 (state only)	This facility has demonstrated compliance through modeling for all TAPs; see the Modeling Summary



STATEMENT OF BASIS
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 BAQ Engineering Services Division

Company Name:	Marine Corps Air Station (MCAS) Beaufort	Permit Writer:	Wanda Parnell
Permit Number:	TV-0360-0004	Date:	March 25, 2014

Regulation	Comments/Periodic Monitoring Requirements
	dated 10/04/2013.

PUBLIC NOTICE

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II(N). This permit was placed in the *Beaufort Gazette* newspaper on January 28, 2014. The comment period was open from January 28, 2014 to February 26, 2014 and was placed on the BAQ website during that time period. Comments were received during the comment period and are being address in the Respose to Comment document.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.