

**EASTERN KERN AIR POLLUTION CONTROL DISTRICT
TECHNICAL SUPPORT DOCUMENT FOR
Edwards Air Force Base
2015 TITLE V PERMIT RENEWAL NO: 9002-V-2000-1**

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APPLICATION RECEIVED FROM:	Edwards Air Force Base 412th Civil Engineer Group Environmental Management Division, Compliance Branch 120 N. Rosamond Boulevard Edwards Air Force Base CA 93524
PLANT SITE LOCATION:	Approximately 21 miles north east of the City of Lancaster and approximately 63 miles north east of the City of Los Angeles
SECTION/TOWNSHIP/RANGE:	S36/T10N/R10W
APPLICATION PROCESSED BY:	Jeremiah Cravens, Senior AQS
APPLICATION REVIEWED BY:	Glen Stephens, Air Pollution Control Officer
NATURE OF BUSINESS:	United States Air Force
SIC Code:	9711
RESPONSIBLE OFFICIAL:	Herbert W. Roraback, NH-III
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I. INTRODUCTION

This Technical Support Document (TSD) pertains to the Edwards Air Force Base (EAFB) Title V renewal of Permit No. 9002-V-2000-1. EAFB is located approximately 21 miles north east of the City of Lancaster and approximately 63 miles north east of the City of Los Angeles (Figure 1.).

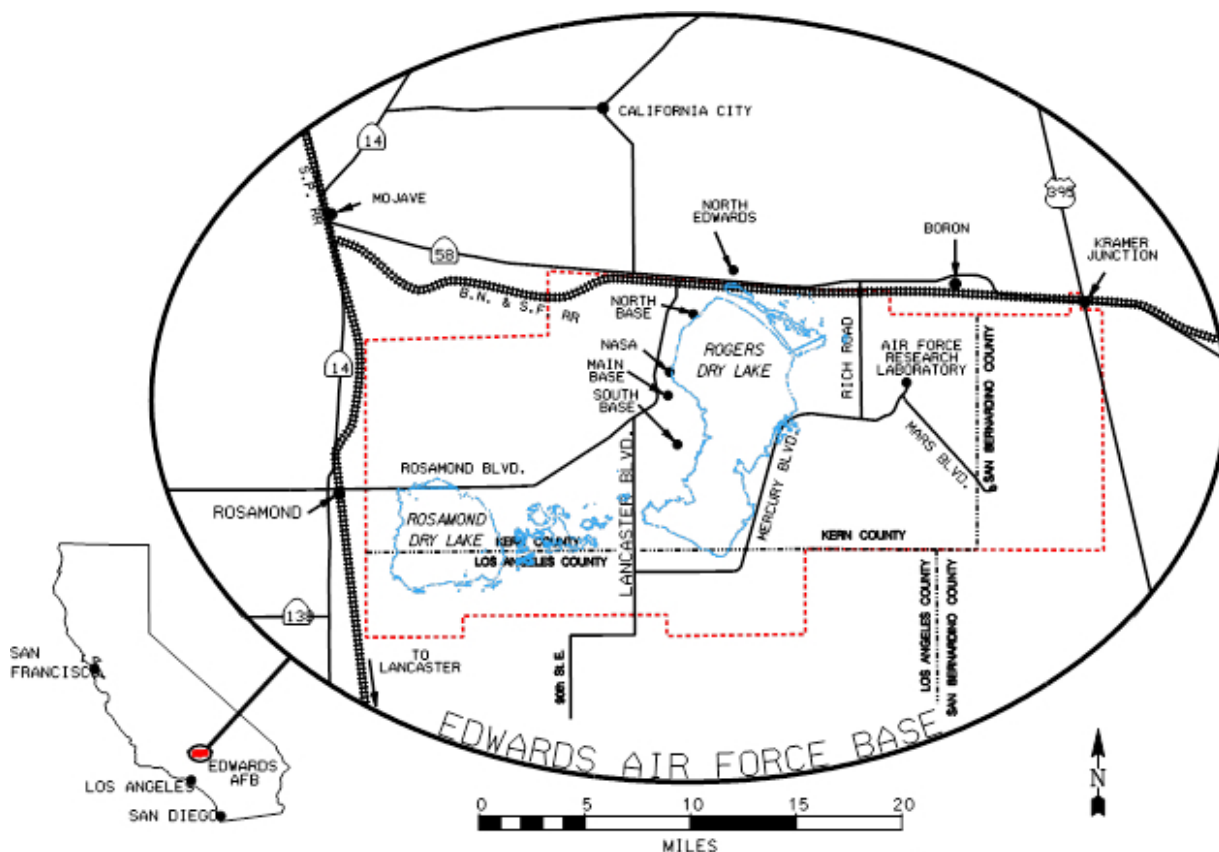
Renewal of Permit No. 9002-V-2000-1 will allow EAFB to continue their day-to-day operations pursuant to the requirements of Eastern Kern Air Pollution Control District's (District) Rule 201.1, Permits to Operate for Sources Subject to Title V of the Federal Clean Air Act Amendments of 1990 (Title V).

Attainment Classification

EAFB is located in an area of the District designated Attainment for the 1997, 8-hour Ozone NAAQS but Nonattainment/Marginal for the 2008, 8-hour Ozone NAAQS. The major source threshold is 50 tons per year for VOCs and NO_x (as ozone precursors in an area formerly designated as a serious 1-hour Ozone nonattainment area). The District is designated attainment or unclassifiable for the NAAQS for the pollutants NO₂, SO₂, CO, PM₁₀, PM_{2.5}, and lead, these major source thresholds are 100 tons per year.

II. FACILITY LOCATION

412th Civil Engineer Group, Environmental Management Division, Compliance Branch
120 N. Rosamond Boulevard, Edwards Air Force Base CA 93524



III. **BACKGROUND**

Pursuant to District Rule 201.1, a Federal Part 70 Permit Renewal was initially issued to EAFB in 2001. EAFB applied for a Title V Permit renewal in 2005 and the District issued the first Title V Permit renewal in 2008. EAFB applied for a second Title V Permit renewal in 2013. Historically EAFB Title V permit was divided into ten (10) groups. For the current Title V permit renewal, EAFB is divided amongst two (2) base operations; 412th Test Wing (412 TW) and Air Force Research Laboratory (AFRL). EAFB Title V permit has also been updated to include all applicable NSPS and NESHAPs delegated to the District, along with inclusion of Greenhouse Gas (GHG) provisions.

On June 5, 2014, the District submitted copies of the proposed draft renewal permits (412 TW) and (AFRL) to EAFB for a 45-day review in accordance with 40 CFR 70.8(c), and District Rule 201.1. EAFB had substantial comments and wanted to meet with District staff. A meeting finally occurred in December 2014. At the meeting EAFB proposed a plan of disaggregation of the base and major revision of the Title V permit. The District agreed to allow EAFB a few months to put together a disaggregation proposal. Approximately six months passed without receiving a disaggregation proposal so the District informed EAFB that the renewal permit would be issued. EAFB was allowed a second 45-day review period beginning in June 2015. Upon completion of review, EAFB had comments indicating that some equipment unit operating permits had been cancelled, revised, or were newly permitted. District staff revised the draft Title V permit renewals to include the most current versions of the equipment unit operating permits.

EAFB has been operating under an application shield during the past two years because they submitted their Title V permit renewal application in a timely manner. This has allowed the facility to operate without violating their Title V permit.

App. Rec.:	01/25/2013	
60-Days:	03/25/2013	
Req. Info. (Deem Incomplete):	03/27/2013	
Deemed Complete:	05/22/2013	
Current Title V Permit Expiration:	07/29/2013	Under Application Shield
Initial Facility 45-Day Review:	Start: 06/05/2014	End: 07/20/2014
Second Facility 45-Day Review:	Start: 06/10/2015	End: 07/25/2015
30 Day Public Notice:	Start: 10/9/2015	End: 11/9/2015
EPA 45-Day Review:	Start: 10/9/2015	End: 11/23/2015

IV. **FACILITY DESCRIPTION**

EAFB is now home to the 412th Test Wing (412 TW). A recent Air Force reorganization consolidated both the 95th Air Base Wing (ABW) and the 412 TW into one organization. The 412 TW provides direction for day-to-day base operations and supports more than 10,000 military, federal civilian, and contractor personnel on base. The 412 TW mission is to plan, conduct, analyze, and report on all flight and ground testing of aircraft, weapons systems, software and components and modeling and simulation for the United States Air Force (USAF). There are several Associate Units that operate at EAFB. One significant operation at the Base is the Air Force Research Laboratory (AFRL) whose mission is to discover, develop, and integrate warfighting technologies for the nation's air, space and cyberspace forces.

A. PREVIOUS TITLE V FUNCTIONAL GROUPING

For the purpose of Title V implementation, the District established 10 groups for EAFB 2006 Title V permit renewal that were based on organizational control, function, and geographic distribution. Table 1 presents that grouping.

Table 1 Title V Functional Grouping

Title V Group #	Organization	Organizational Symbols
1	Maintenance	412 MXS/LGMP, 412 MXS/MXMFC, 412 MXS/MXMA, 452 FLTS (ABL UEC),
2	South Base	95 MSG/LGRF, 95 ABW/CETE, Northrop Grumman, 452 FLTS (ABL UEC), 412 AMXS/MXAB,
3	Phillips Laboratory (now Air Force Research Laboratory)	95 ABW/CETL, AFRL/PRSX, 95 ABW/CEC, AFRL/SVRDR, AFRL/PRSO, AFRL/ADS, AFRL/ERCRS, AFRL/PROF, AFRL/PRSM, AFRL/PRSX,
5	Civil Engineering	412 TW/ENRO, 412 TW/EWW, 95 ABW/CED, 95 ABW/CETE, 95 ABW/CETS, 95 MSG/SVFS, TORRES BROS, Urban Logic Services
6	Hospital	95 ABW/CETE
7	Supply/Transportation	95 MSG/LGRF, 95 CETS/SSO
8	Contract Management	95 MSG/SVRG, Desert Haven, FAA, General Electric, Pratt & Whitney
9	North Base/Technical Support	411 FLTS/YFT, 412 TW/DRP (ATSO), 412 TW/ENRO, 413 FLTS/DTF, 95 ABW/CETE
10	Communications Squadron	95 MSG/SVRA, 95 ABW/CETE

* Note: Group 4 (Army) is not under the control of the Air Force and no longer in operation.

B. NEW TITLE V PERMIT STRUCTURE

This Title V Permit Renewal aligns the structure of the permit to reflect current operations and anticipated operations at the installation. The primary organization located at EAFB is the 412 TW. AFRL can be considered an Associate Unit, but is also a significant operation at the installation. This Title V permit consolidates emission sources from the former 95th Air Base Wing (ABW) and 412 TW into one permit and addresses AFRL operations into its own Title V permit. The District agreed to issue the Title V permit for two groups within EAFB based on EAFB request and discussions between both parties on August 29, 2011 and October 4, 2011. Even though the Title V permit is broken into two distinct groups (412 TW and AFRL), Title V applicability will still be determined fence line to fence line. This reflects the USAF recent reorganizations with the most recent consolidating the 95th ABW and the 412 TW into the 412 TW. Permitted emission units were consolidated into specific groups (e.g., internal combustion engines, external combustion units, etc.) and sequentially arranged in order to streamline the permit.

V. POTENTIAL EMISSIONS

A. 412 TW POTENTIAL EMISSIONS

Table 2

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions:	105.66	179.42	6,474.01	2,350.13	6,060.00

Table 3

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	367,793	442.438	2.94	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	367,793	9,291.2	911.4	N/A	N/A	N/A	377,995.6

Reported for year 2012

GHGs in Table 2 are PTE for year 2012. Actual CO₂e (including landfill emissions) were 29,000.2 metric tons.

B. AFRL POTENTIAL EMISSIONS

Table 4

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions:	13.12	7.62	75.88	10.58	118.71

Table 5

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	106,726	2.6	0.09	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	106,726	54.6	27.9	N/A	N/A	N/A	106,808.5

Reported for year 2012

GHGs in Table 4 are PTE for year 2012. Actual CO₂e was 2,217 metric tons.

Greenhouse Gases:

Carbon dioxide (CO₂), Nitrous oxide (N₂O), Methane (CH₄), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), and Sulfur Hexafluoride (SF₆).

*Global Warming Potential (GWP): The capacity to heat the atmosphere, calculated as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram (kg) of a substance relative to that of 1 kg of CO₂. GWP shall be calculated according to the factors for a 100-year time horizon, as stated in 40 CFR Part 98 Subpart A Table A-1 (Global Warming Potentials).

**GWP varies based on each pollutant.

VI. EQUIPMENT LISTING

A. 412 TW

<u>Unit No.</u>	<u>Description of Source</u>
0127032	Enclosed Sanding Operation
0127033	Abrasive Blasting Operation
0127185	Plastic Media Blast Cabinet
0127297	Abrasive Blast System
0127300	Abrasive Blasting Cabinet
0127301	Abrasive Blasting Cabinet
0129099	Chain Driven Char Broiler
0131020	Permit Exempt Subpart DDDDD Package Boilers
0144002	Boiler, Natural Gas, 5.3 MMBtu/hr
0126005	Gasoline Storage & Dispensing System
0126006	Gasoline Storage & Dispensing System
0126025	Gasoline Bulk Loading Facility
0126030	E85 Gasoline Storage & Dispensing Facility
0126031	Aviation Fuel Storage Tank and Pump Skid
0132004	Gasoline Storage & Dispensing System
0132005	Gasoline Storage & Dispensing System
0126032	Gasoline Storage & Dispensing System
0139019	Gasoline Storage & Dispensing System
0141003	Aviation Fuel Storage & Dispensing System
0144010	Gasoline Storage & Dispensing System
0129008	Emergency Use Piston Engine with Generator, Diesel, 61 BHP
0129009	Emergency Use Piston Engine with Hangar Deluge Pump #1, Diesel, 400 BHP
0129010	Emergency Use Piston Engine with Hangar Deluge Pump #2, Diesel, 400 BHP
0129014	Emergency Use Piston Engine with Generator, Diesel, 685 BHP
0129018	Emergency Generator, Diesel, 275 Bhp
0129019	Emergency Use Piston Engine with Water Pump #4, Diesel, 266 BHP
0129020	Emergency Use Piston Engine with Water Pump #3, Diesel, 266 BHP
0129021	Emergency Use Piston Engine with Water Pump #2, Diesel, 266 BHP
0129022	Emergency Use Piston Engine with Water Pump #1, Diesel, 266 BHP
0129027	Emergency Use Piston Engine with Generator, Diesel, 465 BHP
0129028	Emergency Use Piston Engine with Generator, Diesel, 390 BHP
0129034	Emergency Use Piston Engine with Generator, Diesel, 227 HP
0129036	Emergency Use Piston Engine with Generator, Diesel, 160 HP
0129046	Emergency Use Piston Engine with Generator, Diesel, 380 BHP
0129047	Emergency Use Piston Engine with Generator, Diesel, 166 BHP
0129048	Emergency Use Piston Engine with Generator, Diesel, 135 BHP
0129049	Emergency Use Piston Engine with Generator, Turbo, Diesel, 277 BHP
0129053	Emergency Use Piston Engine with Generator, Diesel, 1,041 BHP
0129055	Emergency Use Piston Engine with Generator, Diesel, 102 BHP
0129067	Emergency Use Piston Engine with Firewater Pump #1, Diesel, 801 BHP
0129068	Emergency Use Piston Engine with Firewater Pump #2, Diesel, 801 BHP
0129069	Emergency Use Piston Engine with Generator, Diesel #3, 801 BHP
0129070	Emergency Use Piston Engine with Generator, Diesel, 390 BHP
0129071	Emergency Use Piston Engine with Generator, Diesel, 207 BHP

<u>Unit No.</u>	<u>Description of Source</u>
0129080	Emergency Use Piston Engine with Generator, Diesel, 475 BHP
0129085	Emergency Use Piston Engine with Generator, Diesel, 1,135 BHP
0129087	Emergency Use Piston Engine with Generator, Diesel, 68 BHP
0129089	Emergency Use Piston Engine with Generator, Diesel, 102 BHP
0129090	IC Generator, Turbo Charged (Emergency), Diesel, 170 BHP
0129091	IC Emergency Generator Set, Diesel, 765 BHP
0129092	IC Emergency Generator Set, Diesel, 765 BHP
0129093	Emergency Use Piston Engine with Generator, Diesel, 207 BHP
0129094	Emergency Generator Driven By 170 BHP Diesel Piston Engine
0129095	Emergency Generator Driven By 382 BHP Piston Engine
0129096	Emergency Use Piston Engine with Generator, Diesel, 208 BHP
0129097	Emergency Use Piston Engine with Generator, Diesel, 755 BHP
0129098	Emergency Use Piston Engine with Generator, Diesel, 170 BHP
0129100	Emergency Use Piston Engine with Generator, Diesel
0129101	Emergency Use Piston Engine with Generator, Diesel
0129102	Emergency Use Piston Engine with Generator, Diesel
0129103	Emergency Use Piston Engine with Generator, Diesel
0129104	Emergency Use Piston Engine with Generator, Diesel
0129105	Emergency Use Piston Engine with Generator, Diesel
0129107	Emergency Use Engine, Firewater Pump, Diesel, 71 BHP
0129108	IC Generator, Emergency Use, Diesel, 2937 BHP
0129109	Emergency Use Piston Engine with Generator, Diesel, 591 BHP
0129110	Emergency Use Piston Engine with Generator, Diesel, 158 BHP
0129112	Emergency Use Piston Engine with Generator, Diesel, 65 BHP
0129121	Emergency Use Piston Engine with Generator, Diesel, 385 BHP
0130011	Emergency Use Piston Engine with Generator, Diesel, 170 BHP
0130012	Emergency Use Piston Engine with Firewater Pump, Diesel, 105 BHP
0130013	Emergency Use Piston Engine with Generator, Diesel, 535 BHP
0130014	Emergency Use Piston Engine with Generator, Diesel, 103 BHP
0132006	Emergency Use Piston Engine with Generator #1, Diesel, 1,482 BHP
0132007	Emergency Use Piston Engine with Generator #2, Diesel, 1,482 BHP
0132047	Emergency Use Piston Engine with Firewater Pump #1, Diesel, 420 BHP
0132050	Emergency Use Piston Engine with Firewater Pump #3, Diesel, 420 BHP
0132051	Emergency Use Piston Engine with Firewater Pump #5, Diesel, 420 BHP
0132052	Emergency Use Piston Engine with Firewater Pump #2, Diesel, 420 BHP
0132056	Emergency Use Piston Engine with Firewater Pump #4, Diesel, 420 BHP
0132104	Emergency Use Piston Engine with Generator, Diesel, 207 BHP
0132105	Emergency Use Piston Engine with Generator, Diesel, 470 BHP
0132108	Emergency Use Piston Engine with Generator, Diesel, 2937 BHP
0129113	Emergency Use Piston Engine with Generator, Diesel, 900 BHP
0129114	Emergency Use Piston Engine with Generator, Diesel, 184 BHP
0129115	Emergency Use Piston Engine with Generator, Diesel, 440 BHP
0129117	Emergency Use Piston Engine with Generator, Diesel, 102 BHP
0135016	Emergency Use Piston Engine with Firewater Pump, Diesel, 55 BHP
0140018	Emergency Use Piston Engine with Generator
0140019	Emergency Use Piston Engine with Generator

<u>Unit No.</u>	<u>Description of Source</u>
0141004	Piston Engine with Emergency Use Generator, Diesel, 56 BHP
0141005	Piston Engine with Generator, Diesel, 56 BHP
0132092	Piston Engine with Welder, Unleaded, 58 BHP
0129076	Emergency Use Piston Engine with Generator, Natural Gas, 126 BHP
0129077	Emergency Use Piston Engine with Generator, Natural Gas, 164 BHP
0129078	Emergency Use Piston Engine with Generator, Natural Gas, 126 BHP
0138060	Emergency Use Piston Engine with Generator, Natural Gas, 383 BHP
0138061	Emergency Use Generator with Natural Gas Engine
0138062	Emergency Use Generator with Natural Gas Engine
0127016	Jet Engine Test Cell
0127017	Jet Engine Test Cell
0127018	Jet Engine Test Cell
0127019	Jet Engine Test Cell
0137006	Jet Engine Test Cell
0147002	Jet Engine Test Stand
0147006	Jet Engine Test Stand
0137007	Start Cart Powered by Gas Turbine Engine, JP-8, 160 Bhp
0137008	Start Cart Powered by Gas Turbine Engine, JP-8, 160 Bhp
0147048	Start Cart Powered by Gas Turbine Engine, JP-8, 160 Bhp
0131017	Trommel Screen
0131019	Municipal Class III Sanitary Landfill
0131015	Open Burn/Open Detonation Operation
0132094	Paper Shredder, Electric
0132095	Paper Shredder, Electric
0139022	Rocket Motor Setup and Testing
0127028	Paint Spray Booth
0127187	Hangar Paint Spray Insert (Aircraft Stripping/Spray Booth)
0127188	Paint Spray Booths (two)
0127189	Surface Coating Operation
0132107	Surface Coating Operation With Paint Spray Booth
0127027	Outside Aircraft Painting Operation
0127289	Electric Oven for Curing Painted Parts
0127299	Outside Aircraft Painting Operation
0132013	Aircraft Paint Spray Operation
0132014	Aircraft Paint Spray Operation
0138057	Unconfined Surface Coating Operation
0138063	Unconfined Surface Coating Operation
0129106	Downdraft Dust Collector Table
0129111	Woodworking Operation
0131013	Woodworking Operation
0133006	Woodworking Operation
0141006	Woodworking Operation
0127287	Wood & Plastics Working Operation
0127290	Downdraft Dust Collector Table
0132016	Grinding/Milling Operation
0129118	Woodworking Operation

B. AFRL

<u>Unit No.</u>	<u>Description of Source</u>
0134095	Satellite Propulsion Complex
0134096	Propellant Laboratory
0134097	Solid Propellant Component Complex
0134098	Space Environment Propulsion Complex
0134099	Chemical Handling & Disposal Research Facility
0134102	Propulsion Sciences Laboratory
0134103	Carbon Research Laboratory
0134104	PL Area 1-100 Open Burn/Open Detonation (OB/OD) Operation
0134106	Rocket Nozzle Construction Operation
0134107	Rocket Motor Behavior Complex
0134108	Rocket Propellant Preparation Laboratory
0134109	Rocket Propellant Storability Complex
0134115	Carbon Densification Process
0134120	Test Cell 27
0134125	Chemical Mix Room
0134126	Composite Unloading and Machining Operation
0134128	Composite Plate Operation
0134131	Ceramic Polymer Processing
0134132	Separate Area 1-20 Into Different Areas, 1-30-A and 1-30B
0134134	Experimental Furnace
0134050	Steam Generator #2
0134051	Steam Generator #1
0134065	Steam Generator #4
0134066	Steam Generator #1
0134067	Steam Generator #2
0134068	Steam Generator #3
0134070	Steam Generator #101
0134071	Steam Generator #103
0134072	Steam Generator #102
0134075	Propane Vaporizer
0134053	Emergency Use Piston Engine with Generator
0134054	Emergency Use Piston Engine with Generator
0134055	Emergency Use Piston Engine with Firewater Pump
0134079	Emergency Use Piston Engine with Generator
0134086	Rocket Test Stand 1-A
0134087	Rocket Test Stand 2-A
0134088	Rocket Test Stand 1-B
0134089	Rocket Test Stand 1-C
0134090	Rocket Test Stand 1-D
0134091	Rocket Test Stand 1-E
0134133	Rocket Engine Testing Operation

VII. **APPLICABLE FEDERAL REQUIREMENTS**

Sources are subject to the most recently Board approved version of an adopted rule. Most of the rules this facility is subject to are part of the State Implementation Plan (SIP) and a few are considered “local only” meaning that it is not part of the SIP. In some instances a current rule will differ from those in the SIP due to a revision. This is called a SIP gap and happens when EPA has not yet acted on a SIP submittal.

Enforcement of a rule awaiting SIP approval should guarantee compliance with its SIP approved counterpart. This is because the pending rule will be at least as stringent as the SIP rule. The table below lists all rules and regulations this facility is subject to. SIP approved rules list their approval date along with current revision date (if applicable), thus making them federally enforceable.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 107	<u>Inspections</u> Inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations, including authority to require record keeping and to make inspections and conduct tests of air pollution sources.
Rule 108 SIP Approved 2004	<u>Stack Monitoring</u> Upon the request of and as directed by the Control Officer, the owner shall provide, install, and operate continuous monitoring equipment on such operations as directed. The owner shall maintain, calibrate, and repair the equipment and shall keep the equipment operating at design capabilities
Rule 108.1 SIP Approved 2001	<u>Source Sampling</u> Upon the request of the Control Officer and as directed by him the owner of any source operation which emits or may emit air contaminants, for which emission limits have been established, shall provide the necessary and proper facilities for source sampling. The applicable test method, if not specified in the rule, shall be conducted in accordance with Title 40 CFR, Subpart 60, Appendix A - Reference Methods, except particulate matter (PM ₁₀) for compliance with Rule 210.1 requirements shall be conducted in accordance with Title 40 CFR, Subpart 51, Appendix M, Method 201 or 201A. Where no test method exists in the preceding references for a source type source sampling shall be conducted in accordance with California Air Resources Board (CARB) approved methods.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 111 SIP Approved (1980) Revised 1996	<u>Equipment Breakdown</u> An occurrence which constitutes a breakdown condition, and which persists only until the end of the production run or 24-hours, whichever is sooner (except for continuous monitoring equipment, for which the period shall be ninety-six (96) hours), shall constitute a violation of any applicable emission limitation or restriction prescribed by these Rules and Regulations; however, no enforcement action may be taken provided the owner or operator demonstrates to the Control Officer that a breakdown condition exists and the proper requirements are met.
Rule 114 SIP Approved 1999	<u>Severability</u> If any provision, clause, sentence, paragraph, section or part of these Regulations or application thereof to any person or circumstance shall for any reason be adjudged by a court of competent jurisdiction to be unconstitutional or invalid, such judgment shall not affect or invalidate the remainder of this Regulation and the application of such provision to other persons or circumstances, but shall be confined in its operation to the provision, clause, sentence, paragraph, section or part thereof directly involved in the controversy in which such judgment shall have been rendered and to the person or circumstance involved, and it is hereby declared to be the intent of the Eastern Kern Air Pollution Control Board that these Regulations would have been issued in any case had such invalid provision or provisions not been included.
Rule 201.1 Title V Rule Revised 2012	<u>Applicability of Federally Enforceable Conditions</u> Federally Enforceable Conditions <u>do not apply</u> to the following permit sections: Equipment Descriptions, and any Design Conditions, Operational Conditions, Special Conditions, or Compliance Testing Requirements designated as District only. Federally Enforceable Conditions <u>shall apply</u> to Design Conditions, Operational Conditions, Special Conditions, Compliance Testing Requirements, and Emission Limits except as noted above.
Rule 201.1	<u>Permit Life</u> The life of this permit shall be five years from the date of issuance.
Rule 201.1	<u>Administrative Permit Amendment and Minor Permit Modification</u> Administrative Permit Amendment and Minor Permit Modification are those actions taken by the District as defined in Rule 201.1.

Rule No.
Rule 201.1

Rule Title and Description Conditions
Compliance with Permit Conditions

- A. EAFB shall comply with all permit conditions;
- B. Permit does not convey any property rights or any exclusive privilege;
- C. Non-compliance with any permit condition shall be grounds for permit termination, revocation and reissuance, modification, enforcement action or denial of permit renewal;
- D. EAFB shall not use "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition;
- E. Pending permit action or notification of anticipated non-compliance does not stay any permit condition; and
- F. Within a reasonable time period, EAFB shall furnish any information requested by the APCO, in writing, for purpose of determining: 1) compliance with the permit, or 2) whether or not cause exists for a permit or enforcement action

Rule 201.1

Emergency Provisions

- A. EAFB shall comply with the requirements of Rule 111 and the emergency provisions contained in all permit streamlining requirements imposed in accordance with Subsection VI.J. all District-only rules which apply in accordance with Subsection VI.K.1. and all applicable federal requirements not subsumed by such permit streamlining requirement(s) or District-only rules;
- B. Within two weeks of an emergency event, an owner or operator of the source shall submit to the District a properly signed, contemporaneous log or other relevant evidence which demonstrates that:
 - 1) An emergency occurred;
 - 2) The permittee can identify the cause(s) of the emergency;
 - 3) The facility was being properly operated at the time of the emergency;
 - 4) All steps were taken to minimize the emissions resulting from the emergency; and
 - 5) Within two working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigating or corrective actions taken;
- C. In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred.

Rule No.
Rule 201.1

Rule Title and Description Conditions
Record Keeping

- A. Recording of maintenance of all monitoring and support information associated with all permit streamlining requirements imposed in accordance with Rule 201.1, Subsection VI.J., all District-only rules which apply in accordance with Rule 201.1, Subsection VI.K.1., and all applicable federal requirements not submitted by such permit streamlining requirement(s) or District-only rules, including:
 - 1) Date, place, and time of sampling;
 - 2) Operating conditions at time of sampling;
 - 3) Date, place, and method of analysis; and
 - 4) Results of analysis;
- B. Retention of records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application; and
- C. Any other record keeping deemed necessary by the APCO to ensure compliance with all permit streamlining requirements imposed in accordance with Rule 201.1, Subsection VI.J., all District-only rules which apply in accordance with Rule 201.1, Subsection VI.K.1., and all applicable federal requirements not subsumed by such permit streamlining requirement(s) or District-only rules.

Rule 201.1

Referencing of District and Applicable Requirements

Pursuant to Rule 201.1.VII.C. District hereby references the following documents which are clearly identified and available to the District and to the public:

- A. Plant modernization project; and
- B. Each Authority to Construct file for new equipment and each Authority to Construct file to modify existing equipment.

These files contain title, document number, applicant, and date received. Also included in these files are rule citations, engineering evaluations, and final documents all related to the existing permit conditions and emissions limits set forth in this permit.

Rule No.
Rule 201.1

Rule Title and Description Conditions
Reporting

- A. Any non-conformance with permit requirements, including any attributable to emergency conditions (as defined in Rule 201.1) shall be promptly reported to the APCO and in accordance with Rule 111;
- B. Monitoring report shall be submitted at least every six months identifying any non-conformance with permit requirements, including any previously reported to the APCO;
- C. All reports of non-conformance with permit requirements shall include probable cause of non-conformance and any preventative or corrective action taken;
- D. Progress report shall be made on a compliance schedule at least semi-annually and including:
 - 1) Date when compliance will be achieved,
 - 2) Explanation of why compliance was not, or will not be achieved by the scheduled date, and
 - 3) Log of any preventative or corrective action taken; and
- E. Each monitoring report shall be accompanied by a written statement from the responsible official certifying the truth, accuracy, and completeness of the report.

Rule 201.1

Right of Entry

EAFB shall allow entry of District, CARB, or U.S. EPA officials for purpose of inspection and sampling, including:

- A. Inspection of the stationary source, including equipment, work practices, operations, and emission-related activity;
- B. Inspection and duplication of records required by the permit to operate; and
- C. Source sampling or other monitoring activities.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 201.1	<u>Periodic Monitoring</u>

Non-Point

EAFB shall conduct testing semi-annually, in accordance with the methodology contained in EPA Method 22 for all active non-point sources. This testing will be the basis for determining compliance with the visible emission standard in District Rule 401. If no emissions are observed utilizing Method 22, the non-point source shall be deemed to be in compliance with the visible emission standard. If emissions are observed from any non-point source and that source is not operating under breakdown condition as defined in and allowed for in District Rule 111, Edwards AFB shall conduct testing on that non-point source within 24 hours of the Method 22 testing in accordance with EPA Method 9 to verify compliance with the visible emission standard.

NOTE: This requirement does not apply to fugitive emissions resulting from activities not covered by a permit to operate unless the source is subject to District Rule 210.1 (NSR) requirements.

Point

EAFB shall conduct testing semi-annually, in accordance with the methodology contained in EPA Method 22 for all active/in use point sources. This testing will be the basis for determining compliance with the visible emission standard in District Rule 401. If no emissions are observed utilizing Method 22, the point source shall be deemed to be in compliance with the visible emission standard. If emissions are observed from any point source and that point source is not operating under breakdown condition as defined in and allowed for in District Rule 111, Edwards AFB shall conduct testing on that point source:

- A. Within 24 hours of the Method 22 testing in accordance with EPA Method 9 to verify compliance with the visible emission standard. If compliance is not documented:
- B. Within 30 days of the Method 9 testing in accordance with EPA Method 5 or 5D to verify compliance with the requirements of District Rules 404.1, 405, 406 and/or 210.1.

Rule No.
Rule 201.1

Rule Title and Description Conditions
Additional Monitoring

Diesel standby and emergency piston engines do not require opacity monitoring if utilizing California diesel or other low-sulfur, low aromatic fuel. Fuel records shall be kept for verification purposes and an operational log for hours of operation.

All control equipment shall be inspected annually for proper operation. Edwards AFB shall maintain all records of control equipment maintenance for a period of five years.

Monitoring shall be the responsibility of the source; however, a visible emissions inspection or Method 9 conducted by a District inspector may be counted as meeting the requirement for the source to conduct same if the information and records generated by the inspector meets the requirements of the permit and a copy of the records are maintained by the source for a period of five years.

Record keeping provisions associated with all monitoring requirements shall include the following information:

- A. Identification of stack or emission point being monitored;
- B. Operational conditions at the time of monitoring;
- C. Records of any monitoring conducted, including records of emission or operational parameter values and the date, place and time of sampling or measurement; and
- D. Where corrective action is triggered, description of the corrective action and the date, time and results of any corrective action.

Testing

The testing of identical units may be limited to testing one unit per group of units after establishing correlation of NOx emissions and key operating parameters and keeping records of these data for each affected unit.

Records shall be maintained for at least five calendar years on site and shall be made readily available to District personnel.

Compliance test data and results collected shall be submitted to District within 60 days of collection.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 201.1	<p>Units that exceed annual heat input of 90,000 therms or more during one or more of the three preceding years of operation shall be tested to determine compliance with applicable requirements not less than once every 12 months. An owner/operator of gaseous fuel-fired units demonstrating compliance for two consecutive years can, if desired, demonstrate compliance once every thirty-six months.</p> <p>Test results from an individual unit may be used for other units at the same location provided manufacturer, model number, rated capacity, fuel type, and emission control provisions are identical and key operating parameters such as stack gas oxygen, fuel consumption, etc. are monitored and established to correlate with NOX emissions from unit tested.</p> <p>Fuel HHV shall be certified by third party fuel supplier or determined by:</p> <ul style="list-style-type: none">A. ASTM D 240-87 or D 2382-88 for liquid fuels; andB. ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. <p>Oxides of nitrogen (ppmv) - EPA Method 7E, or CARB Method 100. Carbon monoxide (ppmv) - EPA Method 10, or CARB Method 100. Stack gas oxygen - EPA Method 3 or 3A, or CARB Method 100.</p> <p>NOx emission rate (heat input basis) - EPA Method 19, or CARB Method 100 and data from fuel flow meter.</p> <p>Period monitoring may also be performed based on CARB's June 24, 1999 Periodic Monitoring Guidelines.</p>
Rules 201.1	<p><u>Monitoring, Testing, Record Keeping Requirements</u> (GDF Phase I) Applies to EU 0126005, 0126006, 0126025, 0126030, 0126031, 0132004, 0132005, 0126032B, 0139019, and 0144010.</p> <p>All data necessary to demonstrate qualifications for the exemptions allowed in District Rule 412 shall be maintained on the premise at all times and shall be submitted for District review upon request. Such records shall include exemption status and volume delivered to each stationary storage container serviced.</p> <ul style="list-style-type: none">A. Compliance with the vapor recovery requirements of District Rule 412 shall be demonstrated using California Air Resources Board (CARB) Method 202;B. True vapor pressure shall be determined using Reid vapor pressure ASTM Method No. D-323-82 at storage temperature; andC. The test method to determine vapor tightness of delivery vessels shall be EPA Method 27.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rules 201.1	<p><u>Monitoring, Testing, Record Keeping Requirements</u> (GDF Phase II) Applies to EU 0126005, 0126006, 0126025, 0126030, 0132004, 0132005, 0126032B.</p> <p>Each gasoline dispensing facility exempt pursuant to District Rule 412.1, Section III shall maintain gasoline throughput records allowing gasoline throughput for any 30-day period to be continuously determined. These records shall be available upon request to the Air Pollution Control Officer and maintained on the premises for five years.</p> <p>Verification that each CARB-certified Phase II Vapor Recovery System meets or exceeds the requirements of tests specified in District Rule 412.1, Subsection V.C. shall be maintained. These test results shall be dated and shall contain the names, addresses, and telephone numbers of person(s) responsible for system installation and testing.</p> <p>Facility shall be pressure tested to determine proper installation and function before startup, and thereafter as directed by the Control Officer if not consistently operated leak-free or a major modification is implemented.</p> <p>Tests shall be conducted in accordance with test procedures found in CARB's "Test Procedures for Determination of the Efficiency of Gasoline Vapor Recovery Systems at Service Stations".</p>
Rule 209 SIP Approved (1972) Revised 1995	<p><u>Conditional Approval</u></p> <p>The Control Officer shall issue an Authority to Construct or a Permit to Operate, subject to conditions to insure compliance of the operation of any article, machine, equipment or other contrivance within the standards of Rule 208 and 208.1, in which case the conditions shall be specified in writing. Commencing work under such Authority to Construct or operation under such Permit to Operate shall be deemed acceptance of all conditions so specified. The Control Officer shall issue an Authority to Construct or Permit to Operate with revised conditions upon receipt of a new application, if the applicant demonstrates the article, machine, equipment or other contrivance can be operated within the standards of Rule 208 and 208.1 under the revised conditions.</p>

Rule 210.1
SIP Approved
(1981)

Revised
2000

Standards for Authority to Construct

- A. Edwards AFB may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:
 - 1) The Permittee has obtained all permits and approvals required by District Rules 201 and 210.1 (unless the change is exempt under District Rule 202);
 - 2) The change is not subject to any requirements under Title IV of the Clean Air Act;
 - 3) The change is not a Title I modification; and
 - 4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of this permit.
- B. For a change that qualified under this section, the Permittee shall provide contemporaneous written notice to the District and the U.S. EPA (except for a change that is exempt under District Rule 202). This written notice shall describe the change, including the date it was made, and shall contain other information as required to determine new applicable requirements of the Clean Air Act that apply as a result of the change;
- C. Upon satisfying the requirements of paragraph B above, the Permittee may make the proposed change;
- D. Changes that qualify under this section are not subject to the requirements for Part 70 revisions;
- E. The Permittee shall include each off-permit change made under this section in the application for renewal of this Part 70 permit; and
- F. The permit shield(s) provided in this permit do not apply to off-permit changes made under this section.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 210.4 SIP Approved 2013	<u>Prevention of Significant Deterioration (PSD)</u> EAFB may be subject to District Rule 210.4, Prevention of Significant Deterioration (PSD) if it undergoes major modification(s).
Rule 301 and 201.1	<u>Permit Fees</u> Every applicant for an Authority to Construct or a Permit to Operate shall pay a filing fee. For issuance of an Authority to Construct, or an initial Permit to Operate, the applicant shall pay fees as prescribed in Rule 301. For issuance of an Authority to Construct, application processing fees shall also be paid as prescribed in Rule 303. The applicant shall receive credit for filing fees paid. Annually on the anniversary of issuance of a Permit to Operate, the permittee shall pay a renewal fee as prescribed in Rule 301. Fees collected pursuant to Rule 201.1, Section VIII.B. shall supplement applicable Rules 301 and 301.3 fee requirements. <u>Payment of Supplemental Fee</u> An owner or operator, or his designee, shall pay an annual supplemental fee for a permit to operate pursuant to Rule 201.1 as determined by the calculation method in Subsection VIII.B.3., to provide a District-wide fee rate of \$25 per ton of fee-based emissions (CPI-adjusted) for all facilities subject to Rule 201.1, unless Rule 201.1 VIII.B.2. applies.
Rule 301.4	<u>Greenhouse Gas Fee</u> Any stationary source that has actual GHG emissions, in the prior calendar year, greater than or equal to 100,000 tons of CO ₂ e, as calculated in accordance with 40 CFR Part 98, shall pay a Consumer Price Index (CPI) adjusted GHG fee per ton of CO ₂ e being emitted. Sources subject to this Rule shall submit an annual report of GHG emissions to the District no later than the thirty-first day of March.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 401 SIP Approved 2001	<u>Visible Emissions</u> Unless otherwise stated in equipment specific permits, the following limits apply: <u>Limits</u> A person shall not discharge into the atmosphere, from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three minutes in any one hour which is: A. As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or B. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in Subsection A.
Rule 404.1 SIP Approved 2008	<u>Particulate Matter Concentration - Desert Basin</u> A. A person shall not discharge into the atmosphere from any single source operation, in service on the date this Rule is adopted, particulate matter in excess of 0.2 grains per cubic foot of gas at standard conditions. B. A person shall not discharge into the atmosphere from any single source operation, the construction or modification of which commenced after the adoption of this Rule, particulate matter in excess of 0.1 grains per cubic foot of gas at standard conditions.
Rule 405 SIP Approved 1984 Revised 1997	<u>Particulate Matter - Emission Rate</u> A person shall not discharge into the atmosphere from any source operation, particulate matter in excess of the limits set forth in the allowable particle emissions based on process weight rate table included in Rule 405.
Rule 407 SIP Approved 1972	<u>Sulfur Compounds</u> A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 percent by volume calculated as sulfur dioxide (SO ₂).

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 409 SIP Approved 1999	<u>Fuel Burning Equipment - Combustion Contaminants</u> A. Fuel burning equipment, the construction or modification of which is commenced after August 17, 1971, shall not discharge into the atmosphere particulate matter, sulfur dioxide or nitrogen oxides in excess of the Environmental Protection Agency Standard of Performance. B. A person shall not discharge into the atmosphere combustion contaminants exceeding in concentration at the point of discharge: 0.1 grain per cubic foot of gas calculated to 12 percent of carbon dioxide (CO ₂) at standard conditions.
Rule 410 SIP Approved (1977) Revised 1979	<u>Organic Solvents</u> A person shall not discharge into the atmosphere more organic materials in any one day from any article, machine, equipment or other contrivance in which any organic solvent or any material containing organic solvent is utilized unless the emissions are controlled or reduced as outlined in the organic solvent rule (410).
Rule 410.2 SIP Approved 1972	<u>Disposal and Evaporation of Solvents</u> A person shall not during any one day disposed of a total of more than 1½ gallons of any photochemically reactive solvent as defined in Rule 410.2, or of any material containing more than 1½ gallons of any such photochemically reactive solvent into the atmosphere.
Rule 410.3 SIP Approved 1999	<u>Organic Solvent Degreasing Operation</u> A person shall not operate any organic solvent degreasing operation unless the equipment utilized complies with all applicable requirements of Rule 410.3.
Rule 410.4 SIP Approved 2000 Revised 2014	<u>Metal, Plastic, and Pleasure Craft Parts and Products Coating Operations</u> EAFB may be subject to provisions of Rule 410.4 that apply to surface coating of metal parts or products, large appliances parts or products, metal furniture, and plastic parts or products including automotive, transportation, and business machine, and pleasure crafts, and to the cleaning, storage, and disposal of all organic solvents and waste solvent materials associated with such coating operations.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 410.4A SIP Approved 1998 Revised 2014	<u>Motor Vehicle and Mobile Equipment Refinishing Operations</u> EAFB may be subject to provisions of Rule 410.4A that apply to the use or application of any automotive coating or associated solvent within the District.
Rule 410.8	<u>Aerospace Assembly and Coating Operations</u> Edwards AFB shall comply with all applicable requirements of Rule 410.8.
Adopted 2014 Rule 410.9	<u>Wood Products Surface Coating Operations</u> Edwards AFB may be subject to provisions of Rule 410.9 that apply to surface coating of wood products.
Adopted 2014	
Rule 411 SIP Approved 1998	<u>Storage of Organic Liquids</u> A person shall not use equipment to store organic liquids and petroleum distillates with a true vapor pressure greater than 1.5 psia unless provisions are made for controlling organic vapors.
Rule 412 SIP Approved 1995	<u>Gasoline Transfer into Stationary Storage Containers, Delivery Vessels and Bulk Plants</u> A person shall not transfer gasoline into storage or delivery vessels unless provisions are made to recover 95% of the displaced vapors.
Rule 412.1 SIP Approved 1996	<u>Transfer of Gasoline into Vehicle Fuel Tanks</u> No person shall transfer gasoline into vehicle fuel tanks unless CARB-Certified Phase II dispensing equipment is utilized and maintained in correct working order.
Rule 416 SIP Approved 1999	<u>Open Burning</u> <u>Applicability</u> This Rule shall apply to all burning activities not confined to an incinerator which meets requirements of Rule 418 (Incinerators), but shall not apply to combustion of fuels in a device designed to produce useful energy and which meets all applicable parts of Regulation IV. <u>Prohibition</u> No person shall burn any refuse or other material in an open outdoor fire within the boundaries of the District, unless any of the exceptions in Rule 416 apply. Burning of Federal facility materials must comply with applicable requirements of Section V of Rule 416.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 419 SIP Approved 1972	<u>Nuisance</u> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.
Rule 422 SIP Approved 1977 Revised 2011	<u>Federal New Source Performance Standards (NSPS)</u> Provisions of Part 60, Chapter 1, Title 40, Code of Federal Regulations, in effect September 5, 1996, are hereby adopted by reference and made a part hereof. All new and modified sources shall comply with applicable standards, criteria and requirements set forth therein. All applicable requirements of 40 CFR Part 60, Subparts A (General Requirements) and WWW (Municipal Solid Waste Landfills) apply to this facility.
Rule 423 SIP Approved 1977 Revised 2011	<u>National Emission Standards for Hazardous Air Pollutants and Source Categories (NESHAPS)</u> Provisions of Title 40, Chapter 1, Parts 61 and 63, Code of Federal Regulations, in effect November 7, 2002, are hereby adopted by reference and made a part hereof. All sources of hazardous air pollution shall comply with applicable standards, criteria and requirements set forth herein. All applicable requirements of 40 CFR Part 61, Subparts M (Asbestos), C (Beryllium), and D (Beryllium Rocket Motor Firing); and 40 CFR Part 63, Subparts A (General Provisions), GG (Aerospace Manufacturing and Rework Facilities), AAAA (Municipal Solid Waste Landfills), ZZZZ (RICE), and DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters) apply to this facility. The RICE NESHAP does not apply to portable or transportable (has wheels, skids, carrying handles, dolly, trailer, or platform), which do not remain in one location within the facility for more than 12 months.
Rule 425.2 SIP Approved 1999	<u>Boilers, Steam Generators, and Process Heaters (Oxides of Nitrogen)</u> An owner/operator of any emission unit with annual heat input of 90,000 therms or more during one or more of the three preceding years of operation shall comply with applicable NOx emission limit(s) listed in Section V, Requirements of Rule 425.2.

Federal Rule No.	<u>Rule Title and Description Conditions</u>
Rule 431	<u>Propellant Combustion and Rocket Testing</u> Edwards AFB shall comply with all applicable requirements of Rule 431.
Rule 432	<u>Polyester Resin Operations</u> Adopted 2014 Edwards AFB shall comply with all applicable requirements of Rule 432.
40 CFR 61 Subparts C and D	<u>Beryllium and Beryllium Rocket Motor Firing</u> Edwards AFB shall not engage in any activities subject to requirements of 40 CFR 61, Subparts C and D (Beryllium and Beryllium Rocket Motor Firing) without first applying for and receiving approval as specified in District Rule 201.1.
40 CFR 61 Subpart M	<u>National Emission Standard for Asbestos</u> Edwards AFB shall comply with the applicable requirements of Sections 61.145 through 61.147 of the National Emission Standard for Asbestos for all demolition and renovation projects.
CAA Section 112(r)(7)	<u>Clean Air Act</u> Should this stationary source, as defined in 40 C.F.R. section 68.3, become subject to the accidental release prevention regulations in part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in section 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 C.F.R. part 70 or 71.
40 CFR 68	<u>Risk Management Plan</u> Should this stationary source, as defined in 40 CFR section 68.3, become subject to the accidental release prevention regulations in part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in section 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 CFR part 70 or 71.

Federal Rule

40 CFR
70.5d

Rule Title and Description Conditions

Compliance Certification

The owner/operator shall comply with the following procedures for compliance certification:

- A. Submittal of a compliance certification by the owner or operator to the U.S. EPA and copy to the APCO within 60 days after end of compliance certification period;
- B. Compliance certification period shall begin March 28 of each year and end March 27 of the following year;
- C. Such compliance certification shall identify the basis for each permit term or condition, e.g., specify the emissions limitation, standard or work practice, and a means of monitoring compliance with the term or condition;
- D. Such compliance certification shall include compliance status and method(s) used to determine compliance for the current time period and over entire reporting period; and
- E. Such compliance certification shall include any additional inspection, monitoring or entry requirement promulgated pursuant to Sections 114(a) and 504(b) of the CAA.

Any application form, report, or compliance certification submitted pursuant to these regulations shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this part shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

U.S. EPA's Mailing Address:

Director, Air Division
75 Hawthorne Street
AIR-3
San Francisco, CA 94105

<u>Federal Rule</u>	<u>Rule Title and Description Conditions</u>
40 CFR 82	<u>Protection of Stratospheric Ozone</u>

Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR §82.156. Equipment used during maintenance, service, repair, or disposal of appliances must meet the standards for recycling and recovery equipment in accordance with 40 CFR §82.158. Persons performing maintenance, service, repair or disposal of appliances must be certified by a certified technician pursuant to 40 CFR §82.161.

VIII. NEW AND CANCELLED EQUIPMENT UNITS

Twenty two new equipment units have been added and twenty five equipment units have been take out of service (permits canceled) since issuance of the last Title V permit renewal. Addition of all new permitted equipment units do not increase facility-wide emissions and have been considered a minor modification that will exceed the daily maximum limits; therefore, public noticing of each new unit was not required.

New and canceled equipment has contributed to facility-wide emissions reductions. Summaries of the new and canceled equipment units are as follows:

A. New Units

<u>Equipment Unit</u>	<u>Description</u>
0127289	<u>Abrasive Blast Cabinet</u> <i>Emissions ton/yr: VOC-0.03</i>
0127301	<u>Abrasive Blast Cabinet</u> <i>Emissions ton/yr: PM-0.21</i>
0127302	<u>Portable Downdraft Table</u> <i>Emissions ton/yr: PM-0.05</i>
0129099	<u>Chain-Driven Charbroiler</u> <i>Emissions ton/yr: PM₁₀-0.018, SO₂-0.001, NO₂-0.05, VOC-0.05, CO-0.01</i>
0129108	<u>Emergency Generator</u> <i>Emissions ton/yr: PM₁₀-0.05, SO₂-0.72(lb/day), NO₂-2.56, VOC-0.65, CO-0.43</i>

<u>Equipment Unit</u>	<u>Description</u>
0129109	<u>Emergency Generator</u> <i>Emissions ton/yr: PM₁₀-0.07, SO₂-0.14 (lb/day), NO₂-0.63, VOC-0.01, CO-0.06</i>
0129110	<u>Emergency Generator</u> <i>Emissions ton/yr: PM₁₀-0.05, SO₂-0.05 (lb/day), NO₂-0.1, VOC-0.003, CO-0.05</i>
0129111	<u>Woodworking Operation</u> <i>Emissions ton/yr: PM₁₀-2.73</i>
0129118	<u>Woodworking Operation</u> <i>Emissions ton/yr: PM₁₀-3.03</i>
0129121	<u>Emergency Generator</u> <i>Emissions ton/yr: PM₁₀-0.01, SO₂-0.90 (lb/day), NO₂-0.24, VOC-0.02, CO-0.22</i>
0130014	<u>Emergency Generator</u> <i>Emissions ton/yr: PM₁₀-0.001, SO₂-0.02 (lb/day), NO₂-0.05, VOC-0.001, CO-0.01</i>
0131017	<u>Trommel Screen</u> Emissions n/a
0131019	<u>Municipal Class III Sanitary Landfill</u> Emissions n/a
0131020	<u>Permit Exempt Subpart DDDDD Package Boilers</u> Emissions are Exempt
0132110	<u>Woodworking Operation</u> <i>Emissions ton/yr: PM₁₀-0.11</i>
0132111	<u>Abrasive Blasting Operation</u> <i>Emissions ton/yr: PM₁₀-0.13</i>
0132112	<u>Sanding Operation</u> <i>Emissions ton/yr: PM₁₀-1.80</i>
0132113	<u>Sanding Operation</u> <i>Emissions ton/yr: PM₁₀-1.80</i>
0134126	<u>Composite Machining Operation</u> <i>Emissions ton/yr: PM₁₀-1.58</i>

<u>Equipment Unit</u>	<u>Description</u>
0134133	<u>Rocket Engine Testing Operation</u> <i>Emissions ton/yr: NO₂-2.49, VOC-1.34, Ammonia Gas (NH₃)-7091.84 (lb/yr), Hydrazine-1679.44 (lb/yr), PM₁₀-1.35, CO-75.99, NH₃-120 (lb/yr)</i>
0138064	<u>Emergency Use Piston Engine with Generator</u> <i>Emissions ton/yr: PM₁₀-0.001, SO₂-0.000, NO₂-0.02, VOC-0.01, CO-0.18</i>
141003	<u>Aviation Fuel Storage & Dispensing System</u> <i>Emissions ton/yr: VOC-0.36</i>

B. Canceled Units

<u>Equipment Unit</u>	<u>Description</u>
0126029	<u>Aboveground Synthetic Diesel Fuel Storage Tank</u> Permit Cancelled. <i>Emission reductions ton/yr: VOC-0.020</i>
0129001, 002, 003	<u>Gasoline Storage and Dispensing System</u> Permit Cancelled. <i>Emission reductions ton/yr: N/A</i>
0129013	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions ton/yr: N/A</i>
0129088	<u>Boiler</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-0.34, SO₂-0.03, NO₂-1.44, VOC-0.12, CO-3.39</i>
0131018	<u>Emergency Water Pump</u> Permit Cancelled. <i>Emission reductions ton/yr: N/A</i>
0132096	<u>Laser Test Unit</u> Permit Cancelled. <i>Emission reductions: PM - 0.01 ton/yr; Chlorine Gas (Cl₂) 150.20 lb/yr</i>

<u>Equipment Unit</u>	<u>Description</u>
0132097	<u>Diesel Fueled Piston Engine Powering Hydraulic Mule</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-0.06, SO₂-0.13, NO₂-3.26, VOC-0.22, CO-0.52</i>
0132098	<u>Diesel Fueled Piston Engine Powering Hydraulic Mule</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-0.06, SO₂-0.13, NO₂-3.26, VOC-0.22, CO-0.52</i>
0132099	<u>Chlorine Loading and Unloading Operation</u> Permit Cancelled. <i>Chlorine Gas (Cl₂) 75.60 lb/yr</i>
0132100	<u>Ammonia Loading and Unloading Operation</u> Permit Cancelled. <i>Emission reductions ton/yr: N/A</i>
0132101	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-0.00, SO₂-0.01, NO₂-0.23, VOC-0.01, CO-0.03</i>
0132102	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-0.01, SO₂-0.01, NO₂-0.26, VOC-0.01, CO-0.05</i>
0132103	<u>Airborne Laser Cooling System</u> Permit Cancelled. <i>Ammonia Gas (NH₃) 3238.56 lb/yr</i>
0134084	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-1.35, SO₂-0.24, NO₂-0.27, VOC-0.01, CO-8.09</i>
0134113	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-0.02, SO₂-0.00, NO₂-0.15, VOC-0.02, CO-15.55</i>
0134114	<u>Aerospace Components Carbon Deposition Reactor #1</u> Permit Cancelled. <i>Emission reductions lb/yr: VOC-0.47</i>

<u>Equipment Unit</u>	<u>Description</u>
0134116	<u>Aerospace Components Carbon Deposition Reactor #3</u> Permit Cancelled. <i>Emission reductions lb/yr: VOC-0.41</i>
0134117	<u>Carbon Deposition Reactor #6</u> Permit Cancelled. <i>Emission reductions ton/yr: VOC-0.15</i>
0134119	<u>Carbon Parts Fabrication Operation</u> Permit Cancelled. <i>Emission reductions lb/yr: PM-0.01</i>
0135013	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions lb/hr: PM₁₀-0.04, SO₂-0.02, NO₂-1.23, VOC-0.05, CO-0.84</i>
0135014	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions lb/day: PM₁₀-0.22, SO₂-0.21, NO₂-7.53, VOC-0.07, CO-3.01</i>
0135017	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-0.01, SO₂-0.01, NO₂-0.26, VOC-0.01, CO-0.05</i>
0139013	<u>Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions ton/yr: PM₁₀-0.01, SO₂-0.01, NO₂-0.54, VOC-0.02, CO-0.07</i>
0147047	<u>Emergency Use Piston Engine with Generator</u> Permit Cancelled. <i>Emission reductions ton/yr: N/A</i>

IX. COMPLIANCE:

A summary of Violations filed against EAFB because on non-compliance and Variances filed by EAFB to maintain compliance are summarized below.

A. Notice of Violations (NOV)

No NOV's have been issued to EAFB between the reporting years of 2008 to 2013.

B. Variances

2008 Variances

<u>Hearing Date</u>	<u>Completion Date</u>	<u>Operation Requiring Variance</u>	<u>Variance Number</u>
4/10/08	12/18/08	Steam Generator Rule 210.1, NSR	08-05

2009 Variances

<u>Hearing Date</u>	<u>Completion Date</u>	<u>Operation Requiring Variance</u>	<u>Variance Number</u>
8/10/09	9/14/09	Em Use Engine Rule 427 and 210.1	09-03int
9/14/09	11/30/09	Em Use Engine Rule 427 and 210.1	09-03

2010 – 2013 Variances

None

C. Breakdowns

2008 – 2013

No Occurrences

X. EDWARDS COMMENTS:

On June 10, 2015, the District provided EAFB with preliminary drafts of the proposed Title V renewal permit formatted in the two primary functional groups (412 TW and AFRL). EAFB was given 45-days to review and provide comments. EAFB comments and District responses pertaining to the restructured Draft Title V Permit renewal is as follows:

A. 412 TW Comments

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
Global Change	Various	Multi	<p>Add site or building location to each permit.</p> <p>It would be helpful in tracking if each permit included the site location. E.g., 0127028 is located at Building 1600A. The locations are included in the EKAPCD Permits.</p>	This can be considered for the next Title V renewal.

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
Global Change	Various	Multi	Move to “state-only enforceable requirements” section. If the requested change to condition #6 is not incorporated (see below), please create a state-only enforceable requirements section for each permit and move this condition and other District- or state-only enforceable conditions to that section.	District revised condition #6.
Federal Reg.	NA	ix	Please add 40 CFR Part 60 IIII and JJJJ. These NSPSs apply to new IC engines operated by the facility.	These have not been delegated to the District.
General Permit Conditions				
Condition #6	Applicability of Federally Enforceable Conditions	2	Please revise to read: “Equipment Descriptions, and any Design Conditions, Operational Conditions, Special Conditions, or Compliance Testing Requirements that are District-or state-enforceable only (i.e., not approved by EPA) are not federally enforceable. Federally Enforceable Conditions shall apply to Design Conditions, Operational Conditions, Special Conditions, Compliance Testing Requirements, and Emission Limits except as noted above. The condition, as written is confusing because the permit does not designate “District only” conditions.	This has been revised per comment.
Condition #12A	Referencing of District and Applicable Requirements	5	It is unclear what the Plant modernization project is. Please remove this condition if no longer relevant.	This has been revised per comment.
Condition #41	Federal New Source Performance Standards (NSPS)	15	Please revise to read: “Provisions of Part 60, Chapter 1, Title 40, Code of Federal Regulations, in effect September 5, 1996, are hereby adopted by reference and made a part hereof. All new and modified sources shall comply with <u>applicable</u> standards, criteria and requirements set forth therein.” Adding the word “applicable” clarifies that the affected emission units may be exempt from some or all requirements.	This has been revised per comment.

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
Condition #42	National Emission Standards for Hazardous Air Pollutants and Source Categories (NESHAPS)	15	Please add the following paragraph: “The RICE NESHAP does not apply to portable or transportable (has wheels, skids, carrying handles, dolly, trailer, or platform), which do not remain in one location within the facility for more than 12 months.” The EPA has clarified that the RICE NESHAP is not applicable to portable engines that move within the facility as long as they are not in one location for more than 12 months.	This has been revised per comment.
Condition #47	National Emission Standard for Asbestos	16	Please revise to read: “Edwards AFB shall comply with the applicable requirements of Sections 61.145 through 61.147 of the National Emission Standard for Asbestos for all demolition and renovation projects.” Adding the word “applicable” clarifies that the affected emission units may be exempt from some or all requirements.	This has been revised per comment.
Condition #49	Compliance Certification	17	1. Change Bullet B to read: “Compliance certification period shall begin 1 March of each year and end 28 February of the following year. 2. Add bullet F to indicate: “The Annual Compliance Certification also satisfies the semi-annual Monitoring Report submittal requirement for the second semi-annual Monitoring Report.”	1. Reference: email dated 4/17/2012 from Scott Webb to Glen Stephens, 2. The annual compliance certification covers the same six-month period covered by the second semi-annual monitoring report. The EKAPCD has historically accepted the annual compliance certification in lieu of the semi-annual report. This change would formalize the practice.
Sanding and Abrasive Operations				
Sanding	Special conditions	23	PTO 0127032 Remove “(MXS)” from this statement. This limits the permit in its future use.	This has been revised per comment.
“	“	25	PTO 0127033A Remove “(MXS)” from these statements	This has been revised per comment.
Fuel loading/Gasoline Storage/Fuel Dispensing				
0132004	Equipment Description	56	Incorporate PTO 0132004A is in the Title V permit.	This has been revised per comment.
0132005	Equipment Description	59	Reflect PTO 0132005A is in the permit.	This has been revised per comment.

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
Fuel loading/Gasoline Storage/Fuel Dispensing				
0126005	Entire permit	41	Please incorporate the latest version of the PTO (0126005F).	This has been revised per comment.
0126006	Entire permit	45	Please incorporate the latest version of the PTO (0126006F).	This has been revised per comment.
0126030	Permit Conditions	52	PTO 0126030A increased the throughput limit from 145,000 gallons per year to 480,000 gallons per year.	This has been revised per comment.
Internal Combustion – Diesel				
0129008, 0129009, 0129010, 0129019, 0129020, 0129021, 0129022, 0129027, 0129028, 0129046, 0129047, 0129048, 0129049, 0129055, 0129070, 0129071, 0129080, 0129087, 0129089, 0129090, 0129093, 0129094, 0129095, 0129096, 0129098, 0130011, 0130012, 0130013, 0132047, 0132050, 0132051, 0132052, 0132056, 0129114, 0129115, 0129117, 0135016, 0141004, 0141005	Permit Conditions	Multi	<p>< 500 bhp, Diesel, Existing Emergency Engines.</p> <ol style="list-style-type: none"> 1. Add RICE NESHAP (40 CFR Part 63, Subpart ZZZZ) requirements as shown in Enclosure 1. 2. In addition, add permit conditions to incorporate CARB ATCM requirements (state-only, not federally enforceable) 	<ol style="list-style-type: none"> 1. Subpart ZZZZ is in appendices. 2. District will consider adding conditions to individual permits in next Title V renewal.

Section No.	Paragraph	Page No.	EAFB Comment/Question	District Response
External Combustion				
0129088	0129088	0129088	0129088	0129088
0144002	0144002	0144002	0144002	0144002
0129018, 0129034, 0129036, 0129100, 0129101, 0129102, 0129103, 0129104, 0129105, 0129107, 0129110, 0129112, 0130014, 0132104 0132105	Permit Conditions	Multi	<p>< 500 bhp, Diesel, New Emergency Engines.</p> <p>1. Add CI NSPS (40 CFR Part 60 Subpart IIII) requirements as shown in Enclosure 1.</p> <p>2. In addition, add permit conditions to incorporate CARB ATCM requirements (state-only, not federally enforceable)</p>	<p>1. IIII is not delegated to the District.</p> <p>2. District will consider adding conditions to individual permits in next Title V renewal.</p>
0129014, 0129053, 0129067, 0129068, 0129069, 0129085, 0129091, 0129092, 0129097, 0132006, 0132007, 0129113, 0140018, 0140019	Permit Conditions	Multi	<p>>500 hp, Diesel, Existing Emergency Engine.</p> <p>No substantive RICE NESHAP (40 CFR Part 63, Subpart ZZZZ) requirements, other than meeting the emergency operation constraints specified in § 63.6640.</p> <p>Add permit conditions to incorporate CARB ATCM requirements (state-only, not federally enforceable)</p>	District will consider adding conditions to individual permits in next Title V renewal.
0129108, 0129109, 0132108	Permit Conditions	Multi	<p>>500 hp, Diesel, New Emergency Engine.</p> <p>Add CI NSPS (40 CFR Part 60 Subpart IIII) requirements as shown in Enclosure 1.</p> <p>add permit conditions to incorporate CARB ATCM requirements (state-only, not federally enforceable)</p>	IIII is not delegated to the District.
0129013	Entire Page	73	Remove this permit. Based on the 2013 PTO 0129013 cancellation letter and the AQ tracking sheet, this permit was cancelled on 7/8/2013.	This has been revised per comment.

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
Table of Contents: 0129118		vi	This line needs to be removed from the Internal Combustion – Diesel category on the Table of Contents, page vi. This is a woodworking permit that is listed under the woodworking section on page vii.	This has been revised per comment.
Internal Combustion – Gasoline				
0132092	Permit Conditions	194	< 500 hp, Existing, Non-Emergency Gasoline Engine. Add RICE NESHAP (40 CFR Part 63, Subpart ZZZZ) requirements as shown in Enclosure 2.	Subpart ZZZZ is in appendices. District will consider adding conditions to individual permits in next Title V renewal.
Internal Combustion – Natural Gas				
0129076	Permit Conditions	196	< 500 bhp, Existing, Natural Gas, Emergency Engine. Add RICE NESHAP (40 CFR Part 63, Subpart ZZZZ) requirements as shown in Enclosure 2.	Subpart ZZZZ is in appendices. District will consider adding conditions to individual permits in next Title V renewal.
0129077	Permit Conditions	198	< 500 bhp, Existing, Natural Gas, Emergency Engine. Add RICE NESHAP (40 CFR Part 63, Subpart ZZZZ) requirements as shown in Enclosure 2.	Subpart ZZZZ is in appendices. District will consider adding conditions to individual permits in next Title V renewal.
0129078	Permit Conditions	200	< 500 bhp, Existing, Natural Gas, Emergency Engine. Add RICE NESHAP (40 CFR Part 63, Subpart ZZZZ) requirements as shown in Enclosure 2.	Subpart ZZZZ is in appendices. District will consider adding conditions to individual permits in next Title V renewal.
0138060	Permit Conditions, Description of Source, Equipment Description	202	< 500 bhp, Existing, Natural Gas, Emergency Engine. Add RICE NESHAP (40 CFR Part 63, Subpart ZZZZ) requirements as shown in Enclosure 2. Add “Emergency Use” to the <i>Description of Source</i> and <i>Equipment Description</i> like PTOs 0129076 through 0129078.	Subpart ZZZZ is in appendices. District will consider adding conditions to individual permits in next Title V renewal. Emergency Use added.
0138061	Permit Conditions, Description of Source, Equipment Description	204	< 500 bhp, New, Natural Gas, Emergency Engine Add SI NSPS (40 CFR Part 60 Subpart IIII) requirements as shown in Enclosure 2. Add “Emergency Use” to the Description of Source and Equipment Description like PTOs 0129076 through 129078.	IIII is not delegated to the District. Emergency Use added.

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
0138062	Permit Conditions, Description of Source, Equipment Description Conditions	206	<p>< 500 bhp, New, Natural Gas, Emergency Engine</p> <p>Add SI NSPS (40 CFR Part 60 Subpart III) requirements as shown in Enclosure 2.</p> <p>Add "Emergency Use" to the <i>Description of Source</i> and <i>Equipment Description</i> like PTOs 0129076 through 0129078.</p>	<p>III is not delegated to the District.</p> <p>Emergency Use added.</p>
Surface Coating - Booth				
Various	Various	Multi	Minor grammatical errors were identified and corrected using the track change features in Word. Text was modified accordingly. Will provide in track changes to the permit.	Revised per suggestions.
Various	Various	Multi	Modify Description of Source and Equipment Description to match PTO using the track change features in Word. Text was modified accordingly. Will provide in track changes to the permit.	This has been revised per comment.
0127028	PC # 19	236	Refers to P.C. # 20. Change reference to P.C. # 21. Modified text accordingly. Will provide in track changes to the permit.	This has been revised per comment.
0127187	Equipment Description	240	Added verbiage to the equipment description section. Will provide in track changes to the permit.	This has been revised per comment.
0127188	Equipment Description	247	Indicate that the permit covers two spray booths. There is one conventional Booth and one powder coating booth.	This has been revised per comment.
0127188	PC 8 & 9	248	Replace existing PC 8 & 9 with similar conditions from PTO 0127187. These similar conditions provide consistency for similar permits.	The PTO must be modified. The District cannot change conditions that are not on the PTO.
0127188	Special Condition	253	Is the citation of Section 93000, California Administrative Code a federal or state only citation? Modify text to remove reference to the California state citation.	Did not removed.
0127189	Equipment Description	254	Added verbiage to the equipment description section.	This has been revised per comment.
0127189	Special Condition	259	Is the citation of Section 93000, California Administrative Code a federal or state only citation? Modify text to remove reference to the California state citation.	Did not removed.
0132107	Equipment Description	260	Added verbiage to the equipment description section.	This has been revised per comment.

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Section	Paragraph	Page No.	EAFB Comment/Question	District Response
0132107	Table 1	264	Add verbiage that clearly indicates this table applies to Specialty Coatings only.	The District may adopt rules that may conflict with listed VOC limits, PTO may need to be revised if this is the case.
Various	Various	Multi	Minor grammatical errors were identified and corrected using the track change features in Word.	Reviewed.
Various	Various	Multi	Modify Description of Source and Equipment Description to match PTO using the track change features in Word.	Reviewed.
0127027	Permit Conditions	268	Delete permit condition 17. This equipment does not exist. The equipment was never installed.	This has been revised per comment.
0127289	Equipment Description	270	Minor verbiage revision to the equipment description section. Will provide in track changes to the permit.	This has been revised per comment.
0127289	Special Condition	271	Remove this condition. The ovens have been removed and this condition is no longer applicable.	This has been revised per comment.
0127299	Equipment Description	272	Minor verbiage revision to the equipment description section. Will provide in track changes to the permit.	This has been revised per comment.
0127299	Emission Limits	273	Revise the emissions limits to tons per year versus tons per quarter. This provides consistency with other coating permit limits.	This has been revised per comment.
0132013	Permit Conditions	277-279	Modify permit conditions to mirror permit conditions from PTO 132014.	Added P.C.s from PTO 132014.
0132013	Equipment Description	275	Modify equipment description. There is no paint booth at this facility. A PTO Modification application is being submitted to correct this.	This has been revised per comment.
0132013	Permit Condition 1	277-279	Delete reference to Building 151. That facility is covered under a separate PTO. A PTO Modification application is being submitted to correct this.	This has been revised per comment.
0132013	Permit Conditions	277-279	Remove references to CTF. A PTO Modification application is being submitted to correct this.	This has been revised per comment.
0132014	Equipment Description	278	Modify equipment description. There is no paint booth at this facility.	This has been revised per comment.

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Section	Paragraph	Page No.	EAFB Comment/Question	District Response
0132014	Permit Condition 3	278	Delete conditions 2. There is no spraybooth at this facility. Adjust references to other conditions in the PTO to reflect the deletion of the permit condition. For example, Condition 5 should be Condition 4 and reference Conditions 2 and 3 versus Conditions 4 and 5.	This has been revised per comment.
0132014	Permit Conditions	278	Remove reference to HVLP. A PTO Modification application is being submitted to correct this.	This has been revised per comment.
0138057	Permit Conditions	284-287	Remove either P.C. # 1 or 21. These are for Public Nuisance and there are two identical conditions. Renumber P.C.s accordingly.	This has been revised per comment.
0138057	Permit Conditions	282-286	Modify permit conditions to mirror conditions associated with PTO 0138063. The facilities are nearly identical in operations. Updating the permit conditions would provide consistency to the facility and facilitate in streamlining the recordkeeping requirements.	Operations may be similar however, PTO 0138063 is substantially different. If PTO is revised/modified, the next Title V renewal will reflect those changes.
0138063	Various	Multi	Minor grammatical errors were identified and corrected using the track change features in Word.	Reviewed.
Woodworking Operation				
Wood	Equipment Description "A".	296	PTO 0133006. Delta Tablesaper @ 5 hp omitted. The # of units should also be changed to 11. The tablesaper is included in the PTO	This has been revised per comment.
"	Operational Conditions	298	PTO 0133006D. A typo in the # of conditions. Should be # 11	This has been revised per comment.
Appendix A – Facility-wide Greenhouse Gas				
GHG Emissions	N/A1	1	Actual CY 2012 GHG emissions for the Test Wing are 31,967 tpy CO ₂ e, including landfill emissions. Actual CY 2014 reported GHG emissions under the AB 32 Mandatory Reporting Program (e.g., combustion sources) is 20,182 MT CO ₂ e. Actual reported emissions are 20,182 tpy for CY 2014 GHG Mandatory Reporting.	2012 Data is being used for the renewal.
GHG Emissions	N/A1	1	Potential to Emit Methane emissions do not include landfill emissions. Total methane emissions are 471.9 tpy CH ₄ or 9,909 tpy CO ₂ e. CO ₂ emissions are 405,418.18, CH ₄ emissions are 487.7 tpy or 10,241 tpy CO ₂ e, and N ₂ O emissions are 3.24 tpy N ₂ O or 1,004 tpy CO ₂ e. Total CO ₂ e emissions are 416,663 tpy CO ₂ e	This has been corrected.

B. AFRL Comments

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
Global Change	Various	Multi.	It would be helpful in tracking if each permit included the site location. Where possible, please add site location.	This can be considered for the next Title V renewal.
Emission Units	Aerospace	ii	Please remove PTO 0134117, Carbon Deposition Reactor #6.	This PTO is cancelled. Removed
Emission Units	Aerospace	ii	Please add PTO 0134134, Experimental Furnace.	This is a new EU, Added
Emission Units	Rocket Test Stands	iv	Please add ATC 0134133, Rocket Engine Testing Operation	This is a new EU, Added
Federal Reg.	NA	iv	Please remove Subpart GG from the list of applicable Part 63 regulations.	AFRL does not perform aerospace coating operations, Removed.
Federal Reg.	NA	iv	Please add 40 CFR Part 60 IIII and JJJJ.	These have not been delegated to the District.
Condition #6	Applicability of Federally Enforceable Conditions	2	The condition, as written is confusing because the permit does not designate "District only" conditions. Please revise to read: "Equipment Descriptions, and any Design Conditions, Operational Conditions, Special Conditions, or Compliance Testing Requirements that are District-or state-enforceable only (i.e., not approved by EPA) are not federally enforceable. Federally Enforceable Conditions shall apply to Design Conditions, Operational Conditions, Special Conditions, Compliance Testing Requirements, and Emission Limits except as noted above.	This has been revised per comment.
Condition #12A.	Referencing of District and Applicable Requirements	4	Please remove this condition if no longer relevant. It is unclear what the Plant modernization project is.	This has been revised per comment.

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
General Permit Conditions				
Condition #35	Federal New Source Performance Standards (NSPS)	14	Adding the word “applicable” clarifies that the affected emission units may be exempt from some or all requirements. Please revise to read: “Provisions of Part 60, Chapter 1, Title 40, Code of Federal Regulations, in effect September 5, 1996, are hereby adopted by reference and made a part hereof. All new and modified sources shall comply with <u>applicable</u> standards, criteria and requirements set forth therein.”	This has been revised per comment.
Condition #36	National Emission Standards for Hazardous Air Pollutants and Source Categories (NESHAPS)	14	Please revise to read: “All applicable requirements of 40 CFR Part 61, Subparts M (Asbestos), C (Beryllium), and D (Beryllium Rocket Motor Firing); and 40 CFR Part 63, Subparts A (General Provisions), DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters) and ZZZZ (RICE), apply to this facility.	Added reference to Subpart DDDDD and removed reference to Subpart GG.
Condition #36	National Emission Standards for Hazardous Air Pollutants and Source Categories (NESHAPS)	14	The EPA has clarified that the RICE NESHAP is not applicable to portable engines that move within the facility as long as they are not in one location for more than 12 months. The RICE NESHAP does not apply to portable or transportable (has wheels, skids, carrying handles, dolly, trailer, or platform), which do not remain in one location within the facility for more than 12 months.	There are many conditions listed in the Appendices ZZZZ was added to aid the source.
Condition #41	National Emission Standard for Asbestos	15	Please revise to read: “Edwards AFB shall comply with the applicable requirements of Sections 61.145 through 61.147 of the National Emission Standard for Asbestos for all demolition and renovation projects.”	This has been revised per comment.

Edwards AFB, Title V Renewal of Permit No. 9002-V-2000-1

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
Condition #43	Compliance Certification	16	<ol style="list-style-type: none"> 1. Change Bullet B to read: "Compliance certification period shall begin 1 March of each year and end 28 February of the following year. 2. Add bullet F to indicate: "The Annual Compliance Certification also satisfies the semi-annual Monitoring Report submittal requirement for the second semi-annual Monitoring Report." 	<ol style="list-style-type: none"> 1. Reference: email dated 4/17/2012 from Scott Webb to Glen Stephens. 2. The annual compliance certification covers the same six-month period covered by the second semi-annual monitoring report. The EKAPCD has historically accepted the annual compliance certification in lieu of the semi-annual report. This change would formalize the practice.
Aerospace				
0134115	Entire Permit	36	Please incorporate PTO 0134115C. The current version is an older version of the permit. PTO 0134115C is significantly different (permit description and conditions).	This has been revised per comment.
0134117	Entire Permit	38	Please remove this permit. Edwards AFB intend to cancel PTO 0134117.	This has been revised per comment.
0134120	Entire Permit	40	Please incorporate PTO 0134120B. The current version is an older version of the permit. PTO 0134120B incorporates Test Cells 25 and 27.	This has been revised per comment.
0134126	Entire Permit	45	Please incorporate PTO 0134126C. The current version is an older version of the permit. PTO 0134126C is significantly different (permit description and conditions).	This has been revised per comment.
0134126C	Condition #4	NA	Please remove Condition #4, which limits opacity to 5%. This condition contradicts Condition #10, which limits opacity to 20%.	Removed #10, cannot remove BACT requirements (#4).
0134128	Entire Permit	47	Please incorporate PTO 0134128D. The current version is an older version of the permit. PTO 0134128D is significantly different (permit description and conditions).	This has been revised per comment.
0134131	Entire Permit	49	Please incorporate PTO 0134131B. The current version is an older version of the permit. PTO 134131B is significantly different (permit description and conditions).	This has been revised per comment.
0134134	Entire Permit		Please add PTO 0134134.	This has been revised per comment.
External Combustion				
All Boilers			Add Boiler NESHAP, (40 CFR Part 63, Subpart DDDDD) requirements to permit conditions.	Subpart DDDDD added to appendices. District will consider adding conditions to individual permits in next Title V renewal.

Section	Paragraph	Page No.	EAFB Comment/Question	District Response
Internal Combustion – Diesel				
0134054, 0134055, 0134079	Permit Conditions	Multi.	<p>< 500 bhp, Diesel, Existing Emergency Engines.</p> <ol style="list-style-type: none"> 1. Add RICE NESHAP (40 CFR Part 63, Subpart ZZZZ) requirements as shown in Enclosure 1. 2. Add CARB ATCM conditions (state only requirement. Not federally enforceable.) 	<ol style="list-style-type: none"> 1. Subpart ZZZZ is in appendices. 2. District will consider adding conditions to individual permits in next Title V renewal.
Appendix A – Facility-wide Greenhouse Gas				
GHG Emissions	N/A1	1	Actual emissions listed in Appendix A are for TW, not AFRL. Actual CY 2012 GHG emissions for the AFRL were 2,217 tpy CO ₂ e. Actual emissions for AFRL were 2,217 tpy for CY 2012	This has been revised per comment.
GHG Emissions	N/A1	1	<p>Potential to Emit emissions listed in Appendix A are for 412TW, not AFRL.</p> <p>CO₂ emissions are 106,726 MT CO₂, CH₄ emissions are 2.6 tpy CH₄ or 54.6 MT CO₂e, and N₂O emissions are 0.09 tpy N₂O or 27.1 tpy CO₂e. Total CO₂e emissions are 106808 tpy CO₂e</p>	This has been corrected

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