



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
CLARK COUNTY
Application No: 08-04451

DATE: 1/30/2003

178 Fighter Wing
Vincent Roberts
901 Fontaine Ln
Springfield, OH 455028784

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL

08-04451

Application Number: 08-04451
APS Premise Number: 0812720352
Permit Fee: **To be entered upon final issuance**
Name of Facility: 178 Fighter Wing
Person to Contact: Vincent Roberts
Address: 901 Fontaine Ln
Springfield, OH 455028784

Location of proposed air contaminant source(s) [emissions unit(s)]:
**901 Fontaine Ln
Springfield, Ohio**

Description of proposed emissions unit(s):
engine test cell located at 120 F Ave.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable. This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

178 Fighter Wing

Facility ID: 0812720352

PTI Application:

08-04451

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection

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Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified

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source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

Pollutant

Tons Per Year

178 Fighter Wing**PTI Application:****08-04451****Facility ID: 0812720352****Issued: To be entered upon final issuance**

Particulate (PE)	0.50
Nitrogen oxides (NOx)	11.30
Sulfur dioxide (SOx)	0.98
Organic compounds (OC)	4.02
Carbon Monoxide (CO)	8.30

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 PTI A
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Emissions Unit ID: P001

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Jet Engine Test Cell Building 120 "F" Avenue	OAC rule 3745-31-05(A)(3)	6.73 lbs/hr particulate emissions (PE) 0.50 TPY PE, as a rolling 12-month summation 151.1 lbs/hr nitrogen oxides (NO _x), 11.3 TPY NO _x , as a rolling 12-month summation 13.1 lbs/hr sulfur dioxide (SO _x), 0.98 TPY SO ₂ , as a rolling 12-month summation 53.6 lbs/hr organic carbon (OC), 4.02 TPY OC, as a rolling 12-month summation 110.7 lbs/hr carbon monoxide (CO), 8.30 TPY CO, as a rolling 12-month summation
	OAC rule 3745-17-11(B)(5)(b)	The particulate limit established by this rule is less stringent than that established by OAC rule 3745-31-05

2. Additional Terms and Conditions

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Emissions Unit ID: **P001**

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None

B. Operational Restrictions

- a. The maximum annual fuel usage for this emissions unit shall not exceed 1,155,105 gallons based on a rolling 12- month basis.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The number of engine tests performed each month.
 - b. The number of hours each month in which testing was performed at each engine power setting.
 - c. The fuel flow rate utilized for each engine power setting during testing, in pounds per hour.
 - d. The fuel usage for each month, in gallons.
 - e. The rolling, 12-month summation of the fuel usage rates, in gallons.
 - f. The rolling, 12-month summation of emissions of particulates, NO_x, SO₂, OC, and CO, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation, and/or the rolling, 12-month emission limitations. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

E. Testing Requirements

1. a Emission Limitation-
6.73 lbs PE/hr

178 Fighter Wing**PTI A****08-044****Issued****Facility ID: 0812720352**Emissions Unit ID: **P001****Applicable Compliance Method-**

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the hourly PE emission totals at each power setting. The amount of PE emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested by the PE emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

Emission Limitation -

0.50 TPY PE, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the monthly PE emission totals at each power setting. The amount of PE emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested, in hours, by the PE emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

1. b **Emission Limitation-**
151.1 lbs NO_x/hr

Applicable Compliance Method-

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the hourly PE emission totals at each power setting. The amount of PE emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested by the PE emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

Emission Limitation -

11.3 TPY NO_x, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the monthly NO_x emission totals at each power setting. The amount of NO_x emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested (hr/month) by the NO_x emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

1. c **Emission Limitation-**
13.1 lbs SO₂ /hr

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Applicable Compliance Method-

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the hourly PE emission totals at each power setting. The amount of PE emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested by the PE emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

Emission Limitation -

0.98 TPY SO₂, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the monthly SO₂ emission totals at each power setting. The amount of SO₂ emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested (hr/month) by the SO₂ emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-6, January 2002).

1.d Emission Limitation-
53.6 lbs OC/hr

Applicable Compliance Method-

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the hourly PE emission totals at each power setting. The amount of PE emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested by the PE emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

Emission Limitation -

4.02 TPY OC, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the monthly OC emission totals at each power setting. The amount of OC emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested (hr/month) by the OC emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

NEW SOURCE REVIEW FORM B

PTI Number: 08-04451

Facility ID: 0812720352

FACILITY NAME 178 Fighter Wing

FACILITY DESCRIPTION engine test cell.

CITY/TWP Springfield

Emissions Unit ID: **P001**

1.e Emission Limitation-
110.7 lbs CO/hr

Applicable Compliance Method-

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the hourly PE emission totals at each power setting. The amount of PE emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested by the PE emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

Emission Limitation -

8.30 TPY CO, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the summation of the monthly CO emission totals at each power setting. The amount of CO emitted from testing at each engine power setting shall be calculated by multiplying the fuel flow rate (lbs/hr) by the total time tested (hr/month) by the CO emission factor (as specified in USAF Air Emission Inventory guidance Document for Mobile Sources at Air Force Installations, Tables 3-3, 3-5, January 2002).

F. Miscellaneous Requirements

None

SIC CODE 4581 SCC CODE 2-04-003-02 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION Jet Engine Test Cell

DATE INSTALLED August 1986

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	6.73 lbs/hr	0.50	6.73 lbs/hr	0.50
PM ₁₀					
Sulfur Dioxide	attainment	13.1 lbs/hr	0.94	13.1 lbs/hr	0.98
Organic Compounds	attainment	53.6 lbs/hr	5.50	53.6 lbs/hr	4.02
Nitrogen Oxides	attainment	151.1 lbs/hr	11.30	151.1 lbs/hr	11.30
Carbon Monoxide	attainment	110.7 lbs/hr	8.30	110.7 lbs/hr	8.30
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

NEW SOURCE REVIEW FORM B

PTI Number: 08-04451 Facility ID: 0812720352

FACILITY NAME 178 Fighter Wing

FACILITY DESCRIPTION engine test cell. CITY/TWP Springfield

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

BAT has been determined to be compliance with the applicable OAC rules, compliance with the annual engine test and fuel usage restrictions, and compliance with the monitoring and record keeping/reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____