

**EASTERN KERN AIR POLLUTION CONTROL DISTRICT
TECHNICAL SUPPORT DOCUMENT FOR
Edwards Air Force Base
2022 TITLE V PERMIT RENEWAL**

2700 "M" Street, Suite 302
Bakersfield, California 93301
Telephone: 661-862-5250

APPLICATION RECEIVED FROM: **Edwards Air Force Base
412th Civil Engineer Group
Environmental Management Division,
Compliance Branch
120 North Rosamond Boulevard, Suite A
Edwards Air Force Base CA 93524-8600**

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: **Marc G. Minneci, NH-III**
Title: **Chief, Compliance Branch**
Telephone: **(661) 277-1457**

FACILITY CONTACT PERSON: **John W. Vidic**
Title: **Air Program Manager**
Telephone: **(661) 277-1457**

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I. INTRODUCTION

This Technical Support Document (TSD) pertains to an extensive revision to the Edwards Air Force Base (EAFB) Title V permit renewal, which includes disaggregation of the major stationary source groups. 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 (See Figure 1).

Issuance of the Title V permit renewal will allow EAFB to continue their day-to-day operations pursuant to the requirements of the Eastern Kern Air Pollution Control District (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 pursuant to the 1997, 8-hour Ozone NAAQS but Severe for the 2008, (75 ppb) and Serious for the 2015, (70 ppb) 8-hour Ozone NAAQS. The major source threshold is 25 tons per year (tpy) for NO_x and VOCs. The District is designated attainment or unclassifiable for the NAAQS pollutants: NO₂, SO₂, CO, PM₁₀, PM_{2.5}, and lead, these major source thresholds are 100 tpy.

EAFB has been operating under an application shield during the past few 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.:	08/19/2020	
60-Days:	10/18/2020	
Deemed Complete:	10/16/2020	
Current Title V Permit Expiration:	02/19/2021	Under Application Shield
Initial Facility 45-Day Review:	Start: 12/16/2020	End: 01/30/2021
Second Facility 45-Day Review:	Start: 09/20/2021	End: 11/04/2021
Third Facility Review:	Start: 03/02/2022	End: 04/18/2022
EPA 45-Day Review:	Start: 03/02/2022	End: 04/18/2022
Second EPA 45-Day Review:	Start: XX/XX/2022	End: XX/XX/2022
30 Day Public Notice:	Start: XX/XX/2022	End: XX/XX/2022

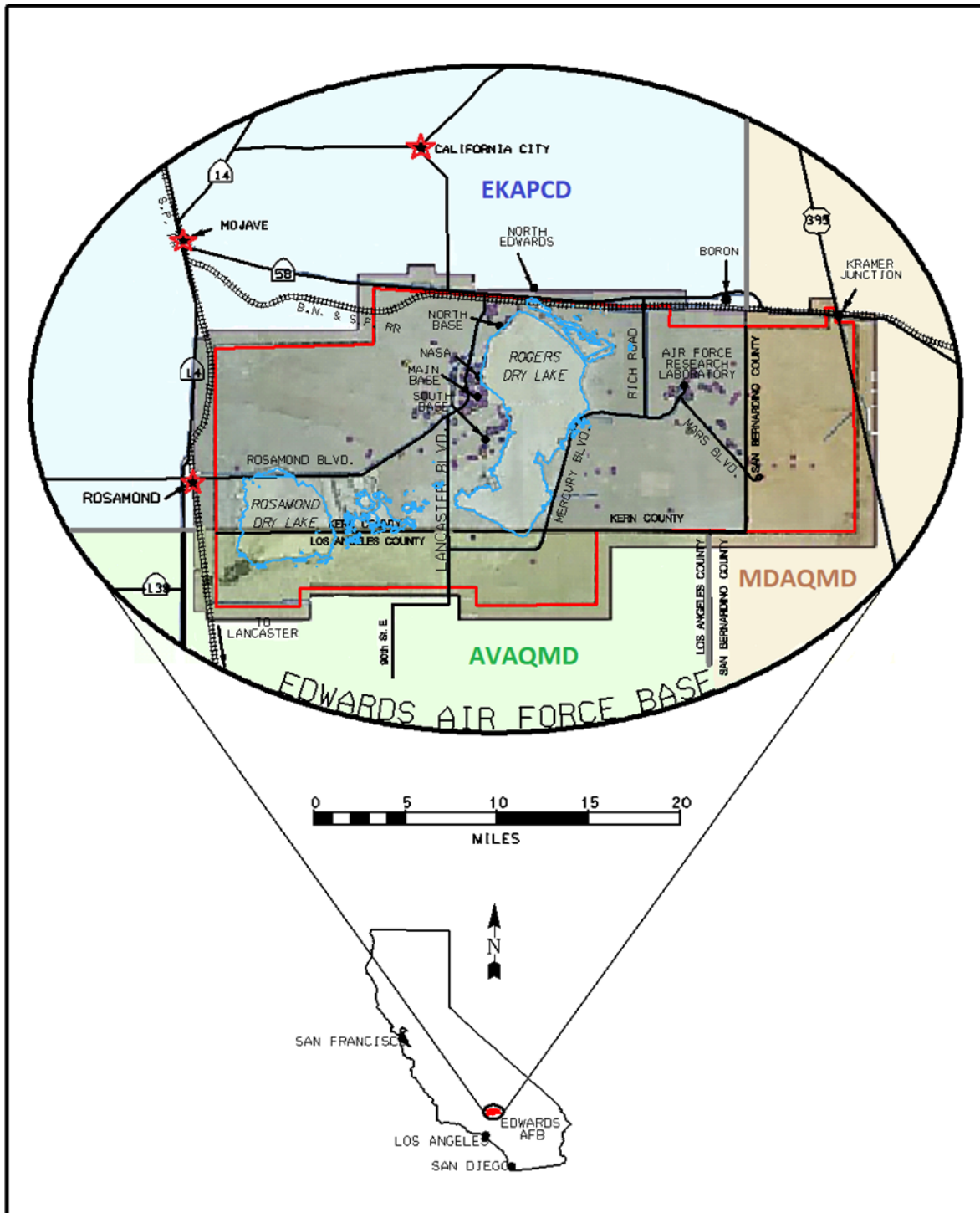
II. FACILITY DESCRIPTION

An Air Force reorganization consolidated both the 95th Air Base Wing (ABW) and the 412th Test Wing (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.

III. FACILITY LOCATION

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

General Vicinity Map of Edwards AFB, Edwards, CA



IV. BACKGROUND

Pursuant to District Rule 201.1, a Federal Part 70 Permit (No. 9002-V-2000-1) was first issued to EAFB in 2001. EAFB’s initial Title V permit was divided into ten (10) source groups. However, EAFB’s reorganization condensed their Title V permit down to the two (2) primary base operations; 412th Test Wing (412 TW) and Air Force Research Laboratory (AFRL).

A. INITIAL TITLE V FUNCTIONAL GROUPING

For the purpose of Title V implementation, the District established initially established 10 groups for EAFB Title V permit 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. 412 TW & AFRL TITLE V PERMIT STRUCTURE

The 2011, renewal aligned the structure of the Title V Permit to reflect the current (reorganized) operations and anticipated operations at the installation. The primary organization located at EAFB is the 412 TW. AFRL could be considered an Associate Unit, but was determined to be a significant operation. After discussions between both parties occurring on August 29, 2011 and October 4, 2011, and at the request of EAFB, the District agreed to issue two Title V permits for EAFB (one for each primary group operating within the base).

The Title V permit consolidated emission sources from the former 95th Air Base Wing (ABW) and 412 TW into one permit and consolidated AFRL operations into its own Title V permit. Even though the Title V permit was broken into two distinct groups (412 TW and AFRL), Title V applicability was still determined to be fence line to fence line. This reflected the USAF reorganization with the consolidation of 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. TITLE V PERMIT DISAGGREGATION

EAFB's current Title V Permit was set to expire on 19 February 2021. EAFB submitted an application package to renew and restructure their Title V permit within the appropriate timeframe. The proposed restructure is based on disaggregating the stationary sources for the purpose of Title V permitting. The basis for this disaggregation is the 2 August 1996 U.S. Environmental Protection Agency (EPA) Memorandum, titled: "Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act."

Given the wide variety of functions performed and array of control on a military installation, the Department of Defense (DoD) requested that EPA provide guidance to DoD components on how to determine air emission "major sources" for the 1963 Clean Air Act's (CAA) Title I Parts C & D (1977/1990 amendments), including new source review (NSR) and prevention of significant deterioration) and Title V (1990 amendment, Permits) applicability. The underlying purpose of the memorandum is to ensure military installations are treated consistently with their nonmilitary counterparts with respect to EPA regulations and policies. The memorandum states that "EPA believes it is appropriate to think of military installations as combinations of functionally distinct groupings of pollutant-emitting activities that may be identified and distinguished the same way that industrial and commercial sources are distinguished, that is, on the basis of a 'common sense notion of a plant.'" In addition to major source determination guidance, this 1996 memorandum provides guidance to EPA Regional Offices and their delegated permitting authorities; specifically, the ability to accept multiple Title V permit applications from DoD components for each major source. Therefore, through this application's permit modification EAFB will be able to manage major source groups under separate mission-aligned Title V permits.

The purpose of restructuring EAFB's existing Title V permit is to allow a more flexible and sustainable approach in managing EAFB's air quality requirements while minimizing impact to EAFB's mission. The proposed disaggregation will result in eight (8) distinct Title V permits, encompassing eight (8) of EAFB's twenty-two (22) Stationary Source Groups (SSGs). The twenty-two (22) SSGs capture a total of 188 (as of 30 July 2020) District permitted sources and are based on organizational command and control, functional mission, and geography. The proposed disaggregation identifies eight SSGs with 93 sources of which 56 are subject to Title V requirements and 37 are exempt. The remaining 14 SSGs with 96 sources also fall under Title V exemptions. The inclusion of the SSGs to be Title V permitted are based on the sum of potential to emit (PTE) for each source within the group as compared to Title V major source applicability criteria, or if the group includes sources requiring Title V by regulation (e.g. 40 CFR Subpart GG, Aerospace NESHAP).

A. DISAGGREGATION BACKGROUND

On 2 August 1996, EPA issued a memorandum titled “Major Source Determination for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act.” This memorandum was developed to make evaluation of operations at military installations consistent with nonmilitary stationary sources. EPA determined that a single Standard Industrial Code (SIC) designation, Major Group 97, National Security and International Affairs, was inappropriate for major source determinations at some military installations because it may subject portions of the installation and some operations to requirements that would not otherwise apply if it were a comparable source at a nonmilitary facility. A single SIC designation inappropriately aggregated activities of unique type and diversity based on a single military purpose rather than separate designations based

EPA states that it is appropriate to think of military installations as combinations of functionally distinct groupings of pollutant-emitting activities that may be identified and distinguished the same way that industrial and commercial sources are distinguished within a city. Similar to nonmilitary sources, operations at military installations are classified into “primary” and “support” activities. When support activities are essential to perform the mission, support activities at military bases may be aggregated with their associated primary activity regardless of dissimilar SIC codes. Activities that are independent of the primary aerospace mission, such as gas stations or utilities providing convenience for civilians and residents, may be considered separate, disaggregated operations.

B. STATIONARY SOURCE GROUPS

As result from 1987 discussions and agreement between the District and the Air Force Flight Test Center (AFFTC), EAFB aligned all stationary air sources into distinct Stationary Source Groups (SSGs) for CAA Title I NSR permitting purposes. During these discussions, AFFTC proposed that EAFB be treated as twenty-two (22) separate SSGs based on their command organization and functional mission. In a letter dated 08 September 2014, Edwards AFB proposed to restructure and rename the SSGs to be more consistent with a new command organization and to align the SSGs with specific missions across geographic locations on Edwards AFB. This proposal was slightly amended in December 2014 to reflect additional organizational changes and the changes were accepted by the District on 29 January 2015.

All permitted equipment and support operations at AFRL were classified under SSG 134, AFRL Installation Services. As a number of sources in SSG 134 did not match the Installation Services function, EAFB submitted a change of ownership application on 27 March 2017, to align source function with source group. As a result, twenty-one (21) rocket test stand sources would be restructured under SSG 145, AFRL-Rocket Test Operation. In May of 2017, The District issued twenty-one (21) revised Permits to Operate for the rocket test stand sources reflecting the change to SSG 145.

Although each SSG group's function ultimately reports to the EAFB's Installation Commander, these SSGs are distinct in operation and are not necessarily managed or regulated by the commander. Utilizing the 2 August 1996 EPA guidance, EAFB approached the District in December 2014, and requested that for Title V permitting, EAFB be separated into the same SSGs that were proposed in November 2014, for NSR.

Additionally, EAFB requested that Title V applicability be determined for each SSG separately based on the group's emission sources, their PTE, and estimated actual emissions of regulated pollutants based on the District's approved annual emissions inventory. EAFB contended that application of this proposal would result in capturing the main emission sources at EAFB under Title V, while excluding non-applicable smaller and less significant emission sources from the Title V program. The District agreed to consider EAFB's proposal and discuss it with EPA Region 9. In February 2015, the District informed EAFB that EPA was not opposed to the idea but suggested the District follow through with issuing the Title V renewal permit (Permit 9002-V-2000-1, dated 19 February 2016) based on the existing structure of the Title V permit and address the disaggregation approach on the next renewal application. The District agreed to address disaggregation as part of this current renewal with modification application. Since 2016, however, the decision to use estimated actual emissions has been dropped to maintain optimum mission flexibility.

C. DISAGGREGATION RENEWAL APPLICATION

EAFB Title V renewal application package requested disaggregating the Title V permit to include eight (8) SSGs of the twenty two 22 SSGs, which capture the major emission sources under Title V, while excluding non-applicable less significant emission sources from the Title V program. Each SSG was evaluated separately to determine whether the PTE for that SSG qualified as a major stationary source, rather than the current permit approach that aggregates all SSG into one major source.

Thresholds for determining a "major stationary source" and Title V applicability include separate qualifications for areas that are in attainment and non-attainment for NAAQS. Generally, the threshold for requiring a "major stationary source" or SSG to have a Title V permit is lower in areas classified with a higher severity of nonattainment (Marginal, Moderate, Serious, Severe, or Extreme).

The criteria for a SSG inclusion in the Title V permit is based on the definition of a "major stationary source" in District Rule 201.1 and 40 CFR 70.2. Other criteria for SSGs, which fall under the purview of the Title V program include specific sources that have a major source permit under the NSR permit program in 40 CFR 51.165, as administered locally by Districts Rule 210.1 and 210.1A, and non-major sources subject to certain NESHAP regulations such as 40 CFR 63, Subpart GG for aerospace.

There are no actual or potential emissions increases associated with grouping each source separately. Based on the established PTE thresholds under District rule 201.1, five (5) SSGs (0127, 0134, 0139, 0145 and 0147) fall under the definition of "major stationary source" and three (3) SSGs (0131, 0132, and 0138) qualify for inclusion in the Title V permit as determined by NESHAPs. The remaining fourteen (14) SSGs are below the Major Source thresholds and are not subject to a NESHAP, and therefore not Title V permitted.

Table 2 provides a summary of Title V permit applicability for each SSG. The table identifies if PTE is above or below the major source threshold and if the SSG is subject to a specific NESHAP. PTE was determined by using the permitted emissions specified on each PTO and engineering evaluation documentation.

Table 2 SSG Title V Applicability

SSG	Title V Required	Potential Emissions				
		PM10	SOx	NOx	VOC	CO
126	No, PTE is well below thresholds.	-	-	-	1.55	-
127	Yes, PTE exceeds applicable Title V thresholds. SSG also includes Aerospace NESHAP Sources which must obtain a Title V permit	36.95	167.67	3,281.26	2,309.92	2,472.55
128	No, Permitted sources in SSG.	-	-	-	-	-
129	No, PTE is well below thresholds.	8.27	0.62	29.87	3.02	8.45
130	No, PTE is well below thresholds.	0.02	0.04	1.15	0.03	0.12
131	Yes, Anticipated HAP PTE from PIRA Open Burn/Open Detonation (OB/OD) Operation and MSW Landfill NESHAP.	13.66	0.15	5.09	0.38	0.52
132	Yes, Includes Aerospace NESHAP Sources that must operate under a Title V permit.	10.09	0.83	12.63	13.75	4.20
133	No, PTE is well below thresholds.	0.03	-	-	-	-
134	Yes, AFRL Command has directed EAFB to obtain a Title V Permit to allow operational flexibility.	9.40	6.48	50.05	2.97	118.02
135	No, PTE is well below thresholds.	0.001	0.002	0.07	0.004	0.02
136	No, Permitted sources in SSG.	-	-	-	-	-
137	No, PTE is well below thresholds.	0.30	1.27	22.45	0.02	0.68
138	Yes, Includes Aerospace NESHAP Sources that must operate under a Title V permit.	0.04	0.03	0.53	0.16	0.78
139	Yes, PTE exceeds the applicable Title V thresholds.	0.01	0.14	0.12	0.09	1989.98
140	No, PTE is well below thresholds.	0.20	0.15	6.75	0.98	8.31
141	No, PTE is well below thresholds.	1.01	-	0.18	0.39	0.04
142	No, Permitted sources in SSG.	-	-	-	-	-
143	No, Permitted sources in SSG.	-	-	-	-	-
144	No, Permitted sources in SSG.	-	-	-	-	-
145	Yes, PTE exceeds applicable Title V threshold and AFRL Command has directed EAFB to obtain a Title V Permit to allow operational flexibility.	2.53	-	13.00	-	100.74
146	No, Permitted sources in SSG.	-	-	-	-	-
147	Yes, PTE exceeds the applicable Title V thresholds.	39.77	10.37	3,085.21	17.40	1,545.88

VI. POTENTIAL EMISSIONS

There have been no major emission sources added since the previous (2016) Title V renewal. The majority of new or replacement permitted emission sources have been for facility management and emergency operations, and have lower emission rates from improved engine efficiency and stricter emission controls. The following tables list the potential emissions, post-modification emissions, emissions change, and Greenhouse Gas emissions for each Title V permitted SSG. GHGs are PTE reported for year 2019 and exclude exempt sources.

SSG 127, MXG-Operations MB

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions ¹	36.95	167.67	3,281.26	2,309.92	2,472.55
Post-modification Emissions	34.14	167.67	3,281.26	2,309.89	2,472.55
Emissions Change ²	(2.81)	0	0	(0.03)	0

¹Potential to emit prior to project modifications

²Difference between potential emissions and post-modification emissions, excluding exempted.

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	293,393	11.7	2.3	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	293,393	245.7	713	N/A	N/A	N/A	294,352

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

SSG 131, CEG-Operations BW

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions ¹	13.66	0.15	5.09	0.38	0.52
Post-modification Emissions	13.66	0.15	5.09	0.38	0.52
Emissions Change ²	0	0	0	0	0

¹Potential to emit prior to project modifications

²Difference between potential emissions and post-modification emissions, excluding exempted.

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	5,394	26	0.02	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	5,394	546	6.2	N/A	N/A	N/A	5,946

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

SSG 132, OG-Operations SB

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions ¹	10.1	0.826	12.6	13.75	4.2
Post-modification Emissions	6.14	0.823	11.0	13.5	3.9
Emissions Change ²	(4.0)	(0.003)	(1.6)	(0.3)	(0.3)

¹Potential to emit prior to project modifications²Difference between potential emissions and post-modification emissions, excluding exempted.

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	1,676	0.06	0.04	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	1,676	1.26	12.4	N/A	N/A	N/A	1,690

Carbon dioxide (CO₂), Nitrous oxide (N₂O), Methane (CH₄), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), and Sulfur Hexafluoride (SF₆).**SSG 134, Installation Services**

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions ¹	9.4	6.5	50.1	3.0	118
Post-modification Emissions	9.3	6.4	47.1	2.6	117.0
Emissions Change ²	(0.1)	(0.1)	(3.0)	(0.4)	(1.0)

¹Potential to emit prior to project modifications²Difference between potential emissions and post-modification emissions, excluding exempted.

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	99,723	4.87	0.97	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	99,723	102.3	300.7	N/A	N/A	N/A	100,126

SSG 138, MXG-Logistics MB

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions ¹	-	-	-	-	-
Post-modification Emissions	0.04	0.03	0.53	0.16	0.78
Emissions Change ²	-0.04	-0.03	-0.53	-0.16	-0.78

¹Potential to emit prior to project modifications²Difference between potential emissions and post-modification emissions, excluding exempted.

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	-	-	-	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	-	-	-	N/A	N/A	N/A	0

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

SSG 139, OG-Operations BW

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions ¹	0.01	0.14	0.12	0.09	1,990
Post-modification Emissions	0.01	0.14	0.12	0	1,990
Emissions Change ²	0	0	0	(0.09)	0

¹Potential to emit prior to project modifications

²Difference between potential emissions and post-modification emissions, excluding exempted.

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	5.6	0.0002	0.00004	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	5.6	0.0042	0.0124	N/A	N/A	N/A	5.6

SSG 145, Rocket Test Operations

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions ¹	2.53	0	13.00	0	100.74
Post-modification Emissions	2.53	0	13.00	0	100.74
Emissions Change ²	0	0	0	0	0

¹Potential to emit prior to project modifications

²Difference between potential emissions and post-modification emissions, excluding exempted.

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	27,735	146.7	0.001	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	27,735	3,080.7	0.31	N/A	N/A	N/A	30,816

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

SSG, 147 MXG-Contracted Operations BW

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	SO _x	NO _x	VOC	CO
Potential Emissions ¹	39.765	10.37	3,085.21	17.395	1,545.9
Post-modification Emissions	39.760	10.35	3,085.14	17.392	1,545.6
Emissions Change ²	(0.005)	(0.02)	(0.08)	(0.004)	(0.3)

¹Potential to emit prior to project modifications

²Difference between potential emissions and post-modification emissions, excluding exempted.

Greenhouse Gas Emissions (tons per year)							
Pollutants:	CO ₂	CH ₄	N ₂ O	HFCs	PFCs	SF ₆	Total
Emissions (tpy):	146,058	5.8	1	N/A	N/A	N/A	
*GWP:	1	21	310	**	**	23,900	
CO ₂ e (tpy):	146,058	121.8	310	N/A	N/A	N/A	146,490

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

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.

Rule No. **Rule Title and Description Conditions**

Rule 107

Inspections

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**Stack Monitoring**

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.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
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 (PM10) 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.
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 shall apply to Design Conditions, Operational Conditions, Special Conditions, Compliance Testing Requirements, and Emission Limits. Any District or State-only condition (not required by the EPA) does not apply.
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 Title and Description Conditions**

Rule 201.1

Compliance with Permit Conditions

- A. Edwards AFB 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. Edwards AFB 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, Edwards AFB 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 Title and Description Conditions

Rule 201.1

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.VI.C. District hereby references the following documents which are clearly identified and available to the District and to the public:

Each reference shall include, at a minimum, title or document number, author and recipient if applicable, date, citation of relevant sections of the Rule or document, and identification of specific source activities or equipment for which the referencing applies.

Rule No.

Rule Title and Description Conditions

Rule 201.1

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>
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Rule 201.1

Periodic Monitoring

Non-Point

Edwards AFB shall conduct testing semi-annually, in accordance with the methodology contained in EPA Method 22 for all active non-point sources where conditions allow for a valid Method 22. 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 operating under normal operating conditions, 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 permitted emission sources such as the application of paint that is not sprayed or atomized, or 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. Additionally, this requirement does not apply to classified operations that do not have external venting to an unclassified area.

Point

Edwards AFB shall conduct testing semi-annually, in accordance with the methodology contained in EPA Method 22 for all active/in use point sources. This condition is only applicable to areas where a valid Method 22 or Method 9 can be performed. 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 non-point source operating under normal operating conditions, 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 Title and Description Conditions**

Rule 201.1 **Additional Monitoring**

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.

Rule 209 **Conditional Approval**

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.

Rule No. **Standards for Authority to Construct**

- Rule 201.1 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.

Rule 210.4
SIP Approved
2013

Prevention of Significant Deterioration (PSD)

EAFB may be subject to District Rule 210.4, Prevention of Significant Deterioration (PSD) if it undergoes major modification(s).

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 301 and 201.1	<p><u>Permit Fees</u></p> <p>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.</p> <p>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.</p> <p><u>Payment of Supplemental Fee</u></p> <p>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.</p>
Rule 301.4	<p><u>Greenhouse Gas Fee</u></p> <p>Any stationary source that has actual GHG emissions, in the prior calendar year, greater than or equal to 100,000 tons of CO₂e, as calculated in accordance with 40 CFR Part 98, shall pay a Consumer Price Index (CPI) adjusted GHG fee per ton of CO₂e 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.</p>
Rule 401 SIP Approved 2001	<p><u>Visible Emissions</u></p> <p>Unless otherwise stated in equipment specific permits, the following limits apply:</p> <p><u>Limits</u></p> <p>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:</p> <ul style="list-style-type: none">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, orB. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in Subsection A.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 404.1 SIP Approved 2008	<u>Particulate Matter Concentration - Desert Basin</u> 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. This condition does not apply to rocket engine testing meeting the requirements of Rule 431, fires set in accordance with Rule 416, or boilers, steam generators, water or process heaters that combust only CARB certified or PUC regulated liquid or gaseous fuel.
Rule 405 SIP Approved 1984	<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).
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).

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 410.1A SIP Approved 2010	<u>Architectural Coating Operations</u> Edwards AFB may be subject to provisions of Rule 410.1A that apply to architectural coatings operations. This provision does not apply to coating operations occurring in shop applications to nonstationary structures or associated parts such as airplanes, ships, boats, trains, automobiles. Aerosols, adhesives, and architectural coatings sold in one liter or less containers are not considered architectural coating operations as defined in Rule 410.1A. Architectural coating operations shall maintain adequate records demonstrating compliance and / or any exemption to the requirements of Rule 410.1A.
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.X, 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. Organic solvent degreasing operations as defined in Rule 410.3 shall maintain adequate records demonstrating compliance or any exemption to the requirements of Rule 410.3.
Rule 410.8 SIP Approved 2016	<u>Aerospace Assembly and Coating Operations</u> Edwards AFB shall comply with all applicable requirements of Rule 410.8 that apply to the manufacturing, assembling, coating, masking, bonding, paint stripping, surface cleaning, service, and maintenance of aerospace components and cleanup of associated equipment, storage, and disposal of solvents and waste solvent materials. Aerospace and associated components coating operations as defined in Rule 410.8 shall maintain adequate records demonstrating compliance or any exemption to the requirements of Rule 410.8.
Rule 410.9 SIP Approved 2016	<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. Aerosols and architectural coatings as defined in Rule 410.1A are not considered wood product coating operations as defined in Rule 410.9. Wood product coating operations shall maintain adequate records demonstrating compliance or any exemption to the requirements of Rule 410.9.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
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. A portable temporary tank with capacity of 21,000 gallons or less, left on site for six months or less, may be exempt from vapor control requirements provided pressure relief device is set within 10 percent of maximum allowable working pressure of container.
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. Wildland vegetation management, forest management, or range improvement burning as defined in Rule 417, and in compliance with applicable provisions of Rule 417 shall not be subject to this requirement. Rule 417. <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.
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	<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), Dc (Small Steam Generating Units), IIII (Compression Ignition Internal Combustion Engines), and WWW (Municipal Solid Waste Landfills) apply to this facility.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 423 SIP Approved 1977	<p><u>National Emission Standards for Hazardous Air Pollutants and Source Categories (NESHAPS)</u></p> <p>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.</p> <p>All applicable requirements of 40 CFR Part 61, Subpart M (Asbestos); and 40 CFR Part 63, Subpart A (General Provisions), GG (Aerospace Manufacturing and Rework Facilities), DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters), and ZZZZ (RICE) apply to this facility apply to this facility.</p> <p>Asbestos EAFB 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.</p> <p>The RICE NESHAP does not apply to portable or transportable engines (has wheels, skids, carrying handles, dolly, trailer, or platform), which do not remain in one location within the facility for more than 12 months.</p>
Rule 425.2 SIP Approved 1984	<p><u>Boilers, Steam Generators, and Process Heaters (Oxides of Nitrogen)</u></p> <p>An owner/operator of any emission boiler, steam generator or process heater with a rated heat input of 5 million Btu/hr unit with and 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.</p> <p>An owner/operator of any unit becoming subject to requirements of Section V.A by exceeding the annual heat input exemption threshold shall comply with following increments of progress:</p> <ol style="list-style-type: none">1. On or before December 31st of calendar year immediately following year annual heat input threshold was exceeded, submit an Emission Control Plan containing information prescribed in Section VI.D; and2. No later than three calendar years following submission of Emission Control Plan, demonstrate final compliance with all applicable standards and requirements of this Rule.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 431	<u>Propellant Combustion and Rocket Testing</u>
SIP Approved 2008	Edwards AFB shall comply with all applicable requirements of Rule 431 for open-air rocket propellant combustion operations conducted on rocket test stands. The provisions of Rule 431 do not apply to emergency destruction/disposal of propellant by qualified bomb squad or explosive ordinance groups or jet engine testing. Propellant Combustion and Rocket Testing detonation operations shall maintain adequate records demonstrating compliance and / or any exemption to the requirements of Rule 431.
Rule 432	<u>Polyester Resin Operations</u>
SIP Approved 2015	Edwards AFB shall comply with all applicable requirements of Rule 432 that apply to the commercial and industrial polyester resin operations and cleanup of associated equipment, storage, and disposal of solvents and waste solvent materials. Polyester resin and associated components coating operations as defined in Rule 432 shall maintain adequate records demonstrating compliance and / or any exemption to the requirements of Rule 432.
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.
<u>Federal Rule</u>	<u>Rule Title and Description Conditions</u>
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.
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.

Federal Rule **Rule Title and Description Conditions**

Protection of Stratospheric Ozone

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.

40 CFR
70.5d

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

VIII. COMPLIANCE:

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

A. Notice of Violations (NOV)

No NOV's have been issued to EAFB during the reporting years of 2016 to 2021.

B. Variances

No Variances have been granted to EAFB during the reporting years of 2016 to 2021.

C. Breakdowns

No Breakdowns have occurred at EAFB during the reporting years of 2016 to 2021.

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