



# Regulatory Order

Issued in accordance with:

RCW 70A.15.2040, RCW 70A.15.2300,  
WAC 173-400-091, AND SRCAA  
Regulation I, Sections 2.01, 2.02, and 2.05

1610 S. Technology Blvd., Suite 101, Spokane, WA 99224 (509) 477- 4727

## ORDER #04-02

### ORDER TO ESTABLISH VOLUNTARY EMISSIONS LIMITS FOR FAIRCHILD AIR FORCE BASE 92D AIR REFUELING WING PURSUANT TO WAC 173-400-091

DATE ISSUED: DECEMBER 10, 2004

1<sup>ST</sup> REVISION DATE: DRAFT - TBD

ISSUED TO: FAIRCHILD AIR FORCE BASE 92D AIR REFUELING WING

SITE LOCATION: FAIRCHILD AFB, WASHINGTON

MAILING ADDRESS: 92 CES/CEVC, 100 W. ENT STREET, SUITE 155  
FAIRCHILD AFB, WA 99011

RESPONSIBLE OFFICIAL: 92 AIR REFUELING WING COMMANDER

FACILITY CONTACT: JOSHUA POTTER  
AIR QUALITY ENGINEER  
(509) 247-8139

FACILITY DESCRIPTION: US AIR FORCE BASE

#### BACKGROUND

Fairchild Air Force Base 92d Air Refueling Wing (FAFB) is a military base located about 12 miles west-southwest of Spokane, WA. FAFB is an Air Mobility Command air refueler tanker base. A unit of the Washington Air National Guard is also located at FAFB. This unit is considered separate from the 92d Air Refueling Wing. During the initial implementation of SRCAA's Title V Air Operating Permit program, FAFB was classified as a major source, as defined in Chapter 173-401 WAC, due to potential emissions of oxides of nitrogen (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) above the major source threshold of 100 tons per year. NO<sub>x</sub>, SO<sub>2</sub>, and CO were primarily emitted from four large

boilers at FAFB's main steam plant. FAFB also operated additional natural gas and diesel fired boilers, diesel fired emergency generators, petroleum storage tanks, surface coating operations, solvent cleaning tanks, and particulate collection systems at the facility. Several categories of emission units operated at FAFB were not subject to the Title V Air Operating Permit program, including emission units and activities for the convenience of military personnel, National Guard emission units and activities, CERCLA Superfund emission units and activities, and aerospace ground equipment (AGE). SRCAA (then known as SCAPCA) issued an air operating permit to FAFB (AOP-2) on December 12, 2000.

In 2002-2003, FAFB decommissioned the four large boilers (three boilers rated at 110 MMBTU/hr; and one boiler rated at 120 MMBTU/hr) at the central steam plant; each boiler was capable of burning either natural gas or diesel). FAFB also installed 109 natural gas fired boilers and hot water heaters in numerous buildings throughout the Base. As a result of these projects, the potential emissions of SO<sub>2</sub>, CO, and VOC decreased to below the major source threshold of 100 tons per year. However, the facility's the potential to emit (PTE) for NO<sub>x</sub> was still above the major source threshold level of 100 tons annually. The NO<sub>x</sub> emissions were generated primarily from generators and remaining boilers at the facility.

On May 28, 2004, SRCAA received a request from FAFB, dated May 22, 2004, to revoke the air operating permit issued to FAFB (i.e., AOP-2) and issue a Voluntary Emission Limit (VEL) Order, under WAC 173-400-091, to limit facility-wide emissions of NO<sub>x</sub> to 90 tons per year. According to FAFB's request, historical facility-wide annual actual emissions had been below 100 tons of each criteria pollutant. However, because of the central steam plant boilers, the NO<sub>x</sub> emissions were close to the major source threshold of 100 tpy. With the emissions reductions obtained from decommissioning the central steam plant boilers, FAFB proposed to limit NO<sub>x</sub> emissions to below the 100 tpy major source threshold as allowed under WAC 173-400-091.

Order #04-02 was issued December 10, 2004 and became effective on January 1, 2005, thereby limiting the facility's emissions to below major source thresholds. As of January 1, 2005, FAFB was longer a major source and was no longer subject to SRCAA's Title V Air Operating Permit program. AOP-2 was voided and FAFB became a SRCAA registered source, pursuant to SRCAA Regulation I, Article IV. Order #04-02 required FAFB to monitor and record all fuel (natural gas and diesel) usage for all boilers and stationary emergency generators at the facility, excluding natural gas usage at the 4 military family housing areas. To determine the facility's non-military housing natural gas usage, FAFB was required to monitor natural gas usage at both the facility's central gas meter and readings from the gas meters for the 4 housing areas on the Base.

Since issuance of Order #04-02, FAFB has made the following additional changes:

- By 2013, all diesel fired boilers had been removed from the facility; and.
- By 2018, independent natural gas meters were installed for the military family housing areas, and are now separate from the central gas meter. This allows FAFB to directly

monitor FAFB natural gas usage at the base, separate from the military housing area usage.

- By 2018, all propane fired boilers were removed from the facility.

On 1/17/2023, SRCAA received an e-mailed request from FAFB to revise Order #04-02. In their request, FAFB proposed the following revisions to the Order:

- Track natural gas usage via Avista utility bills for the FAFB facility, and revise the emission estimation equation to calculate NOx emissions from natural gas usage in terms of therms (the units for natural gas usage on Avista utility bills).
- Remove the requirement to monitor and record monthly natural gas usage for the military family housing area usage.
- Remove the requirement to track diesel boilers usage.
- Remove the requirement to track propane boilers usage until a time that FAFB installs a propane boiler on the installation.

The voluntary emission limit revision request has been reviewed by SRCAA. The facility shall comply with the annual potential to emit limitation, given in Condition 1 below, effective January 1, 2005:

1. Facility-wide oxides of nitrogen emissions shall not exceed 90 tons during any rolling twelve month period.

To ensure that NOx emissions do not exceed the limit given in Condition 1 above, the facility shall comply with the following revised conditions, beginning *[insert date]*.

- A. Monthly records shall be kept of the total natural gas consumption by the facility as determined by Avista utility bills, or SRCAA approved alternative records, for the facility. Monthly Avista Utility bill records be kept at the facility for the previous five calendar years and shall be made available to SRCAA staff upon request.
- B. Monthly records shall be kept of the fuel oil #2 (diesel) usage for all stationary emergency generators / diesel engines at the facility. In lieu of keeping actual fuel oil #2 usage records, it is acceptable to calculate the amount of fuel oil #2 used in the stationary emergency generators diesel engines, by multiplying the maximum hourly fuel oil #2 usage in each generator (based on the maximum rated input capacity of each generator) by the number of hours that each generator operated during each month. Monthly records of the fuel oil #2 usage or the actual hours that each generator operated on fuel oil #2 during each month shall be kept at the facility for the previous five calendar years and shall be made available to SRCAA staff upon request.
- C. Only natural gas shall be burned in boilers at the facility without prior SRCAA approval. Prior SRCAA approval and revision of SRCAA Order #04-02 is required prior to burning any other fuel in boilers at the facility.

- D. Compliance with the NOx emission limits, given in Condition 1, shall be determined by using the equation below:

$$\frac{(0.00964 * NG) + (604.2 * GEN)}{2000} < 90 \text{ tons NOx}$$

where NG= natural gas consumption by the facility, as given on Avista utility bills for the previous twelve month period, (therms),

GEN = total diesel (fuel oil #2) used during the previous twelve month period in all stationary emergency generators / diesel engines, (1,000's of gallons):

- E. Within 60 days after the end of each calendar month, FAFB shall calculate emissions of NOx for the previous 12-month period, using the equation given in Condition D., to verify compliance with the emission limitation given in Condition 1. Emission calculation records shall be kept on-site for a minimum of five calendar years and shall be made available to SRCAA staff upon request.
- F. Instances of any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God such as major disaster<sup>1</sup>, that causes the facility to exceed the emissions limitations and/or fuel usage or operating hour limitations under this order due to unavoidable increases in operative hours attributable to the emergency shall be treated as a breakdown, subject to the provisions of SRCAA Regulation I, Section 6.08. SRCAA shall exempt the facility from penalties if:
- (a) the excess emissions period is reported to SRCAA on or before the next working day after the emission limitation is exceeded, and
  - (b) The facility submits a report providing:
    - 1. a description of the emergency and what caused the emergency,
    - 2. a statement that the facility was being properly operated at the time of the emergency, and
    - 3. a statement that during the emergency all reasonable steps were taken to minimize emissions and a description of those steps.
- G. The Control Officer, or duly authorized representative, shall be allowed to enter the facility premises at reasonable times to inspect equipment and/or records specific to the control, recovery, or release of contaminants into the atmosphere, in accordance with

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<sup>1</sup> Major Disaster, for the purposes of this order, means appropriate extreme and unusual circumstances such as any hurricane, tornado, storm, flood, storm, flood, high water, wind-driven water, earthquake, drought, fire, or other catastrophe in any part of the United States which could not have been avoided by the exercise of prudence, diligence, and due care, and which is or threatens to become of sufficient severity and magnitude to warrant the use of emergency standby engines for back-up electrical power.

SRCAA Regulation I, Article II and RCW 70A.15.2500. For the purposes of this regulatory order, reasonable times include, but are not limited to, any of the following: normal business and/or equipment operating hours, periods of equipment breakdown or malfunction, and times when the Control Officer, or duly authorized representative are investigating air quality complaints filed with agency and/or have reason to believe that air quality violations have occurred or may be occurring. No person shall obstruct, hamper or interfere with any such inspection.

- H. It is an ongoing condition of this regulatory order that the source be registered with the agency. Registration includes the following:
- i) Submittal of updated registration information at least annually as required by SRCAA, using forms provided by SRCAA. The forms provided by SRCAA shall be completed and returned to SRCAA within 45 days of issuance.
  - ii) Timely payment of annual registration fees to SRCAA in the amount required by SRCAA Regulations, as periodically amended. Failure to pay registration fees and other related fees within 120 days of the annual registration billing due date will result in an administrative closure of the facility. Re-opening will be governed by SRCAA Regulation I, Section 4.02.F.2, and may include resubmissions of a Notice of Construction and Application for Approval.

Effective January 1, 2005, FAFB is no longer classified as a major stationary source, as defined in WAC 173-400-113, and is not required to have a Title V Air Operating Permit.

Any proposed deviation from this order shall require revision or revocation of this order. The revision or revocation shall occur prior to the deviation.

This order does not relieve the proponent of the obligation to comply with all other applicable federal, state and local regulations and requirements.

Authorization may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following:

- Violation of any terms or conditions of this authorization; and/or
- Obtaining this authorization by misrepresentation or failure to disclose fully all relevant facts.

This order of approval may be appealed as described below:

Pursuant to the Revised Code of Washington (RCW) 43.21B.310, you have the right to appeal this Order by filing a notice of appeal with both the Pollution Control Hearings Board (PCHB) and the Spokane Regional Clean Air Agency (SRCAA) on or before the 30<sup>th</sup> day of receipt of SRCAA's order, permit, license, Notice and Order of Assessment of Civil Penalty, or Notice of Disposition.

Required procedures are detailed in state law (Chapter 43.21B RCW and Chapter 70A.15 RCW)

and the PCHB's own regulations (Chapter 371.08 Washington Administrative Code) which may be found in many public libraries, county and municipal law libraries or on the Internet at [www.access.wa.gov/](http://www.access.wa.gov/). Since others publish these documents, copies are not available from SRCAA.

If you are filing an appeal, mail, deliver, or fax it to SRCAA and the PCHB at:

SRCAA Address

SRCAA  
1610 S. Technology Blvd, Suite 101  
Spokane, WA 99224

PCHB Mailing Address

PCHB  
Environmental Hearings Office  
P.O. Box 40903  
Olympia, WA 98504-0903

SRCAA Fax Number

(509) 477-6828

PCHB Fax Number

(360) 586-2253

PCHB Physical Address

PCHB  
1111 Israel Rd. SW. Ste 301  
Tumwater, WA 98501

E-File Address

PCHB-SHBappeals@eluhwa.gov

All notices of action in connection with the appeal (date and place of hearings, findings, etc.) will be issued by the PCHB with copies to the person filing the appeal and to SRCAA.

ORDERED BY:

\_\_\_\_\_  
SCOTT WINDSOR  
CONTROL OFFICER

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DATE