



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

6280
Ser 92109/1812/RPK
9 October 1992

IN REPLY REFER TO

N60478.AR.000236
NWS EARLE
5090.3a

ENSR Consulting and Engineering
35 Nagog Park
Acton, Massachusetts 01720

Dear Mr. Gary T. Hunt:

Re: Draft Engineering Air Pollution Emissions Study at
Naval Weapons Station (NWS) Earle, Colts Neck, N.J.

The Draft Report for the Clean Air Act Amendments Study conducted at NWS Earle has been reviewed by the government, and the activity POC's and our comments have been discussed with you and Halliburton NUS (Mr. Dennis Dubberley) on several occasions in the last two weeks.

The report is a very thorough accounting and analysis of the air pollution sources and their emissions at NWS Earle.

The government comments are provided as enclosure (1). It is not expected that any of the comments will result in an increase in the scope of the current contract (Contract #N62472-90-D-1298 CTO #27), with the possible exception of the inclusion of the twenty emergency diesel generators.

Per phoncon confirmation between yourself and and NORTHDIV code 1812 (Mr. R. Killian) on 9 October 1992, the revised completion date for the final report of the Engineering Air Pollution Emissions Study at NWS Earle is 30 October 1992.

Point-of-Contact at Northern Division is Mr. Richard Killian, commercial (215) 595-0567.

Sincerely,

Richard C. Killian
for George Weise

Head, Environmental Programs Section
By direction of the Commanding Officer

Copy to:
NWS Earle Public Works Department (Attn: Mr. Greg Goepfert)

Halliburton NUS Environmental Corporation
One Devon Square, Suite 222
724 West Lancaster Avenue
Wayne, Pennsylvania 19087



**GOVERNMENT COMMENTS ON DRAFT REPORT
NWS EARLE AIR STUDY**

GENERAL COMMENTS:

1. Make a statement in the Executive Summary (ES) that some sources (list examples) were excluded from the inventory, and discuss the reasoning employed in making that determination. Add a section in the body of the report that lists all excluded sources, and discusses in some detail why they were not included in the inventory.
2. Make a statement in the ES that emissions for most sources were computed individually, but some (list examples) were compiled as a group of similar sources, and state why this was done. Add a section in the body of the report that explains in further detail, and lists all sources that were compiled as a group.
3. In the ES, address whether sources that exhaust to the workspace have been included in the inventory. Include sources that control emissions prior to exhausting to the workspace (i.e.: with an APCD), and include sources with no emissions controls (i.e.: machine shop equipment with no ductwork). Add a section (i.e.: Combine with Section 1.3.5) in the body of the report that discusses the criteria used to determine whether sources of air pollution that exhaust to the work space should be included in the inventory, and include a list of all of these sources. Additionally, make a statement in the ES and the later section about the permit applicability for workstation fugitive emissions. Cite applicable regulations, or proposed CAAA90 regulations.
4. Add a statement in the ES that addresses activity support required for the following: Maintain the inventory and emissions information developed as part of this contract, track emissions information on a regular basis for end of year reporting, determine end of year air pollution emissions utilizing calculation examples, etc., as provided in the appendices to the final report, and monitor EPA/State regulations, as they pertain to activity emissions. Address activity support in terms of man-hours and/or man-years required.

5. Hand-drawn building floor plans indicating the approximate location of each source, with building North-South orientation, must be included as an appendix. See paragraph 8.6.6.(e)(3) of Standard Clean Air Act Scope of Work dated 30 September 1991.
6. Add an appendix that contains all calculation sheets and/or computer spreadsheets for all emission sources that are included in the emissions inventory. This is needed for the activity personnel to conduct their own emissions inventory update in subsequent years. No additional work is required to provide this appendix (i.e.: Include actual calculation sheets and/or computer spreadsheets developed during the accomplishment of this contract). Include a computer diskette in the Appendix that contains the Lotus spreadsheet program (i.e.: Insert a folder with a pocket in the report). This Appendix is to be provided in only one copy (each) of the Report for the EIC and the activity POC.
7. Highlight in the ES that some emissions were derived based on a comparison of activity supply records against actual emissions known for specific sources minus material removed as hazardous waste, and a review of excess inventory purchased during the calendar year, but not issued. Discuss in more detail in a section later in the report (i.e.: Include a list of all of these sources).
8. The emergency diesel generators at the NWS are not included in the report. Include these sources.
9. Discuss in the ES and a later section, the impact of N.J.A.C. 7:27-21 (Emission Statements), as it is proposed.
10. Discuss which VOC definition (EPA or State) is used for the Clean Air Act Study, and whether both VOC emissions numbers should be reported to the NJDEPE.

PAGE/PARA

COMMENTS

ES-1 / 1

Add a statement early in the ES that identifies the attainment/non-attainment status of the activity with respect to various pollutants, and discuss the impact of that classification.

- ES-1 / 4 Explain how 8760 hours was derived (The first time it is mentioned). Also discuss that potential hours are sometimes based on less than 8760 hours (i.e.: restricted by permit, restricted by material availability, etc.).
- ES-3 / 3 LQER is not included in the list of acronyms. Also should explain better the first time it is mentioned.
- ES-3 / 5 Last sentence "Title V permit provisions..." is very vague. Explain in more detail.
- ES-3 / 6 Discuss in more detail why there is a question as to whether the five incinerators and the grit blaster require a permit. Address discussions with NJDEPE.
- ES-3 / 6 Last sentence - "Additionally, it appears..." Explain further. Do not like vague words like it appears.
- ES-4 / 1 TRS is not included in the List of Acronyms. Explain the first time it is used.
- ES-4 / 3 Only four criteria pollutants mentioned. Address that VOCs are covered elsewhere, and lead emissions are minimal.
- 1-4 / Fig 1-1 Identify shore facility on site map. Can we get a site map that shows the activity a little better.
- 1-5 / 2 Discussion of mobile source exclusion from the inventory/emissions tracking should also be included in the ES.
- 1-5 / 1.3.3.1 Exclusion of silver recovery furnaces and the fugitive sources from the inventory/emissions tracking should also be discussed in the ES.
- 1-11/Tbl 1-2 Delete this table and the current Appendix A. In their place, as the new Appendix A, insert an Inventory and Compliance Status of Sources Identified and Examined at NWS Earle, which shall have the following headings:

| | |
|--------------------|--|
| Compliance Status | Permitted, Exempt, Grandfathered, and Requires a Permit under proposed CAAA90 Regulations |
| Source Category | Boiler, etc. |
| Building Nr. | |
| Unit Nr | Sequential numbering from 1 to ... for all sources. |
| Fuel/Material | Nr 2 Fuel Oil, Safety Kleen 105, Sawdust, etc. |
| APCD | Dust Collector, etc. |
| Compliance Remarks | Identifies EPA, State, CAAA90 regulations that require a permit, allow an exemption, provide grandfather status, etc. Identifies when permits are due for renewal, when grandfathered status ends, when proposed CAAA90 regulations are expected to require a permit, etc. |

Sources are to be organized by Compliance Status, so that all permitted sources are at the beginning of the inventory, and then by source type (i.e.: boilers, fuel tanks, etc.), by fuel/material type, and finally by unit number.
Add Unit Number on Appendix B Source Specific Emissions Inventory, so that Appendices A and B can be cross-referenced.

- 1-20/1.3.5. Ensure that work stations are listed in the ES as an emissions exclusion.
- 1-22/1.4.1.1 Explain reasoning for using 4380 actual hours of operation for boilers. Does any permit condition restrict boiler operation for potential hours.

- 1-22/1.4.1.2 Explain reasoning for using 2000 actual hours of use.
- 1-23/1.4.1.4 Explain reasoning for using 2000 actual hours of use. Use the amount of CFC/Halon issued to users as the emissions, instead of that purchased/stocked, if that information is available. If not, state that the information is not available.
- 1-23/1.4.2 100% of VOC or solvent can be assumed to be emitted to the atmosphere, as long as none of it is disposed of as hazardous waste. Address in this section.
- 1-24/1.4.4 Discuss both Actual and Potential to Emit in a section prior to discussing source type emission estimates. (i.e.: Move prior to paragraph 1.4.1.1).
- You state where NJDEPE permits exist, you used permit hours as actual hours. Don't allowable permit hours also limit potential hours?
- Explain why 2000 hours was assumed for actual painting operations, and 4380 hours was assumed for boiler operation (i.e.: Explain why you picked 50% operation for boilers).
- 1-24/1.5 Explain why criteria pollutants lead and VOCs are not addressed in Appendix C.
- 1-24/1.5 Explain why criteria pollutants lead and VOCs are not included in Table 2-1a.
- 1-25/Tbl 1-3 Shouldn't PM be designated as PM10?
- 2-1/2.2.1 Explain Severe-17 non-attainment area.
- 2-7/Title VI Make a statement that the dates for ODS phase-out may be accelerated.
- 2-10 / 2 Explain further why NWS Earle would not be subject to MACT "except perhaps under area source regulations."

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- 2-12/2.3.2.1 The section on the New Jersey Code does not address Total Suspended Particulate (TSP). NJ proposed rules cite a threshold 100 tons per year as a reporting requirement. Add to this section. Activity requests this information be added to page 1-25, Table 1-3. Also affects Tables ES-1 and 2-1a, and Appendix B emissions inventory.
- 2-16 / 1 Activity requests a list of paints, coatings and solvents that exceed the allowable NJDEPE limits for VOCs. Is that readily available and can it be provided to the Activity? Or can a discussion be added into the Report, explaining how the activity can review their MSDSs and prepare their own list of paints, coating and solvents that they should discontinue purchasing and using.