UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title:	Clean Air Act Inspection of Naval Support Facility Indian Head
Inspection Date(s):	12/6-7/2022
Regulatory Program(s):	SIP, NSPS, MACT
Company Name:	Naval Surface Warfare Center
Facility Name:	Naval Support Facility Indian Head
Facility Location:	3972 Ward Avenue Indian Head, MD 20640
Latitude:	38.5868 **Longitude:** -77.1731
County/Parish:	Charles
AFS Number:	MD0000002401700040
Permit Number:	24-017-0040
NAICS Code:	928110 **SIC:** 9199
Unique Project #:	3E23CA081A

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Naval Support Facility Indian Head (NSFIH or Facility) to verify compliance with applicable State and Federal regulations. The Maryland Department of the Environment (MDE) Division of Air Quality was notified of the inspection on November 17, 2022, via email. On November 29, 2022, EPA notified the Facility of the planned inspection via phone and email. A list of records requested was sent to the Facility via email on November 29, 2022.

A. Summary of the Facility

The Facility is located at 3972 Ward Avenue, Indian Head, MD. NSFIH produces propellants and smokeless black powder for use in naval ordinance. NSFIH also conducts research and development for other ordinance applications (torpedo, missile, artillery). The NSFIH site was originally commissioned in 1890 to serve as a proving ground for the U.S. Navy and the development of smokeless powder and ordnance testing. NSFIH has continuously operated at the current location since its inception and is comprised of over 2500 acres. The site is owned by Commander, Navy Installation Command (CNIC) and the Naval Surface Warfare Center (NSWC) is the main tenant. Naval Facilities (NAVFAC) is responsible for the maintenance of the buildings and site grounds onsite. NSFIH operates with a combination of military and civilian workforce.

NSFIH is classified a major source of emissions for multiple criteria pollutants and was issued a CAA Title V permit (No. 24-017-0040) by the MDE on August 1, 2016. NSFIH was formerly a major source for hazardous air pollutant (HAP) emissions but now considers itself a minor source of HAP. The Facility is subject to, or *potentially* subject to the following federal regulations:

- 40 C.F.R. Part 60, Subpart KKKK: Standards of Performance for Stationary Combustion Turbines (NSPS KKKK);
- 40 C.F.R. Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (NSPS Dc);
- 40 C.F.R. Part 60, Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (NSPS IIII);
- 40 C.F.R. Part 63, Subpart GG: National Emission Standards for Aerospace Manufacturing and Rework Facilities (MACT GG);
- 40 C.F.R. Part 63, Subpart JJJJJJ: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (MACT 6J);
- 40 C.F.R. Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT ZZZZ);

B. Inspection Opening Conference

At 8:58AM on December 6, 2022, EPA inspectors arrived at the Facility for a CAA Inspection and conducted an opening conference to discuss the scope of the inspection. NSFIH was represented by multiple NAVFAC environmental staff. NAVFAC is responsible for the day to day compliance monitoring and permit implementation at the site. John Artes, Dakota Blum, and Alexander Holt, from MDE, were also present for the opening conference. EPA inspectors, Bruce Augustine and Carly Joseph, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine if the Facility is in compliance with applicable the existing Title V permit and applicable regulations. The inspection also served as a follow-up to a multi-media inspection that was conducted in September 2017 and a subsequent Notice of Violation and Opportunity to Confer (NOVOC) issued by EPA on December 22, 2021. Additionally, EPA informed the NSFIH representatives of their right to claim any confidential business information (CBI). At that time, NSFIH did not claim any documents provided as CBI, however, NSFIH stated that all photographs taken during the inspection would be taken by NAVFAC staff and would need to be cleared by the U.S. Navy prior to being released.

II. Site Activity/Process Description

NSFIH is involved in the research and development of energetics and the manufacture of products for the military and private customers. Besides having laboratory capabilities, NSFIH has a full production facility for ordnance. There are multiple different manufacturing processes of ordnance and propellants used in artillery. Parts of these processes include forming, casting, mixing, extrusion, and coating. Each of the various processes utilizes all or part of these manufacturing scenarios in the manufacture of final products. Furthermore, VOC and/or HAP is not used in each process.

An integral part of the manufacturing process is the use of steam for process heating. Rather than having individual combustion units located at each process or building, NSFIH utilizes a central steam plant to provide power and process steam. In 2015, NSFIH constructed a new power and steam generation facility (primary nodal plant) that includes a 4.5MW Centaur combustion turbine and a 29.5MMBtu/hr heat recovery steam generator (HRSG). The primary nodal plant replaced the existing coal fired boilers that were used to provide steam to the facility. The combustion turbine and HRSG can combust either natural gas or distillate oil. The combustion turbine is equipped with Dry SoLoNOx injection to limit SO_2 and NOx emissions. NSFIH does not use water or steam injection in the turbine for emission control.

The entire nodal energy system (NES) consists of the combustion turbine/HRSG, 17 natural gas fired boilers, and five diesel fired emergency generators. To avoid New Source Review (NSR) requirements under the CAA, VOC emissions from the NES are limited to less than 25 tons in any 12 month rolling period. The secondary nodal system consists of the 17 natural gas boilers that provide steam to processes throughout the site. The secondary nodal plant is comprised of boiler pairs located at various buildings. In addition, the auxiliary steam plant consists of two

distillate oil fired boilers that NSFIH indicated are not operating. They further indicated that rental boilers are in place that were installed in 2020. NSFIH stated that secondary nodal plant 2, 3, & 4 are connected to provide steam while secondary nodal plant 6, 7, & 8 are connected and 1 & 9 are connected and provide steam to the administration buildings. NSFIH stated that no steam that is generated is sent off-site and that all steam is used at the Facility. NSFIH makes 200psi steam for process and 100psi steam for comfort heat.

At 10:00AM the EPA inspection team moved to another building to discuss the inspection with military personnel and conduct an additional process overview. NSFIH staff reiterated that NSWC is the largest tenant at the site and that CNIC is the holder of the permits. NAVFAC is in charge of projects, such as the installation of the NES project in 2015, which are requested and approved through military construction (MILCON).

EPA and NSFIH discussed the paint booths that are located at the site and that are still in operation. There are 12 paint booths listed in the current Title V permit. NSFIH stated that currently the following booths are still operating: Booth 1134, 717, 693, 720, and 198. The booths are used to coat hardware used in energetics (explosives) manufacturing. Each of the paint booths uses a fan to pull air through filters on the wall of the booth and through a stack to the atmosphere. None of the paint booths vent to an oxidizer of other control device. NSFIH monitors pressure drop across the paint booth filter beds and coatings (coating and quantity) used in the booths. EPA requested records of pressure drop and coating use for booths 1134 and 717. NSFIH stated that they have been transitioning to one part paints, or paints that don't need a solvent to set up, but they cant use them in all cases because of customer specifications. NSFIH indicated that paint booths are used as needed and are not operated daily. In fact, some booths may not operate for months at a time.

Energetics manufacturing is located at multiple buildings throughout the Facility. The extrusion plant is located in Buildings 874 and 888. Propellant manufactured at another building is put through an extruder and then a solvent, ethyl lactate butyl acetate (ELBA) is applied to the ed of the propellant grain. The propellant is nitro cellulose and nitro glyceride based and the solvent is applied to both sides. NSFIH utilizes a multi-wrap machine to apply ELBA to the propellant grain while it spins. At the same time, tape is being applied to the grain. The solvent is dried in the ambient air and is exhausted to the atmosphere through a fan without being controlled. Excess solvent is recycled and re-used in the process until the water and nitro content is out of customer specification. NSFIH stated that approximately 30,000 propellant grains are manufactured annually.

CXM is the main component of RDX (explosive) manufacturing, it is mixed with Di-octo Adipate in a mixer to create RDX. Product is placed on perforated trays and baked at 140ºF to remove moisture. The oven is vented directly to atmosphere without control. Building 1430 in the RDX process is used to grind energetic material to the desired particle size. This process is controlled with a baghouse to reduce particulate matter emissions. The LOVA process is another

energetic manufacturing process listed in the Title V permit. NSFIH stated that this process has not operated in several years. There is a thermal/catalytic oxidizer associated with this process to control VOC emissions. NSFIH stated that its no longer used because the LOVA process is not operating.

Bracon is another explosive manufacturing process at NSFIH. NSFIH representatives stated that it is a research and development process and there is not much activity in this area. This process is housed in Building 727 and involves the melting of TNT in kettles. The melted TNT is poured into warheads. This process vents to a scrubber for emission control.

The Agile Chemical process was constructed in 2016 and involves a nitration process for energetics. NSFIH indicated that this process is expected to begin operating in February 2023 and has never operated as of the date of this inspection.

This opening meeting concluded at 11:45AM.

III. Observations

The EPA and MDE EPA inspection team returned to the conference room at 12:25PM to begin the onsite walkthrough. EPA was led on the walkthrough by multiple NSFIH representatives and was met at various buildings/processes by the department personnel to explain the process(es) and answer questions. Because of military security concerns, all photographs were taken during the walkthrough by NAVFAC personnel. EPA directed NAVFAC which photographs to take and supervised the photos. EPA was instructed that once the photographs were cleared by the U.S. Navy they would be released to EPA. The photographs are included as Attachment 2 to this report.

The EPA inspection team arrived at the Industrial Waste Processor (Building 1770) at 1:03PM and were met by representatives of the energetics manufacturing department. This process utilizes an oven to het up metal equipment and hardware used in energetics manufacturing to remove explosive residue. The residue needs to be removed so that it can be re-used. The oven vents to a cyclone and baghouse for particulate matter control which then vents to a dry scrubber for VOC control. NSFIH claims that this process has a 100% capture efficiency and a 99% control efficiency. EPA observed the oven, which was not operating during the inspection. The oven operates approximately every other week while it used to operate twice er week. The oven was installed in the 1980's while the controls were installed approximately seven years ago. The EPA inspection team moved to the outside of the building to observe the cyclone, baghouse and dry scrubber. Neither source was operating during the inspection. EPA inquired as to the material of the bags used in the baghouse. NSFIH stated that they conduct a Method 9 fugitive emissions observation on the scrubber stack every 168 hours of operation.

At 1:42PM the EPA inspection team arrived at the NES plant. Diesel fired emergency generator 3163 was observed outside of the building. It was not operating at the time of the inspection. The generator supplies backup power to the NES building in the event of power loss. The nameplate

was observed and the generator is rated at 1000kW and was built in February 2014. The hour meter on the generator was observed at 276.48 hours. The EPA inspection team entered the NES building and observed the Centaur combustion turbine. It was not operating during the inspection. The turbine supplies steam to the southern end of the base and generates 24,000-30,000 lbs of steam per hour and 3.8-4.6MW. To limit emissions of NOx and SO2 to the atmosphere, the combustion turbine and HRSG are equipped with Dry SoLoNox injectors that were installed by the manufacturer. NSFIH stated that all of the steam generated onsite is used within the Facility boundary and is not sold to offsite sources. The combustion turbine has been out of service since July 2022 because of issues operating while combusting natural gas. Located inside the NES building are two Hurst boilers rated at 38MMBtu/hr. The boilers combust natural gas and are used to supply steam to the Facility when steam is not being provided by the combustion turbine and HRSG. The boilers were operating during the inspection and NSFIH stated that they can produce 25,000 lbs of steam per hour. The Hurst boiler was generating 5300 lb steam per hour during the inspection. The Hurst boilers are not equipped with emission controls and vent directly to the atmosphere.

At 2:34PM the EPA inspection team arrived at the "Auxiliary Steam Plant". The Title V permit lists this source as having a 43MMBtu/hr Johnson boiler that combusts distillate oil and a 97MMBtu/hr Nebraska Boiler that also combusts distillate oil. Both of these boilers are out of service. It was observed during the inspection that neither boiler can operate without significant maintenance. To replace the out of service boilers, NSFIH installed a rental boiler in March 2021. The boiler is a Cleaver-Brooks boiler rated at 50,000lb/hr and 1450HP. This boiler was operating during the inspection. A trailer package boiler was also observed at this location and was not operating. Neither boiler is equipped with emission controls and both combust natural gas. The Building 712 diesel fired emergency generator was observed with a total hour reading of 354.8 hours. The generator was not operating. The EPA inspection team also observed the diesel fired Building 3137 emergency generator. The total hour meter was observed at 56.3 hours and the unit is rated at 250kW.

The EPA inspection team arrived back at the conference room at 3:22PM. EPA requested copies of the permit to construct for the package boiler and rental boiler at the auxiliary steam plant and the two Hurst boilers at the NES building. EPA and NSFIH also discussed logistics for the second day of the inspection. NSFIH provided that the bags used in the Building 1770 baghouse are high temperature silicone bags. The first day of the inspection ended at 3:58PM and EPA exited the Facility.

The inspection resumed on December 7, 2022, at 8:03AM. The same inspectors from EPA were present for the inspection, as well as the same NSFIH representatives. MDE was not present for the morning part of the inspection. EPA and NSFIH discussed the logistics and the need to coordinate with NSFIH personnel. As was the case on the first day of the inspection, NAVFAC personnel took all photographs during the walkthrough.

At 8:35AM the EPA inspection team arrived at Building 1134 to observe a paint booth. Devan Russell, Environmental Coordinator for codes M2 & M4, provided a tour of the building and a process description. He indicated that the booth is used to coat the inside of small warheads. A two-part epoxy coating is applied to the warheads. NSFIH turned the filter wall fan on and the magnehelic gauge was observed at 0.24"WC. No parts were being coated or present in the booth during the inspection. The coating production log for Building 1134 were observed. The coating booth located in Building 717 was observed next. Operators indicated that the booth operates approximately three times per year. The coating booth exhaust fan was turned on at EPA's request and the magnehelic was observed at 0.15"WC.

A RCRA hazardous waste satellite accumulation area was observed within Building 717. Two undated drums of waste were observed. NSFIH stated that the drums remain at this location until they are full regardless of when waste first began accumulating. Once full, the drums are moved to the 90 day accumulation area.

The inspection proceeded to Building 901 (Marine Barracks) to observe two 14.3MMBtu/hr Cleaver-Brooks dual fuel fired boilers. Neither NSFIH nor U.S. Marine personnel were unable to locate the boilers. It was not clear if the boilers exist or were ever constructed. NSFIH stated that they would inquire as to their status. The Title V permit indicates that the boilers were installed in August 2015. The EPA inspection team left Building 901 at 10:21AM.

The EPA inspection team arrived at Secondary Nodal Plant (SNP) 9 at 10:25AM. There are several SNP's located throughout the Facility. As discussed earlier, the SNP's provide localized steam to process operations. SNP 9 has two natural gas fired Hurst boilers which were operating during the inspection. Both boilers are rated at 12,075lb/hr steam production and neither has any emission controls. Boiler 1 has operated for 9711 hours while Boiler 2 has operated for 21,542 hours. Adjacent to SNP 9 is a diesel fired emergency generator which provides backup power to SNP 9. The hour meter for the generator was observed at 78 hours.

The EPA inspection team arrived at SNP 2 at 10:50AM. SNP 2 is equipped with two natural gas fired Hurst boilers rated at 21MMBtu/hr and 17,250 lb/hr steam production. The boiler nameplates indicate that the boilers were constructed in 2014 and neither boiler was operating during the inspection. NSFIH stated that the boilers are out of service for safety reasons and to conduct a pressure test. EPA observed the 3165 diesel fired emergency generator which is rated at 100kW. The hour meter on the generator was observed at 378 hours.

The EPA inspection team arrived at SNP 7 at 11:05AM. SNP 7 is equipped with two natural gas fired Hurst boilers. Both boilers are rated at 14.7MMBtu/hr and 12,075 lb.hr steam production. However, the Title V permit lists these boilers with a rating of 10.5MMBtu/hr. Both boilers were operating at the time of the inspection and were built in 2014. Boiler 1 has operated for 37,053 hours while Boiler 2 has operated for 33,504 hours. Boiler 1 was operating at a rate of 4219 lb/hr steam while Boiler 2 was operating at a rate of 4074 lb/hr steam. Diesel fired emergency

generator 3169, associated with SNP 7, was observed. This generator is rated at 100kW and had an hour meter at 441 total hours.

The EPA inspection team returned to the conference room at 11:29AM and reviewed the list of records that were requested prior to the inspection.[1] The EPA inspection team broke for lunch at 12:00PM.

The EPA inspection team returned to the conference room to resume the inspection at 12:43PM. When the inspection resumed after lunch, Alexander Holt from MDE was present. NSFIH representatives confirmed that they would check in the boiler(s) at Building 901 were ever installed. They also indicated that steam needs for Building 901 are served by SNP 9. EPA noted that the boilers for SNP 9 do not appear to be listed in the current Title V permit.

The EPA inspection team arrived at Building 727 at 1:30PM. Chris Bruce, NSFIH M4 operations supervisor, provided a process overview and tour. He stated that live operations are taking place using explosives. Part of the operations in Building 727 involve the disassembly of materials and melt casting. Ventilation ducting in the building is routed to a wet scrubber system located on the top floor. Air that is sent through the scrubber system is vented to the atmosphere while the water is either sent offsite as hazardous waste or non-regulated waste. There are eleven total bays in Building 727, five vent to the wet scrubber. Bay 3 was observed and includes a 100 gallon mixer. The ducting venting to the scrubber was observed. The EPA inspection team also observed the inside of Bay 5, mixers in Bay 6, and scrubber ductwork points in Bay7. Mr. Bruce indicated that solvents aren't used in this process. The process involves melting and mixing of material in three kettles, 600 lb, 1200lb, and 3000lb respectively. The primary mixing material is TNT; however, they also mix A1 and other resins. The first wets scrubber at Building 727 was observed. The unit was installed in 2011 and there is no flow monitoring or pressure drop monitoring conducted by NSFIH. The scrubber collects material vented from Bays 3 & 5. The second scrubber collects vented material from Bays 6, 6A, and 7. NSFIH conducts monthly preventative maintenance on both scrubbers.

The EPA inspection team observed the four ovens and eight curing bays in Building 729. None of these sources were operating at the time of the inspection. The EPA inspection team proceeded to Building 1881 where energetic batches up to 6,000 lb are mixed. A 4320 gallon mixer was observed along with raw material scales. Once a batch is mixed in the bowl, it is moved to another building for processing. Filters were observed on the vents from the scales and mixer. This building is also equipped with a carbon bed for VOC control. EPA inquired about pressure drop monitoring across the filters in this building. NSFIH stated that pressure drop monitoring is part of the SOP for this process and records are maintained. EPA requested copies of these records.

[11] Records reviewed will be discuss in the Records Request section of the report.

Building 808 is where the ELBA solvent is applied to the end of casings. This process occurs in several bays and solvent emissions are vented directly to the atmosphere using an exhaust fan. EPA observed several bays in operation. Operators were manually applying the solvent to casings of various sizes.

The walkthrough concluded at approximately 3:00PM and the EPA inspection team returned to the conference room.

IV. Records Review

Prior to the inspection, EPA included a records request in the November 29, 2022, email to NSFIH (attachment 1). The records request was reviewed with NSFIH on the morning of December 7, 2022. EPA did not review specific records while onsite but confirmed with NSFIH what records have been provided (and for what timeframe) and which records are outstanding. The following is a list of the records requested and the status of NSFIH's response:

1. Provide a hardcopy and electronic copy of a facility plot plan. *NSFIH provided an electronic copy of a site plot plan.*
2. See the attached Excel spreadsheet related to combustion units onsite. Provide the requested information for each combustion unit (Combustion Unit Tab) that was onsite from 2016 through November 2022. *NSFIH provided a copy of the spreadsheet with most of the information completed. However, NSFIH agreed to provide an updated worksheet that is completed and with all errors corrected.*
3. Provide a copy of the most recent Title 5 permit issued by MDE. *NSFIH provided a copy of the 2016 Title V permit issued my MDE.*
4. Provide copies of any emission statements submitted to MDE for 2019-2022. These statements should include emissions of NOx, SO2, PM, VOC, and HAP's. Also, provide calculations for the actual emissions generated and reported. *NSFIH provided electronic copies (pdf) of annual emission statements submitted to MDE for the years 2019-2021. The 2022 emission statement has not yet been submitted to MDE.*
5. Provide calculations of the potential to emit for NOx, SO2, VOC, PM, and HAP for the facility as a whole. These calculations should include each emission factor and its derivation (e.g., stack test, CEMS, AP-42, etc.). *An electronic copy of the potential to emit for the Facility that was completed in 2020 was provided. The document includes calculations for criteria pollutants from sources at the Facility.*
6. See the attached spreadsheet related to the combustion units onsite. For each combustion unit identified in the Combustion Unit Tab, use the tab titled "Stack Tests" to provide the following information:
    a. Date of each test conducted between January 2016 and November 2022;
    b. Each pollutant tested and the emission result (lb/hr, ton/yr, etc.);
    c. Identify if the test was conducted for informational purposes or to determine compliance. *NSFIH provided a response to this response in the spreadsheet provided in Response to Question 2.*

7. Identify which combustion units identified in the "Combustion Units" tab are equipped with continuous emission monitoring systems (CEMS). See "CEMS" tab in combustion Excel spreadsheet. For each unit that has a CEMS, provide:
    a. The date the CEMS was installed;
    b. Pollutants monitored;
    c. Date of last Relative Accuracy Test (RATA). *NSFIH indicated that there a no combustion units or emission points at the Facility equipped with CEMS. Therefore, there is no response to this question.*
8. For each combustion unit identified in the "Combustion Units" tab in the spreadsheet, provide the following information:
    a. Hours of operation per month from January 2020-November 2022;
    b. Amount of fuel combusted (gallons, MMscf, etc.) monthly January 2020-November 2022. *NSFIH provided indicated during the inspection that they are still gathering records of hours of operation and fuel combusted for each combustion unit and that these records will be provided after the inspection. On January 20. 2023, NSFIH provided records responsive to this request via email. These records are under review.*
9. Provide copies of any enforcement actions issued to NSFIH by either EPA or MDE for any media from 2017 to the present. *NSFIH provided a copy of the December 22, 2021, NOVOC issued by EPA.*
10. Provide copies of any initial notifications or notifications of compliance status that may have been submitted to EPA or MDE for any applicable regulation under 40 C.F.R. Parts 60 or 63. This includes, but is not limited to, 40 C.F.R. Part 60 Subparts Da, Db, Dc, IIII, JJJJ, KKKK and 40 C.F.R. Part 63 Subparts GG, YYYY, ZZZZ, DDDDD and JJJJJJ. *NSFIH is still gathering records responsive to this request and will provide them after the inspection. On January 20. 2023, NSFIH provided records responsive to this request via email. These records are under review.*
11. Provide copies of any quarterly, semiannual, or annual reports submitted to EPA or MDE for any applicable regulation under 40 C.F.R. Parts 60 & 63 for the period 2019-2022. *In response to this request, NSFIH did not provide any periodic reports pursuant to any applicable federal regulations (40 C.F.R. Part 60 or 63). However, NSFIH did provide copies of the annual compliance certification report for the Title V permit for 2019-2021. NSFIH also submitted copies of the six month compliance certifications for the Title V permit and the NES system. On January 20. 2023, NSFIH provided records responsive to this request via email. These records are under review.*
12. Provide records of the annual emissions of VOC for the nodal energy system (NES) listed under Section 13.0 of the Title V permit for the years 2018-2022. *NSFIH provided copies of the VOC emissions for 2018-2022 for the NES. This included the monthly VOC emissions for the primary and secondary nodal plants and the emission factors used for each unit.*

During the course of the inspection, EPA requested the following records:

1. Material information for the bags used in the industrial waste processor baghouse. *NSFIH indicated the bags are high temperature silicone but did not provide any direct evidence of the type of bags used in the baghouse.*
2. Permit application for the nodal plant. *NSFIH has yet to provide this permit application.*
3. Permit to construct for the boilers at Building 712 (temporary and package boiler). *NSFIH has yet to provide these permit application(s).*
4. Coating records (volume and pressure drop) for the coating booths located in Buildings 1134 and 717. *NSFIH has yet to provide these records.*
5. Records of VOC content of coatings used in Buildings 1134 and 717. *NSFIH has yet to provide these records.*
6. Records of EPA Method 9 monitoring or the industrial waste processor (to be completed every 168 hours). *NSFIH has yet to provide these records.*
7. Records of pressure drop monitoring for Building 1881. *NSFIH has yet to provide these records.*

On January 20, 2023, NSFIH provided, via email, records responsive to the information requested during the inspection. These records are currently under review by EPA.

V. Closing Conference

The closing meeting took place at 3:30PM and included the EPA inspection team, Alexander Holt, from MDE, and representatives from NAVFAC. Also present at the closing were Capt. Copeland, NSFIH Commanding Officer, and Tom Stanley, Senior Civilian Contact for NSFIH. EPA reiterated that the purpose of the inspection is to determine compliance with the existing permit and applicable regulations. The inspection also focused on combustion sources currently onsite and how they are operated. NSFIH is a major source for VOC and NOx emissions and is currently subject to a rolling annual emission limit for both pollutants that exclude the Facility from Non-Attainment New Source Review under the CAA. EPA also stressed that there is an ongoing open enforcement matter and this inspection may serve to additional information to these proceedings. EPA also stressed that no compliance determinations are made during the inspection or in the report that will follow. Mr. Augustine noted that the investigation is on-going, and any areas of concern identified in the final report does not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. In addition, EPA may request records after the inspection for further review. The inspection concluded at 4:00PM.

The following have been identified as *potential* issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by NSFIH.

- Section IV.1.1.D.1 of the Title V permit requires that the combustion turbine and HRSG combust natural gas as the primary fuel and that distillate oil only be used as a backup. NSFIH indicated that the turbine cannot currently operate normally on natural gas and is undergoing repairs. It is not clear that natural gas has been the

primary fuel when the unit is operating. A review of the hours of operation and fuel combustion records provided by NSFIH will aid in that determination.

- Section IV.12.C(a) of the Title V permit and 40 C.F.R. § 60.4400 require annual stack tests on the combustion turbine stack to determine compliance with the applicable NOx emission limits. NSFIH indicated that they have not conducted a stack test on this source since 2016.
- Several combustion sources are included in the Title V permit that are no longer onsite, including the boilers at the Steam B plant (Nebraska Boiler & Johnson Boiler). In addition, NSFIH has installed additional combustion sources at this site that are not included in the Title V permit (rental boiler and package boiler). It is not clear if the new sources have been issued permits to construct by MDE prior to installation. NSFIH should provide a copy of the most recent Title V permit application to identify if the combustion source list has been updated. A review will also need to be competed to determine if these sources are listed in the annual emission statements.
- NSFIH has not provided copies of any periodic reports or initial notifications for any regulations under 40 C.F.R. Part 60 or 63. It is not clear if these reports have been submitted to EPA or MDE and copies have been requested.

VI. List of Attachments

Attachment 1:	November 29, 2022, email to NSFIH confirming CAA inspection and including records request
Attachment 2:	Photo Log