



NOC 12131

Reg#21277

DEPARTMENT OF THE ARMY
JOINT BASE GARRISON HEADQUARTERS, JOINT BASE LEWIS-MCCHORD
1010 LIGGETT AVENUE, BOX 339500, MAIL STOP 1AA
JOINT BASE LEWIS-MCCHORD, WA 98433-9500

RECEIVED

MAR 29 2021

Puget Sound
Clean Air Agency

Public Works

MAR 23 2021

Ms. Margaret Corbin
Puget Sound Clean Air Agency
1904 Third Ave, Suite 105
Seattle, Washington 98101

Dear Ms. Corbin:

Joint Base Lewis-McChord is requesting an administrative change under General Regulatory Order No. 21277, Condition 3.d. This condition requires Joint Base Lewis-McChord to perform a rolling 12-month calculation for base wide emissions of Carbon Monoxide (CO), Oxides of Nitrogen (NOx), Particulate Matter (PM), Oxides of Sulfur (SOx), Volatile Organic Compounds (VOCs), each hazardous air pollutant (HAP), and total hazardous air pollutants within 30 days of the end of each month. The ability to perform an accurate calculation within 30 days of the end of each month is not feasible due to Joint Base Lewis-McChord's practice of using actual emission factors for over 600 varying types of natural gas using external combustion equipment and performing the associated data entry. Another limiting factor is Joint Base Lewis-McChord's usage is not received from our natural gas provider Puget Sound Energy, until 45 days following the end of each month.

Joint Base Lewis-McChord began using equipment specific emissions factors following a comprehensive boiler inventory in 2013. Prior to this, Joint Base Lewis-McChord used the EPA AP-42 Compilation of Emission factors for external combustion equipment. These factors have not been updated since 1998, are used to simplify calculation methodology or used when equipment specific information is unavailable, and commonly calculates emissions that exceed actual emissions. Joint Base Lewis-McChord's use of actual emissions factors provides accurate annual emissions inventories. Due to the limiting factors with the associated data entry for each piece of equipment and time for receiving natural gas usage, Joint Base Lewis-McChord is challenged with meeting the 30 day requirement for rolling totals. In order for Joint Base Lewis-McChord to continue with current methodology, Joint Base Lewis-McChord requests Puget Sound Clean Air Agency extend the time required to perform a rolling total from 30 days to 60 days.

Joint Base Lewis-McChord's annual emissions are well below synthetic minor caps. There is no significant risk of exceedance. The basewide emissions for 2019 were:

- a. Highest single listed hazardous air pollutant (HAP): Toluene: 0.33 ton

- b. Total hazardous air pollutants (HAP): 1.69 tons
- c. Carbon Monoxide (CO): 37.95 tons
- d. Oxides of Nitrogen (NOx): 51.33 tons
- e. Particulate Matter (PM): 4.42 tons
- f. Oxides of Sulfur (SOx): 0.43 tons
- g. Volatile Organic Compounds (VOC): 34.91 tons

In 2019, the highest monthly emissions were: 0.18 tons of total hazardous air pollutants (HAP) in January, 0.036 tons of Toluene in May, 3.12 tons of Volatile Organic Compounds (VOC), 5.53 tons of Oxides of Nitrogen (NOx) in November: and in December, Carbon Monoxide(CO), Particulate Matter (PM), and Oxides of Sulfur (SOx) were 4.84, 0.47 and 0.046 tons respectively.

Based on Puget Sound Clean Air Agency's suggestion, Joint Base Lewis-McChord proposes completing a rough estimate for the 12-month rolling total, 30 days of the end of each month, by adding the worst case emission month(s) for each pollutant from the prior calendar year, and adding those numbers to the basewide rolling total from two months prior. A true rolling total would be calculated 60 days following the end of each month. For example, on August 30th, 2020, Joint Base Lewis-McChord would estimate the rolling total for July, by adding the worst case monthly emissions from 2019, to June 2020's rolling total. Joint Base Lewis-McChord would then perform the rolling 12-month calculation for July, by September 30th, 2020. This would allow Joint Base Lewis-McChord to show compliance with the synthetic minor caps, while remaining in compliance with a requirement to perform a monthly rolling total. Joint Base Lewis-McChord is aware an administrative fee may be assessed but would not constitute a fine or penalty.

If you have any questions, please contact Joint Base Lewis-McChord's Air Program Manager Diane Roberts at diane.e.roberts2.civ@mail.mil or (253) 966-1768.

Sincerely,



Charles S. Markham
Director of Public Works