



## DEPARTMENTS OF THE ARMY AND THE AIR FORCE

JOINT FORCES HEADQUARTERS-ARIZONA  
ARIZONA ARMY NATIONAL GUARD  
5636 EAST MCDOWELL ROAD  
PHOENIX, AZ 85008-3495

November 24, 2021

Arizona Department of Environmental Quality  
Air Quality Division  
1110 West Washington Street  
Phoenix, Arizona 85007

I have attached:

1. Enclosure 1 - the Standard Permit Application Form for renewal of Air Quality Control Permit 65288, place ID 3051 for the Arizona Army National Guard Camp Navajo facility, Enclosure 1.
2. Enclosure 2 – Section 3.5 and 3.6 of the Standard Permit Application Form
3. Enclosure 3 – Equipment List
4. Enclosure 4 – PTE

The Camp Navajo facility is a military installation at which training exercises, vehicle maintenance, administrative functions, and materials storage are conducted. The installation includes a water treatment facility and a 60,000-gallon per day wastewater treatment plant.

Emission sources and process descriptions:

1. 152 pieces of natural-gas-fired equipment, consisting of boilers, water heaters, space heaters, and kitchen equipment, used for the purpose of producing hot water for typical domestic uses, heating buildings, and food preparation.
2. Eight stationary compression-ignition (CI) internal combustion engines (ICE), used for the purpose of providing emergency electrical generation, and operating water pumps for emergency firefighting at the facility.
3. Two stationary (portable) CI ICE engines (wood grinder and brush chipper units), used for fuels reduction of felled hazard trees and wood fuels at the facility.
4. Two stationary (portable) CI ICE engines (milling machine and crack sealer units), used for road maintenance at the facility.
5. One stationary (portable) CI ICE engine (portable handy screen), used for screening earthen material at the facility.

6. One 15,000-gallon underground storage tank (UST) used for the purpose of storing and dispensing unleaded gasoline to government-owned vehicles operated at the facility. UST has been in closure since 2019 for a construction project that was never completed. It is unclear when construction will resume.
7. One 15,000-gallon underground storage tank (UST) used for the purpose of storing and dispensing Jet-A fuel to government-owned vehicles operated at the facility. UST has been in closure since 2019 for a construction project that was never completed. It is unclear when construction will resume.

Revisions for the 2022 Permit renewal include:

1. Equipment List (Enclosure 3), which has been revised to include diesel-powered equipment and natural-gas-fired equipment removed, replaced, or added since 2019 permit revision, and equipment that will be added to replace non-functional equipment.
  - a. Eight stationary internal combustion engines (Inventory #'s: 13, 94, 98, 127, 128, 134, 140 and 149) used for the purpose of providing emergency electrical generation and operating water pumps for emergency firefighting at the facility remain the same since the 2019 permit renewal.
  - b. 2020 - Three forced air furnaces (Inventory #'s 26, 27 and 28) were removed and replaced with furnaces (Inventory #'s 178, 179 and 180). Permit Deviation Report ID: 25120.
  - c. 2020 - One heating boiler (Inventory #68) was removed. Permit Deviation Report ID: 25120. However, it was noted on the equipment list submitted with the deviation report that the BTU/hr removed was 325,000 for equipment ID #74 when in fact it was #68 that was removed. Inventory #68's capacity rating was 650,000 BTU/hr.
  - d. 2020 - Five natural gas fired unit heaters (Inventory #'s 181, 182, 183, 184 and 185) were added. Permit Deviation Report ID: 25120.
  - e. 2021 - One stationary internal combustion engine, inventory #49 has been removed for this permit renewal as the unit has not functioned since 2019, the associated fuel tanks for #49 have been emptied and permanently removed from the facility's Spill Prevention, Control & Countermeasures (SPCC) Plan, and the unit itself will be decommissioned.
  - f. 2021 - Three portable stationary IC engines (milling machine, crack sealer and portable handy screen) have been added to the equipment list (Inventory #'s: 186, 187 and 188). Permit Deviation Report ID: 52766.
2. File 3051\_65288\_PTE\_for\_2022\_Renewal (Enclosure 4), showing controlled potential to emit for stationary internal combustion engines (using voluntary limits applicable to each engine), potential to emit for natural-gas-fired equipment (using 8760 hours of operation), and total potential to emit for both types of sources. Total rated capacity for all natural-gas-fired equipment present is 23.6572 MMBTU/hr.

In order to maintain the synthetic minor status of this facility, operating hours for emergency generator engines (Inventory Numbers 13, 98, 127, 134, 140) will be limited to 1500 hours per year, operating hours for IC engines (Inventory Numbers 147, 148, 186, 187 and 188) will be limited to 1500 hours per year and operating hours for emergency water pump engines (Inventory Numbers 94, 128, 149) will voluntarily be limited to 100 hours per year.

Minor New Source Review is not applicable to this facility.

Few minor requests for the compliance certification (cc) reporting are noted below for your future consideration:

- a. Question #22, #23, #24 and #30 – it is requested that if the equipment have not been used that the choice of “click yes to continue” be worded to included click “Yes” to continue if the equipment operated during the cc and click “No” to continue if the equipment did not operate during the cc.
- b. Question #24 – it is requested that if “No” is selected that the questions 25-29 not have to be answered.
  - a. Question #23 poses this situation where we click “No” and do not have to answer the additional questions.

Please direct questions to Lauren J. Hertz at (928) 773-3210 or by e-mail to [hertzl@emo.azdema.gov](mailto:hertzl@emo.azdema.gov).

Sincerely,



Lauren J. Hertz  
Environmental Compliance Specialist  
ADEMA-AZARNG, NGAZ-FMO-EMO

Enclosures