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SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
COMMENTS ON AIR EMISSION INFORMATION FOR AGGRESSIVE FLUID VAPOR
RECOVERY FOR ZONE I CNC CHARLESTON SC

9/10/2002

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

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MEMORANDUM

DATE: September 10, 2002

TO: Michael Bishop
Bureau of Water

FROM: Mary Peyton Davis *MED*
Air Modeling Section
Bureau of Air Quality

SUBJECT: Charleston Naval Complex, GWPD # 00944
1849 Avenue F
North Charleston, South Carolina

RECEIVED

SEP 11 2002

Water Monitoring Assessment
Protection Division

The Bureau of Air Quality has reviewed the air emission information for the aggressive fluid vapor recovery event to be located at Charleston Naval Complex in North Charleston, SC. Air dispersion modeling results indicate that the air toxics emitted (Benzene, Toluene, Ethylbenzene, Xylenes, and Naphthalene) will result in off-site concentrations of these toxics that will meet the air toxic standards (Standard No. 8). Since the total volatile organic compound (VOC) emissions are less than 1000 lbs./month, an air permit will not be required for the enhanced fluid recovery event. If the 1000 lb. VOC limit is reached during the enhanced fluid recovery event, the system will be shut down, and an air permit will be obtained from the Bureau of Air Quality before operation may continue. This is in accordance with Section II, Part F, Paragraph G of the SC Dept. of Health and Environmental Control Air Pollution Control Regulation No. 62.1.

cc: Bruce Hennessee, Trident EQC District
Alyson Hayes, BAQ Permitting
Engineering File

AIR DISPERSION MODELING SUMMARY SHEET

SITE NAME: Charleston Naval Complex

DATE: 9/10/02

LOCATION: North Charleston

REVIEWED BY: MPD

GWPD NO.: 00944

MODEL: ISCST3

SOURCE DESCRIPTION: Aggressive fluid vapor recovery event

RESULTS:

POLLUTANT	CAS NO.	AVERAGING PERIOD	MAX. MODELED CONCENTRATION ($\mu\text{g}/\text{m}^3$)	STANDARD ($\mu\text{g}/\text{m}^3$)
Benzene	71-43-2	24 Hour	211.95	150
Toluene	108-88-3	24 Hour	211.95	2000
Ethyl benzene	100-41-4	24 Hour	211.95	4350
Xylene	1330-20-7	24 Hour	211.95	4350
Naphthalene	91-20-3	24 Hour	211.95	1250