STATEMENT OF BASIS

Mr. Brian Meyer
Goodrich Landing Systems Services
Facility ID No.: 0250827
Miami-Dade County

Title V Air Operation Permit Revision
FINAL Permit No.: 0250827-012-AV

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The Goodrich Landing Systems Services facility operates a landing gear refurbishing facility located at 3201 NW 167 Street, Miami Gardens, Florida. The facility refurbishes wide- and narrow-body aircraft landing gears and related components.

The applicant submitted an application for a Revision on January 7, 2014. The purpose of this application is to revise Title V Air Operation Permit No. 0250827-009-AV to incorporate the terms and conditions of Air Construction Permit No. 0250827-010-AC. This construction permit was issued on February 6, 2012 to replace existing paint spray booth No. 3 under Emissions Unit No. 002 with proposed paint spray booth No. 5.

The FDEP revised the Title V Air Operation template for renewal permit. Since this is a Title V Revision, the existing permit format will be maintained until the next permit renewal when the new template will be used.

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

The CAM rule requires owners and operators to monitor the operation and maintenance of their control equipment so that they can evaluate the performance of their control devices and report whether or not their facilities meet established emission standards. The MACT standards implemented in the permit will address and insure that the facility will be in compliance with Hazardous Air Pollutants (HAPs) emissions standards. No other limits or standards exist for any of the emissions units at the facility. Therefore, CAM does not apply to this facility.

The facility consists of the following emissions units:

Emissions Unit Number	Emissions Unit Description
001	Vapor Degreaser and Recovery Still
002	Paint Spray Booth Nos. 1, 2 & 5
003	Hard Chromium Electroplating Line
004	Nickel Electroplating Line
005	Cadmium Electroplating Line
006	Caustic Strip & Acid Activation Line
007	Shot Peen System
009	Hard Chromium Electroplating Line

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Revision application received January 7, 2014, this facility is a major source of hazardous Air pollutants (HAPs).

These documents are on file with the permitting authority:

Title V Air Operation Permit Revision Application Received January 7, 2014

Specific changes were made to the previously issued Title V Air Operation Permit No. 0250827-009-AV, and the changes are reflected in the FINAL Title V Air Operation Permit Revision as described below.

Recent organizational changes have occurred within the Miami-Dade County Government and the Department of Environmental Resources Management (DERM) was merged with two (2) other departments. The consolidated name is now the Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management. As a result, all references to DERM in the permit have been changed to RER.

Items numbered 1 – 6 below represent the changes to the previous Title V Air Operation Permit. Underline text indicates additions. ~~Strikethrough indicates text removed.~~

1. Section II – Facility-wide Conditions. Recently, the FDEP revised the Prevention of Accidental Releases (Specific Condition No. 4), and the Annual Emissions Fee Form and Fee (Specific Condition No. 13). Accordingly, these conditions have been revised to reflect the recent changes.

2. Changes in Section III, Emissions Unit and Conditions – Subsection A, Emissions Unit 001 – Vapor Degreaser Still. 40 CFR 63 Subpart T – National Emissions Standards for Hazardous Air Pollutants Halogenated Solvent Cleaning Table 2 allows seven (7) control combination options. The facility initially chose option No. 6, and the current permit addresses option No. 6 only. The complete Table has been added to allow the other available options even though the facility does not currently use the other options. As such, the following Specific Conditions related to the various options have either been modified or added:

   A.4., A.6., A.8., A.9., A.10., A.11., A.12., A.13., A.15., A.16., A.19., A.20., A.22., A.23., A.25., A.26., and A.27.

3. Changes in Section III, Emissions Unit Specific Conditions – Subsection B, Emissions Unit 002 – Three (3) Paint Spray Booths. The incorporation of Air Construction Permit No. 0250827-010-AC required that the emissions unit description be revised accordingly to reflect Paint Spray Booth Nos. 1, 2 & 5 instead of 1, 2 & 3 since booth No. 3 was replaced by booth No. 5. All Specific Conditions now cite Air Construction Permit No. 0250827-010-AC in addition to the other citations.

4. Changes in Section III, Emissions Unit Specific Conditions – Subsection C, Emissions Units 003 & 009 – Hard Chromium Electroplating Lines. 40 CFR 63 Subpart N – National Emissions Standards for Hazardous Air Pollutants for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Electroplating Anodizing Tanks was revised on September 19, 2012. With this revision, minor changes to seventeen (17) specific conditions. Included with these changes are revisions to Specific conditions C.3., C.10, and C.20. as follows:

C.3. Chromium Emissions Standards: During tank operations, up to and including September 19, 2014, each owner or operator of an existing, new, or reconstructed affected source shall control chromium emissions discharged to the atmosphere from that affected source by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (6.6×10^{-6} grains per dry standard cubic foot (gr/dscf) for all open surface hard chromium electroplating tanks that are existing affected sources and are located at large, hard chromium electroplating facilities. After September 19, 2014, chromium emissions shall not exceed 0.011 mg/dscm (4.8×10^{-6} gr/dscf).:
[40 CFR 63.342(c)(1)(i), Permit Nos. 0250827-001-AC, 0250827-003-AC, and 0250827-008-AC]

C.10. Compliance Dates: The owner or operator of an existing affected source shall comply with the emission limitations in 40 CFR 63.342 no later than September 19, 2014.
[40 CFR 63.343(a)(1), Permit Nos. 0250827-001-AC, 0250827-003-AC, and 0250827-008-AC]

C.20. Report of Performance Test Results:
(1)The owner or operator of an affected source should report performance test

(2) Reports of performance test results shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status required by 40 CFR 63.347(e).

(3)(i) Within 60 days after the date of completing each performance test (defined in 40 CFR 63.2) as required by 40 CFR 63 Subpart N, you must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) (*www.epa.gov/cdx*). Performance test data must be submitted in the file format generated through use of the EPA's Electronic Reporting Tool (ERT) (see *http://www.epa.gov/ttn/chief/ert/index.html*). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk, flash drive or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to the EPA via CDX as described earlier in 40 CFR 63.247(3)(f). At the discretion of the RER, you must also submit these reports, including the confidential business information, to the RER in the format specified by the RER. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator shall submit the results of the performance test to the Administrator at the appropriate address listed in 40 CFR 63.13.

[40 CFR 63.347(f), Permit Nos. 0250827-001-AC, 0250827-003-AC, and 0250827-008-AC]

5. Changes in Section III, Emissions Unit Specific Conditions – Subsection C, Emissions Units 003 & 009 – Hard Chromium Electroplating Lines. Specific Condition No. C.10. has been removed since it was a duplicate of Specific Condition No. C.0. Subsequent specific conditions have been renumbered accordingly.

6. Other changes: Minor corrections to typographical errors, etc.