STATEMENT OF BASIS

Triad International Maintenance Corporation (TIMCO)
Lake City Airport

Facility ID No.: 0230035
Columbia County

Title V Air Operation Permit Renewal
Permit Project No.: 0230035-006-AV
Renewal of Title V Air Operation Permit No.: 0230035-005-AV

The initial Title V Air Operation Permit, No. 0230035-001-AV, was issued/effective on June 1, 1998. This Title V Air Operation Permit Renewal 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.

This existing aircraft services facility located at the Lake City Airport performs the maintenance, repair, renovation and refinishing type services on both commercial and military aircraft. This includes all aircraft components except the engines. The emission units are identified below:

E.U. ID No.	Brief Description
001	Hand-Wipe Cleaning Operation
002	Spray Gun Cleaning Operations
003	Flush Cleaning Operations
004	Primer Application Operations
005	Topcoat Application Operations
006	Depainting Operations
007	Waste Storage and Handling Operations
008	Facility-wide Fugitive Emissions (Unregulated)
009	Emergency Engines

This facility is subject to the requirements of 40 CFR Part 63, Subpart GG, National Emissions Standards for Aerospace Manufacturing and Rework Facilities.

Project 006: The purpose of this permit is to renew Title V Air Operation Permit, No. 0230035-005-AV, to include the requirements for 40 CFR 63, Subpart ZZZZ- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine, and to update EU008- Facility Wide Fugitive Emissions (Appendix U-1).

Application Received: September 5, 2012.
Draft/Proposed Issued: October 22, 2012.
Comments Received: October 30, 2012.
Revised Draft/Proposed Issued: November 14, 2012.
Published: November 23, 2012 in the Lake City Reporter.

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E.U. ID No.	Brief Description of Emissions Units and/or Activity
008	Facility Wide Fugitive Emissions - Vehicle traffic on paved and unpaved roads - Fuel and oil storage tanks - Maintenance activities; including maintenance painting, parts cleaning, and welding - Machine shop operations - Sand and media blasting for maintenance painting - Fugitive emissions from other emissions units - Wastewater treatment operations including chemical handling and storage - Use of sealants, fillers, lubricants, and adhesives - Non-destructive material analysis (i.e. Magnaflux™, X-Ray) - Hanger and runway construction, maintenance and repair - Hand sanding of aerospace vehicle and components - Alodine conversion coating - Composite material casting - Miscellaneous woodworking operations - Laboratory activities - Fire suppression system - Space Heaters

EU009 Emergency Engines:

40 CFR Part 63, Subpart ZZZZ- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The compliance date is May 3, 2013. There are no operating limitations, fuel requirements or performance test requirements for these engines.

ENGINES	HP	HRS	POLLUTANT	EMISSION FACTOR (lb/hp-hr) [2]	EMISSIONS [3]	
					(Lb/hr)	(TPY) [4]
No. 6796 No. 6797 No. 10987	300 (each)	100 (each)	NO_X	0.031	27.90	1.4
			CO	0.00668	6.01	0.3
			SO_X	0.00205	1.85	0.1
			PM_{10}	0.0022	1.98	0.1
			VOC[5]	0.0025141	2.26	0.1

(1) Hours of operation are based on 40 CFR 63.6640. Maintenance checks and readiness testing of the units is limited to 100 hour per year. There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) Emission factors based on AP-42, Table 3.31

(3) Emissions account for all three engines operating.

(4) Annual emissions are based on 100 hour per year.

(5) Assume VOC= TOC.

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ENGINE REFERENCE NO.	EQUIPMENT DESCRIPTION	MANUFACTURER	MODEL NO.	YEAR BUILT	Horsepower	DISPLACEMENT (liters/cyl)	Fuel Type	Compression Ignition (CI) or Spark Ignition (SI)	YEAR REBUILT >50% cost
6796	Firepump Driver	Cummins	nt855f3	1984	300	2.34	diesel	ci	n/a
6797	Firepump Driver	Cummins	nt855f3	1984	300	2.34	diesel	ci	n/a
10987	Firepump Driver	John Deere	RG608-1817-0630	2005	300	1.66	diesel	ci	n/a

The collective annual amount of diesel fuel burned by the RICE units is 500 gallons total.

The diesel fuel sulfur content for the engines is typically less than 7.7 mg/kg.

Based on the Title V permit renewal application received September 5, 2012, this facility is a major source of VOC & HAPs.