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

<u>Permitting and Compliance Authority:</u>
State of Florida Department of Environmental Protection
Northeast District (NED) Air Program
7777 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256
Telephone: 904/256-1700
Fax: 904/ 256-1590

Title V Air Operation Permit Renewal
Permit No. 0230035-006-AV

Table of Contents

Section **Page Number**

I. Facility Information.
A. Facility Description. 2
B. Summary of Emissions Units. 2
C. Applicable Regulations. 2

II. Facility-wide Conditions. 3

III. Emissions Units and Conditions.
A. Emissions Unit-001 Hand-Wipe Cleaning Operations.....6
Emissions Unit-002 Spray Gun Cleaning Operation
Emissions Unit-003 Flush Cleaning Operations

B. Emissions Unit-004 Primer Application Operations.....14
Emissions Unit-005 Topcoat Application Operations

C. Emissions Unit-006 Depainting Operations. 32

D. Emissions Unit-007 Waste Storage and Handling Operations.....39

E. Facility Wide Emission Cap …….....40

F. General Conditions of 40 CFR 63, Subpart GG....…….....42

G. Emission Unit- 009 Emergency Generators.....45

IV. Appendices. 49
Appendix A, Glossary.
Appendix NESHAP, Subpart A – General Provisions. (Include for all units that are subject to a NESHAP)
Appendix NESHAP, GG and ZZZZ.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix U, List of Unregulated Emissions Units and/or Activities.

Referenced Attachments. ..... At End
Table H, Permit History.
Statement of Basis

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
7777 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Permittee:
TIMCO
102 SE Academic Avenue
Lake City, Florida 32025

DRAFT/ PROPOSED Permit No.: 0230035-006-AV
Facility ID No.: 0230035
SIC Nos.: 45, 4581
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew Title V Air Operation Permit, No. 0230035-005-AV and to include the requirements for 40 CFR 63, Subpart ZZZZ- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and to update EU008 Facility Wide Fugitive Emissions (Appendix U-1). This existing facility is located at 102 SE Academic Avenue, Lake City, Columbia County; UTM Coordinates: Zone 17, 348.3 km East and 3339.0 km North; Latitude: 30° 10′ 28.5″ North and Longitude: 82° 34′ 31.8″ West.

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.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Draft/Proposed)

_____

Khalid Al-Nahdy
District Air Program Administrator

KAA: lm

Subsection A. Facility Description.

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 types and number of spray guns at the facility are described as below.

Type	Quantity
Bink HVLP	15
Graco 45 air assisted electrostatic	6
Graco airless (use for non-aircraft related spray painted, equipment, and etc.)	2

Based on the Title V permit renewal application received September 5, 2012,

- This facility is a Title V source
- The facility is a major source of Hazardous Air Pollutants (HAPs)
- The facility is a major source of Air Pollutants, other than Hazardous Air Pollutants (HAPs)
- One or more emissions units subject to NESHAP (40 CFR Part 63)

Subsection B. Summary of Emissions Units.

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
-009	Emergency Generators

Unregulated Emissions Unit and/or Activities:

E.U. ID No.	Brief Description
-008	Facility Wide Fugitive Emissions (Please see Appendix U-1 for details)

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received September 5, 2012, this facility **is a major source of hazardous air pollutants (HAP).** Because this facility operates stationary reciprocating internal combustion engines, it is subject to regulation under 40 CFR 63, Subpart ZZZZ, - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The existing facility took a VOC CAP to escape PSD. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, NESHAPS General Provisions	001, 002, 003
40 CFR 63, Subpart GG	001, 002, 003
40 CFR 63, Subpart ZZZZ	009

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

Unconfined particulate matter will be generated mainly from:

- Hand sanding of aircraft and components
- Machining operations
- Application of primers
- Application of topcoats

Precautions to limit unconfined particulate matter are:

- All facility major travel lanes are paved with concrete or asphalt
- All activities which generate unconfined particulate matter are conducted within hangars
- A sweeper truck is maintained on-site, and generally operates five days per week, for approximately two hours per day.
- A smaller sweeper is maintained on-site, for use within hangars

[Rule 62-296.320(4)(c)2., F.A.C., Proposed by applicant in initial Title V permit application received June 13, 1996.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

THE SPECIFIC CONDITIONS IN THIS SECTION APPLY TO THE FOLLOWING EMISSIONS UNIT(S):

EU No.	Brief Description
001	Hand-wipe Cleaning Operations
002	Spray Gun Cleaning Operations
003	Flush Cleaning Operations

Hand-wipe Cleaning Operations. Contaminants such as dirt, grease, oil and surface coatings are physically removed from aerospace vehicles and/or components with a material like rags, paper, or cotton swabs that have been moistened with a cleaning solvent.

Spray Gun Cleaning Operations. The cleaning of spray guns used to apply the primer and topcoats.

Flush Cleaning Operations. The removal of contaminants such as dirt, grease, oil, and coatings from an aerospace vehicle or component or coating equipment by passing solvent over, into, or through the item being cleaned. The solvent may simply be poured into the item being cleaned and then drained, or be assisted by air or hydraulic pressure, or by pumping.

These emissions units are regulated by:

40 CFR 63 Subpart GG, National Emissions Standards for Aerospace Manufacturing and Rework Facilities.

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

A.1. Hours of Operation. The emissions units are allowed to operate continuously, i.e., 24 hours/day; 7 days/week; 52 weeks/year and 8,760 hours/year.

[Rule 62-210.200, F.A.C., Definitions - (PTE)]

A.2. Housekeeping Measures. The owner or operator shall comply with the requirements in paragraphs (1) through (4) of this condition unless the cleaning solvent used is identified in Table 1(**see specific condition A.7**) **OR** contains HAP and VOC below the de minimus levels as specified in Specific **Condition A.6.**

(1) Unless the owner or operator satisfies the requirements in paragraph (4) of this condition, place used solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.

A.2. continued:

(2) Unless the owner or operator satisfies the requirements in paragraph (4) of this condition, store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.

(3) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

(4) Demonstrate to the Administrator (or delegated State, local, or Tribal authority) that equivalent or better alternative measures are in place compared to the use of closed containers for the solvent-laden materials described in paragraph (1) of this condition, or the storage of solvents described in paragraph (2) of this condition.
[40 CFR 63.744 (a)]

A.3. <u>Standards for Hand-wipe Cleaning Operation (EU 001)</u>. Unless the cleaning solvent solutions contain HAP and VOC below the de minimus levels as described by **Specific Condition A.6**, the owner or operator shall use cleaning solvents that meet one of the following requirements.

(1) Meet one of the composition requirements in Table 1 as shown in **Specific Condition A.7;**

(2) Have a composite vapor pressure of 45 mm Hg (24.1 in. H_2O) or less at 20^0C (68^0F); or

(3) Demonstrate that the volume of hand-wipe solvents used in cleaning operations has been reduced by at least 60% from a baseline adjusted for production. The baseline shall be calculated using data from 1996 and 1997, or as otherwise agreed upon by the Administrator or delegated State Authority. The baseline shall be approved by the Administrator or delegated State Authority and shall be included as part of the facility's title V or part 70 permit.

[40 CFR 63.744(b)]

A.4. <u>Standards for Spray Gun Cleaning (EU002</u>). Unless the cleaning solvent solutions contain HAP and VOC below the de minimus levels as described by **Specific Condition A.6**, the owner or operator of spray gun cleaning operation in which spray guns are used for the application of coatings or any other materials that require the spray guns to be cleaned shall use one or more of the techniques, or their equivalent, specified in paragraphs (1) through (4) of this condition.

(1) (i) <u>Enclosed system</u>. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun.

(2) (ii) If leaks are found during the monthly inspection required in **specific condition A.14**, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.

A.4. continued:

(3) Nonatomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.

(4) Disassembled spray gun cleaning. Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.

(5) Atomizing cleaning. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized solvent emissions.

(6) Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the requirements of this condition.

[40 CFR 63.744(c)]

A.5. **Standard for Flush Cleaning (EU003)**. The owner or operator of a flush cleaning operation (excluding those in which Table 1 as shown in **Specific Condition A.7** or semi-aqueous cleaning solvents are used) shall empty the used cleaning solvent each time aerospace parts or assemblies, or components of a coating unit (with the exception of spray guns) are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control.
[40 CFR 63.744(d)]

A.6. **De Minimus Levels Exemptions**. Cleaning solvent solutions that contain HAP and VOC containing HAP and VOC at a concentration less than 0.1% for carcinogens or 1.0% for noncarcinogens, as determined from manufacturer's representations are exempted from the requirements of **Specific Condition A.2 through A.4.**
[40 CFR 63.744 (a), (b)& (c) and 40 CFR 63.741(f)]

A.7. The table below consists of the composition requirements for approved cleaning solvents.

TABLE 1 - COMPOSITION REQUIREMENTS FOR APPROVED CLEANING SOLVENTS	
Cleaning Solvent Type	**Composition Requirements**
Aqueous	Cleaning solvents in which water is the primary ingredient (≥80 percent of cleaning solvent solution as applied must be water). Detergents, surfactants, and bioenzyme mixtures and nutrients may be combined with the water along with a variety of additives such as organic solvents (e.g., high boiling point alcohols), builders, saponifiers, inhibitors, emulsifiers, pH buffers, and antifoaming agents. Aqueous solutions must have a flash point greater than 93 °C (200 °F) (as reported by the manufacturer) and the solution must be miscible with water.
Hydrocarbon-based	Cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons and have a maximum vapor pressure of 7 mm Hg at 20 °C (3.75 in. H_2O at 68 °F). These cleaners also contain no HAP.

[Table 1 of 40 CFR 63.744]

A.8. **<u>Exempt Cleaning Operations</u>**. The following cleaning operations are exempt from the requirements for Hand-wipe Cleaning Operation (**Specific Condition A.3.):**

(1) Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;
(2) Cleaning during the manufacture, assembly, installation, maintenance, or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, or hydrazine);
(3) Cleaning and surface activation prior to adhesive bonding;
(4) Cleaning of electronic parts and assemblies containing electronic parts;
(5) Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to-air heat exchangers and hydraulic fluid systems;
(6) Cleaning of fuel cells, fuel tanks, and confined spaces;
(7) Surface cleaning of solar cells, coated optics, and thermal control surfaces;
(8) Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft;
(9) Cleaning of metallic and nonmetallic materials used in honeycomb cores during the manufacture or maintenance, of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;
(10) Cleaning of aircraft transparencies, polycarbonate or glass substrates; and
(11) Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing.

A.8. continued:

(12) Cleaning operations, using nonflammable liquids, conducted within five feet of energized electrical systems. Energized electrical systems means any AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections; and
(13) Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR 82.4.
[40 CFR 63.744 (e)]

COMPLIANCE DETERMINATION, TEST METHODS AND PROCEDURES

A.9. Housekeeping Measures – Compliance Determination. Each cleaning operation shall be considered in noncompliance if the owner or operator fails to institute and carry out the housekeeping measures required under **specific condition A.2**. Incidental emissions resulting from the activation of pressure release vents and valves on enclosed cleaning systems are exempt from this paragraph.
[40 CFR 63.749 (c)]

A.10. Hand-wipe Cleaning – Compliance Determination. The hand-wipe cleaning operation shall be considered in compliance when all hand-wipe cleaning solvents, excluding those used for hand cleaning of spray gun equipment under **specific condition A.4**, meet either the composition **OR** the vapor pressure requirements specified in **specific condition A.3.**
[40 CFR 63.749 (c)(1)]

A.11. **Spray Gun Cleaning – Compliance Determination**. The spray gun cleaning operation shall be considered in compliance when each of the following conditions is met:

(i) One of the four techniques specified in **specific condition A.4** is used;
(ii) The technique selected is operated according to the procedures specified in **specific condition A.4** as appropriate; and
(iii) If an enclosed system is used, monthly visual inspections are conducted and any leak detected is repaired within 15 days after detection. If the leak is not repaired by the 15th day after detection, the solvent shall be removed and the enclosed cleaner shall be shut down until the cleaner is repaired or its use is permanently discontinued.

[40 CFR 63.749 (c)(2)]

A.12. **Flush Cleaning – Compliance Determination**. An affected flush cleaning operation shall be considered in compliance if the operating requirements specified in **specific condition A.5** are implemented and carried out.
[40 CFR 63.749 (c)(3)]

A.13. **Composition Determination**. Compliance with the hand-wipe cleaning solvent approved composition list specified in **Specific Condition No. A.3.** (1) for hand-wipe cleaning solvents shall be demonstrated using data supplied by the manufacturer of the cleaning solvent. The data shall identify all components of the cleaning solvent and shall demonstrate that one of the approved composition definitions is met.
[40 CFR 63.750(a)]

A.14. **Vapor Pressure Determination.** The composite vapor pressure of hand-wipe cleaning solvents used in a cleaning operation shall be determined as follows:

(1) For single-component hand-wipe cleaning solvents, the vapor pressure shall be determined using MSDS or other manufacturer's data, standard engineering reference texts, or other equivalent methods.

(2) The composite vapor pressure of a blended hand-wipe solvent shall be determined by quantifying the amount of each organic compound in the blend using manufacturer's supplied data or a gas chromatographic analysis (most current version of ASTM E 260-91 or 96) and by calculating the composite vapor pressure of the solvent by summing the partial pressures of each component. The vapor pressure of each component shall be determined using manufacturer's data, standard engineering reference texts, or other equivalent methods. The following equation shall be used to determine the composite vapor pressure:

$$PP_c = \sum_{i=1}^{n} \frac{(W_i)(VP_i)/MW_i}{\frac{W_w}{MW_w} + \sum_{e=1}^{n} \frac{W_e}{MW_e} + \sum_{i=1}^{n} \frac{W_i}{MW_i}}$$

Where:

W_i = Weight of the "i" th VOC compound, grams.
W_w = Weight of water, grams.
W_e = Weight of non-HAP, non VOC compound, grams.
MW_i = Molecular weight of the "i" th VOC compound, g/g-mole.
MW_w = Molecular weight of water, g/g-mole.
MW_e = Molecular weight of exempt compound, g/g-mole.
PP_c = VOC composite partial pressure at 20^0C, mm Hg.
VP_i = Vapor pressure of the "i" th VOC compound at 20^0C, mm Hg.
[40 CFR 63.750(b)]

MONITORING REQUIREMENTS

A.15. **Enclosed Spray Gun Cleaners.** Each owner or operator using an enclosed spray gun cleaner shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.
[40 CFR 63.751 (a)]

RECORDKEEPING REQUIREMENTS

A.16. **Recordkeeping.** The owner or operator shall record the information specified in paragraphs (1) through (5) in the table below, as appropriate. [40 CFR 63.752 (b)]

Records
(1) The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
(2) For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in **specific condition A.3** (1) or for semi-aqueous cleaning solvents used for flush cleaning operations: • The name of each cleaning solvent used; • All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements; and • Annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
(3) For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in **Specific Condition A.3** (1), but does comply with the vapor pressure requirement in **Specific Condition A.3** (2): • The name of each cleaning solvent used; • The composite vapor pressure of each cleaning solvent used; • All vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent; and • The amount (in gallons) of each cleaning solvent used each month at each operation.
(4) For each cleaning solvent used for the exempt hand-wipe cleaning operations specified in **Specific Condition A.8** that does not conform to the vapor pressure or composition requirements of **Specific Condition A.3**: • The identity and amount (in gallons) of each cleaning solvent used each month at each operation; and • A list of the processes set forth in **Specific Condition A.8** to which the cleaning operation applies.

A.16. continued:

(5) A record of all leaks from enclosed spray gun cleaners identified pursuant to **Specific Condition A.14** that includes for each leak found:

- Source identification;
- Date leak was discovered; and
- Date leak was repaired.

REPORTING REQUIREMENTS

A.17. **Cleaning Operation**. Each owner or operator of a cleaning operation shall submit the Semiannual Reports occurring every 6 months from the date of the notification of compliance status that consists of the following information:

- Any instance where a noncompliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation;
- A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in **Specific Condition A.3**. (1);
- Any instance where a noncompliant spray gun cleaning method is used;
- Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
- If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.

[40 CFR 63.753 (b)]

APPLICABLE COMMON CONDITIONS

A.18. The emissions units are also subject to requirements in the following subsections

Subsection (s)	Description
E	Facility Wide Emission CAP
F	General Conditions of 40 CFR 63, Subpart GG

SUBSECTION B. THIS SECTION ADDRESSES THE FOLLOWING EMISSIONS UNITS.

E.U. ID No.	Brief Description
004	Primer Application Operations
005	Topcoat Application Operations

Primer Application Operations. This emissions unit represents the primer application operations that occur at the facility. *Primer* means the first layer and any subsequent layers of identically formulated coating applied to the surface of an aerospace vehicle or component. Primers are typically used for corrosion prevention, protection from the environment, functional fluid resistance, and adhesion of subsequent coatings. Coatings that are defined as specialty coatings are not included under this definition.

Topcoat Application Operations. This emissions unit represents the topcoat application operations that occur at the facility. *Topcoat* means a coating that is applied over a primer on an aerospace vehicle or component for appearance, identification, camouflage, or protection. Coatings that are defined as specialty coatings are not included under this definition.

These emissions units are regulated by 40 CFR 63 Subpart GG, National Emissions Standards for Aerospace Manufacturing and Rework Facilities.

{Permitting Note: The requirements for primers and topcoats in Subsection D do not apply to the use of low-volume coatings in these categories for which the annual total of each separate formulation used at the facility does not exceed 189 liters (50 gallons), and the combined annual total of all such primers and topcoats used at the facility does not exceed 757 liters (200 gallons). Primers and topcoats exempted under Subsection I, B.6.(3), and B.7.(4) are not included in the 50 and 200 gallon limits.}
[40 CFR 63.741(g)]

The following conditions apply to the emissions units listed above:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

B.1. Hours of Operation. These emissions units are allowed to operate continuously, i.e., 24 hours/day; 7 days/week; 52 weeks/year and 8,760 hours/year.
[Rule 62-210.200, F.A.C., Definitions - (PTE)]

EMISSION LIMITATIONS AND STANDARDS

B.2. The handling and transfer of primers and topcoats to or from containers, tanks, vats, vessels, and piping systems shall be conducted in such a manner that minimizes spills.
[40 CFR 63.745(b)]

B.3. Uncontrolled coatings - Organic HAP and VOC Content Levels. The owner or operator shall comply with the organic HAP and VOC content limits specified in paragraphs (1) through (4) of this condition for those coatings that are uncontrolled. Aerospace equipment that is no longer operational, intended for public display, and not easily capable of being moved is exempt from these requirements.

(1) Organic HAP emissions from primers shall be limited to an organic HAP content level of no more than: 540 g/L (4.5 lb/gal) of primer (less water), as applied, for general aviation rework facilities; or 650 g/L (5.4 lb/gal) of exterior primer (less water), as applied to large commercial aircraft at existing affected sources that produce fully assembled, large commercial aircraft; or 350 g/L (2.9 lb/gal) of primer (less water), as applied.

(2) VOC emissions from primers shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of primer (less water and exempt solvents), as applied, for general aviation rework facilities; or 650 g/L (5.4 lb/gal) of exterior primer (less water and exempt solvents), as applied, to large commercial aircraft components (parts or assemblies) or fully assembled, large commercial aircraft at existing affected sources that produce fully assembled, large commercial aircraft; or 350 g/L (2.9 lb/gal) of primer (less water and exempt solvents), as applied.

(3) Organic HAP emissions from topcoats shall be limited to an organic HAP content level of no more than: 420 g/L (3.5 lb/gal) of coating (less water) as applied or 540 g/L (4.5 lb/gal) of coating (less water) as applied for general aviation rework facilities. Organic HAP emissions from self-priming topcoats shall be limited to an organic HAP content level of no more than: 420 g/L (3.5 lb/gal) of self-priming topcoat (less water) as applied or 540 g/L (4.5 lb/gal) of self-priming topcoat (less water) as applied for general aviation rework facilities.

(4) VOC emissions from topcoats shall be limited to a VOC content level of no more than: 420 g/L (3.5 lb/gal) of coating (less water and exempt solvents) as applied or 540 g/L (4.5 lb/gal) of coating (less water and exempt solvents) as applied for general aviation rework facilities. VOC emissions from self-priming topcoats shall be limited to a VOC content level of no more than: 420 g/L (3.5 lb/gal) of self-priming topcoat (less water and exempt solvents) as applied or 540 g/L (4.5 lb/gal) of self-priming topcoat (less water) as applied for general aviation rework facilities.

{Note: Table below is created for ease of reading regarding the organic HAP and VOC content limitations as described above. It is intended to serve as guidance only, please refer to condition above for details.}

Coating Type	Maximum Content, as Applied *			
	Organic HAP Content		VOC Content	
	g/liter	lb/gal	g/liter	lb/gal
Primers	350	2.9	350	2.9
General Aviation Rework Facilities (all coating categories)	540	4.5	540	4.5
Topcoats (including self-priming)	420	3.5	420	3.5
Large commercial aircraft components (parts or assemblies) or fully assembled, large commercial aircraft	650	5.4	650	5.4

* HAP content is measured "less water"; VOC content is measured less water and exempt solvents.

[40 CFR 63.745(a) & (c)]

B.4. **Compliance Method**. Compliance with the organic HAP and VOC content limits specified in **Specific Condition B.3.** shall be accomplished by using the methods specified below, either by themselves or in conjunction with one another:

(1) Use primers and topcoats (including self-priming topcoats) with HAP and VOC content levels equal to or less than the limits specified in **Specific Condition B.3.**

(2) Use the averaging provisions described in **Specific Condition B.5.**

[40 CFR 63.745(e)]

B.5. **Averaging Provision.** The owner or operator may choose to comply with the coating limit by using the averaging provision as described below.

(1) The owner or operator shall use any combination of primers, topcoats (including self-priming topcoats), such that the monthly volume-weighted average organic HAP and VOC contents of the combination of primers, topcoats, as determined in accordance with the applicable procedures set forth in **Specific Conditions B.9 and B.11**, complies with the specified content limits in **Specific Condition B.3,** unless the permitting agency specifies a shorter averaging period as part of an ambient ozone control program.

(2) Averaging is allowed only for uncontrolled primers, topcoats (including self-priming topcoats).

(3) Averaging is not allowed between primers and topcoats (including self-priming topcoats).

(4) Averaging is not allowed between primers and chemical milling maskants, or between topcoats and chemical milling maskants.

(5) Each averaging scheme shall be approved in advance by the permitting agency and be adopted as part of the facility's title V permit.

[40 CFR 63.743(d)]

B.6. **Application Equipment**. Except as stated in paragraph (3) of this condition, the owner or operator of a primer or topcoat (including self-priming topcoats) application operation in which any of the coatings contain organic HAP or VOC shall comply with the requirements specified below:

(1) All primers and topcoats (including self-priming topcoats) shall be applied using one or more of the application techniques herein:

(i) Flow/curtain coat application;
(ii) Dip coat application;
(iii) Roll coating;
(iv) Brush coating;
(v) Cotton-tipped swab application;
(vi) Electrodeposition (dip) coating;
(vii) High volume low pressure (HVLP) spraying;
(viii) Electrostatic spray application; or
(ix) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods, as determined according to the requirements in **Specific Condition B.12.**

B.6. continued:

(2) All application devices used to apply primers and topcoats (including self-priming topcoats) shall be operated according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP and electrostatic spray application techniques.

(3) The following situations are exempt from the requirements of paragraph (1) of this condition:

(i) Any situation that normally requires the use of an airbrush or an extension on the spray gun to properly reach limited access spaces;

(ii) The application of coatings that contain fillers that adversely affect atomization with HVLP spray guns and that the permitting agency has determined cannot be applied by any of the application methods specified in paragraph (1) of this condition;

(iii) The application of coatings that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.) and that the permitting agency has determined cannot be applied by any of the application methods specified in paragraph (1) of this condition;

(iv) The use of airbrush application methods for stenciling, lettering, and other identification markings;

(v) The use of hand-held spray can application methods; and

(vi) Touch-up and repair operations.

[40 CFR 63.745(f)]

B.7. <u>Inorganic HAP emissions</u>. Except as stated in paragraph (4) of this condition, the owner or operator shall comply with the following applicable requirements for these emissions units in which any of the coatings that are spray applied contain inorganic HAP:

(1) Apply these coatings in a booth or hangar in which air flow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets.

(2) Control the air stream from this operation as follows:

(i) For existing sources, the permittee must choose one of the following:

(A) Before exhausting it to the atmosphere, pass the air stream through either a dry particulate filter system certified using the methods described in **Specific Condition B.13** to meet or exceed the efficiency data points in Tables 1 and 2 of Subsection D, or

(B) Before exhausting it to the atmosphere, pass the air stream through a Waterwash system shall remain in operation during all coating application operations, or

(C) Before exhausting it to the atmosphere, pass the air stream through an air pollution control system that meets or exceeds the efficiency data points in Tables 1 and 2 of Subsection D, and is approved by the permitting authority.

(ii) Omitted

(iii) Omitted

B.7. continued:

TABLE 1 of Subsection D TWO-STAGE ARRESTOR; LIQUID PHASE CHALLENGE FOR EXISTING SOURCES	
Filtration efficiency requirement, %	**Aerodynamic particle size range, μm**
> 90	> 5.7
> 50	> 4.1
> 10	> 2.2

TABLE 2 of Subsection D TWO-STAGE ARRESTOR; SOLID PHASE CHALLENGE FOR EXISTING SOURCES	
Filtration efficiency requirement, %	**Aerodynamic particle size range, μm**
> 90	> 8.1
> 50	> 5.0
> 10	> 2.6

(iv) If a dry particulate filter system is used, the following requirements shall be met:
- (A) Maintain the system in good working order;
- (B) Install a differential pressure gauge across the filter banks;
- (C) Continuously monitor the pressure drop across the filter and read and record the pressure drop once per shift; and
- (D) Take corrective action when the pressure drop exceeds or falls below the filter manufacturer's recommended limit(s).

B.7. continued:

(v) If a conventional waterwash system is used, continuously monitor the water flow rate and read and record the water flow rate once per shift. If a pumpless system is used, continuously monitor the booth parameter(s) that indicate performance of the booth per the manufacturer's recommendations to maintain the booth within the acceptable operating efficiency range and read and record the parameters once per shift.

(3) If the pressure drop across the dry particulate filter system, as recorded pursuant to **Specific Condition B.14 (1),** is outside the limit(s) specified by the filter manufacturer or in locally prepared operating procedures, shut down the operation immediately and take corrective action. If the water path in the waterwash system fails the visual continuity/flow characteristics check, or the water flow rate recorded pursuant to **Specific Condition B.14 (2)** exceeds the limit(s) specified by the booth manufacturer or in locally prepared operating procedures, or the booth manufacturer's or locally prepared maintenance procedures for the filter or waterwash system have not been performed as scheduled, shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop or water flow rate is returned within the specified limit(s).

(4) The requirements of **Specific Condition B.7.** paragraph (1) through (3) do not apply to the following:

- Touch-up of scratched surfaces or damaged paint;
- Hole daubing for fasteners;
- Touch-up of trimmed edges;
- Coating prior to joining dissimilar metal components;
- Stencil operations performed by brush or air brush;
- Section joining;
- Touch-up of bushings and other similar parts;
  Sealant detackifying;
- Painting parts in an area identified in a title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth; and
- The use of hand-held spray can application methods.

[40 CFR 63.745(g)]

COMPLIANCE DETERMINATION, TEST METHODS AND PROCEDURES

B.8. **Primer & Topcoat Application – Compliance Determination**. The primer application operation is considered in compliance when the conditions specified in paragraphs (i) through (iv) below, as applicable, and in **Specific Condition B.9** are met. Failure to meet any one of the conditions identified in these paragraphs shall constitute noncompliance.

(i) For all uncontrolled primers, all values of H_i and H_a (as determined using the procedures specified in **Specific Condition B.10 & B.11** are less than or equal to 350 grams of organic HAP per liter (2.9 lb/gal) of primer (less water) as applied, and all values of G_i and G_a (as determined using the procedures specified in **Specific Condition B.12 & B.13**) are less than or equal to 350 grams of organic VOC per liter (2.9 lb/gal) of primer (less water and exempt solvents) as applied.

(ii) For all uncontrolled topcoats, all values of H_i and H_a(as determined using the procedures specified in § 63.750(c) and (d)) are less than or equal to 420 grams organic HAP per liter (3.5 lb/gal) of topcoat (less water) as applied, and all values of G_i and G_a (as determined using the procedures specified in § 63.750(e) and (f)) are less than or equal to 420 grams organic VOC per liter (3.5 lb/gal) of topcoat (less water and exempt solvents) as applied.

(iii) (A) Uses an application technique specified in **Specific Condition B.6 (1) (i) through (viii)**, or (B) Uses an alternative application technique, as allowed under **Specific Condition No. B.6 (1)(ix),** such that the emissions of both organic HAP and VOC for the implementation period of the alternative application method are less than or equal to the emissions generated using HVLP or electrostatic spray application methods as determined using the procedures specified in **Specific Condition B.14.**

(iv) Operates all application techniques in accordance with the manufacturer's specifications or locally prepared operating procedures, whichever is more stringent.

[40 CFR 63.749(d)(3)& (4)]

B.9. **Inorganic HAP Emissions - Primer and Topcoat Application Operations**. For each primer or topcoat application operation that emits inorganic HAP, the operation is in compliance when:

(1) It is operated according to the requirements specified in **Specific Condition B.7 (1) through (3)**; and

(2) It is shut down immediately whenever the pressure drop or water flow rate is outside the limit(s) established for them and is not restarted until the pressure drop or water flow rate is returned within these limit(s), as required under **Specific Condition B.7(3).**

[40 CFR 63.749(e)]

B.10. <u>Organic HAP Content Level Determination - Compliant Primers and Topcoats</u>. For those uncontrolled primers and topcoats complying with the primer and topcoat organic HAP content limits specified in **Specific Condition B.3.** without being averaged, the following procedures shall be used to determine the mass of organic HAP emitted per volume of coating (less water) as applied.

(1) For coatings that contain no exempt solvents, determine the total organic HAP content using manufacturer's supplied data or Method 24 of 40 CFR 60, Appendix A to determine the VOC content. The VOC content shall be used as a surrogate for total HAP content for coatings that contain no exempt solvent. If there is a discrepancy between the manufacturer's formulation data and the results of the Method 24 analysis, compliance shall be based on the results from the Method 24 analysis.

(2) For each coating formulation as applied, determine the organic HAP weight fraction, water weight fraction (if applicable), and density from manufacturer's data. If these values cannot be determined using the manufacturer's data, the permittee shall submit an alternative procedure for determining their values for approval by the Permitting authority. Recalculation is required only when a change occurs in the coating formulation.

(3) For each coating as applied, calculate the mass of organic HAP emitted per volume of coating (lb/gal) less water as applied using equations 1, 2, and 3:

$$V_{wi} = \frac{D_{ci}\ W_{wi}}{D_w} \qquad \text{Eq. 1}$$

Where

V_{wi} = volume (gal) of water in one gal of coating i.
D_{ci} = density (lb of coating per gal of coating) of coating i.
W_{wi} = weight fraction (expressed as a decimal) of water in coating i.
D_w = density of water, 8.33 lb/gal.

$$M_{Hi} = D_{ci} W_{Hi} \qquad \text{Eq. 2}$$

Where

M_{Hi} = mass (lb) of organic HAP in one gal of coating i.
D_{ci} = density (lb of coating per gal of coating) of coating i.
W_{Hi} = weight fraction (expressed as a decimal) of organic HAP in coating i.

$$H_i = \frac{M_{Hi}}{(1 - V_{wi})} \qquad \text{Eq. 3}$$

B.10. continued:

Where

H_i = mass of organic HAP emitted per volume of coating i (lb/gal) less water as applied.
M_{Hi} = mass (lb) of organic HAP in one gal of coating i.
V_{wi} = volume (gal) of water in one gal of coating i.

[40 CFR 63.750(c)]

B.11. **Organic HAP Content Level Determination - Averaged Primers and Topcoats**. For those uncontrolled primers and topcoats that are averaged together in order to comply with the primer and topcoat organic HAP content limits specified in **Specific Condition B.3**, the following procedure shall be used to determine the monthly volume-weighted average mass of organic HAP emitted per volume of coating (less water) as applied, unless the permitting agency specifies a shorter averaging period as part of an ambient ozone control program.

(1)(i) Determine the total organic HAP weight fraction as applied of each coating. If any ingredients, including diluent solvent, are added to a coating prior to its application, the organic HAP weight fraction of the coating shall be determined at a time and location in the process after all ingredients have been added.

(ii) Determine the total organic HAP weight fraction of each coating as applied each month.
(A) If no changes have been made to a coating, either as supplied or as applied, or if a change has been made that has a minimal effect on the organic HAP content of the coating, the value previously determined may continue to be used until a change in formulation has been made by either the manufacturer or the user.
(B) If a change in formulation or a change in the ingredients added to the coating takes place, including the ratio of coating to diluent solvent, prior to its application, either of which results in a more than minimal effect on the organic HAP content of the coating, the total organic HAP weight fraction of the coating shall be redetermined.

(iii) Manufacturer's formulation data may be used to determine the total organic HAP content of each coating and any ingredients added to the coating prior to its application. If the total organic HAP content cannot be determined using the manufacturer's data, the permittee shall submit an alternative procedure for determining the total organic HAP weight fraction for approval by the Permitting authority.

(2)(i) Determine the volume both in total gallons as applied and in total gallons (less water) as applied of each coating. If any ingredients, including diluent solvents, are added prior to its application, the volume of each coating shall be determined at a time and location in the process after all ingredients (including any diluent solvent) have been added.
(ii) Determine the volume of each coating (less water) as applied each month, unless the permitting agency specifies a shorter period as part of an ambient ozone control program.
(iii) The volume applied may be determined from company records.

B.11. continued:

(3)(i) Determine the density of each coating as applied. If any ingredients, including diluent solvent, are added to a coating prior to its application, the density of the coating shall be determined at a time and location in the process after all ingredients have been added.
(ii) Determine the density of each coating as applied each month, unless the permitting agency specifies a shorter period as part of an ambient ozone control program.
(A) If no changes have been made to a coating, either as supplied or as applied, or if a change has been made that has a minimal effect on the density of the coating, then the value previously determined may continue to be used until a change in formulation has been made by either the manufacturer or the user.

(B) If a change in formulation or a change in the ingredients added to the coating takes place, including the ratio of coating to diluent solvent, prior to its application, either of which results in a more than minimal effect on the density of the coating, then the density of the coating shall be redetermined.
(iii) The density may be determined from company records, including manufacturer's data sheets. If the density of the coating cannot be determined using the company's records, including the manufacturer's data, then the permittee shall submit an alternative procedure for determining the density for approval by the Permitting authority.
(4) Calculate the total volume in gallons as applied (less water) by summing the individual volumes of each coating (less water) as applied, which were determined under paragraph (2) of this condition.
(5) Calculate the volume-weighted average mass of organic HAP in coatings emitted per unit volume (lb/gal) of coating (less water) as applied during each 30-day period using equation 4:

$$H_a = \frac{\sum_{i=1}^{n} W_{Hi} D_{ci} V_{ci}}{C_{lw}} \qquad \text{Eq. 4}$$

Where

H_a = volume-weighted average mass of organic HAP emitted per unit volume of coating (lb/gal) (less water) as applied during each 30-day period for those coatings being averaged.
n = number of coatings being averaged.
W_{Hi} = weight fraction (expressed as a decimal) of organic HAP in coating i as applied that is being averaged during each 30-day period.
D_{ci} = density (lb of coating per gal of coating) of coating i as applied that is being averaged during each 30-day period.
V_{ci} = volume (gal) of coating i as applied that is being averaged during the 30-day period.
C_{lw} = total volume (gal) of all coatings (less water) as applied that are being averaged during each 30-day period.

[40 CFR 63.750(d)]

B.12. <u>VOC Content Level Determination - Compliant Primers and Topcoats</u>. For those uncontrolled primers and topcoats complying with the primer and topcoat VOC content levels specified in **Specific Condition B.3.** without being averaged, the following procedure shall be used to determine the mass of VOC emitted per volume of coating (less water and exempt solvents) as applied.

(1) Determine the VOC content of each formulation (less water and exempt solvents) as applied using manufacturer's supplied data or Method 24 of 40 CFR 60, appendix A to determine the VOC content. The VOC content shall be used as a surrogate for total HAP content for coatings that contain no exempt solvent. If there is a discrepancy between the manufacturer's formulation data and the results of the Method 24 analysis, compliance shall be based on the results from the Method 24 analysis.

(2) For each coating applied, calculate the mass of VOC emitted per volume of coating (lb/gal) (less water and exempt solvents) as applied using equations 5, 6, and 7:

$$V_{wi} = \frac{D_{ci}\ W_{wi}}{D_w} \qquad \text{Eq. 5}$$

Where

V_{wi} = volume (gal) of water in one gal of coating i.
D_{ci} = density (lb of coating per gal of coating) of coating i.
W_{wi} = weight fraction (expressed as a decimal) of water in coating i.
D_w = density of water, 8.33 lb/gal.

$$M_{Vi} = D_{ci} W_{Vi} \qquad \text{Eq. 6}$$

Where

M_{Vi} = mass (lb) of VOC in one gal of coating i.
D_{ci} = density (lb of coating per gal of coating) of coating i.
W_{Vi} = weight fraction (expressed as a decimal) of VOC in coating i.

$$G_i = \frac{M_{vi}}{(1 - V_{wi}) - V_{xi}} \qquad \text{Eq. 7}$$

Where

G_i = mass of VOC emitted per volume of coating i (lb/gal) (less water and exempt solvents) as applied.
M_{Vi} = mass (lb) of VOC in one gal of coating i.
V_{wi} = volume (gal) of water in one gal of coating i.
V_{Xi} = volume (gal) of exempt solvents in one gal of coating i.

B.12. continued:

(3) (i) If the VOC content is found to be different when EPA Method 24 is used during an enforcement inspection from that used by the permittee in calculating G_a, compliance shall be based, except as provided in B.10.(3)(ii), upon the VOC content obtained using EPA Method 24.
(ii) If the VOC content of a coating obtained using Method 24 would indicate noncompliance as determined under either B.8 (i) or (ii), the permittee may elect to average the coating with other uncontrolled coatings and (re)calculate G_i (using the procedure specified in B.13), provided appropriate and sufficient records were maintained for all coatings included in the average (re)calculation. The (re) calculated value of G_i (G_a in B.13) for the averaged coatings shall then be used to determine compliance.
[40 CFR 63.750(e)]

B.13. <u>VOC Content Level Determination - Averaged Primers and Topcoats</u>. For those uncontrolled primers and topcoats that are averaged within their respective coating category in order to comply with the primer and topcoat VOC content limits, the following procedure shall be used to determine the monthly volume-weighted average mass of VOC emitted per volume of coating (less water and exempt solvents) as applied, unless the permitting agency specifies a shorter averaging period as part of an ambient ozone control program.

(1) (i) Determine the VOC content (lb/gal) as applied of each coating. If any ingredients, including diluent solvent, are added to a coating prior to its application, the VOC content of the coating shall be determined at a time and location in the process after all ingredients have been added.
(ii) Determine the VOC content of each coating as applied each month, unless the permitting agency specifies a shorter period as part of an ambient ozone control program.
(A) If no changes have been made to a coating, either as supplied or as applied, or if a change has been made that has a minimal effect on the VOC content of the coating, the value previously determined may continue to be used until a change in formulation has been made by either the manufacturer or the user.
(B) If a change in formulation or a change in the ingredients added to the coating takes place, including the ratio of coating to diluent solvent, prior to its application, either of which results in a more than minimal effect on the VOC content of the coating, the VOC content of the coating shall be redetermined.
(iii) Determine the VOC content of each primer and topcoat formulation (less water and exempt solvents) as applied using EPA Method 24 or from manufacturer's data.
(2) (i) Determine the volume both in total gallons as applied and in total gallons (less water and exempt solvents) as applied of each coating. If any ingredients, including diluent solvents, are added prior to its application, the volume of each coating shall be determined at a time and location in the process after all ingredients (including any diluent solvent) have been added.
(ii) Determine the volume of each coating (less water and exempt solvents) as applied each day.
(iii) The volume applied may be determined from company records.

B.13. continued:

(3) Calculate the total volume in gallons (less water and exempt solvents) as applied by summing the individual volumes of each coating (less water and exempt solvents) as applied, which were determined under paragraph (2) of this condition.

(4) Calculate the volume-weighted average mass of VOC emitted per unit volume (lb/gal) of coating (less water and exempt solvents) as applied for each coating category during each 30-day period using equation 8:

$$G_a = \frac{\sum_{i=1}^{n} (VOC)_{ci} \; V_{ci}}{C_{lwes}} \qquad \text{Eq. 8}$$

Where

G_a = volume weighted average mass of VOC per unit volume of coating (lb/gal) (less water and exempt solvents) as applied during each 30-day period for those coatings being averaged.

n = number of coatings being averaged.

$(VOC)_{ci}$ = VOC content (lb/gal) of coating i (less water and exempt solvents) as applied (as determined using the procedures specified in paragraph (1) of this condition that is being averaged during the 30-day period.

V_{ci} = volume (gal) of coating i (less water and exempt solvents) as applied that is being averaged during the 30-day period.

C_{lwes} = total volume (gal) of all coatings (less water and exempt solvents) as applied during each 30-day period for those coatings being averaged.

(5) (i) If the VOC content is found to be different when EPA Method 24 is used during an enforcement inspection from that used by the permittee in calculating G_a, recalculation of G_a is required using the new value. If more than one coating is involved, the recalculation shall be made once using all of the new values.
(ii) If recalculation is required, the permittee may elect to include in the recalculation of G_a uncontrolled coatings that were not previously included provided appropriate and sufficient records were maintained for these other coatings to allow daily recalculations.
(iii) The recalculated value of G_a under either paragraph (5)(i) or (5)(ii) of this condition shall be used to determine compliance.

[40 CFR 63.750(f)]

B.14. Alternative Application Method-Primers and Topcoats.

(1) Each permittee seeking to use an alternative application method (as allowed in B.6.(1)(ix)) in complying with the standards for primers and topcoats shall use the procedures specified in paragraph (2) (i) and (2)(ii) or (2)(iii) of this condition to determine the organic HAP and VOC emission levels of the alternative application technique as compared to either HVLP or electrostatic spray application methods.

(2) (i) For the process or processes for which the alternative application method is to be used, the total organic HAP and VOC emissions shall be determined for an initial 30-day period, the period of time required to apply coating to five completely assembled aircraft, or a time period approved by the permitting agency. During this initial period, only HVLP or electrostatic spray application methods shall be used. The emissions shall be determined based on the volumes, organic HAP contents (less water), and VOC contents (less water and exempt solvents) of the coatings as applied.

(ii) Upon implementation of the alternative application method, use the alternative application method in production on actual production parts or assemblies for a period of time sufficient to coat an equivalent amount of parts and assemblies with coatings identical to those used in the initial 30-day period. The actual organic HAP and VOC emissions shall be calculated for this post-implementation period.

(iii) Test the proposed application method against either HVLP or electrostatic spray application methods in a laboratory or pilot production area, using parts and coatings representative of the process (es) where the alternative method is to be used. The laboratory test will use the same part configuration(s) and the same number of parts for both the proposed method and the HVLP or electrostatic spray application methods.

(iv) Whenever the approach in either paragraph (2)(ii) or (2)(iii) of this condition is used, the permittee shall calculate both the organic HAP and VOC emission reduction using equation 19:

$$P = \frac{E_b - E_a}{E_b} x100 \qquad \text{Eq. 19}$$

Where

P	=	organic HAP or VOC emission reduction, percent.
E_b	=	organic HAP or VOC emissions, in pounds, before the alternative application technique was implemented, as determined under paragraph (2)(i) of this condition.
E_a	=	organic HAP or VOC emissions, in pounds, after the alternative application technique was implemented, as determined under paragraph (2)(ii) of this condition.

(3) Each permittee seeking to demonstrate that an alternative application method achieves emission reductions equivalent to HVLP or electrostatic spray application methods shall comply with the following:

B.14. continued:

(i) Each coating shall be applied such that the dried film thickness is within the range specified by the applicable specification(s) for the aerospace vehicle or component being coated.
(ii) If no such dried film thickness specification(s) exists, the permittee shall ensure that the dried film thickness applied during the initial 30-day period is equivalent to the dried film thickness applied during the alternative application method test period for similar aerospace vehicles or components.
(iii) Failure to comply with these dried film thickness requirements shall invalidate the test results obtained under paragraph (2)(i) of this condition.
[40 CFR 63.750(i)]

B.15. **Inorganic HAP Emissions - Dry Particulate Filter Certification Requirements**. Dry particulate filters used to comply with **Specific Condition B.7.(2)** shall be certified by the filter manufacturer or distributor, paint/depainting booth supplier, and/or the facility owner or operator using method 319 in appendix A of subpart A of this part, to meet or exceed the efficiency data points found in Tables 1 and 2 of **Specific Condition B.7**., respectively.
[40 CFR 63.750(o)]

MONITORING REQUIREMENTS.

B.16. **Dry Particulate Filter, HEPA Filter, and Waterwash Systems - Primer and Topcoat Application Operations**.

(1) Each permittee using a dry particulate filter system to meet the requirements of **Specific Condition B.7. (3)** shall, while primer or topcoat application operations are occurring, continuously monitor the pressure drop across the system, and read and record the pressure drop once per shift following the recordkeeping requirements of **Specific Condition B.17.**

(2) Each permittee using a conventional waterwash system to meet the requirements of **Specific Condition B.7. (3**) shall, while primer or topcoat application operations are occurring, continuously monitor the water flow rate through the system, and read and record the pressure drop once per shift following the recordkeeping requirements of **Specific Condition B.17.** Each permittee using a pumpless waterwash system to meet the requirements of **Specific Condition B.7.(2)** shall, while primer and topcoat application operations are occurring, measure and record the parameter(s) recommended by the booth manufacturer that indicate booth performance once per shift, following the recordkeeping requirements of **Specific Condition B.17.**
[40 CFR 63.751(c)]

RECORDKEEPING REQUIREMENTS.

B.17. **Primer and Topcoat Application Operations - Organic HAP and VOC**. The following information shall be recorded as appropriate:
[40 CFR 63.752(c)]

B.17. continued:

Records
(1) The name and VOC content as received and as applied of each primer and topcoat used at the facility.
(2) For uncontrolled primers and topcoats that meet the organic HAP and VOC content limits in **Specific Condition B.3. (1) through (4)** without averaging: (iv) The mass of organic HAP emitted per unit volume of coating as applied (less water) (H_i) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G_i) for each coating formulation within each coating category used each month (as calculated using the procedures specified in **Specific Condition B.10. and B.12.** (v) All data, calculations, and test results (including EPA Method 24 results) used in determining the values of H_i and G_i; and (vi) The volume (gal) of each coating formulation within each coating category used each month.
(3) For "low HAP content" uncontrolled primers with organic HAP content less than or equal to 250 g/l (2.1 lb/gal) less water as applied and VOC content less than or equal to 250 g/l (2.1 lb/gal) less water and exempt solvents as applied: (i) Annual purchase records of the total volume of each primer purchased; and (ii) All data, calculations, and test results (including EPA Method 24 results) used in determining the organic HAP and VOC content as applied. These records shall consist of the manufacturer's certification when the primer is applied as received, or the data and calculations used to determine H_i if not applied as received.
(4) For primers and topcoats complying with the organic HAP or VOC content level by averaging: (i) The monthly volume-weighted average masses of organic HAP emitted per unit volume of coating as applied (less water) (H_a) and of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G_a) for all coatings (as determined by the procedures specified in specific condition B.11. and B.13. and (ii) All data, calculations, and test results (including EPA Method 24 results) used to determine the values of H_a and G_a.

B.18. **<u>Primer and Topcoat Application Operations - Inorganic HAP Emissions</u>**. The owner or operator shall meet the following recordkeeping requirements.

(1) Each permittee complying with **Specific Condition B.7.** for the control of inorganic HAP emissions from primer and topcoat application operations through the use of a dry particulate filter system or a HEPA filter system shall record the pressure drop across the operating system once each shift during which coating operations occur.

B.18. continued:

(2) Each permittee complying with **Specific Condition B.7.** through the use of a conventional waterwash system shall record the water flow rate through the operating system once each shift during which coating operations occur. Each permittee complying with **Specific Condition B.7.** through the use of a pumpless waterwash system shall record the parameter(s) recommended by the booth manufacturer that indicate the performance of the booth once each shift during which coating operations occur.

(3) This log shall include the acceptable limit(s) of pressure drop, water flow rate, or for the pumpless waterwash booth, the booth manufacturer recommended parameter(s) that indicate the booth performance, as applicable, as specified by the filter or booth manufacturer or in locally prepared operating procedures.

[40 CFR 63.752(d)]

REPORTING REQUIREMENTS

B.19. <u>Primer and Topcoat Application Operations</u>. Each permittee of a primer or topcoat application operation subject to this subsection shall submit the following information:
[40 CFR 63.753(c)]

Reports
(1) **Semiannual reports** occurring every 6 months from the date of the notification of compliance status that identify: (i) For primers and topcoats where compliance is not being achieved through the use of averaging or a control device, each value of H_i and G_i, as recorded under **Specific Condition B.17.(2)(i),** that exceeds the applicable organic HAP or VOC content limit specified in **Specific Condition B.3.** (ii) For primers and topcoats where compliance is being achieved through the use of averaging, each value of H_a and G_a, as recorded under **Specific Condition B.17.(4)(i),** that exceeds the applicable organic HAP or VOC content limit specified in **Specific Condition B.3.;** (iii) All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, the water flow rate through a conventional waterwash system, or the recommended parameter(s) that indicate the booth performance for pumpless systems, as appropriate, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures; (iv) If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards; and,

B.19. continued:

Reports
(2) **Annual reports** beginning 12 months after the date of the notification of compliance status listing the number of times the pressure drop or water flow rate for each dry filter or waterwash system, as applicable, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.

APPLICABLE COMMON CONDITIONS

B.20. The emissions units are also subject to requirements in the following subsections

Subsection (s)	Description
E	Facility Wide Emission CAP
F	General Conditions of 40 CFR 63, Subpart GG

SUBSECTION C. THIS SECTION ADDRESSES THE FOLLOWING EMISSIONS UNIT.

E.U. ID No.	Brief Description
006	Depainting Operations

Depainting Operation means the use of a chemical agent, media blasting, or any other technique to remove permanent coatings from the outer surface of an aerospace vehicle or components. The depainting operation includes washing of the aerospace vehicle or component to remove residual stripper, media, or coating residue.
This emissions unit is regulated by 40 CFR 63 Subpart GG, National Emissions Standards for Aerospace Manufacturing and Rework Facilities.

The following conditions apply to the emissions unit listed above:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

C.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 24 hours/day; 7 days/week; 52 weeks/year and 8,760 hours/year.
[Rule 62-210.200, F.A.C., Definitions - (PTE)]

EMISSION LIMITATIONS AND STANDARDS

C.2. Applicability. The owner or operator shall comply with the requirements (1) through (3) of this condition, and with the requirements specified in **Specific Condition C.3.** where there are no controls for organic HAP. The requirements of this subsection do not apply to an aerospace manufacturing or rework facility that depaints six or less completed aerospace vehicles in a calendar year.

(1) The provisions of this subsection apply to the depainting of the outer surface areas of completed aerospace vehicles, including the fuselage, wings, and vertical and horizontal stabilizers of the aircraft, and the outer casing and stabilizers of missiles and rockets. These provisions do not apply to the depainting of parts or units normally removed from the aerospace vehicle for depainting. However, depainting of wings and stabilizers is always subject to the requirements of this section regardless of whether their removal is considered by the permittee to be normal practice for depainting.
(2) Aerospace vehicles or components that are intended for public display, no longer operational, and not easily capable of being moved are exempt from the requirements of this section.
(3) The following depainting operations are exempt from the requirements of this subsection:
  (i) Depainting of radomes; and
  (ii) Depainting of parts, subassemblies, and assemblies normally removed from the primary aircraft structure before depainting.

[40 CFR 63.746(a)]

C.3. HAP Emissions Standards. The owner or operator shall comply with the requirements as described below.

(1) HAP Emissions - non-HAP Chemical Strippers and Technologies. Except as provided in paragraph (2) and (3) of this condition, no organic HAP from chemical stripping formulations and agents or chemical paint softeners shall be emitted.

(2) Where non-chemical based equipment is used to comply with paragraph **Specific Condition C.3.(1)** of this condition, either in total or in part, each permittee shall operate and maintain the equipment according to the manufacturer's specifications or locally prepared operating procedures. During periods of malfunctions of such equipment, each permittee may use substitute materials during the repair period provided the substitute materials used are those available that minimize organic HAP emissions. In no event shall substitute materials be used for more than 15 days annually, unless such materials are organic HAP-free.

(3) The owner or operator shall not, on an annual average basis, use more than 26 gallons of organic HAP-containing chemical strippers or alternatively 190 pounds of organic HAP per commercial aircraft depainted or more than 50 gallons of organic HAP-containing chemical strippers or alternatively 365 pounds of organic HAP per military aircraft depainted for spot stripping and decal removal.

(4) Each permittee of a new or existing depainting operation complying with **Specific Condition C.3.(2),** that generates airborne inorganic HAP emissions from dry media blasting equipment, shall also comply with the requirements specified in paragraphs (4)(i) through (4)(v) of this condition.

(i) Perform the depainting operation in an enclosed area, unless a closed-cycle depainting system is used.

(ii) For existing sources, pass any air stream removed from the enclosed area or closed-cycle depainting system through a dry particulate filter system, certified using the method described in **Specific Condition B.15** to meet or exceed the efficiency data points in Tables 1 and 2 of **Specific Condition B.7**, through a baghouse, or through a waterwash system before exhausting it to the atmosphere.

(iii) If a dry particulate filter system is used, the following requirements shall be met:

(A) Maintain the system in good working order;

(B) Install a differential pressure gauge across the filter banks;

(C) Continuously monitor the pressure drop across the filter; and read and record the pressure drop once per shift; and

(D) Take corrective action when the pressure drop exceeds or falls below the filter manufacturer's recommended limits.

(iv) If a waterwash system is used, continuously monitor the water flow rate.

(v) If the pressure drop, as recorded pursuant to **Specific Condition C.6. (7),** is outside the limit(s) specified by the filter manufacturer or in locally prepared operating procedures, whichever is more stringent, shut down the operation immediately and take corrective action.

C.3. continued:

If the water path in the waterwash system fails the visual continuity/flow characteristics check as recorded pursuant to **Specific Condition C.6.(7),** or the water flow rate, as recorded pursuant to **Specific Condition B.18,** exceeds the limit(s) specified by the booth manufacturer or in locally prepared operating procedures, or the booth manufacturer's or locally prepared maintenance procedures for the filter or waterwash system have not been performed as scheduled, shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop or water flow rate is returned within the specified limit(s).

(5) Mechanical and hand sanding operations are exempt from the requirements in paragraph (4) of this condition.

[40 CFR 63.746(b)]

COMPLIANCE DETERMINATION, TEST METHODS AND PROCEDURES

C.4. **Compliance Determination for Organic HAP Emissions**. For non-HAP depainting operations complying with **Specific Condition C.3 (1);**

(A) For any spot stripping and decal removal, the value of C, as determined using the procedures specified in **Specific Condition C.6**, is less than or equal to 26 gallons of organic HAP-containing chemical stripper or 190 pounds of organic HAP per commercial aircraft depainted calculated on a yearly average; and is less than or equal to 50 gallons of organic HAP-containing chemical stripper or 365 pounds of organic HAP per military aircraft depainted calculated on a yearly average; and

(B) The requirements of **Specific Condition C.3 (2)** are carried out during malfunctions of non-chemical based equipment.

[40 CFR 63.749 (f)(3)(ii)]

C.5. **Compliance Determination for Inorganic HAP Emissions.** Each depainting operation is in compliance when:

(1) The operating requirements specified in **Specific Condition C.3 (4)** are followed; and

(2) It is shut down immediately whenever the pressure drop or water flow rate is outside the limit(s) established for them and is not restarted until the pressure drop or water flow rate is re-turned within these limit(s), as required under **Specific Condition C.3 (4)(v).**

[40 CFR 63.749 (g)]

C.6. <u>Spot Stripping and Decal Removal</u>. Each permittee seeking to comply with **Specific Condition C.3.(3)** shall determine the volume of organic HAP-containing chemical strippers or alternatively the weight of organic HAP used per aircraft using the procedure specified in paragraphs (1) through (3) of this condition.

(1) For each chemical stripper used for spot stripping and decal removal, determine for each annual period the total volume as applied or the total weight of organic HAP using the procedure specified in **Specific Condition B.11. (2).**

(2) Determine the total number of aircraft for which depainting operations began during the annual period as determined from company records.

(3) Calculate the annual average volume of organic HAP-containing chemical stripper or weight of organic HAP used for spot stripping and decal removal per aircraft using equation 20 (volume) or equation 21 (weight):

$$C = \frac{\sum_{i=1}^{n} V_{si}}{A} \qquad \text{Eq. 20}$$

Where

C = annual average volume (gal per aircraft) of organic HAP-containing chemical stripper used for spot stripping and decal removal.
n = number of organic HAP-containing chemical strippers used in the annual period.
V_{si} = volume (gal) of organic HAP-containing chemical stripper i used during the annual period.
A = number of aircraft for which depainting operations began during the annual period.

$$C = \frac{\sum_{i=1}^{n} (V_{si} D_{hi} (\sum_{i=1}^{m} W_{hi}))}{A} \qquad \text{Eq. 21}$$

Where

C = annual average weight (lb per aircraft) of organic HAP (chemical stripper) used for spot stripping and decal removal.
m = number of organic HAP contained in each chemical stripper, as applied.
n = number or organic HAP-containing chemical strippers used in the annual period.
W_{hi} = weight fraction (expressed as a decimal) of each organic HAP "i" contained in the chemical stripper, as applied, for each aircraft depainted.
D_{hi} = density (lb/gal) of each organic HAP-containing chemical stripper "i", used in the annual period.
V_{si} = volume (gal) of organic HAP-containing chemical stripper "i" used during the annual period.
A = number of aircraft for which depainting operations began during the annual period.
[40 CFR 63.750(j)]

MONITORING REQUIREMENTS

C.7. **Particulate Filters and Waterwash Booths - Depainting Operations**. Each permittee using a dry particulate filter or conventional waterwash system in accordance with the requirements of **Specific Condition C.3.(4)** shall, while depainting operations are occurring, continuously monitor the pressure drop across the particulate filters or the water flow rate through the conventional waterwash system and read and record the pressure drop or the water flow rate once per shift following the recordkeeping requirements of **Specific Condition C.8.** Each permittee using a pumpless waterwash system to meet the requirements of **Specific Condition C.3. (4)** shall, while depainting operations are occurring, measure and record the parameter(s) recommended by the booth manufacturer that indicate booth performance once per shift, following the recordkeeping requirements of **Specific Condition C.8.**
[40 CFR 63.751(d)]

RECORDKEEPING REQUIREMENTS

C.8. The following information shall be recorded as appropriate:

(1) General. For all chemical strippers used in the depainting operation:

(i) The name of each chemical stripper; and

(ii) Monthly volumes of each organic-HAP containing chemical stripper used or monthly weight of organic HAP-material used for spot stripping and decal removal.

(2) Omitted.

(3) Omitted.

(4) For each type of aircraft depainted at the facility, a listing of the parts, subassemblies, and assemblies normally removed from the aircraft before depainting. Prototype, test model or aircraft that exist in low numbers (i.e., less than 25 aircraft of any one type) are exempt from this requirement.

(5) Omitted.

(6) Spot stripping and decal removal. For spot stripping and decal removal, the volume of organic HAP-containing chemical stripper or weight of organic HAP used, the annual average volume of organic HAP-containing stripper used per aircraft, the annual number of aircraft stripped or weight of organic HAP, and all data and calculations used.

(7) Inorganic HAP emissions. Each permittee shall record the actual pressure drop across the particulate filters or the visual continuity of the water curtain and water flow rate for conventional waterwash systems, once each shift in which the depainting process is in operation. For pumpless waterwash systems, each permittee shall record the parameter(s) recommended by the booth manufacturer that indicate the performance of the booth once per shift in which the depainting process is in operation. This log shall include the acceptable limit(s) of the pressure drop as specified by the filter manufacturer and the visual continuity of the water curtain and water flow rate for waterwash systems as specified by the booth manufacturer or in locally prepared operating procedures.
[40 CFR 63.752(e)]

REPORTING REQUIREMENTS

C.9. The following information shall be submitted:
[40 CFR 63.753(d)]

(1) Semiannual Reports occurring every 6 months from the date of the notification of compliance status that identify:	
(i)	Any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in **Specific Conditions C.2., C.3.(3), and C.3.(5).**
(ii)	Any new chemical strippers used at the facility during the reporting period;
(iii)	The organic HAP content of these new chemical strippers;
(iv)	For each chemical stripper that undergoes reformulation, its organic HAP content;
(v)	Any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed;
(vi)	For periods of malfunctions: (A) The non-chemical method or technique that malfunctioned; (B) The date that the malfunction occurred; (C) A description of the malfunction; (D) The methods used to depaint aerospace vehicles during the malfunction period; (E) The dates that these methods were begun and discontinued; and (F) The date that the malfunction was corrected;
(vii)	All periods where a non-chemical depainting operation subject to **Specific Condition C.3.(2) and C.3.(4)** for the control of inorganic HAP emissions was not immediately shut down when the pressure drop, water flow rate, or recommended booth parameter(s) was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operational procedures;
(viii)	A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed for depainting for each new aircraft model being depainted; and
(ix)	If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards.

C.9. continued:

(2) Annual Reports occurring every 12 months from the date of the notification of compliance status that identify:	
(i)	The average volume per aircraft of organic HAP-containing chemical strippers used for spot stripping or weight of organic HAP and decal removal operations if it exceeds the limits specified in **Specific Condition C.3.(3)**; and
(ii)	The number of times the pressure drop limit(s) for each filter system or the number of times the water flow rate limit(s) for each waterwash system were outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.

APPLICABLE COMMON CONDITIONS

C.10. The emissions units are also subject to requirements in the following subsections

Subsection (s)	Description
E	Facility Wide Emission CAP
F	General Conditions of 40 CFR 63, Subpart GG

SUBSECTION D. THIS SECTION ADDRESSES THE FOLLOWING EMISSIONS UNIT.

E.U. ID No.	Brief Description
007	Waste Storage and Handling Operation

This emissions unit represents the storage and the handling of HAP containing waste generated by the facility.

This emissions unit is regulated by 40 CFR 63 Subpart GG, National Emissions Standards for Aerospace Manufacturing and Rework Facilities.

The following conditions apply to the emissions unit listed above:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

D.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 24 hours/day; 7 days/week; 52 weeks/year and 8,760 hours/year.
[Rule 62-210.200, F.A.C., Definitions - (PTE)]

EMISSION LIMITATIONS AND STANDARDS

D.2. Except as provided in **Specific Condition D.3**, the owner or operator of each operation that produces a waste that contains HAP shall conduct the handling and transfer of the waste to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills. Failure to comply with the requirements as described in this condition shall be considered a violation
[40 CFR 63.748 & 749(i)]

D.3. All wastes that are determined to be hazardous wastes under the Resource Conservation and Recovery Act of 1976 (PL 94-580) (RCRA) as implemented by 40 CFR parts 260 and 261, and that are subject to RCRA requirements as implemented in 40 CFR parts 262 through 268, are exempt from the requirements of **Specific Condition D.2.**
[40 CFR 63.748 & 741(e)]

SUBSECTION E. FACILITY WIDE EMISSIONS CAP.

The facility wide emissions cap is established to escape prevention of significant deterioration (PSD) review and allowed for more operational flexibility.

EMISSIONS LIMITATIONS AND STANDARDS

E.1. **Volatile Organic Compounds Emissions Cap**. The facility wide maximum allowable VOC emissions shall not exceed 229.8 tons per year.
[Requested Emissions Cap in Title V permit application received June 13, 1996]

RECORDKEEPING REQUIREMENTS

E.2. All VOC emissions from the facility (including the emissions from unregulated sources and miscellaneous insignificant activities) shall be included in the VOC emissions estimations to demonstrate compliance with the emissions CAP. Compliance with **Specific Condition No. E.1.,** shall be determined by recording the following data for each material used that contains VOC.

Quantity	
• Gallons of Material Used (Plant usage logs shall be maintained)	
Emissions Factors	
• Density of Material in Pounds per Gallon (Manufacturer specification's data shall be maintained)	• VOC Factor (Percentage by Weight) • Time Factor (Hours per Year)
Emissions	
• Total Cumulative VOC Emissions (Tons)	

[Proposed by the applicant in the initial Title V permit application received June 13, 1996]

REPORTING REQUIREMENTS

E.3. **Reporting**. A report of the data required by **Specific Condition E.2.** shall be submitted to the Northeast District Office on a semi-annual basis. These reports shall be postmarked no later than the 60th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - June	September 1
July-December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the July-December semi-annual report.

SUBSECTION F. GENERAL CONDITION OF 40 CFR 63, SUBPART GG

This section addresses the following emissions units.

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

The following conditions apply to the emissions units listed above:

F.1. General Conditions. Except as provided in paragraphs (4) through (9) of this condition and in Table 1 of A.7., each permittee of an affected source subject to 40 CFR 63 Subpart GG is also subject to the following sections of 40 CFR 63, subpart A:

(1) 40 CFR 63.4, Prohibited activities and circumvention;

(2) 40 CFR 63.5, Construction and reconstruction; and

(3) 40 CFR 63.6, Compliance with standards and maintenance requirements.

(4) For the purposes of this subsection, all affected sources shall submit any request for an extension of compliance not later than 120 days before the affected source's compliance date. The extension request should be requested for the shortest time necessary to attain compliance, but in no case shall exceed 1 year.

(5)(i) For the purposes of this subsection, the Permitting authority (or the State with an approved permit program) will notify the permittee in writing of his/her intention to deny approval of a request for an extension of compliance submitted under either 40 CFR 63.6(i)(4) or 40 CFR 63.6(i)(5) within 60 calendar days after receipt of sufficient information to evaluate the request.

(ii) In addition, for purposes of this subsection, if the Permitting authority does not notify the permittee in writing of his/her intention to deny approval within 60 calendar days after receipt of sufficient information to evaluate a request for an extension of compliance, then the request shall be considered approved.

(6)(i) For the purposes of this subsection, the Permitting authority (or the State) will notify the permittee in writing of the status of his/her application submitted under 40 CFR 63.6(i)(4)(ii) (that is, whether the application contains sufficient information to make a determination) within 30 calendar days after receipt of the original application and within 30 calendar days after receipt of any supplementary information that is submitted, rather than 15 calendar days as provided for in 40 CFR 63.6(i)(13)(i).

F.1. continued:

(ii) In addition, for the purposes of this subsection, if the Permitting authority does not notify the permittee in writing of the status of his/her application within 30 calendar days after receipt of the original application and within 30 calendar days after receipt of any supplementary information that is submitted, then the information in the application or the supplementary information is to be considered sufficient upon which to make a determination.

(7) For the purposes of this subsection, each permittee who has submitted an extension request application under 40 CFR 63.6(i)(5) is to be provided 30 calendar days to present additional information or arguments to the Permitting authority after he/she is notified that the application is not complete, rather than 15 calendar days as provided for in 40 CFR 63.6(i)(13)(ii).

(8) For the purposes of this subsection, each permittee is to be provided 30 calendar days to present additional information to the Permitting authority after he/she is notified of the intended denial of a compliance extension request submitted under either 40 CFR 63.6(i)(4) or 40 CFR 63.6(i)(5), rather than 15 calendar days as provided for in 40 CFR 63.6(i)(12)(iii)(B) and 40 CFR 63.6(i)(13)(iii)(B).

(9) For the purposes of this subsection, a final determination to deny any request for an extension submitted under either 40 CFR 63.6(i)(4) or 40 CFR 63.6(i)(5) will be made within 60 calendar days after presentation of additional information or argument (if the application is complete), or within 60 calendar days after the final date specified for the presentation if no presentation is made, rather than 30 calendar days as provided for in 40 CFR 63.6(i)(12)(iv) and 40 CFR 63.6(i)(13)(iv).

(10) For the purposes of compliance with the requirements of § 63.5(b)(4) of the General Provisions and this subpart, each permittee of existing primer or topcoat application operations and depainting operations who construct or reconstruct a spray booth or hangar that does not have the potential to emit 10 tons/yr or more of an individual inorganic HAP or 25 tons/yr or more of all inorganic HAP combined shall only be required to notify the Administrator of such construction or reconstruction on an annual basis. Notification shall be submitted on or before March 1 of each year, and shall include the information required in § 63.5(b)(4) for each such spray booth or hangar constructed or reconstructed during the prior calendar year, except that such information shall be limited to inorganic HAP's. No advance notification or written approval from the Administrator pursuant to § 63.5(b)(3) shall be required for the construction or reconstruction of such a spray booth or hangar unless the booth or hangar has the potential to emit 10 tons/yr or more of an individual inorganic HAP or 25 tons/yr or more of all inorganic HAP combined.
[40 CFR 63.743(a), See attached Appendix Subpart A]

F.2. Each facility subject to this subpart shall be considered in noncompliance if the owner or operator fails to submit startup, shutdown, and malfunction plan as required by § 63.743(b) or uses a control device other than one specified in this subpart that has not been approved by the Administrator, as required by § 63.743(c).
[40 CFR 63.749 (b)]

RECORDKEEPING REQUIREMENTS

F.3. The permittee of a source subject to this subsection shall fulfill all recordkeeping requirements specified in 40 CFR 63.10(a),(b),(d), and (f).
[40 CFR 63.752(a), See attached Appendix A]

REPORTING REQUIREMENTS

F.4. (1) Except as provided in paragraphs F.4.(2) and F.4.(3) of this subsection, each permittee subject to 40 CFR 63 Subpart GG shall fulfill the requirements contained in 40 CFR 63.9(a) through (e) and (h) through (j), Notification requirements, and 40 CFR 63.10(a), (b), (d), and (f), Recordkeeping and reporting requirements, of the General Provisions, 40 CFR part 63, subpart A, and that the initial notification for existing sources shall be submitted not later than September 1, 1997. In addition to the requirements of 40 CFR 63.9(h), the notification of compliance status shall include:

(i) Information detailing whether the source has operated within the specified ranges of its designated operating parameters.

(ii) For each coating line, where averaging will be used along with the types and quantities of coatings the facility expects to use in the first year of operation.
Averaging schemes shall be approved by the Permitting authority or delegated State authority and shall be included as part of the facility's title V or part 70 permit.

(2) For the purposes of this subpart, the Permitting authority will notify the permittee in writing of approval or disapproval of the request for an adjustment to a particular time period or postmark deadline submitted under 40 CFR 63.9(i) within 30 calendar days of receiving sufficient information to evaluate the request, rather than 15 calendar days as provided for in 40 CFR 63.9(I)(3).

(3) For the purposes of this subpart, the Administrator will notify the permittee in writing of approval or disapproval of the request for an adjustment to a particular time period or postmark deadline submitted under § 63.9(i) within 30 calendar days of receiving sufficient information to § 63.753 evaluate the request, rather than 15 calendar days as provided for in § 63.9(i)(3).
[40 CFR 63.753(a), See attached Appendix A]

SUBSECTION G. EMERGENCY GENERATORS (EU009)

This facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ-- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

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 compliance date is May 3, 2013. There are no operating limitations, fuel requirements or performance test requirements for these engines.

G.1. <u>Hours of Operation.</u> There is no time limit on the use of emergency stationary RICE in emergency situations.

[40 CFR 63.6640(f)(1)(i)]

MONITORING, INSTALLATION, COLLECTION, OPERATION AND MAINTENANCE REQUIREMENTS

G.2. Maintenance checks and readiness testing of the units is limited to 100 hour per year.

[40 CFR 63.6640(f)(ii)]

G.3. This facility must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(1) An existing emergency or black start stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions.

[40 CFR 63.6625(e)(2)]

G.4. This facility operates existing emergency stationary RICE(s) with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

[40 CFR 63.6625(f)]

G.5. This facility operates existing stationary engines, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2c to this subpart apply.

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
1. Emergency stationary CI RICE and black start stationary CI RICE.[1]	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[2] b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.[3]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.[3]

[1]If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of this subpart, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

[2]Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2c of this subpart.

[3]Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.

[75 FR 51593, Aug. 20, 2010]

[40 CFR 63.6625(h), Table 2c Row 1]

G.6. This facility operates stationary CI engines that are subject to the work, operation or management practices in items 1 Table 2c to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(i)]

RECORDKEEPING REQUIREMENTS

G.7. **Work or Management Practices**. The facility must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.

[40 CFR 63.6655(e)(2)]

G.8. Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, Operating Limitations, Work Practices, and Management Practices.

9. Existing emergency and black start stationary RICE ≤500 HP located at a major source of HAP, existing non-emergency stationary RICE <100 HP located at a major source of HAP, existing emergency and black start stationary RICE located at an area source of HAP, existing non-emergency stationary CI RICE ≤300 HP located at an area source of HAP, existing non-emergency 2SLB stationary RICE located at an area source of HAP, existing non-emergency landfill or digester gas stationary SI RICE located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE ≤500 HP located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that operate 24 hours or less per calendar year	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[Table 6, Row 9]

G.9. If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(1) An existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines.

[40 CFR 63.6655(f)(1)]

REPORTING REQUIREMENTS

G.10. Applicability of General Provisions to Subpart ZZZZ. Except 40 CFR 63.6645(a)(5), 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

[40 CFR 63.6645, and Table 8 to Subpart ZZZZ of Part 63]

G.11. The facility is subject to the definitions of 40 CFR 63.6675.

G.12. If any of the engines need to be replaced, the permittee shall immediately comply with the applicable requirements subject to the engine under 40 CFR 60 Subpart IIII, JJJJ and 40 CFR 63 ZZZZ. The facility must submit any initial notifications as required and may operate under the new requirements. The facility shall submit the specific information on the units to the Department prior to or shortly after installing the engine: Engine No., description, manufacturer, Model No., year built, horsepower, displacement, fuel type, engine type, year rebuilt, etc. This information will be included in the permit at the subsequent revision or renewal (whichever comes first).

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, GG and ZZZZ.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix U, List of Unregulated Emissions Units and/or Activities.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History.

(If combining all of the appendices into one document (recommended), make this page the first page of Attachment Section at the end of the Appendix document.)