Title V Air Operation Permit Renewal
Permit No. 0250827-013-AV

APPLICANT

The applicant for this project is Goodrich Corporation. The applicant's responsible official and mailing address are: Mr. Brian Meyer, Interim Site Director, Goodrich Corporation, Goodrich Landing Gear, 3201 NW 167 Street, Miami Gardens, FL 33056.

After the DRAFT Title V Air Operation Permit was issued, the RER received a notification from the facility on January 15, 2015 that there was a change in the Responsible Official from Mr. Brian Meyer, Interim Site Director to Mr. Greg Watson, Site Director. As such, the change in Responsible Official will be incorporated into this PROPOSED Title V Air Operation Permit

FACILITY DESCRIPTION

The applicant operates the Goodrich Landing Gear facility, which is located at 3201 NW 167 Street, Miami Gardens, FL 33056.

This facility consists of the following emissions units:

EU No.	Brief Description
002	Paint Spray Booth Nos. 1, 2 & 5
003	Hard Chromium Electroplating Line
004	Nickel Electroplating Line
005	Cadmium Electroplating Line
006	Caustic Strip and Acid Activation Line
007	Shot Peen System
009	Hard Chromium Electroplating Line

The Goodrich Landing Gear facility operates a landing gear refurbishing facility in Miami Gardens, Florida. The facility refurbishes wide- and narrow-body aircraft landing gear and related components. The operations at the facility include disassembly of parts, cleaning and degreasing, media blasting, physical and chemical stripping, non-destructive testing and inspection, shot peening, oven baking, surface coating, and assembly.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V Air Operation Permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received November 20, 2014.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a source of air pollution for Prevention of Significant Deterioration (PSD) in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to this facility. The CAM rule requires owners and operators to monitor the operation and maintenance of their control equipment so that they can evaluate the performance of their control devices and report whether or not their facilities meet established emission standards. The MACT standards implemented in the permit will address and insure that the facility will be in compliance with Hazardous Air Pollutants (HAPs) emissions standards.

PROJECT REVIEW

Specific changes were made to the previous Title V Air Operation Permit No. 0250827-012-AV, and are in this PROPOSED Title V Air Operation Permit Renewal. Such changes include FDEP reformatting of the entire permit document, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc. For example, some of the recordkeeping, and testing requirements that were previously listed under TV-6, (i.e. administrative permit corrections, deviation reports, etc.) and the Facility-Wide Conditions, and Specific Conditions under the previous Title V permit (i.e. certification by responsible official, testing, submittal of monitoring reports, statement of compliance, etc.) are now listed under the new Appendix RR – Facility-Wide Reporting Requirements, and Appendix TR – Facility-Wide Testing Requirements.

Items numbered 1 – 5 below represent the changes to the previous Title V Air Operation Permit. Underline text indicates additions. ~~Strikethrough indicates text removed.~~

1. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Unit 001 – Vapor Degreaser and Recovery Still. The applicant stated in the application that the vapor degreaser was shutdown for production purposes in July 2013, and formally taken out of service in January 2014, which included the complete removal of solvent from the unit and removal of refrigerant from the condenser systems. The applicant further stated that the unit is still located onsite; however, it has been rendered inoperable, will not be reactivated, and is scheduled to be dismantled and removed from the facility in 2015. Since the facility no longer uses any halogenated solvents for degreasing, the facility is no longer subject to 40 CFR 63, Subpart T – National Emissions Standards for Hazardous Air Pollutants for Halogenated Solvents. As such, Subsection A that addressed the vapor degreasing operations along with the associated specific conditions have been removed. Subsequent Subsections have been renumbered accordingly.

2. Changes in Section III – Subsection B, Emissions Unit and Specific Conditions, Emissions Unit 002 – Three (3) Paint Spray Booths. The following specific condition has been removed since it is contained in Specific Condition B.0. Subsequent specific conditions have been renumbered accordingly.

   ~~**B.29.** General Provisions Requirements: The permittee shall comply with the requirements of the General Provisions in 40 CFR 63, Subpart A.~~
   ~~[40 CFR 63, Permit Nos. 0250827-001-AC, 0250827-003-AC and 0250827-010-AC]~~

3. Changes in Section III – Subsection C, Emissions Unit and Specific Conditions, Emissions Units 003 & 009 – Hard Chromium Electroplating Lines. Some of the tank volume information has been revised to accurately reflect the sizes of the tanks.

4. Changes in Section III – Subsection D, Emissions Unit and Specific Conditions, Emissions Units 004 - 007 – Nickel and Cadmium Electroplating Lines, Caustic Strip and Acid Activation Line, Shot Peen System. A description for each emissions unit has been added.

5. Changes to Appendix I – List of Insignificant Emissions Units and/or Activities. The applicant provided Attachment E (an updated list of insignificant activities). The previously existing hand wipe cleaning utilizing non-HAP VOCs, and the acid dip baths were not included in the updated list. The updated list included a hot pressure washing station, non-HAP solvent cleaning activities, a plastic media blast booth, an aluminum oxide blast booth, passivation, chrome strips, ultrachromate 300 tanks, and aqueous cleaning baths. The applicant stated in the attachment that the process or production units and other pollutant-emitting activities at the facility which, by virtue of size or operating rate, are eligible for treatment as insignificant emissions units in accordance with Rule 62-213.430(6), F.A.C., and requested to treat the units as such pursuant to Rule 62-213.420(3), F.A.C. Therefore, the RER will update the List of Insignificant Activities as per the updated list in Attachment E submitted with the application.

CONCLUSION

This project renews Title V air operation permit No. 0250827-012-AV, which was issued on June 9, 2014. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.