

SIP CONSTRUCTION & OPERATING PERMIT AND TITLE V 502(b)10 CHANGE APPLICATION REVIEW

Facility Name: **Vought Aircraft Industries, Inc.**

City: Milledgeville

County: Baldwin

AIRS #: 04-13-009-00031

Application #: 17724

Date SIP Application Received: October 5, 2007

Date Title V Application Received: N/A

Permit No: 3728-009-0031-V-02-1

Program	Review Engineers	Review Managers
SSPP	John Caudle	Eric Cornwell
SSCP	Dika Kuoh	Karen Hays
ISMP	Marcus Cureton	Richard Taylor
TOXICS	Dika Kuoh	Karen Hays

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and operate and Section 502(b)(10) change to the Part 70 source. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1), 391-3-1-.03(2), and 391-3-1-.03(10). of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the permit and is presented in the same general order as the permit amendment. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, all administrative amendments and minor and significant modifications to that permit, and any 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3728-009-0031-V-02-0	October 24, 2007	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3728-009-0031-V -02-0	Renewal Title V Permit

B. Regulatory Status

1. PSD/NSR/RACT

The Permittee has taken a 100 ton per year cap on VOC (Condition 2.1.1) emissions to avoid Georgia Rule 391-3-1-.02(2)(kkk). Therefore, Vought is considered a PSD minor source. The emission increases associated with Application No 17724 alone are noted in Table 4 and represent a PSD minor modification.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓			✓*
NO _x	✓			✓
CO	✓			✓
TRS	N/A			✓
H ₂ S	N/A			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

*Vought has previously accepted a 100 TPY VOC limit (Condition 2.1.1).

II. Proposed Modification

A. Description of Modification

Application No. 17724 requests the replacement of one aerospace spray booth (1S08) with two new aerospace spray booths (1S09 and 1S10).

B. Emissions Change

Vought estimated actual and potential emissions for the modification based on historic coating/solvent usage and future production estimates.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	✓	0	0
PM ₁₀	✓	0	0
SO ₂	✓	0	0
VOC	✓	5	0*
NO _x	✓	0	0
CO	✓	0	0
TRS	N/A	-	-
H ₂ S	N/A	-	-
Individual HAP	✓	1	2
Total HAPs	✓	3	9

* Potential VOC emissions are limited to 100 TPY via Condition 2.1.1.

C. Title I Modification

- PSD/NSR Applicability

The Vought facility in Milledgeville is a PSD minor source. PSD does not apply to this modification since the modification itself does not constitute a major PSD source.

- NSPS Modification

Not Applicable

- NESHAP Modification

Not Applicable

III. Facility Wide Requirements

A. Emission and Operating Caps

No new facility-wide emission or operating limits.

B. Applicable Rules and Regulations

- Rules and Regulations Assessment – Not Applicable
- Emission and Operating Standards – Not Applicable

C. Compliance Status

No compliance issues exist at this time.

D. Operational Flexibility

No operational flexibility requested.

E. Permit Conditions

Not Applicable

IV. Regulated Equipment Requirements

A. Brief Process Description

Application No. 17724 requests the replacement of aerospace spray coating booth 1S08 (New Spray Booth) with two new aerospace spray booths: 1S09 (Hand Prime Spray Booth) and 1S10 (Robot Spray Booth). Hand priming and robotic spray coating were previously accomplished in aerospace spray booth 1S08. Both of the significant emission units already have an Equipment Group established (NAG), with specific emission units assigned to each equipment group identified in Attachment D to the Title V Permit.

B. Equipment List for the New or Modified Process(es)

TABLE 5 LIST OF EMISSION UNITS PER EQUIPMENT/OPERATIONS GROUP

EQUIPMENT GROUP	EMISSION UNIT IDs
NAG	Spray Booth: 1S09 – Hand Prime Spray Booth 1S10 – Robot Prime Spray Booth

NOTE: Emission Unit 1S08 (New Spray Booth) is deleted from Equipment Group NAG.

C. Equipment & Rule Applicability

- Emission and Operating Caps – Not Applicable
- Applicable Rules and Regulations -

Rules and Regulations Assessment:

The Aerospace MACT (40 CFR 63, Subpart GG) is applicable to the two new aerospace spray coating booths (1S09 and 1S10). The two new aerospace spray booths will comply with the 3-stage filter requirements for new aerospace spray coating booths. The coatings applied in the old spray coating booth (1S08) were considered aerospace specialty coatings and will generally be exempt for the Aerospace MACT coating limits. The new spray booths will use the same specialty coating.

The opacity limits in Georgia Rule (b) are applicable to the two new spray booths (1S09 and 1S10).

The particulate matter emission limits in Georgia Rule (e) are applicable to the two new spray booths (1S09 and 1S10).

Emission and Operating Standards:

Application No. 17724 includes the construction of new emission units that are identical to emission units currently at the facility. All of the new significant emission units may be added to current Equipment Groups as depicted in Table 5 to this Narrative. The regulatory requirements for each Equipment Group, identified in Table 3.1, are current and applicable to the new equipment. Therefore, the emission units only need to be added to the Equipment Groups in Attachment D to Permit No. 3728-009-0031-V-02-0. Specific discussion of the applicable regulatory requirements for each Equipment Group can be found in the Narrative for Permit No. 3728-009-0031-V-02-0.

D. Compliance Status

No compliance issues exist at this time.

E. Operational Flexibility

No operational flexibility requested.

F. Permit Conditions

No permit conditions will be added, deleted or modified by this permit amendment. All applicable regulatory requirements for the emission units proposed in Application No. 17724 are already contained in Title V Permit No. 3728-009-0031-V-02-0. The new emission units (1S09 and 1S10) are added to and the removed unit (1S08) is removed from Equipment Group NAG in Attachment D.

V. Testing Requirements (with Associated Record Keeping and Reporting)

- A. Individual Equipment: Not Applicable – No new testing requirements.
- B. Equipment Groups (all subject to the same test requirements): Not Applicable – No new testing requirements.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

- A. Individual Equipment: Not Applicable – No new monitoring requirements.
- B. Equipment Groups (all subject to the same monitoring requirements): Not Applicable – No new monitoring requirements.

VII. Other Record Keeping and Reporting Requirements

Not Applicable – No new recordkeeping or reporting requirements.

VIII. Specific Requirements

A. Operational Flexibility

No operational flexibility requested.

B. Alternative Requirements

Not Applicable

C. Insignificant Activities

No insignificant activities are added or removed as a part of Application No. 17724.

D. Temporary Sources

No temporary sources were included in Application No. 17724.

E. Short-Term Activities

No short term sources were included in Application No. 17724.

F. Compliance Schedule/Progress Reports

No compliance issues exist at this time.

G. Emissions Trading

Not Applicable

H. Acid Rain Requirements

Not Applicable

I. Prevention of Accidental Releases

Not Applicable

J. Stratospheric Ozone Protection Requirements

Not Applicable

K. Pollution Prevention

Not Applicable

L. Specific Conditions

Not Applicable