PERMIT AMENDMENT NO. 4581-215-0174-S-06-1
ISSUANCE DATE:

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Air Quality – Permit Amendment

In accordance with The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to or in effect under that Act, Permit No. 4581-215-0174-S-06-0 issued on September 18, 2018, to:

Facility Name:	**Textron Aviation/McCauley Facility**
Facility Address:	**5000 Cargo Drive** **Columbus, Georgia 31907 Muscogee County**
Mailing Address:	**9709 East Central – B15-B01** **Wichita KS, 67206**
Facility AIRS Number:	**04-13-215-00174**

for the following:

The operation of an aircraft repair and maintenance facility.

is hereby amended as follows:

To revise the 40 CFR 63 Subpart N requirements/conditions to match their existing chromic acid anodizing operation and the recently installed composite mesh-pad system.

Reason for Amendment: Application No. 29160 dated December 14, 2023

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **5** page(s).

This Permit Amendment is hereby made a part of Permit No. 4581-215-0174-S-06-0 and compliance herewith is hereby ordered. Except as amended hereby, the above referenced Permit remains in full force and effect.

STATE OF GEORGIA
CONSTITUTION
WISDOM JUSTICE MODERATION
1776

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Jeffrey W. Cown, Director
Environmental Protection Division

2. Allowable Emissions

Added Conditions:

2.7 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart A, General Provisions, as specified in Table 1 to 40 CFR 63 Subpart N and all applicable standards and limitations in 40 CFR 63 Subpart N, "National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks," as they pertain to Chromic Anodizing Tank CA01.
[40 CFR 63.340(b)]

2.8 During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from Chromic Anodizing Tank CA01 by:
[40 CFR 63.342(d)(1)]

a. Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.007 mg/dscm (3.1×10^{-6} gr/dscf).

4. Process & Control Equipment

Modified Condition:

4.4 The Permittee shall operate the composite mesh-pad system at all times during the operation of Chromic Anodizing Tank CA01.
[391-3-1-.02(2)(a)10]

Removed Condition:

4.6 Deleted.

5. Monitoring

Modified Condition:

5.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1. and 40 CFR 63.343(c)(1)(ii)]

a. A differential pressure monitoring device to measure and record the pressure drop across the composite mesh-pad system that controls Chromic Anodizing Tank CA01. Data shall be recorded once each day CA01 is operating.

To be in compliance with the standards specified in Condition 2.8a., the pressure drop across the composite mesh-pad system shall be maintained within ±2 inches of water column of the pressure drop value established during the initial performance test specified in Condition 6.2. Before the initial performance test specified in Condition 6.2 is conducted, the Permittee shall operate the composite mesh-pad system within the proper pressure drop range specified by the composite mesh-pad system manufacturer.

Removed Condition:

5.2 Deleted.

Modified Condition:

5.3 **Within 120 days after the issuance of this Permit Amendment, the** Permittee shall prepare an operation and maintenance plan for **Chromic Anodizing Tank CA01** that includes what are required by 40 CFR 63.342(f)(3), and shall include the following information and considerations:
[**391-3-1-.02(6)(b)1. and** 40 CFR 63.342(f)(3)]

a. The plan shall specify the operation and maintenance criteria for **CA01 and its composite mesh-pad system**, and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment.

b. The plan shall incorporate the **following operation and maintenance practices for the composite mesh-pad system:**

i. Visually inspect device to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device;

ii. Visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist;

iii. Visually inspect ductwork from tank to the control device to ensure there are no leaks; and

iv. Perform washdown of the composite mesh-pads in accordance with manufacturers' recommendations.

c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.

d. The plan shall include a systematic procedure for identifying malfunctions of **CA01 and its composite mesh-pad system,** control system monitoring equipment, and for implementing corrective actions to address such malfunctions.

e. **The plan shall include the following housekeeping procedures, as applicable:**

Table 1: Housekeeping Practices

For	You Must:	At this minimum frequency
1. Any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium	(a) Store the substance in a closed container in an enclosed storage area or building; AND (b) Use a closed container when transporting the substance from the enclosed storage area	At all times, except when transferring the substance to and from the container. Whenever transporting the substance, except when transferring the substance to and from the container.
2. Each affected tank, to minimize spills of bath solution that result from dragout. Note: this measure does not require the return of contaminated bath solution to the tank. This requirement applies only as the parts are removed from the tank. Once away from the tank area, any spilled solution must be handled in accordance with Item 4 of these housekeeping measures	(a) Install drip trays that collect and return to the tank any bath solution that drips or drains from parts as the parts are removed from the tank; OR (b) Contain and return to the tank any bath solution that drains or drips from parts as the parts are removed from the tank; OR (c) Collect and treat in an onsite wastewater treatment plant any bath solution that drains or drips from parts as the parts are removed from the tank	Prior to operating the tank. Whenever removing parts from an affected tank. Whenever removing parts from an affected tank.
3. Each spraying operation for removing excess chromic acid from parts removed from, and occurring over, an affected tank	Install a splash guard to minimize overspray during spraying operations and to ensure that any hexavalent chromium laden liquid captured by the splash guard is returned to the affected chromium electroplating or anodizing tank	Prior to any such spraying operation.
4. Each operation that involves the handling or use of any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium	Begin clean up, or otherwise contain, all spills of the substance. Note: substances that fall or flow into drip trays, pans, sumps, or other containment areas are not considered spills	Within 1 hour of the spill.
5. Surfaces within the enclosed storage area, open floor area, walkways around affected tanks	(a) Clean the surfaces using one or more of the following methods: HEPA vacuuming; Hand-wiping with a damp	At least once every 7 days if one or more chromium electroplating or chromium anodizing tanks were used, or

For	You Must:	At this minimum frequency
contaminated with hexavalent chromium from an affected chromium electroplating or chromium anodizing tank	cloth; Wet mopping; Hose down or rinse with potable water that is collected in a wastewater collection system; Other cleaning method approved by the permitting authority; OR (b) Apply a non-toxic chemical dust suppressant to the surfaces	at least after every 40 hours of operating time of one or more affection chromium electroplating or chromium anodizing tank, whichever is later. According to manufacturer's recommendations.
6. All buffing, grinding, or polishing operations that are located in the same room as chromium electroplating or chromium anodizing operations	Separate the operation from any affected electroplating or anodizing operation by installing a physical barrier; the barrier may take the form of plastic strip curtains	Prior to beginning the buffing, grinding, or polishing operation.
7. All chromium or chromium-containing wastes generated from housekeeping activities	Store, dispose, recover, or recycle the wastes using practices that do not lead to fugitive dust and in accordance with hazardous waste requirements	At all times.

f. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the **Permittee** shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment or monitoring equipment during similar malfunction events, and a program for corrective action for such events.

g. If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the Permittee shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with the Division.

h. The Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Administrator for a period of 5 years after each revision to the plan.

i, To satisfy the requirements of this condition, the **Permittee** may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this section.

6. Performance Testing

Added Condition:

6.2 Within 120 days of issuance of this permit amendment, the Permittee shall conduct an initial chromium performance test on **Chromic Anodizing Tank** CA01 that is controlled by composite mesh-pad system CMP1 using the procedures and test methods listed in 40 CFR 63.344. The Permittee shall determine the outlet chromium concentration and demonstrate compliance with the emission limit specified in Condition 2.8a. During the test, the Permittee shall record the pressure drop across CMP1 and establish the pressure drop value during the test.
[391-3-1-.02(6)(b)1.; 40 CFR 63.343(b)(1); 40 CFR 63.343(c)(1)(i); and 40 CFR 63. 344(d)(5)]

7. Notification, Reporting and Record Keeping Requirements

Added Condition:

7.11 Within 60 days after the date of completing each performance test, the Permittee shall submit the results of the performance tests, including any associated fuel analyses, required by this subpart to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through the use of the EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html).
[40 CFR 63.347(f)(3)(i)]