

## **NARRATIVE**

TO: Jeng-Hon Su  
FROM: Dawn Wu  
DATE: February 15, 2024

Facility Name: **Textron Aviation/McCauley Facility**  
AIRS No.: 215-00174  
Location: Columbus, GA (Muscogee County)  
Application #: 29160  
Date of Application: December 14, 2023

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### **Background Information**

Textron Aviation/McCauley Facility (hereinafter “facility”) is located in Columbus, Muscogee County, Georgia, and manufactures aircraft propellers and assemblies. The facility has been operating under Permit No. 4581-215-0174-S-06-0 which was issued on September 18, 2018.

### **Purpose of Application**

Application No. 29160 was received on January 25, 2024. The application was submitted to revise the 40 CFR 63 Subpart N requirements/conditions to match the existing chromic acid anodizing operation and the recently installed composite mesh-pad system. A Public Advisory was not needed.

### **Updated Equipment List**

Emission Unit Groups		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
CA01	Chromic Anodizing Tank Located at McCauley Building (Surface area of 96 square feet)	40 CFR Part 63 Subpart N	CMP1*	Composite Mesh-Pad System
MS01	Miscellaneous Solvent Usage used in cleaning operations for the McCauley Building operations	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	N/A
SC02	Paint Booth Group 2 including large Propeller Paint Booth PB05/PB02 with 3-stage filter in McCauley building	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DF1	3-Stage Aerospace Dry Filter
SG02	Enclosed Spray Gun Cleaning Unit SG05 for PB05/PB02	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	N/A
AU01	Natural Gas Combustion device: Air unit: 5.5 MMBTU/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	N/A	N/A
DO01	Natural Gas Combustion device: Paint Drying Oven 0.49 MMBTU/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	N/A	N/A

Emission Unit Groups		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
BL01	Natural Gas Combustion device: small boiler 0.14 MMBTU/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	N/A	N/A

\*Proposed within current application

## **Emissions Summary**

### **Facility-Wide Emissions** (in tons per year)

Pollutant	Potential Emissions			Actual Emissions		
	Before Mod.	After Mod.	Emissions Change	Before Mod.	After Mod.	Emissions Change
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.13	0.13	0	0.008	0.008	0
NO <sub>x</sub>	0.23	0.23	0	0.14	0.14	0
SO <sub>2</sub>	0.001	0.001	0	0.001	0.001	0
CO	0.195	0.195	0	0.118	0.118	0
VOC	3.59	3.59	0	2.72	2.72	0
Max. Individual HAP	0.12	0.12	0	0.07	0.07	0
Total HAP	0.27	0.27	0	0.27	0.27	0
Total GHG (if applicable)	254	254	0	127	127	0

## **Regulatory Applicability**

Georgia Rules (b), (d), and (e) applicability are unchanged.

40 CFR Part 63 Subpart N, “National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks” – Anodizing tank(s) in Emission Unit CA01 are subject to 40 CFR Part 63 Subpart N. This modification revises the 40 CFR 63 Subpart N requirements/conditions to match the existing chromic acid anodizing operation and the recently installed composite mesh-pad system. Note that the facility does not operate any hard chromium electroplating tanks; all references to such tanks have been removed by the proposed permit amendment. Since the facility uses a Composite Mesh-Pad System CMP1 instead of a fume suppressant to control chromium emissions, the requirements (such as surface tension requirements) for the fume suppressant have been replaced with requirements associated with the new composite mesh-pad system.

## **Permit Conditions**

Condition 2.7 has been added to include the general applicability of 40 CFR 63 Subpart A and Subpart N.

New Condition 2.8a. subjects Chromium Anodizing Tank CA01 to the outlet chromium emission concentration limit for existing chromium anodizing tanks.

Condition 4.4 has been modified to require the Permittee operating composite mesh-pad system at all times during the anodizing tank operation.

Condition 4.6 has been deleted by the proposed permit amendment because the facility no longer uses any fume suppressant.

Condition 5.1 has been modified to require the facility monitoring the pressure drop across composite mesh-pad system.

Condition 5.2 has been deleted.

Condition 5.3 has been modified to specify the operation and maintenance practices for the new composite mesh-pad system.

Condition 6.2 has been added to require the facility to conduct an initial performance test for Chromium Anodizing Tank CA01 with Composite Mesh-Pad System CMP1 to demonstrate compliance with the emission limit specified in Condition 2.8a. The facility must establish the pressure drop value during the test.

Condition 7.11 has been added to include the EPA electronic reporting requirements.

### **Toxic Impact Assessment**

A TIA is not needed since there is no emissions increase.

### **Summary & Recommendations**

Textron Aviation/McCauley Facility in Columbus is considered a synthetic minor source due to 100 tpy emission limit on VOC, 25 tpy emission limit on combined HAPs and 10 tpy emission limit on a single HAP. The Public Advisory was not needed. As a synthetic minor source, compliance responsibility is assigned to SSCP. I recommend issuance of Air Permit Amendment No. 3728-215-0174-S-06-1 to Textron Aviation/McCauley Facility in Columbus.

**Addendum to Narrative**

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//