

Facility Name: **Gulfstream Aerospace Corporation**
 City: Savannah
 County: Chatham
 AIRS #: 04-13-051-00046

Application #: TV-641205
 Date Application Received: June 23, 2022
 Permit No: 3721-051-0046-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Gulfstream Aerospace Corporation

2. Parent/Holding Company Name

General Dynamics

3. Previous and/or Other Name(s)

Not Applicable

4. Facility Location

500 Gulfstream Road (Savannah Airport)
Savannah, GA 31407-4308

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

The following Gulfstream sites are considered a single site for Title V applicability:

- Main Facilities – 500 Gulfstream Road
- Service Centers – 1 Product Support Road & 10 Eddie Jungemann Drive (Gulfstream West)
- Service Center East - 1000 Davidson Drive
- Gulfstream South Facilities – 34 Wings Road
- Gulfstream Northwest Facilities – Buildings 6000, 6003, and 6004 at 100 Airways Avenue
- Gulfstream Seat and Carpet Center – 210 Bourne Boulevard
- Research and Development activities at the following locations – Hangar 1005 (1005 LP Owen Drive); 135 Crossroads Parkway; and 1, 30, and 32 Innovation Drive
- Technical Training Center - 141 Knowlton Way; and,
- Auxiliary Facilities, not already listed, with emergency engines – 550 Northport Parkway (PSDC also known as CSDC)

Gulfstream assumed the aircraft manufacturing and rework activities at the Savannah Air Center (AIRS No. 051-00206) in September 2010. The Operating Permit for the Savannah Air Center was revoked on March 16, 2011 and all previous Savannah Air Center operations were consolidated under the Gulfstream Title V Permit and AIRS Number.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
Permit No. 3721-051-0046-V-04-0	January 12, 2018	Title V Renewal
Off Permit Change	April 17, 2018	Construction and operation of Paint Booth SCT-A (carcoon workstation)
Off Permit Change	December 13, 2018	Construction and operation of a service center, three diesel fire water pumps, one diesel engine for backup, two 3.0-MMBtu/hr boilers, three natural gas-fired water heaters, and three 500-gallon AST and a 2,252-gallon AST for diesel
Off Permit Change	February 11, 2019	Construction and operation of two work stands for NDT and repairs to horizontal stabilizers at the PSDC located at 550 Northport Parkway in Port Wentworth
Off Permit Change	February 19, 2019	Construction and operation of two temporary paint spray booths (SCT-B and SCT-C)
Off Permit Change	May 8, 2019	Construction and operation of a flammability test lab and minor manufacturing to wing components in Bldg. 35
Off Permit Change	September 5, 2019	Relocation of existing permitted sources, for the construction and operation of paint booth SC32 and spray gun cleaner EGC16 and for the construction and operation of a diesel-fired emergency generator and natural gas-fired air makeup units and rooftop heating units
Off Permit Change	October 28, 2019	Construction and operation of two additional stands for non-destructive testing and warranty related repairs to horizontal stabilizers at the PSDC (555 Northpoint Parkway)
Off Permit Change	June 10, 2020	Operation of a (rented) 282-hp diesel fired air compressor and 500-gallon kerosene tank and the reconstruction of the fuel farm from five 20,000-gallon below ground tanks to three 30,000-gallon and one 20,000-gallon above ground tanks
Off Permit Change	July 6, 2020	Construction and operation of a laser cutting machine and an enclosed spray gun cleaner (EGC17)
Off Permit Change	July 24, 2020	Installation of a new 400 kW diesel generator emergency engine (IC88) at 1 Product Support Road
Off Permit Change	October 13, 2020	Construction and operation of an open-faced glue booth (SC33) and modification to a recently installed flammability test chamber
Off Permit Change	June 15, 2021	Construction and operation of four SIP exempted boilers and the removal of two boilers

Off Permit Change	July 6, 2021	Construction and operation of a temporary paint booth (SC34) and an open-faced glue booth (SC35). Temporary paint booth SC34 will be part of Emission Group NSG and will be subject to the Aerospace MACT
Off Permit Change	March 29, 2022	Construction and operation of an additional APU test stand with associated above ground jet fuel storage tank
Off Permit Change	June 16, 2022	Construction and operation of an insulated flame test enclosure
Off Permit Change	March 16, 2023	Replacement of existing 40-kW diesel emergency generator with a new 40-kW diesel emergency generator
Off Permit Change	July 25, 2023	Installation of a 2.5-MMBtu/hr boiler
Off Permit Change	November 14, 2023	Construction and operation of a 150-kW Emergency Generator (IC89), two 3.0-MMBtu/hr natural gas-fired boilers and one 1.5-MMBtu/hr natural gas-fired boiler
Off Permit Change	December 6, 2023	The construction and operation of an aircraft hangar and a paint booth
Amendment No. 3721-051-0046-V-04-1	April 8, 2024	Change from HAP area source to a HAP major source and construction and operation of one glue booth and four paint booths with two associated heaters
Off Permit Change	February 9, 2026	Replacement of two 1.94-MMBtu/hr natural gas fired make-up air units (Emission Unit ID No. EC16 and EC17) with similar units

D. Process Description

1. SIC Codes(s)

3721

2. Description of Product(s)

Gulfstream Aerospace Corporation (hereinafter “facility” or “Gulfstream”) in Savannah, Georgia manufactures complete G500, G600, G650, G700 and G800 model aircraft, including interior components. This facility also provides repair, maintenance, and refurbishment services for these models and older model Gulfstream aircraft.

3. Overall Facility Process Description

Gulfstream conducts aircraft manufacturing activities, aircraft completion activities, aircraft maintenance and refurbishment activities, and research and design activities. Primary operations include solvent cleaning, primer and topcoat application, metal surface treatment, paint stripping, aircraft maintenance, aircraft refurbishment, woodworking, composite fabrication, upholstering interior components, operation and maintenance of facility equipment (boilers, HVAC, backup power generators, fire pump engines, ground support equipment), wastewater pretreatment. Gulfstream manufactures G500, G600, G650, G700 and G800 model aircraft. The facility also performs maintenance, service, and refurbishment of all Gulfstream models.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The Gulfstream Aerospace facility in Savannah is a minor source with respect to PSD/NSR.

2. Title V Major Source Status by Pollutant

Table 2: 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	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes	✓		
CO	Yes	✓		
TRS	No			
H ₂ S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		
GHG	Yes			✓

3. MACT Standards

The facility is subject to the following:

- 40 CFR 63 Subpart GG - NESHAP for *Aerospace Manufacturing and Rework Facilities* for HAP major facilities.
- 40 CFR 63 Subpart MMMM – *Surface Coating of Miscellaneous Metal Parts and Products*
- 40 CFR 63 Subpart JJ - *National Emission Standards for Wood Furniture Manufacturing Operations*
- 40 CFR 63 Subpart DDDDD – *Industrial, Commercial, and Institutional Boilers and Process Heaters*

Due to change from a synthetic minor (area) HAP source to a major source of HAP emissions with Permit Amendment No. 3721-051-0046-V-04-1, 40 CFR 63 Subpart HHHHHH (MACT 6H) Surface Coating of Miscellaneous Metal and Plastic Parts at Area Sources is no longer applicable.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

The previous VOC and HAP limits were removed with Permit Amendment No. 3721-051-0046-V-04-1.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no compliance issues noted with this application.

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
ECG1	Facility Boilers Between 10 MMBtu/hr and 100 MMBtu/hr	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	N/A	N/A
ECG2	Facility Boilers Less than 10 MMBtu/hr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	N/A	N/A
ECG3	Facility Boilers meeting definition of Hot Water Heater and not subject to 40 CFR 63 Subpart DDDDD	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	N/A	N/A
EC57	Thermal Processing Unit	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	N/A	N/A
ESG	Existing Aerospace Spray Booths and Paint Hangars	40 CFR 63 Subpart A 40 CFR 63 Subpart GG 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(kkk)	N/A	2-Stage Aerospace Dry Filter
NSG	New Aerospace Spray Booths and Paint Hangars	40 CFR 63 Subpart A 40 CFR 63 Subpart GG 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(kkk)	N/A	3-Stage Aerospace Dry Filter
CSG1	Conventional Small Parts Spray Booths subject to 40 CFR 63 Subpart MMMM	40 CFR 63 Subpart A Depending on predominant activity on an annual analysis 40 CFR 63 Subpart MMMM or 40 CFR 63 Subpart GG (optional) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	2-Stage Aerospace Dry Filter or 3-Stage Aerospace Dry Filter
CSG2	Conventional Spray Booths subject to 40 CFR 63 Subpart JJ (not subject to 40 CFR 63 Subpart GG)	40 CFR 63 Subpart A 40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Paint Arrestor Filters
SUG	Fugitive Emissions from Aerospace Activities: Solvent (Handwipe and Flush Cleaning) and Material Usage subject to 40 CFR 63 Subpart GG	40 CFR 63 Subpart A 40 CFR 63 Subpart GG 391-3-1-.02(2)(kkk)	N/A	N/A
SUJ	Fugitive Emissions from Wood Furniture Manufacturing Activities: Solvent (Handwipe and Flush Cleaning) and Material Usage subject to 40 CFR 63 Subpart JJ	40 CFR 63 Subpart A 40 CFR 63 Subpart JJ	N/A	N/A
DPG	Facility-wide Aerospace Depainting Activities	40 CFR 63 Subpart A 40 CFR 63 Subpart GG 391-3-1-.02(2)(kkk)	N/A	N/A

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
SCT	Temporary Spray Booths	40 CFR 63 Subpart A 40 CFR 63 Subpart GG 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(kkk)	N/A	3-Stage Aerospace Dry Filter

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

LIST OF EMISSION UNITS PER EQUIPMENT/OPERATIONS GROUP

EQUIPMENT/OPERATIONS GROUPS			
Group ID	Group Description	Assigned Emission Units	Associated Air Pollution Control Device
ECG1	Facility Boilers Between 10 MMBtu/hr and 100 MMBtu/hr	EC01, EC02, EC39, EC40, EC70, EC71, EC84	None
ECG2	Facility Boilers Less than 10 MMBtu/hr	EC18, EC28, EC34, EC35, EC59.1 - EC59.4, EC61.1 and EC61.2, EC64.1 - EC64.4, EC90.1 and EC90.2, EC93.1 and EC93.2	None
ECG3	Facility Boilers meeting definition of Hot Water Heater and not subject to 40 CFR 63 Subpart DDDDD	EC60 (EC60.1 - EC60.5)	None
EC57	Thermal Processing Unit	EC57	None
ESG	Existing Aerospace Spray Booths and Paint Hangars subject to 40 CFR 63 Subpart GG	Existing Spray Booths using Filters SC02 SC06 SC07 SC08	2-Stage Equivalent Filter DF02 (3-stage) DF06 DF07 DF08
NSG	New Aerospace Spray Booths and Paint Hangars subject to 40 CFR 63 Subpart GG	New Spray Booths using Filters SC04a SC04b SC18a SC18b SC20 SC21 SC22 SC23 SC24 SC28 SC29 SC30 SC31 SC32 SC34 SC36 SC37 SC38 SC70 SC75 SC76 SC77 SC78 SC80 SC81 SC82 Enclosed Spray Gun Cleaners: EGC2 EGC3 EGC4	3-Stage Equivalent Filter DF04a DF04b DF18a DF18b DF20 DF21 DF22 DF23 DF24 DF28 DF29 DF30 DF31 DF32 DF34 DF36 DF37 SF38 DF70 DF75 DF76 DF77 DF78 DF80 DF81 DF82 None None None

		EGC5 EGC6 EGC7 EGC8 EGC9 EGC10 EGC11 EGC12 EGC13 EGC16 EGC17	None None None None None None None None None None None
CSG1	Conventional Small Parts Spray Booths subject to 40 CFR 63 Subpart MMMM (or to be regulated under 40 CFR 63 Subpart GG per Predominant Activity)	Units using Filters SC10 SC71 SC84 Enclosed Spray Gun Cleaners: EGC14 EGC15	Paint Arrestor Filters DF10 DF71 DF84 None None
CSG2	Conventional Spray Booths subject to 40 CFR 63 Subpart JJ (not subject to 40 CFR 63 Subpart GG)	Units using Filters SC09 SC11 SC12 SC13 SC14 SC15 SC16 SC17 SC19 SC25 SC26 SC27 SC33 SC35 SC60 SC61 SC62 SC63 SC64 SC72 SC73 SC74 SC83 Enclosed Spray Gun Cleaners: EGC1	Paint Arrestor Filters DF09 DF11 DF12 DF13 DF14 DF15 DF16 DF17 DF19 DF25 DF26 DF27 DF33 DF35 DF60 DF61 DF62 DF63 DF64 DF72 DF73 DF74 DF83 None
SUG	Fugitive Emissions from Aerospace Activities: Solvent (Handwipe and Flush Cleaning) and Material Usage subject to 40 CFR 63 Subpart GG	SU02a SU03 SU04 SU05 SU07 SU08a SU09 SU70a SU99	None
SUJ	Fugitive Emissions from Wood Furniture Manufacturing Activities: Solvent (Handwipe and Flush Cleaning) and Material Usage subject to 40 CFR 63 Subpart JJ	SU02b SU70b SU06 SU08b	None
DPG	Facility-wide Aerospace Depainting Activities	Facility-wide depainting activities SC79	None DF79
SCT	Temporary Spray Booths	Varies as permitted	3-Stage Equivalent Filter

Group ID ECG2 are facility boilers with a heat capacity of less than 10 MMBtu/hr and currently include the following emission units: EC18 (2.0 MMBtu/hr boiler), EC28 (2.5 MMBtu/hr boiler), EC34 (5.0 MMBtu/hr modular boiler), EC35 (5.0 MMBtu/hr modular boiler), EC59.1 - EC59.4 (four 2.1-MMBtu/hr modular boilers), EC61.1 and EC61.2 (two 3.0-MMBtu/hr modular boilers), EC64.1 - EC64.4 (four 2.0-MMBtu/hr modular boilers), EC90.1 and EC90.2 (two 3.0-MMBtu/hr modular boilers), EC93.1 and EC93.2 (two 3.0-MMBtu/hr modular boilers).

Group ID ECG3 are facility boilers meeting definition of Hot Water Heater and not subject to Boiler MACT, and this group currently includes EC60 (EC60.1 - EC60.5) (1.5 MMBtu/hr each with capacity to hold 108 gallons of water, that are connected and ran in tandem).

B. Equipment & Rule Applicability

Emission and Operating Caps:

Boilers and indirectly fired process heaters subject to 40 CFR 63 Subpart DDDDD - *NESHAP for Industrial for Institutional, Commercial, and Industrial Boilers and Process Heaters* will have repeated tune ups requirements and will not be subject to any Boiler MACT emission standards if they meet the definition of "Unit designed to burn gas 1 subcategory." Because the boilers and indirectly fired process heaters are not allowed to fire fuel oil unless during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel, they are not subject to the emission limits for combusting fuel oil. The fuel requirements are included in Condition 3.2.1.

Rules and Regulations Assessment:

Applicable Regulations

Georgia Rule (b) - *Visible Emissions* applies to all sources of visible emissions except fuel burning equipment in Equipment Groups ECG1, ECG2 and ECG3, whose visible emission are regulated by Georgia Rule (d). Visible emissions are limited by this rule to less than 40 percent opacity. Due to the extensive use of particulate filters and clean-burning fuels, actual visible emissions from all operations are expected to readily comply. Therefore, no specific monitoring, recordkeeping, or reporting is required to evaluate compliance with Georgia Rule (b).

Georgia Rule (d) - *Fuel Burning Equipment* applies to fuel burning equipment in Equipment Groups ECG1, ECG2 and ECG3. All emission units in Equipment Groups ECG1, ECG2 and ECG3 were constructed/installed after 1972, these emission units are subject to the "new" source PM emission standard and the opacity limit of 20 percent in Georgia Rule (d). Due to the exclusive use of clean burning fuels (i.e., natural gas and LPG), no specific monitoring, recordkeeping, or reporting is required to evaluate compliance with Georgia Rule (d).

Georgia Rule (e) - *Particulate Emission from Manufacturing Processes* applies to all particulate generating processes that are not covered by a more specific rule or regulation. Particulate emissions are limited by the equations specified in the rule. Permit conditions requiring control of particulate matter control devices for spray booths in Equipment Groups CSG1 and CSG2 are included in the permit to ensure compliance with Georgia Rule (e). Particulate matter emissions

from aerospace spray booths in Equipment Groups NSG and ESG are controlled by a similar particulate control strategy.

Georgia Rule (g) - *Sulfur Dioxide* applies to all fuel burning sources, specifically the emission units in Equipment Groups ECG1, ECG2 and ECG3 and Thermal Processing Unit (Autoclave) EC57. Georgia Rule (g) limits the sulfur content of fuel burned to less than 2.5 percent by weight. It should be noted that boilers in Equipment Group ECG1 are subject to the more stringent 0.5 percent sulfur-in-fuel limit required by NSPS Dc. Since the boilers and other fuel burning equipment are not capable of accommodating high sulfur content residual fuel oil, no specific monitoring, recordkeeping, or reporting is required to evaluate compliance with Georgia Rule (g).

Georgia Rule (ff) - *Solvent Metal Cleaning* applies requirements for operating cold cleaner degreaser. The facility complies with this rule by using a cold cleaner equipped with the proper storage and drainage measures. Because the cold cleaners are used for the maintenance of aerospace parts and products, they are subject to 40 CFR 63 Subpart GG and Georgia Rule (kkk), Georgia Rule (ff)6. states that any cold cleaners subject to Georgia Rule (kkk) are not subject to Georgia Rule (ff). No additional conditions are required.

Georgia Rule (kkk) - *VOC Emissions from Aerospace Manufacturing and Rework Facilities* applies to Existing Aerospace Spray Booths and Paint Hangars (Equipment Group ESG), New Aerospace Spray Booths and Paint Hangars (Equipment Group NSG), Fugitive Emissions from Aerospace Activities: Solvent (Handwipe and Flush Cleaning) and Material Usage subject to 40 CFR 63 Subpart GG (Operations Group SUG) and Facility-wide Aerospace Depainting Activities (Operations Group DPG). Georgia Rule (kkk) contains VOC emission limits and work practice standards. Most requirements of the 40 CFR 63 Subpart GG - *National Emission Standards for Aerospace Manufacturing and Rework Facilities* will satisfy the requirements for Georgia Rule (kkk) and requirements for 40 CFR 63 Subpart GG are already included the proposed Title V renewal permit. The Aerospace RACT Rule was amended to better reflect the aerospace CTG established by EPA. The rule applies to parts not critical to flight performance. The rule specifies which coatings are subject to these rules and which coatings are exempt. The rule includes “specialty coatings” in the requirements.

40 CFR 60 Subpart Dc (NSPS Dc) - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* apply to the emission units in Equipment Group ECG1 since these units were constructed after the applicability date of June 9, 1989 and have a heat input greater than the 10 MMBtu/hr applicability threshold. Because the emission units in Equipment Group ECG1 burn only gaseous fossil fuels (i.e., natural gas or propane), the only applicable requirement is to record monthly usage of each fuel. All boilers in Equipment Group ECG1 (i.e., Boilers EC01, EC02, EC39, EC40, EC70, EC71 and EC84), subject to NSPS Dc, will use individual gas usage meters to monitor monthly boiler fuel usage. Although Thermal Processing Unit EC57 was constructed after 1989 and is larger than 10 MMBTU/hr, Thermal Processing Unit EC57 is exempt from NSPS Dc requirements due to its classification as a “direct-contact process heater.” The June 13, 2007 revision to NSPS Dc allows the use of monthly fuel delivery receipts in lieu of direct monitoring of daily/monthly usage.

40 CFR 60 Subpart IIII (NSPS IIII) - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is applicable to the compression ignition (diesel) emergency generators and fire pumps installed after the applicability date of April 1, 2006 for stationary diesel engines (i.e., emergency generators) and July 1, 2006 for diesel fire pump engines. NSPS IIII is applicable to all size engines. Requirements for this rule are located in Section 8.27. Emergency engines must have an operating hours meter and comply with annual runtime limits. Several compliance options are offered for the NSPS IIII engines to demonstrate compliance with pollutant emission limits. Fuel used in NSPS IIII engines must comply with a 15 ppm sulfur content limit. The NSPS IIII fuel sulfur limits subsume the less stringent Georgia Rule (g) sulfur limits.

40 CFR 60 Subpart JJJJ (NSPS JJJJ) – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* is applicable to the insignificant spark ignition (natural gas) emergency generator. NSPS JJJJ is applicable to spark ignition emergency engines, greater than 25 HP manufactured after January 1, 2009 and commenced construction after June 12, 2006. Requirements for this rule are located in Section 8.27. Emergency engines that are certified must be maintained and retain maintenance records. Uncertified engines must also have an operating hours meter, maintain an operating record, and conduct a performance test.

40 CFR 63 Subpart GG (MACT GG) - *National Emission Standards for Aerospace Manufacturing and Rework Facilities* applies to Existing Aerospace Spray Booths and Paint Hangars (Equipment Group ESG), New Aerospace Spray Booths and Paint Hangars (Equipment Group NSG), Fugitive Emissions from Aerospace Activities: Solvent (Handwipe and Flush Cleaning) and Material Usage subject to 40 CFR 63 Subpart GG (Operations Group SUG) and Facility-wide Aerospace Depainting Activities (Operations Group DPG). Conventional Small Parts Spray Booths subject to 40 CFR 63 Subpart MMMM (Equipment Group CSG1) can have the option of complying with 40 CFR 63 MMMM or 40 CFR 63 GG depending on the predominant activity as determined in an annual analysis. The facility does not perform chemical milling or blasting depainting operations; therefore, those parts of MACT GG are not included in this permit. Spray booths in Equipment Groups CSG1 and CSG2 apply coatings to aerospace parts and assemblies that are not critical to the vehicle's structural integrity or flight performance; therefore, these booths are exempt from the requirements for aerospace spray booths, application equipment and spray gun cleaning.

40 CFR 63 Subpart JJ - *National Emission Standards for Wood Furniture Manufacturing Operations* applies to the manufacture of wood furniture or wood furniture components which is Wood Furniture Booth SC83 (SC83 is part of Emission Group CSG2). This standard limits VHAP emissions from finishing operations and contact adhesives and limits HAP emissions from strippable spray booth coatings. Note the facility became HAP major on April 8, 2024. Per 40 CFR 63.800(f), the compliance date is the date 1 year after the area source becomes a major source. The facility is subject to this rule now.

40 CFR 63 Subpart MMMM (MACT MMMM) - *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* applies to Conventional Small Parts Spray Booths (Equipment Group CSG1) which can have the option of complying with 40 CFR 63 MMMM or 40 CFR 63 GG depending on the predominant activity as determined in an annual analysis. This MACT limits the organic HAP emissions from the surface coating of miscellaneous metal parts and products based on the types of the coatings being used. At least one of the three compliance options listed below is required:

- (1) Compliant materials option.
- (2) Emission rate without add-on control option which requires each 12-month average organic HAP emission rate based on all the coatings, thinners, additives and/or cleaning materials used for a coating operation to be less than or equal to the applicable emission limit.
- (3) Use of add-on control option. (The facility does not use this option.)

40 CFR 63 Subpart M MMMM allows the Permittee to use certain combinations of the above options to comply with the HAP emission limit. Both the compliant material and the emission rate without add-on control options also allow additional compliance approaches including predominant activity emission limit and facility-specific emission limit. Note the facility became HAP major on April 8, 2024. Per 40 CFR 63.3883(c)(2), the compliance date is the date 1 year after the area source becomes a major source. Since the facility opts to comply with 40 CFR 63 Subpart GG for Equipment Group CSG1, the facility is currently not subject to 40 CFR 63 Subpart M MMMM. However, the permit contains all applicable 40 CFR 63 Subpart M MMMM requirements so no permit modification will be required when the facility opts to comply with 40 CFR 63 Subpart M MMMM in the future.

40 CFR 63 Subpart D D D D D (MACT D D D D D) - *National Emission Standards for Hazardous Air Pollutants for Industrial for Institutional, Commercial, and Industrial Boilers and Process Heaters* is applicable to the boilers and process heaters, excluding hot water heaters. All units are classified as "Gas 1 units" and are required to conduct periodic tune ups with the schedule depending on the capacity class and assuming without any oxygen trim systems. No emission standards apply. Note the facility became HAP major on April 8, 2024. Per 40 CFR 63.7495(c)(2), the compliance date is the date 3 year after the area source becomes a major source. 40 CFR 63 Subpart D D D D D will start to apply on April 7, 2027.

The emission units subject to this rule are also required to have a one-time energy assessment if they were constructed or re-constructed on or before June 4, 2010.

0-5 MMBtu/hr - Tune-up every 5 years

Greater than 5 but less than 10 MMBtu/hr – tune-up every 2 years (biennial)

10 MMBtu/hr or greater - tune-up every year (annual).

Prior to April 7, 2027, the boilers and process heaters are not subject to 40 CFR 63 Subpart J J J J J because they are gas-fired boilers per 40 CFR 63.11195(e).

Equipment Group ECG3 will not be subject to MACT D D D D D because these meet the definition of hot water heaters which are hot water boilers with a heat capacity of less than 1.6 MMBtu/hr, provides on demand hot water and has a capacity of less than 120 gallons. EC60 consists of five boilers (EC60.1 - EC60.5) each having a maximum heat input capacity of 1.5 MMBtu/hr with capacity to hold 108 gallons of water, that are connected and ran in tandem. Each module has its own burner so that if one needs repair or maintenance, the other can continue to operate while it receives service.

Not Applicable Regulations

Georgia Rule (ii) – *VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products* applies to facilities with potential VOC emissions from all surface coating of miscellaneous parts and products that equal or exceed 100 tons per year for Chatham County. Because the potential VOC emissions from all surface coating of miscellaneous parts and products at the facility do not exceed this threshold, it is not subject to rule.

40 CFR 60 Subpart Kb (NSPS Kb) – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984* applies to tanks at the site have a storage capacity less than 75 cubic meters (19,815 gallons) or have a storage capacity between 75 and 151 cubic meters (19,815 to 39,894 gallons) and store a product with a maximum true vapor pressure less than 15 kPa (2.18 psia). The facility does not have any tanks that meet these requirements.

40 CFR 63 Subpart JJJJ - *NESHAP for Web Coating*, which sets standards for web coating operations, is not applicable because the fabric-based operations at the facility are not web coating lines.

40 CFR 63 Subpart OOOO - *NESHAP for Fabrics and Other Textiles* concerns facility operations that meet the definitions for subcategories including printing, coating, slashing, dyeing, or finishing of fabric and other textiles. Gulfstream operates slashing operations for various fabrics and textiles used in the final product. Emissions from these processes are insignificant in the predominant coating operations that comply with NESHAP Subpart GG. Because Gulfstream is subject to and complies with coating requirements under the Aerospace NESHAP (Subpart GG), which offer more stringent limitations on surface coating operations, the facility is requesting a predominant activity exemption to this subpart and a permit shield.

40 CFR 63 Subpart PPPP - *NESAHP for Miscellaneous Plastic Parts* concerns surface coating of plastic parts and products including parts for mobile sources. Per the subpart, surface coating of plastic components of aerospace vehicles that meet the applicability criteria for aerospace manufacturing and rework is exempt from this subpart. Because Gulfstream is subject to NESHAP Subpart GG, this standard is not applicable.

40 CFR 63 Subpart RRRR – *NESHAP for Metal Furniture Manufacturing Operations* concerns metal furniture surface coating facilities producing metal furniture or components constructed either entirely or partially from metal. However, this subpart does not apply to surface coating that meets the criteria of surface coating of metal components of wood furniture conducted in an operation that is subject to the wood furniture manufacturing NESHAP. Because the facility meets this criteria and any glue applied to large metal parts are components of wood furniture, the facility is not subject to this subpart.

40 CFR 63 Subpart TTTT - *NESHAP for Leather Coating*, which sets standards for surface coating of leather materials, is not applicable because the facility does not coat the surface of used leather materials.

40 CFR 63 Subpart YYYY - *NESHAP for Stationary Combustion Turbines* establishes emissions and operating limits for stationary combustion turbines located at major sources; however, the facility is not subject to this rule because the turbines are part of the engine test cells.

40 CFR 63 Subpart P PPPP - *NESHAP for Engine Test Cells/Standards* establishes emission limitations for engine test cells or stands. This rule applies to engine test cells used for testing uninstalled stationary or uninstalled mobile sources of HAP emissions that are not yet incorporated in or are not an integrated part of a final product at a major source of HAP. The facility operates multiple test cells, some for testing uninstalled and installed mobile sources and a test cell for testing climate controls and other auxiliary functions of the aircrafts; however, the APUs are combustion turbine engines. Per 40 CFR 63.9290(d)(1), “any portion of the affected source used exclusively for testing combustion turbine engines” does not have to meet the requirements.

40 CFR 63 Subpart H HHHHHH - *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable because this rule is for area sources and the facility is a major source of HAP emissions.

40 CFR 63 Subpart J JJJJJJ - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* is not applicable because this rule is for area sources and the facility is a major source of HAP emissions.

40 CFR 63 Subpart W WWWWWW - *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations* is not applicable to chrome conversion coating at Gulfstream since the chrome conversion coatings are hand-applied and not applied by a coating solution in a tank. Also this rule is for area sources and the facility is a major source of HAP emissions.

C. Permit Conditions

The Aerospace MACT requirements were updated to reflect current changes to the rule. The conditions subject to this rule were reorganized as a result. Startup, Shutdown, and Maintenance (SS&M) Plan requirements have been removed from MACT Subpart GG.

Condition 3.2.1 limits the fuel fired in the boilers, indirect-fired process heaters and hot water heaters.

40 CFR 63 Subpart GG

- Conditions 3.3.1 through 3.3.4 are general Aerospace MACT requirements.
- Conditions 3.3.5 through 3.3.8 are Aerospace MACT coating requirements for all uncontrolled, non-exempt aerospace primers, topcoats, and specialty coatings. The requirements include limits for specialty coatings and chemical milling maskants.
- Conditions 3.3.9 and 3.3.10 are Aerospace MACT application techniques requirements for all non-exempt primers, topcoats, and specialty coatings. Condition 3.3.9 has been modified to reflect the changes of MACT GG.
- Conditions 3.3.11 through 3.3.15 are Aerospace MACT inorganic HAP controls requirements for Equipment Groups ESG and NSG.
- Condition 3.3.16 is the Aerospace MACT general solvent requirements.
- Conditions 3.3.17 and 3.3.18 are Aerospace MACT handwipe cleaning requirements.

- Condition 3.3.19 is the Aerospace MACT spray gun cleaning requirements for Equipment Groups ESG and NSG.
- Condition 3.3.20 is the Aerospace MACT flush cleaning requirements.
- Condition 3.3.21 is the handling and storage of waste requirements.
- Conditions 3.3.22 through 3.3.26 detail the requirements for depainting operations as required by the Aerospace MACT.

40 CFR 60 Subpart Dc

- Condition 3.3.27 subjects Equipment Group ECG1 to NSPS Dc requirements.

Previous Conditions 3.3.28 through 3.3.33 were deleted because these conditions concerned GACT 6H, which is no longer applicable.

40 CFR 63 Subpart MMMM

- Condition 3.3.28 subjects the applicable options to 40 CFR 63 Subpart MMMM. The facility is required to comply with 40 CFR 63 Subpart MMMM if they are not using 40 CFR 63 Subpart GG. As discussed previously, the facility currently opts to comply with 40 CFR 63 Subpart GG for Equipment Group CSG1. The proposed Title V renewal permit contains all applicable requirements of 40 CFR 63 Subpart MMMM so no permit modification will be required when the facility opts to comply with 40 CFR 63 Subpart MMMM in the future. Such flexibility has been built into Condition 3.3.28.
- Condition 3.3.29 details the emission limits and requirements of MACT MMMM.
- Condition 3.3.30 explains compliance options to meet the emission limits of MACT MMMM.
- Condition 3.3.31 details the MACT MMMM Predominant Activity Emission Limit compliance option which applies to existing general coating operations/activities account for 90% or more of the coating activities at this facility. This approach will simplify the record keeping, compliance determination and/or reporting requirements.
- Condition 3.3.32 details the MACT MMMM Facility-Specific Emission Limit option which is another compliance approach for the emission rate without add-on controls option. This condition requires the monthly calculation of a sole usage-weighted emission limit for all the existing affected sources at this facility based on a 12-month rolling average. This approach is specifically desirable for the situation when a majority quantity of the coating material used are compliant coating materials with the applicable HAP emission limit(s) while a small amount of the coating materials are not complaint materials.

40 CFR 63 Subpart DDDDD

- Condition 3.3.33 subjects the applicable equipment to the Boiler MACT.
- Condition 3.3.34 contains the tune-up schedule/requirements for natural gas boilers and indirectly fired process heaters.
- Condition 3.3.35 requires a one-time energy assessment for “existing” boilers and indirectly fired process heaters.

40 CFR 63 Subpart JJ

- Condition 3.3.36 subjects the applicable equipment to 40 CFR 63 Subpart JJ.
- Conditions 3.3.37 specifies the definition of *Volatile Hazardous Air Pollutant* and *as applied* per 40 CFR 63.801.

- Condition 3.3.38 lists emission standards for the various finishing materials used in the spray booths.
- Condition 3.3.39 limits the emission standards from strippable spray booth coatings.
- Condition 3.3.40 lists the emission standards from contact adhesives.
- Condition 3.3.41 limits formaldehyde emissions in accordance with 40 CFR 63.802(a)(4).
- Condition 3.3.42 prohibits cleaning or washoff solvents that contain any of the pollutants as specified.
- Condition 3.3.43 limits the VOC content for cleaning spray booth components.
- Condition 3.3.44 prohibits conventional air spray guns except when all emissions from the finishing application station are routed to a functioning control device.
- Condition 3.3.45 requires a Work Practice Implementation Plan.

State Rules

- Condition 3.4.1 subjects all process equipment to Georgia Rule (b).
- Condition 3.4.2 subjects each manufacturing process to Georgia Rule (e).
- Condition 3.4.3 limits the fuel combusted to 2.5 percent sulfur as required by Georgia Rule (g). This condition applies to all fuel burning sources not included in Condition 3.2.1.
- Condition 3.4.4 subjects the boilers, indirectly fired process heaters, and hot water heaters to Georgia Rule (d).
- Condition 3.4.5 subjects the applicable equipment to Georgia Rule (kkk).
- Condition 3.4.6 details the activities not subject to Georgia Rule (kkk).
- Condition 3.4.7 lists the VOC content limits for the specified types of coatings for Georgia Rule (kkk).
- Condition 3.4.8 lists the options for complying the VOC content limits of Georgia Rule (kkk).
- Condition 3.4.9 is an exemption for low-volume coatings for Georgia Rule (kkk).
- Condition 3.4.10 details the housekeeping requirements as subject to Georgia Rule (kkk).
- Condition 3.4.11 details the requirements for hand-wipe cleaning operations as subject to Georgia Rule (kkk).
- Condition 3.4.12 lists the cleaning operations exempt from the hand-wipe cleaning requirements of Georgia Rule (kkk).
- Condition 3.4.13 lists the requirements for cleaning spray guns for Georgia Rule (kkk).
- Condition 3.4.14 requires used cleaning solvents to be contained as subject to Georgia Rule (kkk).
- Condition 3.5.1 requires that the emissions from all paint booths in Equipment Group CSG2 use a dry particulate filter system.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Not applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

- Condition 5.2.1a. details the monitoring requirements for MACT GG.
- Condition 5.2.1b. details the filter pressure drop monitoring for Equipment Groups CSG1 and CSG2. This is a state requirement.
- Condition 5.2.2 details the enclosed gun cleaner requirements for MACT GG and Georgia Rule (kkk).
- Condition 5.2.3 requires inspections at least once per calendar month for the aerospace work practices
- Condition 5.2.4 concerns monitoring requirements for 40 CFR 63 Subpart JJ.

C. Compliance Assurance Monitoring (CAM)

An emission unit is subject to the provisions of 40 CFR 64, “Compliance Assurance Monitoring” because:

- It is located at a major source that is required to obtain a Title V Permit. [40 CFR 64.2(a)]
- It is subject to an emission limitation or standard for the applicable pollutant. [40 CFR 64.2(a)(1)]
- The facility uses a control device to achieve compliance. [40 CFR 64.2(a)(2)]
- Potential pre-controlled emissions of the applicable pollutant (particulate matter) from such emission unit are at least 100 percent of major source threshold. [40 CFR 64.2(a)(3)]

CAM is not applicable. The paint booths use filter media, but uncontrolled emissions of particulate matter from any single paint booth do not exceed major source levels.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

- Condition 6.1.7b.i. notes that exceedances of the aerospace solvent cleaning requirements in 40 CFR 63 Subpart GG are reported in Condition 6.2.6.
- Condition 6.1.7b.ii. notes that exceedances of the aerospace primer and topcoat requirements in 40 CFR 63 Subpart GG are reported in Condition 6.2.8.
- Condition 6.1.7b.iii. notes that exceedances of the aerospace depainting requirements in 40 CFR 63 Subpart GG are reported in Condition 6.2.12.
- Condition 6.1.7b.iv. is an exceedance reporting for 40 CFR 63 Subpart MMMM for exceeding the emission limits when using the compliant material option.
- Condition 6.1.7b.v. is an exceedance reporting for 40 CFR 63 Subpart MMMM for exceeding the emission limits when using the emission rate without add-on control option.
- Condition 6.1.7b.vi. is an exceedance reporting for 40 CFR 63 Subpart JJ for exceeding monthly weighted average VHAP emissions from any finishing operation coating exceeding 1.0 pounds per pound of solids.
- Condition 6.1.7b.vii. is an exceedance reporting for 40 CFR 63 Subpart JJ for exceeding the limit for VOC emissions from contact adhesive, excluding foam adhesives used in products used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies and excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, that has a VHAP content of greater than 1.0 pound of VHAP per pound of solids, as applied.
- Condition 6.1.7b.viii. is an exceedance reporting for 40 CFR 63 Subpart JJ for exceeding the limit for VHAP emissions from contact adhesives as applied for foam adhesives.
- Condition 6.1.7b.ix. is an exceedance reporting for 40 CFR 63 Subpart JJ for exceeding the limit for VOC emissions from strippable spray booth coatings.
- Condition 6.1.7b.x. is an exceedance reporting for 40 CFR 63 Subpart JJ for thinner purchased premade that has a VHAP content greater than 10.0 percent.
- Condition 6.1.7b.xi. is an exceedance reporting for 40 CFR 63 Subpart JJ for using a thinner for onsite formulation of washcoats, basecoats, and enamels that has a VHAP content of greater than 3.0 percent by weight.
- Condition 6.1.7b.xii. is an exceedance reporting for 40 CFR 63 Subpart JJ for using cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of the MACT.
- Condition 6.1.7b.xiii. is an exceedance reporting for 40 CFR 63 Subpart JJ for using compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other

than conveyors, continuous coaters and their enclosures, or metal filters or plastic filters unless spray booths used for wood product finishing operations are being refurbished.

- Condition 6.1.7b.xiv. is an exceedance reporting for 40 CFR 63 Subpart JJ for using more than 1.0 gallons of organic HAP solvent to prepare the surface.
- Condition 6.1.7b.xv. is an exceedance reporting for 40 CFR 63 Subpart JJ for total formaldehyde (F_{total}) use in coatings and contact adhesives exceeding 400 pounds per rolling 12 month period.
- Condition 6.1.7c.i. is an excursion reporting requirement for 40 CFR 63 Subpart JJ for not implementing an operator training course.
- Condition 6.1.7c.ii. is an excursion reporting requirement for 40 CFR 63 Subpart JJ for not implementing a leak inspection and maintenance plan.
- Condition 6.1.7c.iii. is an excursion reporting requirement for 40 CFR 63 Subpart JJ for not implementing an organic HAP solvent accounting form.
- Condition 6.1.7c.iv. is an excursion reporting requirement for 40 CFR 63 Subpart JJ for not complying with comply with the work practice standards of Condition 5.2.4f, Condition 5.2.4h, or Condition 5.2.4i.
- Condition 6.1.7c.v. is an excursion reporting requirement for 40 CFR 63 Subpart JJ for using conventional spray guns to apply finishing materials which not allowed by Condition 5.2.4g.
- Condition 6.1.7c.vi. is an excursion reporting requirement for 40 CFR 63 Subpart JJ for not implementing a formulation assessment plan for finishing operations.
- Condition 6.1.7d.i. is a reporting requirement for not conducting the work practice inspection required by Condition 5.2.3.

40 CFR 63 Subpart GG and Georgia Rule (kkk)

- Condition 6.2.1 contains the general cleaning solvent record requirements for MACT GG and Georgia Rule (kkk).
- Condition 6.2.2 details the non-conforming handwipe cleaning record requirements.
- Condition 6.2.3 details the composition compliant and semi-aqueous solvent record requirements.
- Condition 6.2.4 details the vapor pressure compliant solvent record requirements.
- Condition 6.2.5 details the enclosed gun cleaner leak record requirements.

40 CFR 63 Subpart GG

- Condition 6.2.6 requires a semiannual solvent cleaning compliance report.
- Condition 6.2.7 requires records for the coatings and filters subject to MACT GG.
- Condition 6.2.8 requires a semiannual coatings and filter monitoring compliance report.
- Condition 6.2.9 requires documentation to be maintained concerning coating application in Aerospace Spray Equipment Groups ESG and NSG.
- Condition 6.2.10 requires records of work practice inspections and either pressure drop readings or an interlock system. This condition was modified to allow an interlock system which would not need pressure drop readings. An interlock system automatically shuts down the coating spray application system if the booth parameters are outside the parameter range.
- Condition 6.2.11 requires records concerning depainting.
- Condition 6.2.12 requires depainting semiannual compliance reports.

40 CFR 60 Subpart Dc

- Condition 6.2.13 requires fuel usage records.

VOC/HAP Emission Limits

- Condition 6.2.14 requires the facility to maintain VOC and HAP usage records for the entire facility.
- Condition 6.2.15 requires the VOC records to be used to determine the monthly VOC emissions for the entire facility. VOC emissions are tracked to ensure the emissions used during the Toxic Impact Assessment.
- Condition 6.2.16 requires the calculation of 12-month rolling VOC emissions from the facility using the monthly records. VOC emissions are tracked to ensure the emissions used during the Toxic Impact Assessment.
- Condition 6.2.17 requires the HAP records to be used to determine the monthly HAP emissions for individual HAP emissions and combined HAP emissions. HAP emissions are tracked to ensure the emissions used during the Toxic Impact Assessment.
- Condition 6.2.18 requires the calculation of 12-month rolling HAP emissions from the facility for individual HAP emissions and combined HAP emissions using the monthly records. HAP emissions are tracked to ensure the emissions used during the Toxic Impact Assessment.

Previous Conditions 6.2.19 through 6.2.21 were deleted because these conditions concerned GACT 6H which is no longer applicable.

40 CFR 63 Subpart MMMM

- Condition 6.2.19 details the initial notification requirements for MACT MMMM if the facility chooses to use this for compliance.
- Condition 6.2.20 details the requirements for semiannual compliance reports required by MACT MMMM.
- Condition 6.2.21 requires formulation data or testing data.
- Condition 6.2.22 requires records to the compliance options used for MACT MMMM.
- Condition 6.2.23 provides calculations to determine the organic HAP content for each coating if using the *Compliant Material Option*.
- Condition 6.2.24 provides calculations to assist with compliance of the *Emission Rate Without Add-on Control Option*.
- Conditions 6.2.25 through 6.2.28 details the records to be maintained as required by MACT MMMM.
- Conditions 6.2.29 and 6.2.30 provide guidance for waste when using the *Emission Rate Without Add-on Control Option*.
- Condition 6.2.31 provides calculations to assist with compliance of the *Facility-Specific Emission Limit Option*.

40 CFR 63 Subpart DDDDD

- Condition 6.2.32 requires the annual, biennial, or 5-year compliance reports.
- Condition 6.2.33 details information to be included in the compliance report.
- Condition 6.2.34 details the records to be maintained.

40 CFR 63 Subpart JJ

- Condition 6.2.35 requires the facility to maintain Certified Product Data Sheets (CPDS) for each finishing material (including topcoat, basecoat, washcoat, enamels, sealers, and stains), thinner, contact adhesive, and strippable spray booth coating containing VHAP materials.
- Condition 6.2.36 requires the facility to calculate and record the monthly average VHAP content across all finishing materials.
- Condition 6.2.37 provides options for compliance with the formaldehyde emission limit.
- Condition 6.2.38 requires a semiannual compliance status report.
- Condition 6.2.39 requires written notification if the annual usage of the VHAP identified exceeds its baseline level.

Air Toxics Assessment

- Condition 6.2.40 requires a facility wide air toxics assessment for both process emissions and combustion emissions, including a comparison to the Minimum Emission Rates (MERs) and modeling for pollutants not screened out by the MERs within 8 months after finalization of Georgia Environmental Protection Division's most recent Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions.

VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- Condition 7.6.1 subjects any permitted temporary booth to the Aerospace MACT, Georgia Rule (b), Georgia Rule (e) and Georgia Rule (kkk). These booths usually are permitted with an Off Permit request. The temporary spray booth(s) will also be required to use a three-stage particulate filter.

F. Compliance Schedule/Progress Reports

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Stratospheric Ozone Protection Requirements

- Not applicable.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

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.//