

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

MEMORANDUM

October 9, 2020

TO: Phillip Fielder, P.E., Chief Engineer

THROUGH: Rick Groshong, Compliance and Enforcement Manager

THROUGH: Phil Martin, P.E., Existing Source Permits Section Manager

THROUGH: Joseph K. Wills, P.E., Engineering Section

FROM: Morgan McGrath, P.E., Eng. Section, Regional Office at Tulsa (ROAT)

SUBJECT: Evaluation of Permit Application No. **2019-0769-TVR3**
Spirit AeroSystems, Inc.
Tulsa Facility – 3300 North Mingo Road (SIC 3728/NAICS 336413)
AQD Facility ID: 1435
Latitude 36.20202°, Longitude -95.87118°
Section 24, Township 20N, Range 13E, Tulsa County
3330 North Mingo Road, Tulsa, OK 74116

SECTION I. INTRODUCTION

Spirit AeroSystems, Inc. (Spirit) has submitted an application for a Title V Renewal for their Tulsa Facility – 3300 North Mingo Road (facility). The facility is currently operating under Permit No. 2014-0051-TVR2 (M-2) issued August 1, 2018.

This facility is a major source of HAP emissions. Upon issuance of the renewal, the facility will be considered a synthetic minor source of VOC emissions. The facility is not a PSD major stationary source.

SECTION II. FACILITY DESCRIPTION

The Spirit Tulsa facility builds various parts and assemblies for military and commercial aircraft. The facility is composed of aerospace coating operations, boilers, curing ovens, emergency engines, and other equipment associated with aircraft parts manufacturing and painting.

SECTION III. PERMIT HISTORY

Permits	Date Issued	Description
2014-0051-TVR2	2/19/2015	Second Title V Renewal
2014-0051-TVR2 (M-1)	4/29/2015	Administrative Amendment to correct 5D applicability and remove inappropriate condition language
2014-0051-TVR2 (M-2)	8/1/2018	Minor modification to replace a boiler

SECTION IV. REQUESTED CHANGES

In the renewal, the following changes were requested as part of the application:

1. Applicant has requested to remove paint booths EP-55, EP-56, EP-57, and EP-59 located in EUG 3 from the permit since they were not constructed at the site;
2. Applicant has requested to reduce the EUG 3 emission cap on VOC from 95 TPY to 80 TPY;
3. Applicant has requested to remove ovens EP-85, EP-86, EP-87, and EP-88 located in EUG 2 from the permit since they were not constructed. As such, the EUG 2 emissions have been reduced;
4. Applicant has requested to remove gasoline tank at Building 002 located in the insignificant activities from the permit due to permanent removal;
5. Applicant has requested to remove EP-9, and EP-11 located in EUG 11 from the permit due to permanent removal. As such, the EUG 11 emission limit cap has been reduced;
6. Applicant has requested removal of Vapor Degreaser EP-46 located in EUG 4 from the permit due to the unit being decommissioned (and rendered inoperable);
7. Applicant provided an up-to date insignificant activities list.

AQD has taken the opportunity in the renewal to update all federal and state regulations that apply to the facility. In addition, the specific conditions of the permit were reviewed and the following revisions were made. Specific Condition No. 1 EUG 2(a) and EUG 11(a) has been revised to remove the daily natural gas consumption method listed in the compliance demonstration for EUG 2 and EUG 11. The revised condition retains the requirement to monitor and record natural gas consumption on a monthly and 12 month rolling basis, which is consistent with the averaging time associated with the emission limits. Specific Condition No. 1 EUG 9(a) and EUG 10(a) has been revised to limit non-emergency hours of operation from the emergency engines.

SECTION V. EQUIPMENT

EUG 1 Facility-Wide

This EUG is established to cover all rules or regulations that apply to the facility as a whole.

EUG 2 Combustion Sources (including NESHAP DDDDD Sources)

This group includes a total of 23 individual natural gas combustion units with a combined hourly heat input of 58.45 MMBTUH. Boilers in this group are subject to the requirements of 40 CFR Part 63, Subpart DDDDD. All Ovens in this group are direct fired and are not affected units under Subpart DDDDD.

EU-Point	Description	Serial #	Heat Input Rating (MMBTUH)	Mfg. Date
EP-125	Boiler #28	L-69814	5.25	2018
EP-61	Boiler #9	L-102453	5.103	2003
EP-64	Oven #1	129336	1.5	1983
EP-65	Oven #2	129335	1.5	1983
EP-66	Oven #3	N1010650	1.5	1969
EP-67	Oven #5	N1001322	1.5	1968
EP-68	Oven #6	135420	1.0	1986

EU-Point	Description	Serial #	Heat Input Rating (MMBTUH)	Mfg. Date
EP-69	Oven #15	161487	1.5	1998
EP-70	Oven #16	161486	1.5	1998
EP-71	Oven #17	161484	1.5	1998
EP-72	Oven #18	161483	1.5	1998
EP-73	Oven #19	161485	1.5	1998
EP-74	Oven #20	130543	1.5	1984
EP-75	Oven #22	129533	1.5	1984
EP-76	Oven #24	A0108E008027, A0108E008028 & A0108E008029 ⁽¹⁾	7.5	2008
EP-77	Oven #25	6362	3.0	2008
EP-78	Oven #26	N786183	2.6	2008
EP-79	Oven #27	A0806E00704 & A0806E00705 ⁽²⁾	3.0	2006
EP-80	Oven #28	A0806E00702 & A0806E00703 ⁽²⁾	3.0	2006
EP-81	Oven #29	A0507E007863 & A0507E007864 ⁽²⁾	3.0	2007
EP-82	Oven #30	A0907E007937	2.5	2007
EP-83	Oven #31	A0108E008019 & A0108E008020 ⁽²⁾	3.0	2008
EP-84	Oven #32	A0108E008021 & A0108E008022 ⁽²⁾	3.0	2008

⁽¹⁾This oven is indicated to have 3 burners with 3 unique serial numbers.

⁽²⁾These oven(s) are indicated to have 2 burners with 2 unique serial numbers.

EUG 3 Coating Booths

All of the units below were authorized their current permitted limits through Permit No. 2008-006-TVR. EUG 3 is subject to the requirements of 40 CFR 63, Subpart GG.

EU-Point	Description	Booth Size (ft)	Stack information			Date
			Ht. (ft)	Dia. (in)	CFM	
EP-26	#1 (S)	55×45×25	64	84	110,000	1998
EP-27	#2 (N)	55×45×25	64	84	110,000	1998
EP-28	#3 Flue	14×24×10	45	42	16,838	1968
EP-29	#4 Prime (241)	24×30×12	45	42	19,831	1968
EP-30	#5 Bond prime (N)	24×15×12	45	36	23,760	1968
EP-31	#6 Bond prime (S)	24×12×12	40	36	16,876	1968
EP-32	#7 Flame spray	24×15×12	40	36	12,000	1963
EP-38	#13	21×34×12	66	42	29,652	1982
EP-39	#14	34×19×12	66	42	15,176	1982
EP-40	#15	30×19×12	66	42	14,351	1982
EP-41	#16	34×19×12	66	42	15,105	1982
EP-42	#17	28×19×10	66	42	12,345	1982
EP-43	#18	28×19×10	66	40	15,000	1982
EP-48	#19 General assembly	20×32×11	76	36	16,000	2006
EP-49	#20 General assembly	20×32×11	76	36	16,000	2006
EP-50	#21 General assembly	20×32×11	76	36	16,000	2007
EP-51	#22 General assembly	20×32×11	76	36	42,000	2008
EP-52	#23 General assembly	20×32×11	43	36	42,000	2008

EU-Point	Description	Booth Size (ft)	Stack information			Date
			Ht. (ft)	Dia. (in)	CFM	
EP-53	#24 General assembly	25×25×70	43	36	90,000	2008
EP-54	#25 General assembly	30×16×12	67	35	25,000	2007

EUG 4 Empty

EUG 5 Solvent Cleaning

This group consists of those fugitive sources principally associated with hand-wipe and flush cleaning, but specifically excludes spray gun cleaning. EUG 5 is subject to 40 CFR 63, Subpart GG.

EUG 6 Paint Gun Cleaning

This group consists of those fugitive sources associated only with paint gun cleaning, which has specific requirements under 40 CFR 63, Subpart GG.

EUG 7 Waste Storage and Handling (NESHAP GG)

This group consists of those fugitive sources associated only with the proper storage and handling of waste. EUG 7 is subject to 40 CFR 63, Subpart GG.

EUG 8 Empty

EUG 9 NSPS Reciprocating Internal Combustion Engines

This emission unit group contains one (1) emergency engine subject to the requirements of 40 CFR Part 60, Subpart JJJJ and 40 CFR Part 63, Subpart ZZZZ.

EU-Point	Description	Serial No.	Mfg. Date
EP-110	201-HP On-site Energy Emergency Generator #1	33789-1-1-1011	2010

EUG 10 Reciprocating Internal Combustion Engines (Non-NSPS)

This emission unit group contains six (6) emergency engines and one (1) fire-pump engine subject to the requirements of 40 CFR Part 63, Subpart ZZZZ.

EU-Point	Description	Serial No.	Mfg. Date
EP-111	87-HP SI Generac Emergency Generator #2	SG060-G367.4NCBNNC	2005
EP-112	107-HP SI Kohler Emergency Generator #3	2236229	2005
EP-113	34-HP SI Generac Emergency Generator #4	2020669	2000
EP-114	27-HP SI Kohler Emergency Generator #5	751907	2003
EP-115	40-HP SI Kohler Emergency Generator #6	752210	2003
EP-116	60-HP CI MQ-Power Emergency Generator #7	7200316	1999
EP-117	170-HP CI Allis-Chalmers Fire-Pump Engine #1	4D-170-70	1980

EUG 11 Combustion Sources (NSPS Dc and NESHAP DDDDD)

This group includes a total of four (4) natural gas units with a combined hourly heat input of 79.79 MMBTUH. All boilers in this group are subject to the requirements of 40 CFR Part 60 Subpart Dc and Part 63 Subpart DDDDD.

EU-Point	Source	Serial No.	Heat Input (MMBTUH)	Mfg. Date
EP-8	Cleaver Brooks Boiler #3	L-93558	10.46	1994
EP-10	Cleaver Brooks Boiler #5	OLO97177	10.21	1998
EP-11A	Cleaver Brooks Boiler #7	OLO98268	14.47	1998
EP-11B	Cleaver Brooks Boiler #8	OLO98269	14.47	1998
EP-58	TEC Autoclave #8 AC-10	854	30	2009

SECTION VI. EMISSIONS

EUG 1 Facility-Wide

This EUG was established to cover rules or regulations that apply to the facility as a whole. At this time, there are no emissions estimated in this EUG.

EUG 2 Combustion Sources (including NESHAP DDDDD Sources)

Emissions are estimated based on the max rated hourly heat input of each combustion units, emission factors from Table 1.4-1 and 1.4-2 of AP-42 (7/98), a fuel heating value of 1,020 BTU/SCF and 8,760 hour per year of continuous operation.

Table 1— Emission Factors (lb/MMSCF)

	NO_x	CO	VOC	SO₂	PM₁₀
	100	84	5.5	0.6	7.6

Table 2—Potential Emissions from EUG 2

EU-Point	NO_x		CO		VOC		SO₂		PM₁₀	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EP-125	0.51	2.25	0.43	1.89	0.03	0.12	0.003	0.01	0.04	0.17
EP-61	0.50	2.19	0.42	1.84	0.03	0.12	0.003	0.01	0.04	0.17
EP-64	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-65	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-66	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-67	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-68	0.10	0.43	0.08	0.36	0.01	0.02	0.001	0.003	0.01	0.03
EP-69	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-70	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-71	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-72	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-73	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-74	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-75	0.15	0.64	0.12	0.54	0.01	0.04	0.001	0.004	0.01	0.05
EP-76	0.74	3.22	0.62	2.71	0.04	0.18	0.004	0.02	0.06	0.24
EP-77	0.29	1.29	0.25	1.08	0.02	0.07	0.002	0.01	0.02	0.10
EP-78	0.25	1.12	0.21	0.94	0.01	0.06	0.002	0.01	0.02	0.08
EP-79	0.29	1.29	0.25	1.08	0.02	0.07	0.002	0.01	0.02	0.10
EP-80	0.29	1.29	0.25	1.08	0.02	0.07	0.002	0.01	0.02	0.10
EP-81	0.29	1.29	0.25	1.08	0.02	0.07	0.002	0.01	0.02	0.10
EP-82	0.25	1.07	0.21	0.90	0.01	0.06	0.001	0.01	0.02	0.08
EP-83	0.29	1.29	0.25	1.08	0.02	0.07	0.002	0.01	0.02	0.10
EP-84	0.29	1.29	0.25	1.08	0.02	0.07	0.002	0.01	0.02	0.10
Total	5.74	25.06	4.79	21.06	0.36	1.42	0.04	0.17	0.42	1.92

EUG 3 Coating Booths

The facility established the annual emission cap for EUG 3 in prior permits, for which the statement of basis repeated below (Table 3 and 4). At that time, the permittee requested the permit limits to be based on 50% of the maximum potential to emit from the coating booths (see the memorandum of Permit No. 2008-006-TVR). The removal of coating booths #9, #10, #12 (EP-34, EP-35, and EP-37) in 2008, and the removal EP-55, EP-56, EP-57, and EP-59 (as requested in the application for this renewal) results in a lowered maximum potential to emit from the coating booths as reflected in the tables below. However, in the renewal Spirit has requested to the lower the EUG 3 VOC emission CAP from 95 TPY to 80 TPY in order to no longer be considered major VOC source of emission.

Potential emissions of criteria pollutants were estimated using a supercoat approach and include process cycling time (loading, spraying and curing), which is identified to be an inherent bottleneck for process operations. Under this approach, maximum VOC content of supercoat #1 is 7.0 pounds per gallon (ppg), and supercoat #3 is 6.7 ppg. Maximum solids contents are 3.40 ppg for #1 and 9.0 ppg for #3. Emissions of PM were estimated using a transfer efficiency of 50% and a control efficiency of 99% based on the filter manufacturer rating. The tables below summarizes all assumptions for the calculation. Potential emissions of HAPs are estimated separately for organic HAPs and inorganic HAPs. The facility uses a supercoat approach for the estimate. Emissions of inorganic HAPs were estimated using a transfer efficiency of 50% and a control efficiency of 99% based on the filter manufacturer rating. Under this approach, maximum organic HAP content for coatings used in EP-26 are 5.0 lb/gal and 4.15 lb/gal for all other booth(s). Similarly, maximum inorganic HAP content for coatings used in EP-26 are 0.03 lb/gal and 1.13 lb/gal for all other booth(s). Total HAPs from EUG 3 are estimated to be approximately 94 TPY.

Table 3—Coating Booth Parameters and Assumptions

EU-Point	Booth ID	# Spray Guns	Max Spray Rate (gph) ¹	Supercoat #	Operating Hours (hpy)
EP-26	#1	2	5	1	700.8
EP-27	#2	2	5	3	674
EP-28	#3	1	2.5	3	674
EP-29	#4	1	2.5	3	674
EP-30	#5	1	2.5	3	730
EP-31	#6	1	2.5	3	730
EP-32 ²	#7	1	2.5	--	730
EP-38	#13	2	5.0	3	876
EP-39	#14	1	2.5	3	876
EP-40	#15	1	2.5	3	876
EP-41	#16	1	2.5	3	876
EP-42	#17	1	2.5	3	876
EP-43	#18	1	2.5	3	876
EP-48	#19	1	2.5	3	876
EP-49	#20	1	2.5	3	876
EP-50	#21	1	2.5	3	876
EP-51	#22	1	2.5	3	876
EP-52	#23	1	2.5	3	876
EP-53	#24	1	2.5	3	876

EU-Point	Booth ID	# Spray Guns	Max Spray Rate (gph) ¹	Supercoat #	Operating Hours (hpy)
EP-54	#25	1	2.5	3	876

¹ Accounts for the total spray rate for all spray guns within an individual booth (e.g. for EP-26, 2 spray guns x 2.5 gallons per hour (gph) = 5.0 gph (total));

² Note that EP-32 (flame spray) sprays high temperature metal, not paint products, and was not included in any supercoat.

Table 4—Potential Emissions of VOC and PM₁₀ from EUG 3

EU-Point	Description	Hourly Spray Rate (gph)	Annual Spray Rate (gpy)	VOC		Uncontrolled		Controlled	
				lb/hr	TPY	PM ₁₀		PM ₁₀	
						lb/hr	TPY	lb/hr	TPY
EP-26	#1	5.0	3,504	35.0	12.3	8.5	3.0	0.09	0.03
EP-27	#2	5.0	3,370	33.5	11.3	22.5	7.6	0.23	0.08
EP-28	#3	2.5	1,685	16.8	5.6	11.25	3.8	0.11	0.04
EP-29	#4	2.5	1,685	16.8	5.6	11.25	3.8	0.11	0.04
EP-30	#5	2.5	1,825	16.8	6.1	11.25	4.1	0.11	0.04
EP-31	#6	2.5	1,825	16.8	6.1	11.25	4.1	0.11	0.04
EP-32	#7	2.5	1,825	--	--	--	--	--	--
EP-38	#13	5.0	4,380	33.5	14.7	22.5	9.9	0.23	0.10
EP-39	#14	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-40	#15	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-41	#16	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-42	#17	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-43	#18	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-48	#19	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-49	#20	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-50	#21	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-51	#22	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-52	#23	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-53	#24	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
EP-54	#25	2.5	2,190	16.8	7.3	11.25	4.9	0.11	0.05
Potential to Emit				370.8	149.3	233.5	95.1	2.31	0.97
Permit Limits				238.5	80.0¹	See Controlled		1.67	0.7

⁽¹⁾—Permittee has requested to lower the VOC cap for EUG 3 covered activities from 95.0 tpy to 80.0 tpy in Permit No. 2019-0769-TVR3.

EUG 4 Empty

EUG 5 Solvent Cleaning

The facility has not maintained individual records for materials used in EUG 5 and EUG 6, because many of the same solvents are used in both activities. Emission inventory data supplied with the Part 70 application showed emissions of only 6.9 tons of VOC shared between both EUGs.

EUG 6 Paint Gun Cleaning

See EUG 5 discussion preceding.

EUG 7 Waste Storage and Handling

This Group was established to assure the proper handling of materials under MACT GG. Any emissions from these activities are expected to be fugitive in nature, and would be included in emission calculations for EUG 5 and EUG 6.

EUG 8 Empty

EUG 9 NSPS Reciprocating Internal Combustion Engines

Emissions are estimated using the maximum power of the unit, emission factors from Table 3.2-3 of AP-42 (7/00), 500 hours per year of emergency and non-emergency operation, and an estimated brake-specific-horsepower-rating of 8,000 BTU per horsepower-hour.

Table 5—Potential Emission from EUG 9

Pollutant	Emission Factor	Units	Emissions	
			Lb/hr	TPY
NO _x	2.21	lb/MMBTU	3.55	0.89
CO	3.72	lb/MMBTU	5.98	1.50
VOC	0.0296	lb/MMBTU	0.05	0.01
SO ₂	0.000588	lb/MMBTU	0.01	0.01
PM ₁₀	0.0194	lb/MMBTU	0.03	0.01

EUG 10 Reciprocating Internal Combustion Engines (Non-NSPS)

Emissions from the SI engines are estimated using factors from Table 3.2-3 of AP-42 (7/00), 500 hours per year of emergency and non-emergency operation.

Table 6—SI Engine Emission Factors

Pollutant	Emission Factor	Units
NO _x	2.21	lb/MMBTU
CO	3.72	lb/MMBTU
VOC	0.0296	lb/MMBTU
SO ₂	0.000588	lb/MMBTU
PM ₁₀	0.0194	lb/MMBTU

Table 7— SI Engine Emission Summary (EP-111, EP-112, EP-113, EP-114, EP-115)

Emission Point	NO _x		CO		VOC		SO ₂		PM ₁₀	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EP-111	1.54	0.38	2.59	0.65	0.02	0.01	0.0004	0.0001	0.01	0.003
EP-112	1.89	0.47	3.18	0.80	0.03	0.01	0.001	0.0001	0.02	0.004
EP-113	0.60	0.15	1.01	0.25	0.01	0.00	0.0002	0.0000	0.01	0.001
EP-114	0.48	0.12	0.80	0.20	0.01	0.00	0.0001	0.0000	0.004	0.001
EP-115	0.71	0.18	1.19	0.30	0.01	0.00	0.0002	0.0000	0.01	0.002
Total	5.22	1.30	8.77	2.20	0.08	0.02	<0.01	<0.01	0.05	0.01

Emissions from the CI engines are estimated using factors from Table 3.3-1 of AP-42 (10/96), 500 hours per year of emergency operation.

Table 8— CI Engine Emission Factors (EP-116, EP-117)

Pollutant	Emission Factor	Units
NO _x	0.031	lb/hp-hr
CO	0.00668	lb/hp-hr
VOC	0.00251	lb/hp-hr
SO ₂	0.00205	lb/hp-hr
PM ₁₀	0.0022	lb/hp-hr

Table 9— CI Engine Emission Summary (EP-116, EP-117)

Emission Point	NO _x		CO		VOC		SO ₂		PM ₁₀	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EP-116	1.86	0.47	0.40	0.10	0.15	0.04	0.1230	0.0308	0.13	0.033
EP-117	5.27	1.32	1.14	0.28	0.43	0.11	0.349	0.0871	0.37	0.094
Total	7.13	1.79	1.54	0.38	0.58	0.15	0.47	0.12	0.50	0.13

EUG 11 Combustion Sources (NSPS Dc and NESHAP DDDDD)

Emissions are estimated based on the max rated hourly heat input of each combustion units, emission factors from Table 1.4-1 and 1.4-2 of AP-42 (7/98), a fuel heating value of 1,020 BTU/SCF and 8,760 hour per year of continuous operation.

Table 10— Emission Factors (Lb/MMSCF)

NO _x	CO	VOC	SO ₂	PM ₁₀
100	84	5.5	0.6	7.6

Table 11— Emissions from Ovens and Autoclaves

Emission Point	NO _x		CO		VOC		SO ₂		PM ₁₀	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EP-8	1.03	4.49	0.86	3.77	0.06	0.25	0.01	0.03	0.08	0.34

Emission Point	NO _x		CO		VOC		SO ₂		PM ₁₀	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EP-10	1.00	4.38	0.84	3.68	0.06	0.24	0.01	0.03	0.08	0.33
EP-11A	1.42	6.21	1.19	5.22	0.08	0.34	0.01	0.04	0.11	0.47
EP-11B	1.42	6.21	1.19	5.22	0.08	0.34	0.01	0.04	0.11	0.47
EP-58	2.94	12.88	2.47	10.82	0.16	0.71	0.02	0.08	0.22	0.98
Total	7.81	34.17	6.55	28.71	0.44	1.88	0.06	0.22	0.60	2.59

- Facility-Wide Summary

Criteria Pollutants

Since potential emissions of VOC exceed 100 TPY, the facility is considered to be a synthetic minor source for this pollutant. The facility is a synthetic-minor source of PM, since the facility-wide emissions would exceed major source threshold without the use of particulate control equipment on the coating booths. For permitting purposes, PM_{2.5} is assumed to be equal to PM₁₀.

Emission Summary (Hourly)

EU-Point	NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}
	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
EP-125	0.51	0.43	0.03	<0.01	0.04	0.04
EP-61	0.50	0.42	0.03	<0.01	0.04	0.04
EP-64	0.15	0.12	0.01	<0.01	0.01	0.01
EP-65	0.15	0.12	0.01	<0.01	0.01	0.01
EP-66	0.15	0.12	0.01	<0.01	0.01	0.01
EP-67	0.15	0.12	0.01	<0.01	0.01	0.01
EP-68	0.10	0.08	0.01	<0.01	0.01	0.01
EP-69	0.15	0.12	0.01	<0.01	0.01	0.01
EP-70	0.15	0.12	0.01	<0.01	0.01	0.01
EP-71	0.15	0.12	0.01	<0.01	0.01	0.01
EP-72	0.15	0.12	0.01	<0.01	0.01	0.01
EP-73	0.15	0.12	0.01	<0.01	0.01	0.01
EP-74	0.15	0.12	0.01	<0.01	0.01	0.01
EP-75	0.15	0.12	0.01	<0.01	0.01	0.01
EP-76	0.74	0.62	0.04	<0.01	0.06	0.06
EP-77	0.29	0.25	0.02	<0.01	0.02	0.02
EP-78	0.25	0.21	0.01	<0.01	0.02	0.02
EP-79	0.29	0.25	0.02	<0.01	0.02	0.02
EP-80	0.29	0.25	0.02	<0.01	0.02	0.02
EP-81	0.29	0.25	0.02	<0.01	0.02	0.02
EP-82	0.25	0.21	0.01	<0.01	0.02	0.02
EP-83	0.29	0.25	0.02	<0.01	0.02	0.02
EP-84	0.29	0.25	0.02	<0.01	0.02	0.02
EP-26	--	--	35.00	--	0.08	0.08
EP-27	--	--	33.5	--	0.22	0.22
EP-28	--	--	33.5	--	0.22	0.22
EP-29	--	--		--		
EP-30	--	--	33.5	--	0.22	0.22
EP-31	--	--		--		

EU-Point	NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}
	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
EP-32	--	--	--	--	--	--
EP-38	--	--	33.5	--	0.22	0.22
EP-39	--	--	238.5	--	1.67	1.67
EP-40	--	--				
EP-41	--	--				
EP-42	--	--				
EP-43	--	--				
EP-48	--	--				
EP-49	--	--				
EP-50	--	--				
EP-51	--	--				
EP-52	--	--				
EP-53	--	--				
EP-54	--	--	--	--	--	--
EUG 5, 6, 7	--	--	6.63 ⁽¹⁾	--	--	--
EP-110	3.55	5.98	0.05	0.01	0.03	0.03
EP-111	1.54	2.59	0.02	<0.01	0.01	0.01
EP-112	1.89	3.18	0.03	<0.01	0.02	0.02
EP-113	0.60	1.01	0.01	<0.01	0.01	0.01
EP-114	0.48	0.80	0.01	<0.01	<0.01	<0.01
EP-115	0.71	1.19	0.01	<0.01	0.01	0.01
EP-116	1.86	0.40	0.15	0.12	0.13	0.13
EP-117	5.27	1.14	0.43	0.35	0.37	0.37
EP-8	1.03	0.86	0.06	0.01	0.08	0.08
EP-10	1.00	0.84	0.06	0.01	0.08	0.08
EP-11A	1.42	1.19	0.08	0.01	0.11	0.11
EP-11B	1.42	1.19	0.08	0.01	0.11	0.11
EP-58	2.94	2.47	0.16	0.02	0.22	0.22

⁽¹⁾ Shown in permit memorandum for estimation purposes only. The hourly emission rate is estimated using the annual permit limit for each EUG divided by 2,080 hours per year of operation.

Emission Summary (Annual)

EU-Point	NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}
	TPY	TPY	TPY	TPY	TPY	TPY
EP-125	2.25	1.89	0.12	0.01	0.17	0.17
EP-61	2.19	1.84	0.12	0.01	0.17	0.17
EP-64	0.64	0.54	0.04	<0.01	0.05	0.05
EP-65	0.64	0.54	0.04	<0.01	0.05	0.05
EP-66	0.64	0.54	0.04	<0.01	0.05	0.05
EP-67	0.64	0.54	0.04	<0.01	0.05	0.05
EP-68	0.43	0.36	0.02	<0.01	0.03	0.03
EP-69	0.64	0.54	0.04	<0.01	0.05	0.05
EP-70	0.64	0.54	0.04	<0.01	0.05	0.05
EP-71	0.64	0.54	0.04	<0.01	0.05	0.05
EP-72	0.64	0.54	0.04	<0.01	0.05	0.05
EP-73	0.64	0.54	0.04	<0.01	0.05	0.05
EP-74	0.64	0.54	0.04	<0.01	0.05	0.05
EP-75	0.64	0.54	0.04	<0.01	0.05	0.05
EP-76	3.22	2.71	0.18	0.02	0.24	0.24
EP-77	1.29	1.08	0.07	0.01	0.1	0.1
EP-78	1.12	0.94	0.06	0.01	0.08	0.08
EP-79	1.29	1.08	0.07	0.01	0.1	0.1
EP-80	1.29	1.08	0.07	0.01	0.1	0.1
EP-81	1.29	1.08	0.07	0.01	0.1	0.1
EP-82	1.07	0.9	0.06	0.01	0.08	0.08
EP-83	1.29	1.08	0.07	0.01	0.1	0.1
EP-84	1.29	1.08	0.07	0.01	0.1	0.1
EP-26	--	--	80.0	--	0.03	0.03
EP-27	--	--		--	0.08	0.08
EP-28	--	--		--	0.04	0.04
EP-29	--	--		--	0.04	0.04
EP-30	--	--		--	0.04	0.04
EP-31	--	--		--	0.04	0.04
EP-32	--	--		--	--	--
EP-38	--	--		--	0.10	0.10

EU-Point	NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}
	TPY	TPY	TPY	TPY	TPY	TPY
EP-39	--	--		--	0.05	0.05
EP-40	--	--		--	0.05	0.05
EP-41	--	--		--	0.05	0.05
EP-42	--	--		--	0.05	0.05
EP-43	--	--		--	0.05	0.05
EP-48	--	--		--	0.05	0.05
EP-49	--	--		--	0.05	0.05
EP-50	--	--		--	0.05	0.05
EP-51	--	--		--	0.05	0.05
EP-52	--	--		--	0.05	0.05
EP-53	--	--		--	0.05	0.05
EP-54	--	--		--	0.05	0.05
EUG 5, 6, 7	--	--	6.9	--	--	--
EP-110	0.89	1.50	0.01	0.01	0.01	0.01
EP-111	0.38	0.65	0.01	<0.01	<0.01	<0.01
EP-112	0.47	0.8	0.01	<0.01	<0.01	<0.01
EP-113	0.15	0.25	<0.01	<0.01	<0.01	<0.01
EP-114	0.12	0.2	<0.01	<0.01	<0.01	<0.01
EP-115	0.18	0.3	<0.01	<0.01	<0.01	<0.01
EP-116	0.47	0.1	0.04	0.03	0.03	0.03
EP-117	1.32	0.28	0.11	0.09	0.09	0.09
EP-8	4.49	3.77	0.25	0.03	0.34	0.34
EP-10	4.38	3.68	0.24	0.03	0.33	0.33
EP-11A	6.21	5.22	0.34	0.04	0.47	0.47
EP-11B	6.21	5.22	0.34	0.04	0.47	0.47
EP-58	12.88	10.82	0.71	0.08	0.98	0.98
Insignificant Activities	24.16	20.29	1.33	0.15	1.83	1.83
Total	87.37	74.14	91.71⁽¹⁾	0.66	7.46⁽²⁾	7.46⁽²⁾

⁽¹⁾ Total VOC as shown in the table accounts for the permit limit of 80TPY from the coating booth(s) contribution. Without the permit limit, facility-wide potential emissions of VOC is estimated to be approximately 161.26 TPY.

⁽²⁾ Total PM as shown in the table accounts for the permit limit of 0.70 TPY from the coating booth(s) contribution. Without the permit limit and control device permit requirements, potential PM from the facility is approximately 101 TPY.

Hazardous Air Pollutants (HAPs)

Since the individual HAP exceeds 10 TPY and combined HAP is greater than 25 TPY, the facility is considered a major source of HAP emissions.

SECTION VII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the construction permit application are duplicated below. Appropriate recordkeeping of activities indicated below with “*” is specified in the Specific Conditions (hours, quantity, or capacity). Any activity to which a state or federal applicable requirement applies is not insignificant even if it is included on this list.

- a. Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas).

IA ID#	Equipment	Bldg. #	Manufacturer	Fuel	Rating (MMBTUH)
EP-90	Autoclave #2 AC-7	B605	TEC	NG	4.5
EP-91	Autoclave #3 AC-8	B605	Alameda Tank	NG	4.5
EP-92	Autoclave #4 AC-4	B605	TEC	NG	4.5
EP-93	Autoclave #5 AC-5	B605	TEC	NG	4.5
EP-95	Autoclave #9 AC-11	B605	Walton Process Tech	NG	4.6
EP-96	Autoclave #10 AC-12	B119	Walton Process Tech	NG	4.6
EP-97	Boiler #10	B119	Campus Microflame	NG	1.2
EP-98	Boiler #11	B119	Campus Microflame	NG	1.2
EP-99	Boiler #14	B118	Lochinvar PowerFin	NG	0.75
EP-100	Boiler #15	B118	Lochinvar PowerFin	NG	0.75
EP-101	Boiler #16	B057	Lochinvar PowerFin	NG	1.0
EP-102	Boiler #17	B057	Lochinvar PowerFin	NG	1.0
EP-103	Boiler #18	B057	Lochinvar PowerFin	NG	1.0
EP-107	Boiler #23	B605	Lochinvar PowerFin	NG	1.0
EP-108	Boiler #24	B605	Lochinvar PowerFin	NG	1.0
EP-109	Boiler #20	B605	Lochinvar PowerFin	NG	0.645
EP-122	Boiler #25	B001	Lochinvar PowerFin	NG	0.5
EP-123	Boiler #26	B001	Lochinvar PowerFin	NG	0.5
EP-124	Boiler #27	B609	Lochinvar PowerFin	NG	1.0
EP-126	Boiler #29	B609	Lochinvar PowerFin	NG	1.0
EP-129	Boiler #32	B004	Lochinvar PowerFin	NG	1.0
EP-130	Boiler #33	B004	Lochinvar PowerFin	NG	1.0

The various combustion sources listed in this group have similar emission factors and are treated as a single entity (for emission estimation purposes) with combined heat input of 41.745 MMBTUH. Emissions are estimated based on emission factors from Tables 1.4-1 and 2 of AP-42 (7/98), fuel heating value of 1,020 BTU/SCF, Continuous operation, or 8,760 hours per year.

Pollutant	Emission Factor	Units	Emissions	
			lb/hr	TPY
NO _x	100	lb/MMSCF	4.09	17.93
CO	84	lb/MMSCF	3.44	15.06
VOC	5.5	lb/MMSCF	0.23	0.99

SO ₂	0.6	lb/MMSCF	0.02	0.11
PM ₁₀	7.6	lb/MMSCF	0.31	1.36

- b. *Emissions from fuel storage/dispensing equipment operated solely for facility-owned vehicles if fuel throughput is not more than 2,175 gallons per day (gpd), averaged over a 30-day period.

There is a 1,000-gallon unleaded gasoline tank at Building 604 and a 300-gallon unleaded gasoline tank at Building 003. The aggregate of all fuel dispensing averages approximately 57 gpd or 20,805 gpy. Recordkeeping will be required in the Specific Conditions.

- c. *Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia.

There a 250-gallon tank storing diesel fuel for firefighting equipment and a 1,000-gallon diesel tank at Building 003. Recordkeeping will be required in the Specific Conditions.

- d. *Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant.

IA-ID#	Equipment	Manufacturer	Rating, MMBTUH	Stack information			Date
				Height, ft	Diam., in	CFM	
EP-89	Autoclave #1 AC-9	Thermal Equip.	6.5	18	28	1,218	1985
EP-94	Autoclave #6 AC-1	TEC	8	20	30	1,499	2003

The combustion sources listed in this group have similar emission factors and are treated as a single entity (for emission estimation purposes) with combined heat input of 14.5 MMBTUH. Emissions are estimated based on emission factors from Tables 1.4-1 and 2 of AP-42 (7/98), fuel heating value of 1,020 BTU/SCF, Continuous operation, or 8,760 hours per year.

Pollutant	Emission Factor	Units	Emissions	
			lb/hr	TPY
NO _x	100	lb/MMSCF	1.42	6.23
CO	84	lb/MMSCF	1.19	5.23
VOC	5.5	lb/MMSCF	0.08	0.34
SO ₂	0.6	lb/MMSCF	0.01	0.04
PM ₁₀	7.6	lb/MMSCF	0.11	0.47

SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations listed in OAC 252:100, Appendix Q. These requirements are addressed in the “Federal Regulations” section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in “attainment” of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Required annual information (Turn-Around Document) shall be provided to Air Quality. Emission inventories have been submitted and fees paid for the past years.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility that result in emissions not authorized in the permit and that exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities refer to those individual emission units either listed in Appendix I or whose actual calendar year emissions do not exceed the following limits.

1. 5 TPY of any one criteria pollutant
2. 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAP or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule

Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from the construction and operating permit applications, or are developed from the applicable requirement.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible, but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emissions event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess event describing the extent of the event and the actions taken by the owner or operator

in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emissions event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]
 Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter (PM)) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy.

The following table lists all equipment items, their individual limits, and expected emissions. All fuel burning equipment is in compliance with the particulate matter emission limits contained in Appendix C.

EU-Point	Maximum Heat Input (MMBTUH)	Appendix C Emission Limit (lb/MMBTU)	Potential Emission Rate (lb/MMBTU)
EP-125	5.25	0.60	0.0076
EP-61	5.10	0.60	0.0076
EP-64	1.5	0.60	0.0076
EP-65	1.5	0.60	0.0076
EP-66	1.5	0.60	0.0076
EP-67	1.5	0.60	0.0076
EP-68	1.0	0.60	0.0076
EP-69	1.5	0.60	0.0076
EP-70	1.5	0.60	0.0076
EP-71	1.5	0.60	0.0076
EP-72	1.5	0.60	0.0076
EP-73	1.5	0.60	0.0076
EP-74	1.5	0.60	0.0076
EP-75	1.5	0.60	0.0076
EP-76	7.5	0.60	0.0076
EP-77	3.0	0.60	0.0076
EP-78	2.6	0.60	0.0076
EP-79	3.0	0.60	0.0076
EP-80	3.0	0.60	0.0076
EP-81	3.0	0.60	0.0076
EP-82	2.5	0.60	0.0076
EP-83	3.0	0.60	0.0076
EP-84	3.0	0.60	0.0076
EP-110	1.61	0.60	0.0194

EU-Point	Maximum Heat Input (MMBTUH)	Appendix C Emission Limit (lb/MMBTU)	Potential Emission Rate (lb/MMBTU)
EP-111	0.70	0.60	0.0194
EP-112	0.86	0.60	0.0194
EP-113	0.27	0.60	0.0194
EP-114	0.22	0.60	0.0194
EP-115	0.32	0.60	0.0194
EP-116	0.48	0.60	0.31
EP-117	1.36	0.60	0.31
EP-8	10.46	0.60	0.0076
EP-10	10.21	0.59	0.0076
EP-11A	14.47	0.55	0.0076
EP-11B	14.47	0.55	0.0076
EP-58	30.0	0.46	0.0076
Insignificant Activity(s)	56.25*	0.60*	0.0076

* Represents the combined heat input from all units. The heat input value for each combustion equipment contained in the insignificant activity list have an individual heat input of less than 10 MMBTUH; thus each individually having an Appendix C limit of 0.60 lb/MMBTU. All the insignificant combustion equipment are natural gas-fired.

Section 19-12 limits particulate emissions from emission points in an industrial process and direct-fired fuel-burning equipment based on process weight rate, as specified in Appendix G. As shown on the following table, all emission units are in compliance with Subchapter 19. Continuous compliance with the Appendix G emission limit is ensured by requiring particulate control during all coating operations and performing periodic monitoring which has been incorporated into the specific conditions of the permit.

EU-Point	Process Rate * (TPH)	Appendix G Emission Limit (lb/hr)	Potential Emission Rate (lb/hr)
EP-26	0.01	0.17	0.09
EP-27	0.02	0.32	0.23
EP-28	0.01	0.20	0.11
EP-29	0.01	0.20	0.11
EP-30	0.01	0.20	0.11
EP-31	0.01	0.20	0.11
EP-38	0.02	0.32	0.23
EP-39	0.01	0.20	0.11
EP-40	0.01	0.20	0.11
EP-41	0.01	0.20	0.11
EP-42	0.01	0.20	0.11
EP-43	0.01	0.20	0.11
EP-48	0.01	0.20	0.11
EP-49	0.01	0.20	0.11
EP-50	0.01	0.20	0.11
EP-51	0.01	0.20	0.11

EU-Point	Process Rate * (TPH)	Appendix G Emission Limit (lb/hr)	Potential Emission Rate (lb/hr)
EP-52	0.01	0.20	0.11
EP-53	0.01	0.20	0.11
EP-54	0.01	0.20	0.11

*Note that the process rate considers the maximum hourly spray rate of each booth and the weight of the paint solids in the supercoat (see EUG 3 section in the memo).

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]
 No discharge of greater than 20% opacity is allowed except for short-term occurrences that consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. When burning natural gas there is very little possibility of exceeding these standards. Proper combustion practices for the equipment that uses diesel maintains compliance with this subchapter. The permit requires maintenance of the paint booth filters to ensure compliance with the opacity standard.

OAC 252:100-29 (Fugitive Dust) [Applicable]
 No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originated in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or to interfere with the maintenance of air quality standards. Under normal operating conditions, this facility has negligible potential to violate this requirement; therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Oxides) [Part 5Applicable]
Part 2 limits the ambient air concentration of hydrogen sulfide (H₂S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 µg/m³. Fuel-burning equipment fired with commercial natural gas will not have the potential to exceed the H₂S ambient air concentration limit. The other processes at this facility do not produce substantial amounts of H₂S.
Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972. For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For natural gas having a gross calorific value of 1,020 BTU/SCF, this limit corresponds to fuel sulfur content of 1,208 ppmv. The only combustion sources at this facility are space heaters which are all fired on commercially available pipeline natural gas. “Pipeline natural gas” is defined in Part 72 as having 0.5 grains TRS/100-SCF, which corresponds to a fuel sulfur content below the fuel sulfur content derived from the standard. The permit requires the use of commercial pipeline grade natural gas in order to demonstrate compliance with the standard. For liquid fuels the limit is 0.80 lb/MMBTU heat input averaged over 3 hours. Based on the selected emission factors from AP-42, sulfur dioxide from the diesel-fired emergency engines would not exceed 0.01 lb/MMBTU. The engines are required by Subpart ZZZZ to combust only ultra-low sulfur (15 ppm) fuel, which is in compliance with the standard.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
 This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.20 lb-NOx per MMBTU heat input, three-hour average. There is no equipment that exceeds the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]
 This subchapter affects gray iron cupolas, blast furnaces, basic oxygen furnaces, petroleum catalytic cracking units, and petroleum catalytic reforming units. There are no affected sources.

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]

Part 3 concerns the control of volatile organic compounds in storage and loading operations.

Section 37-15(a) requires that all storage tanks with capacity greater than 40,000 gallons and storing a VOC with a vapor pressure greater than 1.5 psia shall be pressure vessels or shall be equipped with one of the identified vapor-loss control devices. The facility has no tanks at or above the threshold capacity.

Section 37-15(b) requires storage tanks with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia, to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The 300 gallon gasoline tank is not required to have a submerged fill pipe, since it is less than 400 gallons. The permitted B604 gasoline tank is equipped with a submerged-fill pipe, indicating compliance.

Part 5 concerns the control of VOCs in coating operations.

Section 37-25 requires the owner or operator of any coating line or coating operation with VOC emissions shall use coatings that as applied contain VOCs in excess of the amounts listed in the table. Emissions from the clean-up with VOCs of any article, machine, or equipment used in applying coatings shall be counted in determining compliance with this rule. OAC 252:100-37-25(a), coating type limits are expressed in pounds (lbs) of VOC per gallon of coating-as applied, excluding the volume of any water and exempt organic compounds.

Spirit is an aerospace maintenance and rework facility that is subject to the coating limits under OAC 252:100-39-47. Per OAC 252:100-39-47, Coating operations subject to Section 39-47 are exempt from the requirements of OAC 252:100-37-25. There is potential for coatings otherwise not covered under Subchapter 39-47, including any non-aerospace industrial coatings used at the facility, which could be subject to the limits in Subchapter 37-25. Coating operations at Spirit that are otherwise not subject to Section 39-47 could be subject to the coating limits in OAC 252:100-37-25 (listed below). Spirit currently does not have any coatings subject to the requirements of Section 37-25 at this time, but could become subject to this rule in the future.

Coating Type Limits (As Applied) from OAC 252:100-37-25

Coating Type	Definition	Limitation (lb-VOC/gal)
Alkyd primer	A chemical coating composed primarily of alkyd applied to a surface to provide a firm bond between the substrate and any additional coating	4.8

Coating Type	Definition	Limitation (lb-VOC/gal)
Vinyl	A chemical coating containing plasticized or unplasticized polymers and co-polymers of vinyl acetate, vinyl chloride, polyvinyl alcohols or their condensation products. The primary mode of cure is solvent evaporation.	6.0
Nitrocellulose lacquer (NC lacquer)	A chemical coating containing nitrocellulose and suitable resinous modifiers. The primary mode of cure is solvent evaporation.	6.4
Acrylics	A chemical coating containing polymers or co-polymers of acrylic or substitute acrylic acid in combination with resinous modifiers. The primary mode of cure is solvent evaporation.	6.0
Epoxies	A chemical coating containing epoxy groups and suitable chemical cross-linking agents. The primary mode of cure involves a chemical reaction between the epoxy and the cross-linking agent.	4.8
Maintenance finishes	A chemical coating that protects a given substrate from adverse chemical or physical conditions.	4.8
Custom products finish	A proprietary chemical coating designed for a specific customer and use.	6.5

Section 37-27 controls emissions of VOCs from aerospace industry coating operations effective September 15, 2020. Except as noted in OAC 252:100-37-27(a)(2) through (4), this Section applies to existing or new aerospace vehicle and component coating operations at aerospace manufacturing, rework, or repair facilities. For purposes of this Section, coating operations include associated cleaning operations as specified in OAC 252:100-37-27(c)(4) and surface preparation. Per OAC 252:100-39-47(a)(1), Coating operations subject to Section 39-47 are exempt from the requirements of OAC 252:100-37-25 and 252:100-37-27. Spirit is subject to the requirements of Section 39-47 for aerospace coating operations and is exempt from the requirements of Section 37-27.

Part 7 requires fuel-burning equipment to be operated and maintained so as to minimize VOC emissions. Temperature and available air must be sufficient to provide essentially complete combustion. The fuel-burning ovens, autoclaves, engines and boilers are affected under this requirement.

OAC 252:100-39 (VOC in Nonattainment & Former Nonattainment Areas) [Applicable]
 In addition to any application of the requirements contained in 252:100-37, the additional requirements contained in Subchapter 39 shall be required of existing and new facilities located in Tulsa and Oklahoma Counties.

Section 39-41 contains requirements for storage, loading, and transport/delivery of VOCs. Subsection 39-41(a) covers storage of VOCs in vessels with a storage capacity greater than 40,000 gallons. This facility does not have any VOC storage vessels with capacity greater than 40,000 gallons. Subsection 39-41(b) covers storage of VOCs in vessels with a storage capacity of 400-40,000 gallons. For the 1,000 gallon gasoline tank is subject to submerged fill pipe requirements, but is not be subject to the vapor recovery system unless it has an average daily throughput of 30,000 gallons or greater. The 300 gallon gasoline tank is not subject to this section.

Section 39-42 contains requirements for metal cleaning activities in Tulsa and Oklahoma County. Subsection 42 (a) covers cold solvent cleaning units, noting standards for construction and operation of such equipment. The requirements for cold solvent cleaning units are summarized in the table below. Per the inspection report from 2019, the cold cleaning solvent cleaning units on-site appear to be operated, stored, and tabled as required by OAC 252:100-39-42(a).

Summary of Cold Solvent Cleaning Unit Requirements

(1.) Equipment Requirements: An owner or operator of any cold cleaning unit for metal degreasing which uses a VOC shall	
A.	install a cover or door on the facility that can be easily operated with one hand;
B.	provide an internal drain board that will allow lid closure if practical; if not practical, provide an external drainage facility; and,
C.	attach a permanent, conspicuous label summarizing the operating requirements specified in 252:100-39-42(a)(2) to the facility.
(2.) Operating Requirements: As a minimum operators shall	
A.	drain clean parts at least 15 seconds or until dripping ceases before removal;
B.	close degreaser cover when not handling parts in cleaner;
C.	store waste VOC in covered containers;
D.	not dispose or allow disposition of waste VOC in such a manner that more than 20 percent by weight can evaporate into the atmosphere.
E.	use a solid fluid stream, not an atomized spray, when VOC is sprayed.
(3.) Requirements for Controls: If the vapor pressure of the VOC is greater than 0.6 psi (4.1 kPa) measured at 100°F (38°C) or if VOC is heated to 248°F (120°C), the owner or operator shall apply one or more of the following control devices/techniques.	
A.	Freeboard that gives a freeboard ratio greater than or equal to 0.7.
B.	Water cover where the VOC is insoluble in and denser than water or such equivalent.
C.	Another system of equivalent control as approved by the Division Director.

Subsection 42 (b) covers vapor-type metal degreasers, noting standards for construction and operation of such equipment. Paragraph 1 outlines equipment standards including doors and covers in Subparagraph A; safety switches in Subparagraph B; equipment specifications such as freeboard, chillers, etc., in Subparagraph C; and, conspicuous labeling of the equipment in Subparagraph D. Paragraph 2 describes the labeling information required to comply with Subparagraph 1(D). Paragraph 3 lists compliance and recordkeeping criteria. There are no operable vapor degreasers at the facility.

Section 39-46 limits the VOC content of coatings used in industries located in Tulsa County which manufacture and/or coat metal parts and products, such as large farm machinery, small farm

machinery, small appliances, commercial machinery, industrial machinery and fabricated metal products. Architectural coating, aerospace coating, and automobile refinishing are not included. OAC 252:100-37-25(a), coating type (1-5) limits are expressed in pounds (lbs) of VOC per gallon of coating-as applied, excluding the volume of any water and exempt organic compounds. If more than one limit listed in the table is applicable to a specific coating, then the least stringent limitation shall be applied.

Spirit is an aerospace maintenance and rework facility that is subject to the coating limits under OAC 252:100-39-47 for aerospace coating operations. There is potential for coatings otherwise not covered under Subchapter 39-47, including any non-aerospace industrial coatings used at the facility, which could be subject to the limits in Subchapter 39-46. Spirit currently does not have any coatings subject to the requirements of Section 39-46 at this time, but could become subject to this rule in the future.

Coating Type Limits (As Applied) from OAC 252:100-39

Coating Type	Definition	Limitation (lb-VOC/gallon)
Air or Forced Air Dry	A coating that are dried by the use of air or forced warm air at temperatures up to 194 F.	3.5
Clear Coat	A coating that lacks color and opacity or is transparent and uses the undercoat as a reflectant base.	4.3
Extreme Performance	A coatings designed for harsh exposure or extreme environmental conditions (e.g., exposure to the weather all of the time, temperature above 200°F, detergents, abrasive and scouring agents, solvents, corrosive atmosphere or similar conditions).	3.5
Powder	A coating that is applied in a finely divided state by various methods, and becomes a continuous, solid film when the metal part or product is moved to an oven for curing.	0.40
Other	All other coatings	3.0

Section 39-47 contains requirements for the control of VOC emissions from aerospace industries coatings operations. This section applies to existing or new aerospace vehicle and component coating operations at aerospace manufacturing, rework, or repair facilities located in Tulsa County that have the potential to emit 10 TPY or more of VOC, or actual emissions of 100 pounds or more per 24-hours day, on a monthly average, of VOC from coating operations. For purposes of this Section, coating operations include associated cleaning operations as specified in OAC 252:100-39-47(d)(4) and surface preparation. Coating operations subject to this Section are exempt from the requirements of OAC 252:100-37-25 and 252:100-37-27. Compliance with 40 CFR Part 63, Subpart GG is deemed to be compliance with all requirements of this Section.

OAC 252:100-40 (Control Of Emission Of Friable Asbestos)

[Applicable]

This subchapter regulates the release of friable asbestos to the ambient air during demolition and renovation operations. Section 40-5, in addition to the requirements set forth for the handling of asbestos found in 40 CFR Part 61, Subpart M, contains provisions for handling, containerizing, storing, transporting and disposal of friable asbestos during demolition or renovation operations as well as maintenance of existing asbestos. The facility is subject to this rule.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC shall be retained, unless a modification is approved by the Director. Because no AOC has been designated, there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Each emissions unit must be evaluated for periodic testing in accordance with the Periodic Testing Standardization guidance issued December 1, 2011, on a pollutant by pollutant basis. Periodic testing requirements are not required for an emission unit that is subject to an applicable requirement that already requires periodic testing, continuous emission monitoring (CEM), or predictive emission monitoring (PEMS). A statement of basis for each emission unit is outlined below.

Periodic Testing Review

Emission Unit (EU)	Pollutant	TPY	Current Monitoring	Periodic Testing (Y/N)
EUG 3	VOC	80.0 ¹	Part 63 ²	N
	HAPs	80.0 ¹	Part 63 ²	N
	PM ₁₀	0.70 ¹	Part 63 ²	N

⁽¹⁾ Representative of the combined permit limits for all coating booths. Potential emissions, without considering controls, is estimated to be VOC 149.3 TPY and PM₁₀ 95.1 TPY. Potential emissions of organic HAP and inorganic HAP are combined for purposes of the periodic testing review.

⁽²⁾ Emissions of VOC and Organic HAP from the coating booths can be verified through mass balance (where the mass of organic HAP and VOC emitted per unit volume of coating as applied for each coating formulation used is

calculated on a monthly basis as required by 40 CFR Part 63, Subpart GG). Emissions of inorganic HAP from the coating booths can be verified via mass balance and maintaining a specified control efficiency for inorganic HAP arrestors (filters) as required by 40 CFR Part 63, Subpart GG. Spirit utilizes filters certified by the filter manufacturer or distributor which serves as a surrogate to site-testing. Periodic testing is not recommended for the coating booths since emissions can be verified using the information supplied by the manufacture and/or distributor of the raw materials used.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

OAC 252:100-7	Minor Facilities	not in source category
OAC 252:100-11	Alternative Emissions Reduction	not eligible
OAC 252:100-15	Mobile (Motor Vehicle) Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Feed & Grain Elevators	not in source category
OAC 252:100-47	Municipal Solid Waste Landfills	not in source category

SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]
 PSD does not apply at this time. Final total emissions are less than the threshold of 250 TPY of any single regulated pollutant. This facility is not one of the listed stationary sources with an emission threshold of 100 TPY.

NSPS, 40 CFR Part 60 [Subparts Dc and JJJJ Applicable]
Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, affects steam generating units constructed after June 9, 1989, and with capacity between 10 and 100 MMBTUH. The boilers in the following table are affected units and subject to the requirements of Subpart Dc. Since the affected units will only combust natural gas, there are no emission standards that are applicable under this subpart. The facility is required to keep and maintain records of the amount of total natural gas fuel combusted, or delivered to each unit, during each calendar month.

EU-Point	Description	Serial #	Heat Input (MMBTUH)	Mfg. Date
EP-8	Cleaver Brooks Boiler #3	L-93558	10.46	1994
EP-10	Cleaver Brooks Boiler #5	OLO97177	10.21	1998
EP-11A	Cleaver Brooks Boiler #7	OLO98268	14.47	1998
EP-11B	Cleaver Brooks Boiler #8	OLO98269	14.47	1998

Subpart Kb, Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. This subpart affects VOL storage tanks with a capacity above 19,813 gallons. Volatile organic liquid (VOL) means any organic liquid which can emit volatile organic compounds (as defined in 40 CFR §51.100) into the atmosphere. The gasoline and diesel fuel tanks are below the threshold capacity of the rule.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE), promulgates emission standards for all new SI engines that commenced construction after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. EP-110 was manufactured in 2010 and subject to this subpart. Emergency engines greater than 25 HP and manufactured after January 1, 2009, are subject to the emission limits in Table 1 of Subpart JJJJ. Per §60.4243(b), the owner/operator may demonstrate compliance with the emissions standards by purchasing an engine certified according to procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section. Spirit previously submitted a copy of the US EPA certificate of conformity (COC) PWR-LSI-10-04 for this engine class, and therefore, can demonstrate continuous compliance in accordance with either paragraph (a)(1) of this section for certified engines operated in accordance with the manufacturer’s instructions or with paragraph (a)(2) for engines that were not operated in accordance with the manufacturer’s instructions and became non-certified. Since the engine has been issued a certificate of conformity, no performance testing is required.

NESHAP, 40 CFR Part 61 [Applicable]
Subpart M, National Emission Standard for Asbestos, The provisions of this subpart are applicable to those sources specified in §§61.142 through 61.151, 61.154, and 61.155. Specifically, §61.145,

Standard for Demolition and Renovation, affects facilities where demolition or renovation occurs in the presence of asbestos. The facility has been in compliance with this rule to date.

NESHAP, 40 CFR Part 63

[Subpart GG, ZZZZ, and DDDDD Applicable]

Subpart O, Ethylene Oxide Emissions Standards for Sterilization Facilities. This subpart affects all sterilization facilities using ethylene oxide in sterilization or fumigation operations. Sterilization facility means any stationary source where ethylene oxide is used in the sterilization or fumigation of materials. Spirit does not use ethylene oxide in the sterilization or fumigation of materials in the autoclaves on-site. This subpart is not applicable.

Subpart T, Halogenated Solvent Cleaners, applies to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. With the decommissioning and removal of the vapor degreaser in 2020 (formerly known as EP-46), the facility has no affected equipment under this regulation. Therefore, Subpart T is no longer applicable to this facility.

Subpart GG, Aerospace Manufacturing and Rework Facilities, applies to facilities that are engaged, either in part or in whole, in the manufacture or rework of commercial, civil, or military aerospace vehicles or components and that are major sources as defined in §63.2. Exempt sources defined by this rule include any primers, topcoats, chemical milling maskants, strippers, and cleaning solvent solutions that contain HAP and VOC <0.1% for carcinogens; <1% noncarcinogens. The facility is subject to this rule. Per the last FCE evaluation in 2019, the affected sources to which the provisions of this subpart apply are as follows.

(a) Each cleaning operation as follows:

- i. All hand-wipe cleaning operations constitute an affected source. The facility complies by using solvent(s) that have a composite vapor pressure of 45 mm Hg (24.1 in. H₂O) or less at 20 °C (68 °F) per 63.744 (b)(2) on all non-exempt hand wipe cleaning operations.
- ii. Each spray gun cleaning operation constitutes an affected source. Spirit uses non-atomized spray gun cleaning and disassembled spray gun cleaning techniques that meet the requirements of §63.744(c)(2) and (3).
- iii. All flush cleaning operations constitute an affected source. *Flush cleaning* is defined as the removal of contaminants such as dirt, grease, and coatings from an aerospace vehicle or component or coating equipment by passing solvent over, into, or through the item being cleaned. The solvent may simply be poured into the item being cleaned and then drained, or be assisted by air or hydraulic pressure, or by pumping.

(b) For organic HAP or VOC emissions, each primer and topcoat (including self-priming topcoat) application operation, which is the total of all primer applications at the facility. For primers and coatings, the facility complies with HAP or VOC level equal to or less than the levels specified in 63.745(c) (1-4).

- (c) For organic HAP or VOC emissions, each specialty coating application operation, which is the total of all specialty coating applications at the facility. The facility complies with HAP or VOC level equal to or less than the levels specified in Table 1 of Subpart GG.
- (d) For organic HAP or VOC emissions, each depainting operation, which is the total of all depainting at the facility. At this time (as indicated in the last FCE evaluation) the facility only performs operations that are considered exempt per 63.746(a)(3)(i).
- (e) Each chemical milling maskant application operation, which is the total of all chemical milling maskant applications at the facility.
- (f) Each waste storage and handling operation, which is the total of all waste handling and storage at the facility.
- (g) For inorganic HAP emissions, each spray booth, portable enclosure, or hangar that contains a primer, topcoat, or specialty coating application operation subject to §63.745(g), or a depainting operation subject to §63.746(b)(4). Spirit utilizes dry paint filters meeting the control efficiencies of §§63.745(g)(2)(i) and (ii).

Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products, was promulgated on August 29, 2003. An affected facility is one that uses at least 250 gallons per year of coatings that contain HAP, and is either major or located at a source that is major, as defined in 40 CFR 63.2. However, surface coating of metal components of aerospace vehicles that meet the applicability criteria for aerospace manufacturing and rework (40 CFR Part 63, subpart GG) and surface coating of metal parts intended for use in an aerospace vehicle or component using specialty coatings as defined in appendix A to Subpart GG of this part are exempt from the rule. This subpart does not apply to coatings used in volumes of less than 189 liters (50 gal) per year, provided that the total volume of coatings exempt under this paragraph does not exceed 946 liters (250 gal) per year at the facility. This subpart is not applicable at this time. Records sufficient to demonstrate that the facility continues in this status is required.

Subpart ZZZZ, Reciprocating Internal Combustion Engines, establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand. For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006. A stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006. All emergency generators on site are less than 500 brake HP and commenced construction before June 12, 2006 (with the exception of EP-110). Owners and operators of new engines and reconstructed engines at major sources meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines). EP-110 is subject to the requirements of this subpart. Per §63.6590(c), Stationary RICE subject to Regulations under 40 CFR Part 60 Subpart JJJJ, meet the requirements of this subpart by meeting

the requirements of Subpart JJJJ. EP-110 is in compliance with Subpart JJJJ; therefore, all requirements of this subpart are met.

The emission units in the table below (EP-111 – EP-117) are considered existing sources under Subpart ZZZZ. Owners and operators of new engines and reconstructed engines at major sources meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines). Per §63.6590(c), Stationary RICE subject to Regulations under 40 CFR Part 60 Subpart JJJJ, meet the requirements of this subpart by meeting the requirements of Subpart JJJJ. EP-110 is in compliance with Subpart JJJJ; therefore, all requirements of this subpart are met.

EU-Point	Description	Serial No.	Mfg. Date
EP-111	87-HP SI Generac Emergency Generator #2	SG060-G367.4NCBNNC	2005
EP-112	107-HP SI Kohler Emergency Generator #3	2236229	2005
EP-113	34-HP SI Generac Emergency Generator #4	2020669	2000
EP-114	27-HP SI Kohler Emergency Generator #5	751907	2003
EP-115	40-HP SI Kohler Emergency Generator #6	752210	2003
EP-116	60-HP CI MQ-Power Emergency Generator #7	7200316	1999
EP-117	170-HP CI Allis-Chalmers Fire-Pump Engine #1	4D-170-70	1980

EUG 10 units are subject to the requirements in Table 2(c) of this subpart which is summarized in the table below. In addition, the facility is required to operate the engine according to the requirements in paragraphs (f)(1) through (4) of §63.6640.

Table 2(c) of Subpart ZZZZ of Part 63

RICE Category	You must meet the following requirement, except during periods of startup...	During periods of startup you must...
Existing Emergency CI RICE	Change oil and filter every 500 hours of operation or annually, whichever comes first;	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
	Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and	
	Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	
Existing Emergency SI RICE	Change oil and filter every 500 hours of operation or annually, whichever comes first;	
	Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and	
	Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	

Subpart DDDDD, Industrial, Commercial and Institutional Boilers and Process Heaters, establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from at major sources of HAP. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and work practice standards. A boiler or process heater is new if construction commenced after June 4, 2010, and you meet the applicability criteria at the time you commence construction. Pursuant to §63.7491, the types of boilers and process heaters listed in paragraphs (a) through (n) are not subject to this subpart. Boilers identified as water heaters are specifically exempted from the subpart, per 40 CFR §63.7491(d). Autoclaves are specifically excluded from the definition of “process heater,” per 40 CFR §63.7575. Because all units are described as “Units designed to burn Gas 1 fuels,” no emission limitations apply.

For new and existing boilers and process heaters, with a heat input rating less than or equal to 5 MMBTUH designed to burn Gas 1 fuels, the facility must conduct a tune-up of the boiler or process heater every 5 years as specified in §63.7540. For new or existing boilers or process heaters with heat input capacity of less than 10 MMBTUH but greater than 5 MMBTUH, the facility must conduct a tune-up of the boiler or process heater biennially as specified in §63.7540. For new or existing boilers or process heaters with heat input capacity greater than or equal to 10 MMBTUH, the facility must conduct a tune-up of the boiler or process heater annually as specified in §63.7540.

For an existing boiler or process heater located at a major source facility, not including limited use units the facility must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table, satisfies the energy assessment requirement. A facility that operated under an energy management program developed according to the ENERGY STAR guidelines for energy management or compatible with ISO 50001 for at least one year between January 1, 2008, and the compliance date specified in §63.7495 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items a. to e. appropriate for the on-site technical hours listed in §63.7575:

- (1.) A visual inspection of the boiler or process heater system.
- (2.) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
- (3.) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.
- (4.) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
- (5.) A review of the facility's energy management program and provide recommendations for improvements consistent with the definition of energy management program, if identified.
- (6.) A list of cost-effective energy conservation measures that are within the facility's control.
- (7.) A list of the energy savings potential of the energy conservation measures identified.
- (8.) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

The following table summarizes the potential process combustion sources at the facility and their applicability under this subpart.

EU-Point	Description	Rating (MMBTUH)	Subpart DDDDD Applicability	Work Practice Standard Frequency
EP-125	Boiler #28	5.25	New Source	Conduct a tune-up of the boiler or process heater biennially as specified in §63.7540.
EP-61	Boiler #9	5.103	Existing Source	Conduct a tune-up of the boiler or process heater biennially as specified in §63.7540.
EP-64	Oven #1	1.5	Exempt Per §63.7575	NA
EP-65	Oven #2	1.5	Exempt Per §63.7575	NA
EP-66	Oven #3	1.5	Exempt Per §63.7575	NA
EP-67	Oven #5	1.5	Exempt Per §63.7575	NA
EP-68	Oven #6	1.0	Exempt Per §63.7575	NA
EP-69	Oven #15	1.5	Exempt Per §63.7575	NA
EP-70	Oven #16	1.5	Exempt Per §63.7575	NA
EP-71	Oven #17	1.5	Exempt Per §63.7575	NA
EP-72	Oven #18	1.5	Exempt Per §63.7575	NA
EP-73	Oven #19	1.5	Exempt Per §63.7575	NA
EP-74	Oven #20	1.5	Exempt Per §63.7575	NA
EP-75	Oven #22	1.5	Exempt Per §63.7575	NA
EP-76	Oven #24	7.5	Exempt Per §63.7575	NA
EP-77	Oven #25	3.0	Exempt Per §63.7575	NA
EP-78	Oven #26	2.6	Exempt Per §63.7575	NA
EP-79	Oven #27	3.0	Exempt Per §63.7575	NA
EP-80	Oven #28	3.0	Exempt Per §63.7575	NA
EP-81	Oven #29	3.0	Exempt Per §63.7575	NA
EP-82	Oven #30	2.5	Exempt Per §63.7575	NA
EP-83	Oven #31	3.0	Exempt Per §63.7575	NA
EP-84	Oven #32	3.0	Exempt Per §63.7575	NA
EP-8	Cleaver Brooks Boiler #3	10.46	Existing Source**	Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3.
EP-10	Cleaver Brooks Boiler #5	10.21	Existing Source	Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3.
EP-11A	Cleaver Brooks Boiler #7	14.47	Existing Source	Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3.

EU-Point	Description	Rating (MMBTUH)	Subpart DDDDD Applicability	Work Practice Standard Frequency
EP-11B	Cleaver Brooks Boiler #8	14.47	Existing Source	Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3.
EP-58	TEC Autoclave #8 AC-10	30.0	Exempt Per §63.7575	NA
EP-90	Autoclave #2 AC-7	4.5	Exempt Per §63.7575	NA
EP -91	Autoclave #3 AC-8	4.5	Exempt Per §63.7575	NA
EP -92	Autoclave #4 AC-4	4.5	Exempt Per §63.7575	NA
EP-93	Autoclave #5 AC-5	4.5	Exempt Per §63.7575	NA
EP-95	Autoclave #9 AC-11	4.7	Exempt Per §63.7575	NA
EP-96	Autoclave #10 AC-12	4.5	Exempt Per §63.7575	NA
EP-97	Boiler #10	1.2	Exempt Per §63.7491(d)	NA
EP-98	Boiler #11	1.2	Exempt Per §63.7491(d)	NA
EP-99	Boiler #14	0.75	Exempt Per §63.7491(d)	NA
EP-100	Boiler #15	0.75	Exempt Per §63.7491(d)	NA
EP-101	Boiler #16	1.0	Exempt Per §63.7491(d)	NA
EP-102	Boiler #17	1.0	Exempt Per §63.7491(d)	NA
EP-103	Boiler #18	1.0	Exempt Per §63.7491(d)	NA
EP-104	Boiler #19	1.0	Exempt Per §63.7491(d)	NA
EP-109	Boiler #20	0.645	Exempt Per §63.7491(d)	NA
EP-105	Boiler #21	0.5	Exempt Per §63.7491(d)	NA
EP-106	Boiler #22	0.5	Exempt Per §63.7491(d)	NA
EP-107	Boiler #23	1.0	Exempt Per §63.7491(d)	NA
EP-108	Boiler #24	1.0	Exempt Per §63.7491(d)	NA
EP-89	Autoclave #1 AC-9	6.5	Exempt Per §63.7575	NA
EP-94	Autoclave #6 AC-1	8.0	Exempt Per §63.7575	NA

(1) Process Heaters do not include units used for comfort heat or space heat, food preparation for on-site consumption, or autoclaves. These autoclave units appear to be exempt.

(2) Boiler identified as water heaters are specifically exempted from the subpart, per 40 CFR §63.7491(d).

(3) Curing ovens are indicated by the applicant to be direct fired, which is not included in the definition of process heater from this subpart.

**Per §63.7490(c) A boiler or process heater is reconstructed if you meet the reconstruction criteria as defined in §63.2, you commence reconstruction after June 4, 2010, and you meet the applicability criteria at the time you commence reconstruction. Facility has indicated that EP-8 will have to be repaired before being brought back on-line. The facility will have to assess if reconstruction has occurred at that time.

Subpart HHHHH, (Miscellaneous Coating Manufacturing), affects facilities defined in 40 CFR §63.7985, that manufactures coatings that contain HAP and is major or located at a major source, as major is defined in 40 CFR §63.2. An exemption exists for a facility subject to the Aerospace MACT (Subpart GG). Although the coatings manufactured are not themselves directly covered by Subpart GG, EPA considers this to be an affiliated activity at a facility subject to Subpart GG, and exempts

the facility from compliance with HHHHH (Per correspondence with Randy McDonald, representing EPA, on September 11, 2003).

Compliance Assurance Monitoring (CAM), 40 CFR Part 64 [Not Applicable]
CAM as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit, if it meets all the following criteria per §64.2(a):

- i. Unit is located at major source that is required to obtain Part 70 or 71;
- ii. Unit is subject to emission limitation or standard for the applicable pollutant;
- iii. Unit uses a control device to achieve compliance;
- iv. Potential pre-control emissions of applicable pollutant from unit are at least 100 percent of major source amount;
- v. Unit is not otherwise exempt.

The only units that might meet these criteria are units that are subject to 40 CFR Part 63, Subpart GG. Since both rules were proposed after November 15, 1990, the applicable emission units are exempt under CAM.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
Facilities that hold more than a threshold quantity of a regulated substance in a process are subject to this Subpart. Spirit does not store any of the listed substances at or above the thresholds listed in this regulation. More information on this federal program is available on the web page: <https://www.epa.gov/rmp>

Stratospheric Ozone Protection, 40 CFR Part 82 [Subparts A and F Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and

recycling and recovery equipment comply with the standards for recycling and emissions reduction.

Greenhouse Gas Reporting, 40 CFR Part 98

[Applicable]

The following rules are applicable to the facility but are not addressed in the permit because Oklahoma has not been delegated authority to enforce these rules.

Subpart A, General Provision

Subpart C, General Stationary Fuel Combustion Sources

SECTION X. COMPLIANCE

The Specific Conditions of this permit contain various testing, monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The specific method used to document compliance was based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

In addition to the permitting requirements, the following periodic inspections were conducted since issuance of the last Title V renewal permit.

Inspection Type	Date	Summary/Results
Full Inspection	5/16/2019	In compliance
Full Inspection	3/17/2017	In compliance

There have been no other enforcement actions since issuance of the last Title V renewal permit.

Performance Testing

Testing required under 40 CFR §63.750(o) is not performed by the facility. The manufacturers test filters and filter systems, and the facility is supplied with the test results. No other testing is required at this time.

SECTION XI. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

This application has been determined to be **Tier II** based on the request for renewal of a Part 70 operating permit. Part 70 operating permit renewal fee of \$7,500 has been received

Public Review

The applicant published the “Notice of Filing a Tier II Application” in the *Tulsa World* a daily newspaper in Tulsa County, on June 29, 2019. The notice stated that the application was available for public review at the DEQ Regional Office at Tulsa and at the DEQ main office in Oklahoma City, Oklahoma. The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>.

The applicant will publish a “Notice of Draft Tier II Permit” in a local newspaper for a 30 day public review period. The draft permit will also be available on the Air Quality section of the DEQ web page at <https://www.deq.ok.gov> during the 30 day public review period.

EPA Review

The proposed permit will go through a 45-day EPA review period after the public comment period has concluded.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of this subsection may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under this subsection, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under this subsection, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

State Review

This facility is not located within 50 miles of the Oklahoma border so no notice to other states is required.

SECTION XII. SUMMARY

The applicant has demonstrated compliance with all applicable air quality rules and regulations. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility. Issuance of the permit is recommended, contingent on public and EPA review.

**PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS**

**Spirit AeroSystems, Inc.
Tulsa Facility – 3300 North Mingo Road**

Permit Number 2019-0763-TVR3

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on July 1, 2019 and subsequent information submitted thereafter. The Evaluation Memorandum dated September 16, 2020, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein.

1. Points of emissions and emission limitations for each point. [OAC 252:100-8-6(a)]

EUG 1 Facility-Wide

This EUG is established to cover all rules or regulations that apply to the facility as a whole.

EUG 2 Combustion Sources (including NESHAP DDDDD Sources) (EP-125, EP-61, and EP-64 through EP-84) Emissions from the EUG 2 units shall be limited by, and will contribute to, the emission cap on NO_x, CO, VOC, SO₂, and PM_{10/2.5} emissions identified below.

Annual Emission CAP (TPY) for EUG 2

NO _x	CO	VOC	SO ₂	PM _{10/2.5}
25.06	21.06	1.42	0.17	1.92

- a. EUG 2 units shall be fired with commercial grade natural gas only. Compliance can be shown for gaseous fuel by a gas company bill. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]
- b. Compliance with the annual emission cap on NO_x, CO, VOC, SO₂, and PM_{10/2.5} for EUG 2 units shall be demonstrated by not exceeding a 512,022 MMBTU per year based on monthly, 12-month rolling total. Fuel use for each unit shall be calculated based on fuel metered for the South (or North, for units located on North Campus) Campus multiplied by a fraction whose denominator is the total rated heat input of all fuel-burning equipment fed by the South (or North) connection, and whose numerator is the rated heat input of each oven/boiler. [OAC 252:100-8-6(a)(1)]
- c. EP-125 and EP-61 are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP DDDDD) for Industrial, Commercial, and Institutional Boilers and Process Heaters. On or after the compliance date(s) specified in §63.7495, the permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD, including but not limited to, the following work practices standards and associated frequencies for the units outlined below. [40 CFR Subpart DDDDD (§§63.7480-63.7575, Table 1-13)]

EU-Point	MMBTUH	NESHAP DDDDD Classification	Work Practice Standard Frequency
EP-125	5.25	New Source	Conduct a tune-up of the boiler or process heater biennially as specified in §63.7540.
EP-61	5.103	Existing Source	Conduct a tune-up of the boiler or process heater biennially as specified in §63.7540. Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3.
EP-64	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-65	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-66	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-67	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-68	1.0	Exempt Per §63.7575	Exempt Per §63.7575
EP-69	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-70	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-71	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-72	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-73	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-74	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-75	1.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-76	7.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-77	3.0	Exempt Per §63.7575	Exempt Per §63.7575
EP-78	2.6	Exempt Per §63.7575	Exempt Per §63.7575
EP-79	3.0	Exempt Per §63.7575	Exempt Per §63.7575
EP-80	3.0	Exempt Per §63.7575	Exempt Per §63.7575
EP-81	3.0	Exempt Per §63.7575	Exempt Per §63.7575
EP-82	2.5	Exempt Per §63.7575	Exempt Per §63.7575
EP-83	3.0	Existing Source	Conduct a tune-up of the boiler or process heater every 5 years as specified in §63.7540
EP-84	3.0	Exempt Per §63.7575	Exempt Per §63.7575

EUG 3 Coating Booths (EP-26—EP-32, EP-38—EP-43, and EP-48—EP-54) Emissions from the surface coating operations, regardless of their classification under any of various rules or regulations that may apply, shall be limited by, and will contribute to, the emission cap on PM₁₀, VOC, and HAP emissions identified in the table below.

Authorized Coating Emissions in TPY

Pollutant	TPY
VOC	80.0
PM ₁₀	0.70

- (a) Compliance with the annual emission cap on VOC and PM₁₀, emissions for EUG 3 shall be demonstrated on a monthly, 12-month rolling total basis. Each month, the facility shall record the total volume of each coatings, thinners, and solvents used (alternatively inventory and/or purchasing records may be used for this record), assuming 100% volatilization of the VOC maximum percentage of the component from the safety data sheets (alternatively the manufacture or supplier provided specific component percentages can be used if records are retained), and shall calculate emissions of VOC for that month, which shall then be added to the rolling 12-month total. For PM₁₀, each month the facility shall record the volume of each coatings used (alternatively inventory and/or purchasing records may be used for this record) and shall calculate emissions of PM₁₀ for that month, which shall then be added to the 12-month rolling total. [OAC 252:100-8-6(a)]
- (b) The VOC content of coatings used at the facility, as applied, less water and exempt solvents, shall not exceed the following limits and shall include all solvents used to cleanup any article, machine, or equipment used in applying coatings. Per OAC 252:100-39-47, Coating operations subject to Section 39-47 are exempt from the requirements of OAC 252:100-37-25. VOC emissions from clean-up solvents used in applying coatings may be determined as the difference between the amounts used minus the amounts recovered for disposal and then included in the calculation of the VOC content for each applied coating. [OAC 252:100-37-25]

Coating Type	VOC Content Limitations, as applied
	lb/gallon
Alkyd Primers	4.8
Epoxies	4.8
Maintenance Finishes	4.8
Vinyls	6.0
Acrylics	6.0
NC lacquers	6.4
Custom Product Finishes	6.5

- (c) The VOC content of coatings applied to metal parts and products, with the exception of architectural coating, aerospace coating, and automobile refinishing which are not included, used at the facility shall not exceed the following limits, as applied, less water and exempt solvents. VOC emissions from cleanup solvents shall be included when determining

compliance with the limitations of VOC per gallon of coating less water and exempt solvents, unless those solvents are recycled into the system or disposed of in such a manner that would prevent their evaporation into the atmosphere. Compliance with the coating limits listed in 252:100-39-46(d) is to be calculated on a daily weighted average basis.[OAC 252:100-39-46]

Coating Type	VOC Content Limitations, as applied
	lb/gallon
Air or Forced Air Dry	3.5
Clear Coat	4.3
Extreme Performance	3.5
Powder	0.4
Other	3.0

(d) The VOC content of specialty coatings, where “*specialty coating*” means a coating that, even though it meets the definition of a primer, topcoat, or self-priming topcoat, has additional performance criteria beyond those of primers, topcoats, and self-priming topcoats for specific applications. These performance criteria may include, but are not limited to, temperature or fire resistance, substrate compatibility, antireflection, temporary protection or marking, sealing, adhesively joining substrates, or enhanced corrosion protection, used in aerospace industries coating operations shall not exceed the levels specified in Appendix N of OAC 252:100.

[OAC 252:100-39-47, Appendix N of OAC 252:100]

(e) The requirements of OAC 252:100-39-47(d)(1) do not apply to the use of primers, topcoats, chemical milling maskants, and specialty coatings for which the annual total of each separate formulation used at the facility does not exceed 50 gal and the combined annual total of all such primers, topcoats, chemical milling maskants, and specialty coatings used at the facility does not exceed 200 gal. Primers, topcoats, and chemical milling maskants exempt under OAC 252:100-39-47(a) are not included in the 50 and 200 gal limits. [OAC 252:100-39-47(d)(1)(D)]

(f) For organic HAP or VOC emissions, each primer, topcoat, specialty coating and repainting application operation, and for inorganic HAP emissions, each spray booth or hanger that contains a primer, topcoat, specialty coating or repainting operation, is subject to NESHAP Subpart GG for Aerospace Manufacturing and Rework Facilities. On or after the compliance date(s) specified in §63.749, the permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart GG,

[40 CFR Part 63 Subpart GG (§§63.741-63.759, Appendix A to Subpart GG)]

(1.) For uncontrolled organic HAP and VOC coatings, each owner or operator shall comply with the organic HAP and VOC content limits (less water and exempt solvents) specified in §§63.745(c)(1) through (6) of Subpart GG for those coatings that are uncontrolled. Compliance with the organic HAP and VOC content limits specified in §§63.745(c)(1) through (6) of Subpart GG shall be accomplished by using the methods specified in §63.745(e)(1) and (2) of Subpart GG either by themselves or in conjunction with one another. Records shall be kept in accordance with §§63.745(c)(1) through (4) of Subpart GG for each coating application operation.

[§§63.745(c)(1) through (c)(6), §§63.745(e)(1) and (2), and §§63.745(c)(1) through (4)]

- (2.) Permittee shall use the following application equipment methods and housekeeping measures for all coating application operations. [§63.745(b), §63.745(f)]
- i. Each owner or operator shall conduct the handling and transfer of primers, topcoats, and specialty coatings to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.
 - ii. Except as provided in paragraph (f)(3) of §63.745, each owner or operator of a new or existing primer, topcoat (including self-priming topcoat), or specialty coating application operation subject to this subpart in which any of the coatings contain organic HAP or VOC shall comply with the requirements specified in paragraphs (f)(1) and (f)(2) of §63.745.
- (3.) For inorganic HAP coatings, except those contained in §63.745(g)(4), each owner or operator of a new or existing primer, topcoat, or specialty coating application operation subject to this subpart in which any of the coatings that are spray-applied and contain inorganic HAP, shall comply with the applicable below. [§63.745(g)(1) through (3)]
- i. Apply these coatings in a booth, hangar, or portable enclosure in which air flow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets.
 - ii. For existing booths #3 (EP-28), #7 (EP-32), #16 (EP-41) and #17 (EP-42) before exhausting to the atmosphere, the facility shall pass the air stream through a dry particulate filter system certified using the methods described in §63.750(o) to meet or exceed the efficiency data points in Tables 2 and 3 of §63.745. Filters must be certified by the filter manufacturer or distributor, paint/depainting booth supplier, and, or facility owner or operator that the filters meet or exceed these efficiency data points. Certification must be based on Method 319 testing located in Appendix A of Subpart GG and kept with the facility's records. Existing booths #16 (EP-41) and #17 (EP-42) are scheduled for conversion and shall meet the "new" booth standards upon completion of conversion.
 - iii. For new booths #1 (EP-26), #2 (EP-27), #4 (EP-29), #5 (EP-30), #6 (EP-31), #13 (EP-38), #14 (EP-39), #15 (EP-40), and #18-25 (EP-43; EP-48 through EP-54), before exhausting it to the atmosphere, pass the air stream through a dry particulate filter system certified using the methods described in §63.750(o) to meet or exceed the efficiency data points in Tables 4 and 5 of §63.745. Filters must be certified by the filter manufacturer or distributor, paint/depainting booth supplier, and, or facility owner or operator that the filters meet or exceed these efficiency data points. Certification must be based on Method 319 testing located in Appendix A of Subpart GG and kept with the facility's records.
 - iv. All new and existing booths shall be equipped with dry particulate filter systems and shall be maintained in good working order. Permittee shall install a differential pressure gauge across the filter banks in each booth, and shall continuously monitor the pressure drop across the filter and read and record the pressure drop once per shift, or install an interlock system that will automatically shut down the coating spray application system if the pressure

drop exceeds or falls below the filter manufacturer's recommended limit(s); and shut down the operation immediately and take corrective action by when the pressure drop exceeds or falls below the filter manufacturer's recommended limit(s). Facility shall keep records the acceptable limit(s) of pressure drop as specified by the filter or booth manufacturer.

EUG 4 Empty

EUG 5 Solvent Cleaning (Hand-Wipe and Flush Cleaning): Emissions from hand-wipe cleaning operations and flush cleaning operations shall be limited to the following.

(a) All hand wipe and flush cleaning operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart GG for Aerospace Manufacturing and Rework Facilities. On or after the compliance date(s) specified in §63.749, the permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart GG, including but not limited to, the following. [40 CFR Part 63 Subpart GG (§§63.741-63.759, Appendix A to Subpart GG)]

- (1.) All hand wipe cleaning operations shall use cleaning solvents that meet one of the requirements specified below. [40 CFR §63.744(b)(1) through (b)(2)]
 - i. Meet one of the composition requirements in Table 1 of §63.744;
 - ii. Have a composite vapor pressure of 45 mm Hg (24.1 in. H₂O) or less at 20 °C (68 °F). Where the composite vapor pressure is determined by following §63.750(b).
 - iii. If option (a) is used, the facility shall record the following: name of each cleaning solvent used, demonstration that the cleaning solvent complies with one of the composition requirements, and annual records of the volume of each solvent used, from facility purchase or usage records. If option 2 is used, the facility shall record the following: name of each cleaning solvent used, composite vapor pressure of each cleaning solvent used, all vapor pressure test results (if appropriate), data, and calculations used to determine the composite vapor pressure of each cleaning solvent, the amount (in gallons) of each cleaning solvent used each month at each operation (purchase records may be used if you can link the quantity of materials to each operation). If a cleaning solvent used in an exempt hand-wipe cleaning operation doesn't conform to the vapor pressure or composition requirements in option (a) or (b), record all of the following: the identity and amount (in gallons) of each cleaning solvent used each month at each operation (purchase records may be used if you can link the quantity of material to each operation) and a list of exempt operations in which these solvents are being used. Recordkeeping is still required if you use a noncompliant cleaning solvent on an exempt operation. [40 CFR §63.752(b)(2) through (b)(4)]

- (2.) All flush cleaning operations shall meet one of the requirements specified below. [40 CFR §63.744(d)]

- i. Use only cleaning solvents that satisfy option 1 under “Cleaning Operations”; or are semi-aqueous cleaners (defined as a solution in which 60% of the solvent solution as applied is water).
 - ii. Empty flushed solvent into an enclosed container or collection system that is kept closed when not in use.
 - iii. If option 1 is used, the facility shall record the following: name of each cleaning solvent used, all data and calculations that demonstrate that the cleaning solvent complies with the composition requirements, and annual records of the volume of each solvent used, as determined from facility purchase or usage records.
[40 CFR §63.752(b)(2)]
- (3.) General housekeeping measures dealing with the handling and disposal of solvent-laden materials, the storage of fresh and used solvents, and the handling and transfer of cleaning solvents, apply to all cleaning operations. [40 CFR §63.744(a)]

EUG 6 Paint Gun Cleaning: Emissions from each spray gun cleaning operation shall be limited to the following:

- (a) Each spray gun cleaning operation is considered a separate affected source and subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP GG) for Aerospace Manufacturing and Rework Facilities. On or after the compliance date(s) specified in §63.749, the permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart GG, including but not limited to, the following.
[40 CFR Subpart GG (§§63.741-63.759, Appendix A to Subpart GG)]
- (1.) Each affected spray gun cleaning operation shall use one or more of the techniques or their equivalent, specified below. [40 CFR §§63.744(c)(1) through (c)(4)]
- i. **An enclosed system.** Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. Facility shall perform a visually inspection seals and other sources of leaks on a monthly basis as required in §63.751(a). If leaks are found the repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed, and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
 - ii. **Non-atomized cleaning.** Without the use of atomizing air, clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.
 - iii. **Disassembled spray gun cleaning.** Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
 - iv. **Atomized Cleaning.** Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

- v. If an enclosed system (option 1) for spray gun cleaning is used, the facility must record the following for each leak found: source identification and the date leak was discovered. [40 CFR §63.752(b)(5)]
- (2.) General housekeeping measures dealing with the handling and disposal of solvent-laden materials, the storage of fresh and used solvents, and the handling and transfer of cleaning solvents, apply to all cleaning operations. [40 CFR §63.744(a)(1) through (a)(4)]

EUG 7 Waste Storage and Handling Emissions from each spray gun cleaning operation shall be limited to the following:

- (a) Each waste storage and handling operation, which is the total of all such operations at a facility, is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP GG) for Aerospace Manufacturing and Rework Facilities. On or after the compliance date(s) specified in §63.749, the permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart GG, including but not limited to, the following. [40 CFR Subpart GG (§§63.741-63.759, Appendix A to Subpart GG)]
 - (1.) The owner or operator of each facility subject to this subpart that produces a waste that contains organic HAP from aerospace primer, topcoat, specialty coating, chemical milling maskant, or chemical depainting operations must be handled and stored as specified below. The requirements of paragraphs (a)(1) and (a)(2) of this section do not apply to spent wastes that contain organic HAP that are subject to and handled and stored in compliance with 40 CFR parts 262 through 268 (including the air emission control requirements in 40 CFR Part 265, Subpart CC). [40 CFR §63.748]
 - i. Conduct the handling and transfer of the waste to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.
 - ii. Store all waste that contains organic HAP in closed containers.

EUG 8 Empty

EUG 9 NSPS Reciprocating Internal Combustion Engines (EP-110) Emissions shall be limited to the following:

- (a) Operation of the emergency engine is limited to 100 hours per calendar year for any combination of purposes specified in 40 CFR 60.4243(d)(2). There is no time limit on the use of emergency stationary ICE in emergency situations. [40 CFR §60.4243(d), OAC 252:100-8-6(a)]
- (b) EP-110 shall be equipped with a non-resettable hour meter. [OAC 252:100-8-6(a), 40 CFR 60.4237(b)]
- (c) EP-110 shall have a permanent identification plate attached, which shows the make, model number, and serial number. [OAC 252:100-43]

- (d) EP-110 shall be fired with commercial grade natural gas defined in Part 72 as having 0.5 grains/100 SCF. Compliance can be shown for gaseous fuel by a gas company bill. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]
- (e) EP-110 is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ. Per §63.6590(c), Stationary RICE subject to Regulations under 40 CFR Part 60 Subpart JJJJ, meet the requirements of this subpart by meeting the requirements of Subpart JJJJ. [40 CFR Part 63 Subpart ZZZZ (§§63.6580-63.6675, Table 1-Table 8, Appendix A to Subpart ZZZZ)]
- (f) EP-110 is an affected unit and subject to the applicable requirements of NSPS Subpart JJJJ, for each affected spark ignition reciprocating internal combustion engine (RICE), including but not limited to, the following.
[40 CFR Part 60 Subpart JJJJ (§60.4230-60.4248, Table 1-Table 4)]
- i. §60.4230 Am I subject to this subpart?
 - ii. §60.4233 What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?
 - iii. §60.4234 How long must I meet the emissions standards if I am an owner or operator of a stationary SI internal combustion engine?
 - iv. §60.4236 What is the deadline for importing or installing stationary SI ICE produced in the previous model year?
 - v. §60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?
 - vi. §60.4244 What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?
 - vii. §60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?
 - viii. §60.4246 What parts of the General Provisions apply to me?

EUG 10 Reciprocating Internal Combustion Engines (Non-NSPS) (EP-111 through EP-117) Emission from EUG 10 units shall be limited to the following:

- (a) Operation of each emergency engine is limited to 100 hours per calendar year for any combination of purposes specified in 40 CFR 63.6635(f)(2). There is no time limit on the use of emergency stationary ICE in emergency situations 40 CFR 63.6635(f)(1).
[40 CFR §60.6635(f), OAC 252:100-8-6(a)]
- (b) Each engine contained in EUG 10 shall be equipped with a non-resettable hour meter.
[OAC 252:100-8-6(a), §63.6625(e)(10)(f)]
- (c) EUG 10 units shall have a permanent identification plate attached, which shows the make, model number, and serial number.
[OAC 252:100-43]

- (d) EP-116 and EP-117 shall be fueled with diesel fuel containing a maximum sulfur content of 15 ppm by weight. Compliance shall be demonstrated by fuel delivery tickets. Compliance shall be demonstrated at least once every calendar year.
[OAC 252:100-31, 40 CFR Part 63 Subpart ZZZZ]
- (e) EP-111 through EP-115 shall be fired with commercial grade natural gas only. Compliance can be shown for gaseous fuel by a gas company bill. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]
- (f) EUG 10 units is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP ZZZZ) for Stationary Reciprocating Internal Combustion Engines. On or after the compliance date(s) specified in §63.6595, the permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart ZZZZ, including but not limited to, the following.
[40 CFR Subpart ZZZZ (§§63.6580-63.6675, Table 1-Table 8, Appendix A to Subpart ZZZZ)]

EUG 11 Combustion Sources (NSPS Dc and NESHAP DDDDD) (EP-8, EP-10, EP-11A, EP-11B, EP-58) Emissions from the EUG 11 units shall be limited by, and will contribute to, the emission cap on NO_x, CO, VOC, SO₂, and PM_{10/2.5} emissions identified below.

Annual Emission CAP (TPY) for EUG 11

NO _x	CO	VOC	SO ₂	PM _{10/2.5}
34.17	28.71	1.88	0.22	2.59

- (a) EUG 11 units shall be fired with commercial grade natural gas only. Compliance can be shown for gaseous fuel by a gas company bill. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]
- (b) Compliance with the annual emission cap on NO_x, CO, VOC, SO₂, and PM_{10/2.5} for EUG 11 units shall be demonstrated by not exceeding a 698,960 MMBTU per year based on monthly, 12-month rolling totals. Fuel use for each unit shall be calculated based on fuel metered for the South (or North, for units located on North Campus) Campus multiplied by a fraction whose denominator is the total rated heat input of all fuel-burning equipment fed by the South (or North) connection, and whose numerator is the rated heat input of each unit.
[OAC 252:100-8-6(a)(1)]
- (c) EP-8, EP-10, EP-11A, and EP-11B are subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units. On or after the compliance date(s) specified in §63.7495, the permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Dc, including but not limited to, the following work practices standards and associated frequencies for the units outlined below
[40 CFR Part 60 Subpart Dc (§§60.40c-60.48c)]
 - i. For each affected facility, meaning each unit affected, the facility shall demonstrate compliance through recording and maintaining records of the amount of each fuel combusted during each calendar month, or by recording and maintaining records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. The method for calculating fuel combusted is described in b. above.
[40 CFR §60.48c(g)(2) through (g)(3)]

(d) EP-8, EP-10, EP-11A, and EP-11B are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP DDDDD) for Industrial, Commercial, and Institutional Boilers and Process Heaters. On or after the compliance date(s) specified in §63.7495, the permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD, including but not limited to, the following work practices standards and associated frequencies for the units outlined below. [40 CFR Part 63 Subpart DDDDD (§§63.7480-63.7575, Table 1-13)]

EU-Point	MMBTUH	Subpart DDDDD Classification	Work Practice Standard Frequency
EP-8	10.46	Fep-8EP	Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3. Conduct a tune-up of the boiler or process heater annually as specified in §63.7540.
EP-10	10.21	Existing Source	Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3. Conduct a tune-up of the boiler or process heater annually as specified in §63.7540.
EP-11A	14.47	Existing Source	Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3. Conduct a tune-up of the boiler or process heater annually as specified in §63.7540.
EP-11B	14.47	Existing Source	Must have a one-time energy assessment performed by a qualified energy assessor as specified in Table 3. Conduct a tune-up of the boiler or process heater annually as specified in §63.7540.

3. Sufficient data to demonstrate that the use of coatings potentially affected by MACT MMMM does not exceed 250 gallons per year shall be maintained. [40 CFR §63.3881(b)]
4. The following records preceded by an asterisk shall be maintained on-site to verify Insignificant Activities. The owner/operator shall be able to keep records on alternative media such as: microfilm, computer files, compact disks, magnetic tape disks, or microfiche, provided it does not conflict with other applicable recordkeeping requirements. [OAC 252:100-8-2, OAC 252:100-8-6 (a)(3)(B)]
 - i. Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas).

IA ID#	Equipment	Bldg. #	Manufacturer	Fuel	Rating (MMBTUH)
EP-90	Autoclave #2 AC-7	B605	TEC	NG	4.5

IA ID#	Equipment	Bldg. #	Manufacturer	Fuel	Rating (MMBTUH)
EP-91	Autoclave #3 AC-8	B605	Alameda Tank	NG	4.5
EP-92	Autoclave #4 AC-4	B605	TEC	NG	4.5
EP-93	Autoclave #5 AC-5	B605	TEC	NG	4.5
EP-95	Autoclave #9 AC-11	B605	Walton Process Tech	NG	4.6
EP-96	Autoclave #10 AC-12	B119	Walton Process Tech	NG	4.6
EP-97	Boiler #10	B119	Campus Microflame	NG	1.2
EP-98	Boiler #11	B119	Campus Microflame	NG	1.2
EP-99	Boiler #14	B118	Lochinvar PowerFin	NG	0.75
EP-100	Boiler #15	B118	Lochinvar PowerFin	NG	0.75
EP-101	Boiler #16	B057	Lochinvar PowerFin	NG	1.0
EP-102	Boiler #17	B057	Lochinvar PowerFin	NG	1.0
EP-103	Boiler #18	B057	Lochinvar PowerFin	NG	1.0
EP-107	Boiler #23	B605	Lochinvar PowerFin	NG	1.0
EP-108	Boiler #24	B605	Lochinvar PowerFin	NG	1.0
EP-109	Boiler #20	B605	Lochinvar PowerFin	NG	0.645
EP-122	Boiler #25	B001	Lochinvar PowerFin	NG	0.5
EP-123	Boiler #26	B001	Lochinvar PowerFin	NG	0.5
EP-124	Boiler #27	B609	Lochinvar PowerFin	NG	1
EP-126	Boiler #29	B609	Lochinvar PowerFin	NG	1
EP-129	Boiler #32	B004	Lochinvar PowerFin	NG	1
EP-130	Boiler #33	B004	Lochinvar PowerFin	NG	1

- ii. *Emissions from fuel storage/dispensing equipment operated solely for facility-owned vehicles if fuel throughput is not more than 2,175 gallons per day (gpd), averaged over a 30-day period. There is one (1) 1,000-gallon unleaded gasoline tank at Building 604 and a 300-gallon unleaded gasoline tank at Building 003. Facility is required to keep records of the fuel dispensed (monthly and annual).
- iii. *Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia. There a 250-gallon tank storing diesel fuel for firefighting equipment and a 1,000-gallon diesel tank at Building 003. Facility is required to keep records of the fuel delivered to the units (monthly and annual).
- iv. *Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. Records of the potential to emit for each of the units below.

IA ID#	Equipment	Manufacturer	Fuel	Rating, MMBTUH	Date
EP-89	Autoclave #1 AC-9	Thermal Equip.	NG	6.5	1985
EP-94	Autoclave #6 AC-1	TEC	NG	8	2003

5. All records required shall be made available to regulatory personnel upon request. These records shall be maintained for a period of at least five years after the time they are made. Such records may include, but are not necessarily limited to the following.

[OAC 252:100-43]

- A. A current natural gas supplier bill to demonstrate that commercial grade natural gas has been used to fuel the natural gas combustion units (once every calendar year per supplier);

- B. Total fuel usage (in units of MMBTU) for EUG 2 units (monthly, 12 month rolling total);
 - C. Safety Data Sheets (SDS) for all products used, which document the VOC content, HAP content, and solids content of each as applied coating, solvents, or thinners used;
 - D. Records (inventory and/or purchasing) of usage for all coatings, solvents and thinners (daily);
 - E. Total emissions of VOC, PM₁₀, and HAPs for EUG 3 (monthly, 12-month rolling total);
 - F. Records for determining compliance with OAC 252:100-37-25;
 - G. Records for determining compliance with OAC 252:100-39-46;
 - H. Records for determining compliance with OAC 252:100-39-47;
 - I. Records for organic HAP and VOC from each primer, topcoat, specialty coating and repainting application operation, and for inorganic HAP, each spray booth or hanger that contains a primer, topcoat, specialty coating or repainting operation coating operations covered by 40 CFR Part 63, Subpart GG;
 - J. Records of dry particulate filter certifications (for each new and existing paint booth) by the filter manufacturer or distributor, paint/repainting booth supplier, and, or facility owner or operator that the filters meet or exceed these efficiency data points of §63.745 (Subpart GG). The documentation should include a statement that they are certified based on Method 319 testing located in Appendix A of Subpart GG;
 - K. Records of the acceptable limit(s) of pressure drop certified by the filter or booth manufacturer for each dry particulate control system on each paint booth. The document should be directly from the filter or booth manufacturer;
 - L. Records of pressure differential readings for each booth (once per shift) and corrective action taken if above or below the acceptable limit(s) of pressure drop certified by the filter or booth manufacturer;
 - M. Records of test and maintenance records per the requirements in OAC 252: 100-39-42(b);
 - N. Records for hand-wipe and flush cleaning activities covered by 40 CFR Part 63, Subpart GG;
 - O. Records for paint gun cleaning activities covered by 40 CFR Part 63, Subpart GG;
 - P. Records required by 40 CFR Part 63, Subpart ZZZZ;
 - Q. Records required by 40 CFR Part 60, Subpart JJJJ;
 - R. Total fuel usage (in units of MMBTU) for EUG 11 units (monthly, 12 month rolling total);
 - S. Records required by 40 CFR Part 60, Subpart Dc;
 - T. Records required by 40 CFR Part 63, Subpart DDDDD;
 - U. Records required by 40 CFR Part 63, Subpart MMMM;
 - V. Records verifying all insignificant activities listed in Specific Condition No. 3.
6. No later than 30 days after each anniversary date of the issuance of the original Part 70 permit (December 23, 2003), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]
7. This Part 70 permit supersedes all other Air Quality operating permits for this facility, which are now superseded and cancelled.
8. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility.

[OAC 252:100-8-6(d)(2)]

- OAC 252:100-11 Alternative Reduction
- OAC 252:100-15 Mobile Sources
- OAC 252:100-17 Incinerators
- OAC 252:100-23 Cotton Gins
- OAC 252:100-24 Feed & Grain Facility
- OAC 252:100-47 Municipal Solid Waste Landfills

**MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(June 21, 2016)**

SECTION I. DUTY TO COMPLY

A. This is a permit to operate this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

[OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

[OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards (“NSPS”) under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants (“NESHAPs”) under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM₁₀). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

[OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

[OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege.

[OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued.

[OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances:

[OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
- (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d).

[OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a "grandfathered source," as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited.

[OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
- (2) the permitted facility was at the time being properly operated;

- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

- B. 5 tons per year of any one criteria pollutant.
- C. 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- A. Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- B. No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- C. For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
 - a. Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
 - b. Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
 - c. An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
 - d. Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- D. No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of

adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

- E. No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- F. Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- G. All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be

- certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
 - (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
 - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.
1. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed



PART 70 PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 N. ROBINSON, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2019-0769-TVR3

Spirit AeroSystems, Inc.,

having complied with the requirements of the law, is hereby granted permission to operate the Tulsa Facility at 3330 N. Mingo Road, Tulsa, Tulsa County, Oklahoma, subject to standard conditions dated June 21, 2016, and specific conditions, both attached.

This permit shall expire five (5) years from the date below, except as authorized under Section VIII of the Standard Condition

Director, Air Quality Division

Date



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Attn. Mark Lawson, P.E.
Spirit AeroSystems, Inc.
P.O. Box 582808
Tulsa, OK 74158-2808

SUBJECT: Part 70 Renewal Permit No. 2019-0769-TVR3
Spirit Tulsa Facility
Section 24, Township 20N, Range 13E; Tulsa, Tulsa County, OK

Dear Mr. Lawson:

Air Quality Division has completed review of your permit application for the above referenced facility. The application has been determined to be a Tier II. In accordance with 27A O.S. §2-14-302 and OAC 252:4-7-13(c), the draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps which you must accomplish:

1. Publish at least one legal notice (one day) in newspaper of general circulation *within the county* where the facility is located (see attached instructions).
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of this draft permit at a convenient location within the county of the facility.
3. At the end of the public review period, send to AQD a copy of the proof of publication notice (from Item #1) above together with any public comments that you may have received.

After the draft permit completes public review, the proposed permit will be submitted to EPA review. Note that the time period for EPA review is 45-days. Contingent on public and EPA review, the permit will be issued. Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at (918) 293-1622.

Sincerely,

A handwritten signature in black ink that reads 'Phillip Fielder'.

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Enclosures:
Notice of Draft Permit Instructions

NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION
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APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD. Note that if either the applicant or the public requests a public meeting, this must be arranged through the Customer Services Division of the DEQ.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE on page 2.

SAMPLE NOTICE (*Italicized print is to be filled in by the applicant.*):

DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT

A Tier ...II or III... application for an air quality ...type of permit or permit action being sought [e.g., Construction Permit for a Major Facility]... has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.

The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be]... located at ...physical address (if any), driving directions, and legal description including county....

In response to the application, DEQ has prepared a draft permit (Permit Number: ...xx-xxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review in the Air Quality Section of DEQ's Web Page: <http://www.deq.ok.gov>

This draft permit would authorize the facility to emit the following regulated pollutants (*list each pollutant and amounts in tons per year (TPY)*).

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below. [*Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.*] A public meeting on the draft permit may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ/CSD staff.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8. [*For Construction Permits, add: The requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process. Therefore, no additional opportunity to provide comments or EPA review, EPA objection, and petitions to EPA will be available to the public when requirements from the construction permit are incorporated into the Title V permit.*]

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45 day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j). Information on all permit actions and applicable review time lines is available in the Air Quality section of the DEQ Web page: <http://www.deq.ok.gov>.

For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Permits Section, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677, (405) 702-4100.

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
7-1-20

ACFM	Actual Cubic Feet per Minute	HCFC	Hydrochlorofluorocarbon
AD	Applicability Determination	HON	Hazardous Organic NESHAP
AFRC	Air-to-Fuel Ratio Controller	HP	Horsepower (hp)
API	American Petroleum Institute	HR	Hour (hr)
ASTM	American Society for Testing and Materials	H₂S	Hydrogen Sulfide
BACT	Best Available Control Technology	I&M	Inspection and Maintenance
BHP	Brake Horsepower (bhp)	IBR	Incorporation by Reference
BTU	British thermal unit (Btu)	IC	Internal Combustion
C&E	Compliance and Enforcement	LAER	Lowest Achievable Emission Rate
CAA	Clean Air Act	LB	Pound(s) [Mass] (lb, lbs, lbm)
CAM	Compliance Assurance Monitoring	LB/HR	Pound(s) per Hour (lb/hr)
CAS	Chemical Abstract Service	LDAR	Leak Detection and Repair
CAAA	Clean Air Act Amendments	LNG	Liquefied Natural Gas
CC	Catalytic Converter	LT	Long Ton(s) (metric)
CD	Consent Decree	M	Thousand (Roman Numeral)
CEM	Continuous Emission Monitor	MAAC	Maximum Acceptable Ambient Concentration
CFC	Chlorofluorocarbon	MACT	Maximum Achievable Control Technology
CFR	Code of Federal Regulations	MM	Prefix used for Million (Thousand-Thousand)
CI	Compression Ignition	MMBTU	Million British Thermal Units (MMBtu)
CNG	Compressed Natural Gas	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
CO	Carbon Monoxide or Consent Order	MMSCF	Million Standard Cubic Feet (MMscf)
COM	Continuous Opacity Monitor	MMSCFD	Million Standard Cubic Feet per Day
D	Day	MSDS	Material Safety Data Sheet
DEF	Diesel Exhaust Fluid	MWC	Municipal Waste Combustor
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MWe	Megawatt Electrical
EGU	Electric Generating Unit	NA	Nonattainment
EI	Emissions Inventory	NAAQS	National Ambient Air Quality Standards
EPA	Environmental Protection Agency	NAICS	North American Industry Classification System
ESP	Electrostatic Precipitator	NESHAP	National Emission Standards for Hazardous Air Pollutants
EUG	Emissions Unit Group	NH₃	Ammonia
EUSGU	Electric Utility Steam Generating Unit	NMHC	Non-methane Hydrocarbon
FCE	Full Compliance Evaluation	NO₂	Nitrogen Dioxide
FIP	Federal Implementation Plan	NO_x	Nitrogen Oxides
FR	Federal Register	NOI	Notice of Intent
GACT	Generally Achievable Control Technology	NSCR	Non-Selective Catalytic Reduction
GAL	Gallon (gal)	NSPS	New Source Performance Standards
GDF	Gasoline Dispensing Facility	NSR	New Source Review
GEP	Good Engineering Practice	O₃	Ozone
GHG	Greenhouse Gases	O&G	Oil and Gas
GR	Grain(s) (gr)	O&M	Operation and Maintenance
HAP	Hazardous Air Pollutants	O&NG	Oil and Natural Gas
HC	Hydrocarbon		

OAC	Oklahoma Administrative Code	SCF	Standard Cubic Foot
OC	Oxidation Catalyst	SCFD	Standard Cubic Feet per Day
PAH	Polycyclic Aromatic Hydrocarbons	SCFM	Standard Cubic Feet per Minute
PAL	Plant-wide Applicability Limit	SCR	Selective Catalytic Reduction
Pb	Lead	SER	Significant Emission Rate
PBR	Permit by Rule	SI	Spark Ignition
PCB	Polychlorinated Biphenyls	SIC	Standard Industrial Classification
PCE	Partial Compliance Evaluation	SIP	State Implementation Plan
PEA	Portable Emissions Analyzer	SNCR	Selective Non-Catalytic Reduction
PFAS	Per-and Polyfluoroalkyl Substance	SO₂	Sulfur Dioxide
PM	Particulate Matter	SO_x	Sulfur Oxides
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	SOP	Standard Operating Procedure
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	T	Tons
POM	Particulate Organic Matter Or Polycyclic Organic Matter	TAC	Toxic Air Contaminant
ppb	Parts per Billion	THC	Total Hydrocarbons
ppm	Parts per Million	TPY	Tons Per Year
ppmv	Parts per Million Volume	TRS	Total Reduced Sulfur
ppmvd	Parts per Million Dry Volume	TSP	Total Suspended Particulates
PSD	Prevention of Significant Deterioration	TV	Title V of the Federal Clean Air Act
psi	Pounds per Square Inch	US EPA	U. S. Environmental Protection Agency
psia	Pounds per Square Inch Absolute	VMT	Vehicle Miles Traveled
psig	Pounds per Square Inch Gage	VOC	Volatile Organic Compound
RACT	Reasonably Available Control Technology	VRU	Vapor Recovery Unit
RATA	Relative Accuracy Test Audit	YR	Year
RICE	Reciprocating Internal Combustion Engine	µg/m³	Micrograms Per Cubic Meter
RO	Responsible Official	2SLB	2-Stroke Lean Burn
ROAT	Regional Office at Tulsa	4SLB	4-Stroke Lean Burn
RVP	Reid Vapor Pressure	4SRB	4-Stroke Rich Burn
SCC	Source Classification Code		