

STATEMENT OF BASIS

**Commercial Jet, Inc.
Dothan, Alabama
Dale County
Facility Number 604-0027**

Introduction

On December 23, 2023, the Department received an application to renew the Title V Major Source Operating Permit (MSOP) for the Commercial Jet facility at Dothan Airport. The proposed Title V MSOP may be issued under the provisions of ADEM Admin. Code R. 335-3-16. The above-named applicant has requested authorization to operate the facility shown on the application on file with the Air Division of the Alabama Department of Environmental Management (ADEM), in accordance with the terms and conditions of the permit. The Standard Industrial Classification (SIC) code for Airports, Flying Fields, and Airport Terminal Services is 4581. The North American Industry Classification System (NAICS) code for Other Support Activities for Air Transportation is 48819.

The initial Title V MSOP for this facility was issued to PEMCO World Air Services (PEMCO), the previous permittee for this facility, on February 14, 2001. Commercial Jet resumed operations at this facility in 2013 after PEMCO shut down in October 2012, and an initial air permit was issued to Commercial Jet on July 30, 2013. The initial Title V MSOP for Commercial Jet was issued on June 24, 2014, and this is the second renewal. The current MSOP was issued on June 24, 2019, with an expiration date of June 23, 2024. The current MSOP was administratively continued because a timely and complete application was submitted to the Department per ADEM Admin. Code r. 335-3-16-.12(2)(c).

The facility is located in Dale County, which is currently in compliance with the National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Commercial Jet necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov/> (Search using Facility ID AL0000000104500027).

Background

Commercial Jet does major maintenance, repairs, and overhaul including installing cargo doors on older jets, which are used to carry large cargo containers. This facility also converts aircraft from passenger craft to cargo work. Aerospace rework operations will include both commercial and military projects.

Some paints and cleaning solvents will be applied by brush and cloth in each of the operations buildings at this facility. The largest source of air emissions at this facility is the main paint hangar. Solvents will also be used to remove old paint in this building. Most of these solvents contain little hazardous air pollutants (HAP) or volatile organic compounds (VOC) content. The facility has a total of eighty 0.3 MMBTU/hr natural gas heaters that are used to heat the hangars.

PEMCO's operations at this facility were subject to 40 CFR 63 Subpart GG, the National Emission Standards for Aerospace Manufacturing and Rework Facilities, because the facility was a major source of HAP per §63.741(a). Commercial Jet continues to perform the same operations that PEMCO did; therefore, Commercial Jet is a designated source that continues to be subject to Subpart GG per §63.1(c)(6)(iii).

Facility Emissions

The facility-wide potential to emit (PTE) values and most recent actual emissions are listed on the table below. Emissions are estimated from material usage and 8,760 hours of operation per year.

Pollutant	Facility PTE (TPY)	Actual Emissions 2025 (TPY)
VOC	102.31	48.46
NO _x	50.91	1.48
SO _x	1.59	0.00
CO	8.75	0.152
PM _{Total}	0.92	0.0033
Phenol	0.06	0.00
MIBK (Hexone)	0.34	0.00
Toluene	1.82	0.00
Xylenes	1.97	0.00
Ethylbenzene	0.42	0.0057
Hexane	0.23	0.0027
Dibutyl Pthalate	0.06	--
Zinc Compounds	0.37	--
Antimony Compounds	0.09	0.057
Manganese Compounds	8.34	2.97
Chromium Compounds	0.40	1.88
Cadmium Compounds	0.20	0.00
Lead Compounds	4.76	0.00
Formaldehyde	0.02	--
Nickle Compounds	0.02	0.00
Styrene	0.06	0.00
Total HAP	19.16	4.92

Aircraft repair and other support activities for air transportation is not a listed source that has a major source threshold of 100 tons per year (TPY) for all regulated New Source Review (NSR) pollutants under ADEM Code R. 335-3-14-.04(2)(a)(1). Therefore, Commercial Jet is not a major source for the Prevention of Significant Deterioration (PSD) program because potential emissions are less than 250 tons per year for all regulated NSR pollutants. The carbon dioxide (CO₂) emissions are from the combustion of natural gas to heat the hangars and diesel fuel usage for static engine testing. Air emissions of other greenhouse gasses are expected to be trivial. This facility is allowed to operate 8,760 hours per year unless otherwise specified. Based on the Title V permit application, this facility is a major source for VOCs.

Summary of Changes from the Existing Permit

No requested changes to facility units or operations were included in the Title V renewal application.

Emission Units

The following is a list of all facility sources that will be part of the Title V Major Source Operating Permit:

Permit Unit Number	Description of Unit
001	Sheet Metal Shop (Hangar 1)
002	General Maintenance (Hangars 2, 6, 7, 8, 15)
003	Aircraft Painting/Stripping & Washing (Hangar 12)
004	Composite Shop (Hangar 14)
005	RICE (Hangar 6, 12, and 15 Emergency Generators, and Fire Water Pumps PH1 and PH2)

001: Sheet Metal Shop (Hangar 1)

Overview

In this area, aluminum sheets are sheered, milled, and drilled to the required shape before being cleaned, and painted. Bench scale stripping, cleaning, and painting will be done in this area. Alodine will be used for chromate conversion.

Emission Standards

Volatile Organic Compounds and Hazardous Air Pollutants

VOC and HAP emissions from this area are expected to be less than one ton per year. The painting, cleaning, and chemical milling done in this area will be subject to 40 CFR 63 Subpart GG, the National Emission Standards for Aerospace Manufacturing and Rework Facilities.

Monitoring and Reporting

Volatile Organic Compounds and Hazardous Air Pollutants

Uncontrolled VOC and HAP emissions from paints and applied coatings are limited by §63.745(c) of 40 CFR 63 Subpart GG, the National Emission Standards for Aerospace Manufacturing and Rework Facilities, and are listed in Table 1:

Table 1

Coating Type	VOC Limit (g/L)	HAP Limit (g/L)
Primer	350	350
General Aviation Rework	540	540
Topcoat	420	420
Topcoat for GA Rework	540	540

Commercial Jet submits air emissions reports and Subpart GG compliance reports for all facility operations to the Department no later than the 15th day of the month following the end of each calendar quarter.

002: General Maintenance Areas (Hangars 2, 6, 7, 8, 15)

Overview

Work in these areas may include stripping, cleaning, priming, and painting of aircraft components. Alodine coating may also be performed in these areas.

Emission Standards

Volatile Organic Compounds and Hazardous Air Pollutants

The amount of chemicals used in these hangars is expected to be small. Chemical usage will be used to determine the air emissions from this facility. Potential emissions from the general rework operations are estimated to be 9 tons of VOC, 1 ton of glycol ethers, and 1 ton of methyl ethyl ketone in any twelve-month period. The painting done in areas other than Hangar 12 is expected to be applied by brush. The painting, cleaning, and chemical milling operations in all hangars will be subject to 40 CFR 63 subpart GG.

Monitoring and Reporting

Volatile Organic Compounds and Hazardous Air Pollutants

Uncontrolled VOC and HAP emissions from paints and applied coatings are limited by §63.745(c) of 40 CFR 63 Subpart GG, the National Emission Standards for Aerospace Manufacturing and Rework Facilities and are listed in Table 1. Commercial Jet submits air emissions reports and Subpart GG compliance reports for all facility operations to the Department no later than the 15th day of the month following the end of each calendar quarter.

003: Aircraft Painting/Stripping & Washing (Hangar 12)

Overview

Hangar 12 will be used for washing, stripping, and painting. Spray painting will be done in this area with high volume low pressure (HVLP) guns. Chromate conversion may also be done in this area. The primary chemical used for paint removal is benzyl alcohol, a VOC. Ventilation air exhausts through a set of mounted exhaust fans, each equipped with an Engineered Systems, Inc. particulate filter. The filter bank differential pressure is normally 0.35-1.35 in. H₂O and is monitored using pressure gauges connected to the system. The manufacturer rating for this filter system is 95% removal efficiency of particles greater than 2.0 µm in diameter, which is compliant with the inorganic HAP emission limits listed in §63.745(g) of 40 CFR 63 Subpart GG. Accumulated hazardous waste is shipped offsite to an approved landfill.

Emission Standards

Volatile Organic Compounds and Hazardous Air Pollutants

Potential air emissions from this area are estimated to be 11 tons of VOC in any twelve-month period. The operation in this hangar will be subject to 40 CFR 63 subpart GG.

Monitoring and Reporting

Volatile Organic Compounds and Hazardous Air Pollutants

Uncontrolled VOC and HAP emissions from paints and applied coatings are limited by §63.745(c) of 40 CFR 63 Subpart GG, the National Emission Standards for Aerospace Manufacturing and Rework Facilities and are listed in Table 1. The particulate matter (PM) emissions for Hangar 12

are limited by §63.745(g) of 40 CFR 63 Subpart GG. Commercial Jet submits air emissions reports and Subpart GG compliance reports for all facility operations to the Department no later than the 15th day of the month following the end of each calendar quarter.

004: Composite Shop (Hangar 14)

Overview

Hangar 14 will be used to repair fiberglass and other composite components along with small commercial aerospace parts. Air exhausts through a set of mounted exhaust fans, each equipped with a Donaldson/Torit particulate filter. The filter bank differential pressure is normally 2-4 in. H₂O and is monitored using pressure gauges connected to the system. The manufacturer rating for this filter system is 95% removal efficiency of particles greater than 2.0 µm in diameter, which is compliant with the inorganic HAP emission limits listed in §63.745(g) of 40 CFR 63 Subpart GG. Accumulated hazardous waste is shipped to an approved landfill.

Emission Standards

Volatile Organic Compounds and Hazardous Air Pollutants

Potential air emissions from this work are estimated to be less than one ton per year of VOC. The painting, cleaning, and stripping operations in this area will be subject to 40 CFR 63 subpart GG.

Monitoring and Reporting

Volatile Organic Compounds and Hazardous Air Pollutants

Uncontrolled VOC and HAP emissions from paints and applied coatings are limited by §63.745(c) of 40 CFR 63 Subpart GG, the National Emission Standards for Aerospace Manufacturing and Rework Facilities and are listed in Table 1. Commercial Jet submits air emissions reports and Subpart GG compliance reports for all facility operations to the Department no later than the 15th day of the month following the end of each calendar quarter.

005: RICE (Hangar 6, 12, and 15 E-Generators, and Fire Water Pumps PH1 and PH2)

Overview

This facility has stationary diesel engines. These include two fire pumps and three emergency generators. These units are subject to 40 CFR 63 subpart ZZZZ, the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, as adopted by ADEM Code R. 335-3-11-.06(103) and the opacity limits of ADEM Code R. 335-3-4-.01. The units will be monitored when they are tested, and the results kept with the maintenance records. Fire water pump PH1 and the Hangar 6 emergency generator are subject to 40 CFR 60 subpart IIII, the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, as adopted by ADEM Code R. 335-3-10-.03(87). The generator specifications are listed in the table below:

Engine Description	Brake Horsepower (bhp)	Last 4 Digits of SN	Ignition Type	Fuel Type	Installation Date
Hangar 6	262	7451	Compression	Diesel	2014
Hangar 12	58	8016	Compression	Diesel	Pre 2006
Hangar 15	58	8016	Compression	Diesel	Pre 2006
PH1	237	1722	Compression	Diesel	2016

PH2	375	7912	Compression	Diesel	Pre 2006
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Emission Standards

Opacity

The state opacity requirement would be applicable to the emergency generators and firewater pumps.

Subpart ZZZZ

The ZZZZ requirements for PH2 and Hangars 12 and 15 generators are listed below:

- 1) Change oil and filter every 500 hours of operation or annually, whichever comes first.
- 2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
- 3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary
- 4) 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.
- 5) Install non-resettable hour meter
- 6) Limit testing times to 100 hr/yr of which 50 hr/yr can be for non-emergency purposes.

Subpart IIII

The IIII requirements for PH1 and Hangar 6 are listed below:

- 1) Install non-resettable hour meter
- 2) Limit testing times to 100 hr/yr of which 50 hr/yr can be for non-emergency purposes.
- 3) Comply with the emission limits listed in 40 CFR Part 60 Subpart IIII - Table 4.

Monitoring and Reporting

Subpart ZZZZ

The facility is required to keep records of hours of operation and all records of maintenance performed on the firewater pumps as required in the emission standards above. The records will be reviewed by Department personnel during compliance inspections.

Subpart IIII

The facility is required to keep records of hours of operation and a certificate of conformity stating that the generator can comply with the Table 4 emission limits. The records will be reviewed by Department personnel during compliance inspections.

Fugitive Dust

The fugitive dust potential was evaluated and is not expected to be of concern at this facility. The plant property is grassed, and travel areas are covered by asphalt, concrete, or graveled

surfaces. No stockpiles of dust producing materials are planned. Therefore, it has been determined by the Department that a dust plan is not required at this time.

CAM

40 CFR Part 64, Compliance Assurance Monitoring, does not apply because a device is not used to control the VOC and HAP emissions from this facility.

Recommendation

I recommend issuing the draft permit following the required public comment and EPA review period. Several provisos were edited and added to the permit for clarification. No changes were requested in the application to renew this permit.

Marisa Milledge

Industrial Chemicals Section
Chemical Branch
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DATE: June 16, 2026