

Permit Renewal Source Analysis & Technical Review

Company	Aero Products and Services JV, LLC	Permit Number	17692
City	Houston	Project Number	373581
County	Harris	Regulated Entity Number	RN100217959
Project Type	Renewal	Customer Reference Number	CN605717925
Project Reviewer	Emma Pertuit	Received Date	May 7, 2024
Site Name	GE AEP APS Houston Facility		

Project Overview

Aero Products and Services JV, LLC (Aero Products) applied for a permit renewal to incorporate by reference several Permits by Rule authorizations, update the Special Conditions, and remove sources from the Maximum Allowable Emission Rate Table (MAERT).

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	13.7	1.44	-12.26
PM ₁₀	13.7	1.44	-12.26
PM _{2.5}	13.7	1.44	-12.26
VOC	32.9	17.01	-15.89
NO _x	163.3	79.12	-84.18
CO	90.7	63.7	-27.00
SO ₂	18	1.54	-16.46

PM and PM_{2.5} are being speciated for emissions currently listed as PM₁₀ on the MAERT.

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	June 3, 2024
Site rating & classification:	0.00 / High
Company rating & classification:	0.00 / High
Has the permit changed on the basis of the compliance history or rating?	No
Did the Regional Office have any comments? If so, explain.	No

Public Notice Information

Requirement	Date
Legislator letters mailed	5/24/2024
Date 1 st notice published	6/17/2024
Publication Name: Daily Court Review	
Pollutants: carbon monoxide, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less and sulfur dioxide	
Date 1 st notice Alternate Language published	6/16/2024
Publication Name (Alternate Language): La Prensa de Houston	
1 st public notice tearsheet(s) received	6/20/2024

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1 st public notice affidavit(s) received	6/20/2024
1 st public notice certification of sign posting/application availability received	7/24/2024

Public Interest

Public Interest Information	
Number of comments received	0
Number of meeting requests received	0
Number of hearing requests received	0
Date meeting held	N/A
Date response to comments filed with OCC	N/A
Date of SOAH hearing	N/A

Renewal Requirements

Requirement	
Date of permit expiration:	11/19/2024
Date written notice of review was mailed:	05/24/2024
Was there a condition of air pollution that had to be addressed during this project review?	No
If yes, explain: N/A	
Permit Renewal Fee: \$	4148.12

Federal Rules Applicability

Requirement	
Subject to NSPS?	Yes
Subparts A & IIII	
Subject to NESHAP?	No
Subparts N/A	
Subject to NESHAP (MACT) for source categories?	Yes
Subparts A & ZZZZ	

Title V Applicability

Requirement		
Title V applicability: The site is a Title V major source and operates under Operating Permit No. O1228 per 30 TAC Chapter 122.		
Periodic Monitoring (PM) applicability: This site is a major source and is subject to PM under 30 TAC Chapter 122. The permit requires PM as follows:		
Emission Source	SC No.	PM Condition Summary
DT-1	8	Model of turbine tested, type of fuel fired, and duration of test recorded for each

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DynaTest Auxiliary Generator		operation. Daily recording and monthly report showing tons of NOX, CO, VOC, SO ₂ , and PM emitted. Tons emitted for the previous 12-month period.
DT-2 DynaTest Auxiliary Generator	8	Model of turbine tested, type of fuel fired, and duration of test recorded for each operation. Daily recording and monthly report showing tons of NOX, CO, VOC, SO ₂ , and PM emitted. Tons emitted for the previous 12-month period.
AUX-2	8	Hours of operation recorded for each day of operation.

Compliance Assurance Monitoring (CAM) applicability: The site is subject to 30 TAC Chapter 122 requirements, however there are no control devices used for compliance assurance monitoring.

Process Description

Aero Products and Services JV, LLC repairs and tests aero-derivative combustion turbines. These turbines are primarily used for electric generation and power applications. The primary business activity at the site consists of Aero Alliance's servicing and repairing of customer-owned turbine engines and engine performance testing, which takes place in various buildings on site.

Project Scope

Aero Products and Services JV, LLC has requested to remove some emissions sources from the MAERT and all language relating to these emission sources from the Special Conditions.

Currently all emissions on the MAERT are organized into two emissions Caps. An hourly and annual combustion Cap and an hourly and annual paint sources cap. All paint cap sources are being removed from the permit. Except for Dyna Test sources EPNs DT-1 and DT-2, and an Auxiliary Diesel Generator, EPN AUX-2 all combustion sources are being removed from the permit. When sources are removed from a cap the cap must be reduced proportionally to the amount of emissions that the removed sources contributed to each cap. Aero Products and Services JV, LLC is reducing the caps appropriately so that the only hourly and annual emissions left in each cap are those that DT-1, DT-2, and AUX-2 originally contributed when the caps were formed.

Changes to MAERT			
Source	EPN	Current Cap	Change
DynaTest	DT-1	Combustion	These sources will remain authorized by the permit within the combustion caps.
DynaTest	DT-2	Combustion	
Testline Auxiliary Diesel Generator (747-hp)	AUX-2	Combustion	
DynaTest Auxiliary Diesel Generator	AUX-1	Combustion	These sources and all emissions associated with each source are being removed from the MAERT.
Closed Loop Test Cell	CLTEST-1	Combustion	
Testline Compressor	COMP-1	Combustion	
Turbine Testline	TEST-1	Combustion	
Building F Paint Shop	F-PAINT	Paint Sources	
Building G Paint Shop	G-PAINT	Paint Sources	
Building F Fugitives	F-FUG	Paint Sources	

Changes to Special Conditions		
Initial	Draft	Description of Change

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SC No.	SC No.	
--	2	Federal Applicability requirements being added for facilities subject to 40 CFR Part 60, NSPS.
--	3	Federal Applicability requirements being added for facilities subject to 40 CFR Part 63, NESHAP (MACT).
2	4	Requirement to identify EPNs on facilities.
3	5	Limits on use of hazardous air pollutants (HAPs) at the site.
4A(4)c	--	Removed Testline Unit from condition language.
4B(2)	--	Removed TEST1 and CLTEST1 from condition language.
4C(1)a	--	Removed TEST1, CLTEST1, COMP1, and AUX1 from condition language.
4A	6	Turbine emission and operation limitations.
4B	7	Requirements to demonstrate compliance.
4C(1)	8	Recordkeeping requirement
4C(2)	9	Recordkeeping requirement
4D(1)	10	Requirement to clean up lubricating oil spills.
4D(2)	11	Requirements for storing waste lubricating oil.
5A-D	--	Removed all language for Paint Buildings F and G (F-PAINT, G-PAINT, F-FUG) since this is no longer operational.
--	12	Added SC identifying Permit by Rule Authorizations that have been incorporated by reference to the permit.

Best Available Control Technology

No sources were modified during this renewal, so a BACT review was not required

Permits Incorporation

This list includes authorizations referenced with this permit. It is not intended to be all-inclusive and can be altered at the site without modification to the permit.

Permit by Rule (PBR) / Standard Permit / Permit Nos.	Description (include affected EPNs)	Action (Reference / Consolidate / Void)
PBR No.148591	Danobat Grinder (D-GRIND), Paint Booth with Oven (PB-1), and the Bearing Wash (BW-1)	Reference
PBR No. 158983	Arc Welding unit (ARCWELD), Cleaning Line Tanks (CLEANING LINE), Fluorescent Penetrant Inspection Line (FPI), and the Wastewater Evaporator 2 (EVAP-2).	Reference
30 TAC § 106.183	Hot Wash Heaters (HW3 and HW4).	Reference
30 TAC § 106.452	Blasting Booth (BLAST-1)	Reference

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Impacts Evaluation

Since there are no project emission increases an Impacts Evaluation is not needed.



3/14/2025

Project Reviewer
Emma Pertuit



3/14/2025

Team Leader
Britany Gilman

Date