

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1319-AR-3 AFIN: 73-00089

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Eaton Hydraulics LLC
400 East Lincoln Avenue
Searcy, Arkansas 72143

3. PERMIT WRITER:

Andrea Sandage

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Fluid Power Valve and Hose Fitting Manufacturing
NAICS Code: 332912

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
7/25/2014	Modification	

6. REVIEWER'S NOTES:

Eaton Hydraulics operates a facility in Searcy, AR that manufactures hydraulic valves, valve components and steering boosters. The basic raw materials used in the processes include aluminum castings, bar stock, cast iron castings, stainless steel tubing and other component parts. This permit modification is being issued to revise the maximum pollutant coating content for the Spray Paint Booth (SN-06) and to change from daily to monthly recordkeeping requirements for SN-A, SN-04, SN-05, SN-06 and SN-07. The permitted emissions will increase by 12.5 tpy PM/ PM10, 0.2 tpy VOC and 0.67 tpy total HAPs.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was inspected on March 20, 2014 and was written out of compliance for failure to maintain daily recordkeeping and exceeding the PM coating limit at SN-06. This permit addresses these compliance issues.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? **N**

b) Is the facility categorized as a major source for PSD? **N**

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

This facility is not subject to 40 CFR Part 63 Subpart XXXXXX because it is not classified under one of the listed NAICS codes.

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-08	NO _x & CO	40 CFR Part 63, Subpart ZZZZ 40 CFR 40 Part 60, Subpart JJJJ
SN-03	HAPs	40 CFR Part 63, Subpart WWWWW

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

Pursuant to Act 1302 of the Regular Session of the 89th General Assembly of the State of Arkansas, no dispersion modeling was performed by ADEQ because it was not voluntarily proposed and agreed to by the facility. No other information was submitted by the applicant. Criteria pollutants were not evaluated for impacts on the NAAQS.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Acetone	1187.12	130.58	3.39	Y
Nickel	1.5	0.165	0.02	Y
Ethylbenzene	86.84	9.552	0.504	Y
Xylene	434.19	47.760	2.268	Y

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
SN-A	MSCS	6.26 lb/gal VOC	none	N/A	0.30 gal/hr
SN-02	AP-42 Table 1.4-1& 1.4-2, MSDS	7.6 lb/MMft ³ PM, 5.5 lb/MMft ³ VOC, 0.6 lb/MMft ³ SO _x , 100 lb/MMft ³ NOX, 84 lb/MMft ³ CO, 7.17 lb/gal VOC in AAA Oil, 6.45 lb/gal VOC in Oil 22, 0.0002 Toluene lb/gal in Oil 22	none	N/A	0.5 MMBtu/hr
SN-03	Characterizing Site Specific Source Emissions for EPA's Risk Assessment Tool for Metal Finishing Industry Table 4	41 grams/day Nickel	none	N/A	Nitec 8200A = 0.165 gal/hr
SN-04	MSDS	1.46 lb/gal VOC in Metex SCB B, 1.67 lb VOC in Oakite 33, 6.59 lb/gal	none	N/A	Metex SCB B = 0.015 gal/hr Oakite 33 =

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		VOC in Pen Dip Super			0,0275 gal/hr Pen Dip Super = 0.275 gal/hr
SN-05	MSDS	6.59 lb/gal VOC in Pen Dip Super, 2.02 lb/gal VOC in Presto Prep P2	none	N/A	Pen Dip Super = 0.275 gal/hr Presto Prep P2 Surface Conditioner = 0.055 gal/hr
SN-06	Mass Balance/MSDS	lb/gal VOC: 5.2 PM: 6.3 Xylene 2.7 Ethylbenzene 0.6	Water Curtain	50% Particulate	0.84 gal/hr 7358 gal/yr
SN-07	MSDS	6.59 lb/gal Acetone 0.0003 lb/gal Benzene	none	N/A	0.51 gal/hr
SN-08	AP-42 Table 3.2-3	(lbs/mmBtu) PM/PM ₁₀ : 0.0095 VOC: 0.0296 SO _x : 0.000588 NO _x : 2.27 CO: 3.72	None	N/A	0.3876 MMBtu/hr

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
See Specific Condition #27				

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
none				

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-A	Mineral Spirits used	219.0 gal/month 2628 gal/yr	Monthly	N
SN-A	VOC Content	6.26 lb/gal	Annual update of MSDS	N
SN-03, SN-04, SN-05	VOC emissions	See Specific Condition #1 & #2	Monthly	N
SN-03	Inspections & Maintenance	N/A	Continuous	N
SN-03	Compliance Certification	Subpart WWWWWW	Annual	N
SN-4	Liquid Additives used	352 gal/month 4224 gal/yr	Monthly	N
SN-5	Liquid Additives used	403 gal/month 4836 gal/yr	Monthly	N
SN-06	Paint used	613.2 gal/month 7358.4 gal/yr	Monthly	N
SN-06	Coating Content	VOC: 5.20 lb/gal Ethyl Benzene: 0.60 lb/gal Xylene: 2.70 lb/gal	Annual update of MSDS	N
SN-07	Acetone Used	371 gal/month 4467.6 gal/yr	Monthly	N
SN-08	Hours of operation and type of use	Total: 500 hr/yr maintenance checks/testing: 100 hr/yr non-emergency: 50 hr/yr	Monthly	N
SN-08	Maintenance Record and Manufacturer's instructions	See Manufacturer's instructions	Monthly	N
SN-08	Engine certification or Testing Results	See SC #28 & #29	continuous	N
SN-08	Notifications for Subpart JJJJ	N/A	Continuous	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02, 03, & 06	5%	§18.501 of Regulation #18	Inspections
08	5%	§18.501 of Regulation #18	Daily Observations when in operation

17. DELETED CONDITIONS:

Former SC	Justification for removal
	None

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Coolant Makeup Tank (2000 gallons)	A-3			0.001			0.001	0.001
Coolant Concentrate Tank (4000 gallons)	A-3			0.001			0.001	0.001
Coolant Reclaim System Tank (1000 gallons)	A-3			0.001			0.001	0.001
AW 46 Hydraulic Oil Tank (4000 gallons)	A-3			0.001			0.001	0.001
AW 32 Hydraulic Oil Tank (4000 gallons)	A-3			0.001			0.001	0.001
Used Oil Storage Tank	A-3			0.001			0.001	0.001
Cutting Oil Reclaim #3	A-3			0.001			0.001	0.001
<i>Total for A-3 Category</i>				<i>0.007</i>			<i>0.007</i>	<i>0.007</i>
Paint Storage in	A-8			0.152			0.075	0.084

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Small Containers (max 5 gallons in capacity)								
<i>Total for A-8 Category</i>				0.152			0.075	0.084
Enclosed Sand Blasting Cabinet	A-13	0.45						
Used Solvent Still	A-13			0.31				
Low Vapor-pressure cleaners	A-13			0.9				
Assembly & Test Area	A-13			0.67			0.011	0.011
Thermal Deburring Unit	A-13	0.008	0.001	0.006	0.088	0.105		
PRC Laser Welder	A-13	1.10						
Empty Drum Label Painting	A-13			0.03			0.012	0.016
Methanol ASTs (2)	A-13			0.011			0.01	0.01
Paint Pre-wash	A-13			1.45				
Oil Reclaim System	A-13			0.31				
4 Grinders (3 connected to collector)	A-13	0.07						
Machining Operations	A-13	0.62						
Storage/Transfer from 55 gallon Paint Drums	A-13			0.38			.180	0.212
Storage/Transfer of Metal Shavings	A-13	0.1						
Water Treating Process	A-13	0.61					0.002	0.002
Two 500 Gallon Methanol Storage Tanks	A-13			0.01			0.01	0.01
Labeling Machine	A-13			0.4			0.294	0.514

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Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Total of A-13 Category		2.958		4.047			0.519	0.775

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1319-AR-2

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 08-25-14

Facility Name: Eaton Hydraulics LLC

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			Old Permit	New Permit
\$/ton factor	23.89	Permit Predominant Air Contaminant	60.6	60.8
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.2	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment <input type="checkbox"/>		Annual Chargeable Emissions (tpy)	60.8	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	11	23.5	12.5
PM ₁₀	11	23.5	12.5
SO ₂	0.2	0.2	0
VOC	60.6	60.8	0.2
CO	0.7	0.7	0
NO _x	0.7	0.7	0
Acetone	14.72	14.72	0
Total HAP	11.5	12.17	0.67