



ARKANSAS
Department of Environmental Quality

February 5, 2010

Kevin Caldwell
ESH Manager
Eaton Corporation
400 Lincoln Avenue
Searcy, AR 72143

RE: Application for Registration
AFIN: 73-00089 Registration No.: 1319-A-REG315

Dear Mr. Caldwell:

The Department has reviewed your facility's application for registration for the facility located at 400 Lincoln Avenue, Searcy in White County, Arkansas.

The Department has determined that the information certified in the application fulfills the required criteria for registration as specified in Arkansas Air Pollution Control Code (Regulation 18), Section 18.315 and other applicable regulations. Your registration number has been assigned as 1319-A-REG315.

This registration is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your registration request received on January 20, 2010. Eaton Corporation is required to update this registration should the facility operations or emissions change so that the current registration no longer reflects actual operations.

Please maintain a copy of this letter and the application at the facility.

Sincerely,

A handwritten signature in black ink, appearing to read "TRheume", is written over a horizontal line.

Thomas Rheume
Permit Branch Manager, Air Division

c: Compliance Monitoring



Eaton Corporation
400 E. Lincoln Avenue
Searcy, AR 72143-7499
Tel.: 501-279-2197
Fax: 501-279-2197

February 2, 2010

Arkansas Department of Environmental Quality
Air Permitting Section
5301 Northshore Drive
North Little Rock, AR 72118

Re: Notification of Air Registration Reply

Dear Mr. Murphy:

This letter and enclosures are in response to your letter to me dated January 26, 2010 concerning Eaton Corporation's Air Permit Registration for our Searcy, AR facility (the facility).

In response to your request that the facility submit a disclosure statement, please note that Eaton Corporation is a publicly held company and therefore exempt from the requirement to submit a disclosure statement as part of the pending air registration application. In accordance with Arkansas Annotated Code Section 8-1-106(b)(4) and the disclosure statement instructions, please find enclosed copies of:

1. Eaton Corporation's 2008 Annual Report
2. Eaton Corporation's 3Q 2009 Quarterly Statement
3. Eaton Corporation's 4Q 2009 Earning Statement

In response to your request that the facility submit detailed emission calculations, please find enclosed a copy of our air emission calculations. Actual emissions were determined by using a combination of USEPA AP-42 emission factors and material balance based on MSDS for materials used.

If you have any question or need any further information, please contact me at telephone number (501)279-2197.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Caldwell".

Kevin Caldwell
EHS Manager

Review of Air Sources - DRAFT
 Eaton Corporation
 400 Lincoln Avenue
 Searcy, Arkansas 72143

Currently Operate 1 shift/day, 5 days/week, 50 weeks/year (2000 hrs/year)

Emission Unit	Description	Process Step	Raw Material	Stack?	Pollution Controls
HVAC Equipment 3,215,000 btu/hr total	HVAC Equipment (See Tab "HVAC Equipment" for list)	Comfort Heating/Cooling	Natural Gas 3,215 mm btu/hr x ft3/1050 btu = 3082 ft3/hr Maximum x 2000 hrs/year = 6,124,000 ft3	No	NA
Shot Blast Cabinet	Enclosed cabinet	Production parts sand blasting	Sand Metal Parts	Yes	Baghouse integral to unit
Solvent degreasers - Mineral Spirits	DG Area - 45"x27", 32" Deep, 14" Freeboard DG Area - 30"x 30", 33" Deep, 15" Freeboard DG Area - 22"x 30", 20" Deep, 10" Freeboard DG Area - 22"x 30", 20" Deep, 10" Freeboard CM Area - 54"x 42", 40" Deep, 15" Freeboard	Maintenance and production parts Cleaning	Mineral Spirits (Calumet 300/360)	No	No
Solvent degreaser - Denatured Alcohol	Solvent Degreaser/Cleaner	Maintenance and production parts	Denatured Alcohol	No	No
Parts Cleaners - Aqueous	Maintenance Shop - Greymills 39"x29", 15" Freeboard List Others	Maintenance and production parts Cleaning	EY 312 CIMCLEAN MA359	No	No
Parts Spray Washers - Aqueous	CN Machining Area - 2 2 Bowden Aqueous Washers Typhoon Power Washers	Maintenance and production parts Cleaning	Cimguard R560 MultiKleen 1573 CIMClean MA338	Yes	No
Parts Cleaners - Acetone	BG Assembly Area - 10 gallon est., List others	Maintenance and production parts Cleaning	Acetone (Replace ?? gals/year maximum)	Yes	No
Paint Spray Booth	Spray Booth	Paint Metal Parts	Solvent-based paint (no thinning)	Yes	Water Curtain
	PreWash	Aqueous Cleaning	SW 727 Luprep 601 (Rust Preventative) Houghton Phos 5450	Yes	No
	Acetone Flushing	Clean lines, guns	Acetone		

Emission Unit	Description	Process Step	Raw Material	Stack?	Pollution Controls
	Paint Storage Cabinet (w/stirring) Emissions Included in booth above				
Paint Hanger Stripping Tank	25"x48" Tank (110 gallons est.)	Submerge clean	Acetone	No	No
Labeling Machine	Silkscreen booth, Infrared Dryer	Silkscreen Oil Filters	Ink-like paints Screen Wash	Yes	No
Tool Sharpening	Production tool repair	Units vent to bag filter on mezzanine	Metal bits, etc	No	Bag filter
DG Spool Grinders (3 connected to 1 collector, 1 to it's own)	Production grinding	Vent to collectors that vent inside	Metal spools	No	Yes, mechanical collectors (2) Confirm
Used Solvent Still	Electric, PRI Model Sc	Used to recycle Mineral Spirits	Mineral Spirits	No	Vent to Drum with Filter
Plating Line	Electroless Nickel	Cleaning Tank #1 Cleaning Tank #3 Acid Cleaning Tank #5 Nickle Bath Nickle Bath Nickle Bath Nickle Bath Rod Hanger Stripping	Uni Kleen 118 Electrokleen 1557 Hydrochloric Acid Nitec 8200C Nitec 8200B Nitec 8200A Ammonium Hydroxide 26 BE Nitric Acid 50-70% Nitric, HCl	Yes	No
Hot Black Operation	Nickle Strippers		Metex SCB A Metex SCB B Penetrate Ultra Oakite 33 Uni Kleen 118 Pen Dip Super	Same Vent as Plating	No
Cold Black Operation			Pen Dip Super Presto Black PBR Presto Prep P2 Surface Conditioner Fremont 6397 Microlock MZN Zinc Phosphate	No	No
Electric Draw Furnace	Same room as plating above	Metal Parts only		Same Vent as Plating	No
Heat Treat Furnaces (2)	Metal Heat Treat	Metal parts	Natural Gas - fuel & atmosphere Assume 10.00 mm btu/hr (Conservative Estimate, no burner or boilerplate rating available) Methanol AAA Quench Oil Quenching Oil 22	Yes	No

Emission Unit	Description	Process Step	Raw Material	Stack?	Pollution Controls
Induction Hardener	Heat Treat end of Spools	Metal Parts, Electric Heat	Polyquench 15 XN	Yes	No
Thermal DeBurring Unit	Detonating Mixture in Closed Chamber	Production	Natural Gas - Assume 0.25 mmbtu/hr (Conservative Estimate, no burner or boilerplate rating available)		
Steam Oxide Coating Area	Only emits water, electric heat				
Empty Drum Label Painting	Spray cans used to mask labels May qualify as Trivial #14	Mask drum labels for reuse	ColorPlace Spray Enamel - Flat Black	No	No
Assembly & Test Area	Miscellaneous work stations	Rust Preventative Dip Tank	Mobilama 247		
		Pre-Brazing Operation	Microbraz Green Stop Off Type II		
		Pre-Brazing Operation	Microbraz LM-S Brazing Filler		
		Loctite	Various Products (approximately 30)		
		Denatured Alcohol - Wipe cleaning	Denatured Alcohol		
AST's	2 - 500 gallon Methanol - Outside	Storage	Methanol	No	No
	Coolant Makeup Tank (2.5%) - 2000 gals	Storage	Q-Cool 330	No	No
	Coolant Concentrate Tank - 4000 gals	Storage	Q-Cool 330	No	No
	Coolant Reclaim System Tanks (2) - 1,000 gals each	Storage	Q-Cool 330	No	No
	AW 46 Hydraulic Oil - 4000 gals	Storage	AW 46 Hydraulic Oil	No	No
	AW 32 Hydraulic Oil - 4000 gals	Storage	AW 32 Hydraulic Oil	No	No
Oil Reclaim System	"Enervac", Electric heater	Vacuum pump vents to room		No	No
PRC Laser Welder	Used to spot weld parts - no rods, wires etc. used	Trivial # 29 if no HAPs	Argon, Helium, CO	Yes	No
Actual Annual Emissions in TPY:					
"Potential" Annual Emissions in TPY:	Multiplied actual by ratio: 8750/2000				

"Group B" Insignificant Units - Exempt from permitting Known as "Trivial Units" per USEPA White Paper	Trivial ID Reference Number
Maintenance Shop Welding	# 14
Battery Charging Station	# 20
Drill Presses, Mills, Lathes	# 58
Deburring-stations	# 17
Water Cooling Towers (3)	#44
Compressed Argon Storage Tank - Outside	#21
Compressed Nitrogen Storage Tank - Outside	#21
Wastewater Treatment	#21
Liquid Soap AST - 1000 gals	#22
Soap Concentrate - 2000 gals	#22

Annual Production	Units	Pollutant	Emission Factor	Units	Reference	Control Device	Efficiency
6,124,000	ft ³ /yr	PM	7.6	lbs/mmft ³	AP-42 Table 1.4-2		
6,124,000	ft ³ /hr	VOC	5.5	lbs/mmft ³	AP-42 Table 1.4-2		
6,124,000	ft ³ /hr	Sox	0.6	lbs/mmft ³	AP-42 Table 1.4-2		
6,124,000	ft ³ /hr	NOx	100	lbs/mmft ³	AP-42 Table 1.4-1		
6,124,000	ft ³ /hr	CO	84	lbs/mmft ³	Ap-42 Table 1.4-1		
50	lbs abrasive used/hr	PM	0.00089	lbs pm/lb abrasive	AP-42 Table 13.2.6-1 (after baghouse)	NA	
2000	gals/year	VOC	6.26	lbs VOC/gallon	MSDS Calumet 300-360, assumes all makeup usage is emitted		
260	gals/year	VOC	6.81	lbs VOC/gallon	MSDS Denatured Alcohol		
		Methanol	4.96	lbs Methanol/gallon	MSDS Denatured Alcohol (75% Methanol)		
		MIBK	0.66	lbs MIBK/gallon	MSDS Denatured Alcohol (10% MIBK)		
1210	gals/year	VOC	0	lbs VOC/gallon	MSDS		
110	gals/year	VOC	1.26	lbs VOC/gallon	MSDS CIMCLEAN MA359		
220	gals/year	VOC	0.54	lbs VOC/gallon	MSDS Cinguard R560 (8% VOC)		
495	gals/year	VOC	0.88	lbs VOC/gallon	MSDS Multi-Kleen 1573 (10% MEA)		
2365	gals/year	VOC	0.37	lbs VOC/gallon	MSDS CIMCLEAN MA338 (0.04 x 9.34)		
See Paint Hanger Strip Tank	gals/year	Acetone	See Paint Hanger Strip Tank		Plant-wide emissions of acetone calculated under Paint Hanger Stripping Tank		
See Tab "Paint Spray Booth"		VOC	7943	lbs VOC/year	Mass Balance - see Tab "Spray booth Paints"	NA	
		Xylene	3291	lbs Xylene/year	Mass Balance - see Tab "Spray booth Paints" (adjusted to account for waste disposed)		
		Ethyl Benzene	669	lbs Ethyl Benzene/yr	Mass Balance - see Tab "Spray booth Paints"		
		Toluene	8.51	lbs Toluene/yr	Mass Balance - see Tab "Spray booth Paints"		
495	gallons SW 727/year	VOC	0	lbs VOC/gal	MSDS SW 727		
770	Gallons Luprep 601/year	VOC	0.88	lbs VOC/gal	MSDS Luprep 601 (10% MEA)		
440	Gallons Houghton Phos 5450/year	VOC	0	lbs VOC/gal	MSDS Houghton Phos 5450 (Ammonium Bifluoride, Phosphoric Acid)		
		Acetone	Included in stripping tank below				

Annual Production	Units	Pollutant	Emission Factor	Units	Reference	Control Device	Efficiency
	1020 gals/year (plant-wide usage)	Acetone	6.59	lbs Acetone/gal	Specific Gravity = $0.79 \times 8.34 = 6.59$		
		Benzene	0.0003	lbs Benzene/gal	MSDS Virgin Acetone 100%		
See Tab "Labeling Machine"		VOC	175.28	Lbs VOC/year	Mass Balance - See Tab "Labeling Machine"		
		Glycol Ethers	2.99	lbs Glycol Ethers/year	Mass Balance - See Tab "Labeling Machine"		
		Toluene	96.39	lbs Toluene/year	Mass Balance - See Tab "Labeling Machine"		
		Acetone	51.33	lbs Acetone/yr	Mass Balance - See Tab "Labeling Machine"		
		Particulate	1	lb/hr, uncontrolled	Engineering Estimate (actual emissions likely much lower)	Bagfilter	90% est.
		Particulate	0.5	lb/hr/unit, uncontrolled	Engineering Estimate (actual emissions likely much lower)	Mechanical collector	90% est.
See "Solvent Degreasers" above		VOC	NA	NA	Plant-wide emissions included in Mineral Spirits solvent degreasers above		
	1150 lbs used/yr (10.93 lbs/gal)	NA			MSDS (Potassium Hydroxide, Sodium Hydroxide, ...)		
	400 lbs used/yr (Powder)	NA			MSDS (Sodium Carbonate, Sodium Hydroxide, ...)		
					Table 4 - "Characterizing Site-Specific Source Emissions for EPA's Risk Assessment Tool for the Metal Finishing Industry" (Schwartz & Lorber, 1999)		
	110 gals used/year	HCl	140	Grams HCl/day (140,000 mg)	MSDS (Acetic Acid, Ammonium Hydroxide, Sodium Hypophosphite)		
	330 gals used/year	NA			MSDS (Sodium Hypophosphite)		
	55 gals used/year	NA			Table 4 - "Characterizing Site-Specific Source Emissions for EPA's Risk Assessment Tool for the Metal Finishing Industry" (Schwartz & Lorber, 1999)		
	330 gals used/year	Nickel Cmpds	41	Grams Nickel/day (41,000 mg)	MSDS (Ammonium Hydroxide, Ammonia, Water)		
	80 gals used/year	NA			MSDS (Nitric Acid)		
	25 gals used/year	NA					
	200 lbs Metex SCB A/year	NA			MSDS Metex SCB A (Aryl Sulfonates)		
	30 gals Metex SCB B/year	VOC	1.46	lbs VOC/gal	MSDS Metex SCB B (Ethylenediamine)		
	330 Gals Penetrate Ultra/yr	NA			MSDS Penetrate Ultra (NaOH, Sodium nitrite, nitric acid)		
	55 Gals Oakite 33	VOC	1.67	lbs VOC/gal	MSDS Oakite 33 (2 Butoxy Ethanol)		
	1150 lbs Uni Kleen 118/yr	NA			MSDS Uni Kleen 118 (NaOH, KOH...)		
	550 Gals Pen Dip Super/year	VOC	6.59	lbs VOC/gal?	MSDS Pen Dip Super		
	550 gallons Pen Dip Super/year	VOC	6.59	lbs VOC/gal	MSDS Pen Dip Super (Assume all make-up is emitted - conservative)		
	440 gallons Presto Black PBR/year	NA			MSDS Presto Black Replenisher (H2SO4, Copper)		
	110 gallons Presto Prep P2/year	VOC	2.02	lbs VOC/gallon	MSDS Presto Prep P2 (Monoethanolamine)		
	800 lbs/year	NA			MSDS Fremont 5397 Soak Cleaner (NaOH)		
	5 gallons/year	NA			MSDS MZN Zinc Phosphate (Phosphoric & Nitric Acid, Zinc salts)		
		No emissions expected	NA				
	19,047,619 ft3 Natural gas/yr	PM	7.6	lbs/mmft3	AP-42 Table 1.4-2		
	(10,000,000 btu/hr x ft3/1050 btu x	VOC	5.5	lbs/mmft3	AP-42 Table 1.4-2		
	2000 hr/yr = 19,047,619 ft3/yr)	Sox	0.6	lbs/mmft3	AP-42 Table 1.4-2		
		NOx	100	lbs/mmft3	AP-42 Table 1.4-1		
		CO	84	lbs/mmft3	Ap-42 Table 1.4-1		
	2507 gallons Methanol/year	VOC/Methanol	No emissions		October 27, 2000 Stack Test, non-detectable		
	110 gallons AAA Quench Oil/year	VOC	7.17	lbs VOC/gallon	MSDS Quenching Oil (0.86 x 8.34 = 7.17) Assume all make-up is emitted		
	110 gallons Quenching Oil 22/year	VOC	6.45	lbs VOC/gallon	MSDS Quenching Oil 22 (.86 x 8.34 x 0.90 = light distillates)		
		Toluene	0.0002	lbs Toluene/gallon	MSDS Quenching Oil 22 (Toluene)		
		Ethyl Acrylate	0.00007	lbs Ethyl Acrylate/gal	MSDS Quenching Oil 22 (Ethyl Acrylate)		

[illegible]

[illegible]

PM	VOC	Sox	NOx	CO	Acetone	Toluene	Xylene	Ethyl Acrylate	Ethyl Benzene	Benzene	Glycol Ethers	Methanol	MIBK	Chromium Cmpds	Nickel Cmpds	HCl	Total HAPs
0.002																	
	0.00																
		0.0001															
			0.02														
				0.02													
0.01																	
						0.0009											
					0.003												
0.15																	
														0.0024			
0.01																	
0.01																	
0.00001												0.01					
0.00002																	
0.00001																	
0.00001																	
0.00001																	
0.07																	
0.25																	
1.71	17.17	0.01	1.28	1.08	3.39	0.063	1.648	0.000004	0.3345	0.0002	0.0015	0.66	0.09	0.00	0.02	0.06	2.86
(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)
7.50	75.21	0.034	5.62	4.72	14.84	0.23	7.21	0.000017	1.47	0.0007	0.01	2.86	0.38	0.01	0.07	0.25	12.50
(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)
PM	VOC	Sox	NOx	CO	Acetone	Toluene	Xylene	Ethyl Acrylate	Ethyl Benzene	Benzene	Glycol Ethers	Methanol	MIBK	Chromium Cmpds	Nickel Cmpds	HCl	Total HAPs

Review of Paints to Identify Worst-case
Note that none are thinned

ID	Annual /Usage Gallons/year	Density Lbs/gallon	VOC Content lbs/gal (Minus Water)	lbs VOC Emitted	HAPS:					
					Xylene lbs/gal	lbs Xylene Emitted	Ethyl Benzene lbs/gal	Lbs Ethyl Benzene	Toluene lbs/gal	lbs Toluene Emitted
PPG - 13P MF Gray	8	9.1	4.5	36	2.34	18.72	0.41	3.28	0	0
PPG - 13 CC New Cat Yellow	195	8.52	4.56	889.2	2.54	495.3	0.45	87.75	0	0
PPG - 13 AC Ford Blue	15	8.36	4.7	70.5	2.16	32.4	0.38	5.7	0	0
PPG - 13 B Gloss Black	660	7.9	4.68	3088.8	2.89	1907.4	0.47	310.2	0	0
PPG - JD Green	235	8.06	4.76	1118.6	2.3	540.5	0.4	94	0	0
PPG - 13 CF Bright Yellow	165	9.94	4.59	757.35	0.99	163.35	0.17	28.05	0	0
PPG - 13 BN Case Tan	8	9.44	4.74	37.92	1.82	14.56	0.32	2.56	0.03	0.24
PPG - 13V IHC Red	8	9.13	4.65	37.2	2.04	16.32	0.36	2.88	0	0
PPG - 13 AQ JD Black	195	8.25	5.13	1000.35	1.77	345.15	0.33	64.35	0.03	5.85
PPG - Industrial Yellow	10	8.06	4.82	48.2	2.13	21.3	0.37	3.7	0	0
PPG - 13 CE Gray	0	8.58	4.61	0	2.39	0	0.42	0	0	0
PPG - 13 AF Cessna White	65	10.13	4.34	282.1	2.11	137.15	0.36	23.4	0	0
PPG - 13C MF Red	8	8.16	4.71	37.68	2	16	0.35	2.8	0	0
PPG - 13 A Prime	110	8.66	4.9	539	2.12	233.2	0.37	40.7	0.022	2.42
* Total Emissions - lbs				7942.9		3941.35		669.37		8.51

* Assumes all usage is emitted to atmosphere, actual emissions lower as some material is disposed as waste.

For CY 2008, plant disposed of 12,265 lbs of paint waste. Of this amount, 53,000 mg/kg was Xylene.
53,000 mg/kg = 0.053 lbs Xylene/lb waste. 0.053 lbs/lb waste x 12,265 lbs = 650 lbs xylene disposed as waste

3291.35 lbs xylene emitted adjusted for waste content

Review of Coatings used in Labeling Machine
 Note that none are thinned

ID	Annual /Usage Gallons/year	Density Lbs/gallon	VOC Content lbs/gal (Minus Water)	lbs VOC Emitted	HAPs:				Acetone lbs/gal	lbs Emitted
					Glycol Ethers lbs/gal	lbs Glycol Ethers	Toluene lbs/gal	Lbs Toluene Emitted		
NAZDAR - 7222 Ultra Blue	0.25	8.93	4.61	1.15	5.36	1.34	0.45	0.11	0	0
NAZDAR - 7219 Fire Red	0.25	8.71	4.59	1.15	2.61	0.65	0.44	0.11	0	0
NAZDAR - 7260 Orange	0.13	8.95	4.51	0.59	2.69	0.35	0.45	0.06	0	0
NAZDAR - 7275 Super Opaque White	0	12.11	4.13	0.00	3.63	0.00	0.61	0.00	0	0
NAZDAR - 7252 Super Opaque Black	0.25	8.67	5.07	1.27	2.6	0.65	0.43	0.11	0	0
NAZDAR Screen Wash	24	7.35	7.13	171.12	0	0.00	4	96.00	2.14	51.36
Total Emissions - lbs				175.27		2.99		96.39		51.36

PRIVILEGED AND CONFIDENTIAL - PREPARED AT ATTORNEY'S REQUEST

ID Number	Heating BTU
102	150,000
103	150,000
105	90,000
108	100,000
113	120,000
114	250,000
115	300,000
118	250,000
119	200,000
120	90,000
121	120,000
122	200,000
125	90,000
126	90,000
127	120,000
128	120,000
138	120,000
146	115,000
200	270,000
201	270,000
Total Heating BTU/hr	3,215,000

PRIVILEGED AND CONFIDENTIAL - PREPARED AT ATTORNEY'S REQUEST

Storage Tanks

Tank Description	Size (Gallons)	Length (Inches)	Length (Feet)	Diameter (Inches)	Diameter (Feet)	Location	Material Stored	VOC Content	VOC, if known
A) Storage Tanks									
Coolant Make-up Tank	2,000	169	14.1	60	5	Indoors	Q-Cool 330	35%	Triethanolamine
Coolant Concentrate Tank	4,000	169	14.1	84	7	Indoors	Q-Cool 330	35%	Triethanolamine
Coolant Reclaim System Tank	1,000	88	7.3	56.75	4.7	Indoors	Q-Cool 330	35%	Triethanolamine
Coolant Reclaim System Tank	1,000	88	7.3	56.75	4.7	Indoors	Q-Cool 330	35%	Triethanolamine
AW 46 Hydraulic Oil Tank	4,000	169	14.1	84	7.0	Indoors	AW 46 Hydraulic Oil Tank	Negligible?	
AW 32 Hydraulic Oil Tank	4,000	169	14.1	84	7.0	Indoors	AW 32 Hydraulic Oil Tank	Negligible?	
Methanol	500	118	9.8	38	3.2	Outdoors	Methanol	100%	Methanol
Methanol	500	118	9.8	38	3.2	Outdoors	Methanol	100%	Methanol
B) Process Tanks									
Cutting Oil Reclaim Tanks:									
Cutting Oil Reclaim Tank #1	1,000	110		48		Indoors	Citgo Ordinance Oil 250		
Cutting Oil Reclaim Tank #2	500	55		48		Indoors	Citgo Ordinance Oil 250		
Cutting Oil Reclaim Tank #1	1,000	110		48		Indoors	Citgo Ordinance Oil 250		
Hydraulic Oil Reclaim Tanks:									
AW 32 Hydraulic Oil Reclaim Tank #1	1000	110		48		Indoors	AW 32 Hydraulic Oil		
AW 32 Hydraulic Oil Reclaim Tank #2	500	55		48		Indoors	AW 32 Hydraulic Oil		
AW 32 Hydraulic Oil Reclaim Tank #3	1000	110		48		Indoors	AW 32 Hydraulic Oil		

PRIVILEGED AND CONFIDENTIAL - PREPARED AT ATTORNEY'S REQUEST

Material Annual Throughput (Plant Total)	Tank Annual Throughput	# Turnovers	Tank Throughput VOC Only	Vapor Pressure	Comments	Annual Emissions - Per Tanks 4.09d (lbs/year)
14496	3624	1.812	1268.4	<.01 mm Hg @ 68 F	Balance - Water	0.02
14496	3624	0.906	1268.4	<.01 mm Hg @ 68 F	Balance - Water	0.03
14496	3624	3.624	1268.4	<.01 mm Hg @ 68 F	Balance - Water	0.01
14496	3624	3.624	1268.4	<.01 mm Hg @ 68 F	Balance - Water	0.01
3911	3911	0.98		< .01 mm Hg @ 20 C		0.02
4000	4000	1.00		< .01 mm Hg @ 20 C		0.02
2507	1253.5	2.5		128 mm hg; 2.47 psi	Nitrogen Blanket - does not affect emissions	13.58
2507	1253.5	2.5		128 mm hg; 2.47 psi	Nitrogen Blanket - does not affect emissions	13.58
	2000	2			Estimated throughput; ran TANKs as if vertical	0.07
	1000	2			Estimated throughput; ran TANKs as if vertical	0.04
	2000	2			Estimated throughput; ran TANKs as if vertical	0.07
						Assumed emissions same as for storage tank above
						Assumed emissions same as for storage tank above
						Assumed emissions same as for storage tank above

ADEQ

Arkansas Department of Environmental Quality

AIR DIVISION

REGISTRATION FOR FACILITIES

REGULATION 18.315

March 2009

REGISTRATION FORM

AFIN	73-00089	DATE	12/21/09
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FACILITY PHYSICAL LOCATION

Facility Name	Eaton Corporation				
Physical Address or Location	400 Lincoln Avenue				
Physical City	Searcy				
Physical Zip	72143				
UTM Zone	46	UTM Westing (nearest meter)	385083.03	UTM Northing (nearest meter)	3900790.0
NAICS Code	332912		NAICS Description	332912 Fluid Power Valve and Hose Fitting Manufacturing	

FACILITY AIR CONTACT

Contact First Name	Kevin		
Contact Last Name	Caldwell		
Contact Position	EHS Manager		
Contact Mailing Address	400 Lincoln Avenue		
Contact Mailing City	Searcy		
Contact Mailing State	AR	Contact Mailing Zip	72143
Contact Phone #	501-279-2197	Contact FAX	501-279-2297
Contact Email Address	kevinpcaldwell@eaton.com		

INVOICE MAILING ADDRESS

Organization Name	Eaton Corporation				
Invoice Contact First Name	Kevin				
Invoice Contact Last Name	Caldwell				
Mailing Address	400 Lincoln Avenue				
Invoice Mailing State	AR	Invoice Mailing Zip	72143		
Invoice Contact Phone	501-297-2197	Invoice Contact FAX	501-279-2297		

1. **Organization Status of Applicant**

Please check the box which appropriately describes the legal organization of the applicant.

Solely Owned Proprietorship	<input type="checkbox"/>	Corporation	<input checked="" type="checkbox"/>	Limited Partnership	<input type="checkbox"/>
General Partnership	<input type="checkbox"/>	OTHER:	<input type="checkbox"/>	Please Specify:	

2. If the applicant is a corporation, indicate if it is a domestic (Arkansas) corporation or a foreign (chartered outside of Arkansas) corporation. Domestic ☐ Foreign ☒
3. If the applicant is a corporation, is it currently registered to do business with the Arkansas Secretary of State? Yes ☒ No ☐

4. **Registration Information**

New Facility	<input type="checkbox"/>	Existing Facility	<input checked="" type="checkbox"/>
Existing Facility with an Air Permit	<input type="checkbox"/>	List Current Permit No.	<i>The permit will be voided with this registration.</i>
Modification of Current Registration	<input type="checkbox"/>	List Current Registration No.	

5. Attach a brief description of the facility, processes and sources of air pollution emissions.

The Eaton Searcy facility is a 290k square foot manufacturing facility that manufactures Industrial & Mobile Valves and Filters. Some of our processes include paint boot operations, plating operations and hot and cold blackening operations.

6. What are the estimated total actual emissions from this facility?

Pollutant	Tons/year
PM	1.7
PM ₁₀	1.7
SO ₂	0.01
VOC	17.2
CO	1.1
NO _x	1.3
Single HAP*	1.7
Combination HAP*	2.9
Air Contaminants**	3.4

HAP* – Hazardous Air Pollutant

**Cannot exceed 25 tons per year

7. Attach an explanation of how the emissions estimate was determined e.g. AP-42, test information, etc.

Actual emissions were determined by using a combination of USEPA AP-42 emission factors and material balance based on MSDS for materials used.

8. Has a Disclosure Statement been submitted to the Department previously? Yes ☐ No ☒
(If no, please attach a disclosure statement)

9. Do you wish to be added the Air Permits Newsletter email list? Yes ☒ No ☐

If yes, list the email address(es) you wish to use:

(or you can email us at AirPermits@adeq.state.ar.us with “subscribe” (no quotation marks) in the subject box.

10. The registration requires an annual fee of \$200. The Department will send an invoice when the annual fee is due. Submit this Registration to:

Arkansas Department of Environmental Quality
Air Permitting Section
5301 Northshore Drive
North Little Rock, AR 72118

CERTIFICATION OF APPLICATION

"Responsible Official" means one of the following:

- 1) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - A) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1990 dollars); or
 - B) the delegation of authority to such representative is approved in advance by the permitting authority.
- 2) For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- 3) For a municipality, State, Federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of EPA).

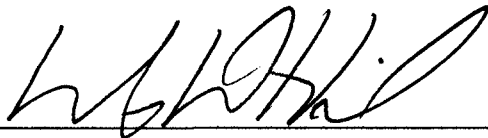
I certify under penalty of law that this application and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Daniel Hilgenkamp

Plant Manager

Typed/printed name of responsible official

Title



Signature of responsible official

Date