STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1319-AR-5 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. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

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
6/25/2019	Deminimis	Replaced SN-06 Paint Booth with SN-09 Paint Booth

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. The facility submitted a de minimis application requesting the following changes to the permit:

- Add the following new sources to the permit

  - Spencer Paint Booth (SN-09)
  - Paint Booth Flush System (SN-11)
- Rename the following source
  - Paint Hanger Stripping Tank (SN-07) to Facility Wide Acetone Usage
- Add the following Insignificant Activities
  - Spencer Pre-Washer
  - Spencer Paint Booth Combination Oven
  - Spencer Paint Booth Air Make-up Unit
  - Pre-washer Tank Heater
  - Pre-washer Air Knife
  - Paint kitchen
- Remove the following Insignificant Activities
  - Used Solvent Still
  - PRC Laser Welder
  - Paint Pre-wash (for SN-06)
  - Labeling Machine
- Decrease annual paint usage to 7,000 gallons
- Bubble SN-06 and SN-09 annual limits

Permitted emissions decreased by 1.1 tpy PM/PM_{10}, , 2.21 tpy Ethylbenzene and 9.94 tpy Xylene. Permitted emissions increased by 1.9 tpy VOC, 9.7 tpy Acetone, 9.77 tpy Single HAP and 1.98 tpy Total HAP.

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 July 25, 2018 and was found to be in compliance.

8. PSD/GHG 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 WWWWWW

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

The facility does not use any materials that contain any single NCAP HAP with facility wide emissions equal to or greater than 10 tpy or a TLV less than 1 mg/m^3. The facility emits HAPs related to plating, painting and coating operations.

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,	none	N/A	0.5 MMBtu/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		0.0002 Toluene lb/gal in Oil 22			
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 VOC in Pen Dip Super	none	N/A	Metex SCB B = 0.015 gal/hr Oakite 33 = 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 Preso 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 Paint Single HAP 2.7 Primer Single HAP 3.55	Water Curtain	50% Particulate	0.84 gal/hr 7000 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
SN-09	Mass Balance/MSDS	Superpaint lb/gal VOC: 3.65 PM: 8.905 Acetone: 0.601	3-stage filter	99% Particulate	23.8 gal/hr Paint/primer – 7,000 gal/yr Primer – 5,550

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		Paint Single HAP 2.7 Primer Single HAP 3.55			gal/yr
SN-11	Mass Balance/MSDS	lb/gal VOC: 2.198 Acetone: 5.998 Single HAP 0.01	N/A	N/A	1.5 gal/hr Solvent – 2,500 gal/yr

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
See Specific Condition #32				

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	Recorded Item	Permit Limit	Frequency	Report (Y/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 and SN-09	Paint/Primer used	7000 gal/yr with no more than 5,500 gallons of primer total	Monthly	N
SN-06 and SN-09	Coating Content	VOC: 5.20 lb/gal Paint Single HAP: 2.7 lb/gal Primer Single HAP: 3.55 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
SN-11	Solvent used	2500 gal/yr	Monthly	N
SN-11	Solvent Content	Acetone - 6.0 lb/gal HAP – 0.01 lb/gal	Annual update of MSDS	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism

SN	Opacity	Justification for limit	Compliance Mechanism
02, 03, 06 & 09	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
Spencer Pre-Washer Stage 1 – 1.5 MMBtu/hr	A-1	0.049	0.0039	0.035	0.54	0.64	0.012	0.012
Spencer Pre-Washer Stage 3 - 1.5 MMBtu/hr	A-1	0.049	0.0039	0.035	0.54	0.64	0.012	0.012
Spencer Paint Booth Combination Oven - 1.2 MMBtu/hr	A-1	0.039	0.0031	0.028	0.43	0.52	0.0097	0.0097
Spencer Paint Booth Air Make-up Unit -2.6 MMBtu/hr	A-1	0.085	0.0067	0.061	0.93	1.11	0.021	0.021
Pre-Washer Tank Heater - 0.5 MMBtu/hr	A-1	0.016	0.0013	0.012	0.18	0.21	0.0041	0.0041
Pre-Washer Air Knife - 1.0 MMBtu/hr	A-1	0.033	0.0026	0.024	0.36	0.43	0.0081	0.0081
Thermal Deburring Unit	A-1	0.0082	0.00064	0.0059	0.090	0.11	0.002	0.002
Total for A-1 Category		*0.28*	*0.022*	*0.20*	*3.08*	*3.67*	*0.069*	*0.069*
Coolant Makeup Tank (2000	A-3			0.001			0.001	0.001

Source Name	Group A Category	Emissions (tpy)						
		PM/PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
gallons)								
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
Total for A-3 Category				*0.007*			*0.007*	*0.007*
Paint Storage in Small Containers (max 5 gallons in capacity)	A-8			0.152			0.075	0.084
Total for A-8 Catagory				*0.152*			*0.075*	*0.084*
Spencer Pre-Washer - DuBois GF Clean 1052 – 0.025 lb/gal VOC	A-9						0.0	0.0
Spencer Pre-Washer - DuBois Secure – 0.017 lb/gal VOC	A-9						0.02	0.02
Spencer Pre-Washer - DuBois SpectraLINK – 0.021 lb/gal VOC	A-9						0.0	0.0
Total for A-9 Catagory							*0.02*	*0.02*
Enclosed Sand Blasting Cabinet	A-13	0.45						

Source Name	Group A Category	Emissions (tpy)						
		PM/PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
Low Vapor-pressure cleaners	A-13			0.9				
Assembly & Test Area	A-13			0.67			0.011	0.011
Empty Drum Label Painting	A-13			0.03			0.012	0.016
Two 500 Gallon Methanol Storage Tanks	A-13			0.011			0.011	0.011
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			0.180	0.212
Storage/Transfer of Metal Shavings	A-13	0.1						
Water Treating Process	A-13	0.61					0.002	0.002
Two Instapak foam-in-place systems	A-13			8.6E-07			8.6E-07	8.6E-07
Paint Kitchen	A-13							
Total of A-13 Category		*1.850*		*2.301*			*0.216*	*0.0252*

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1319-AR-4

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Eaton Hydraulics LLC
Permit Number: 1319-AR-5
AFIN: 73-00089

			Old Permit	New Permit
$/ton factor	23.93	Permit Predominant Air Contaminant	60.8	62.7
Minimum Fee $	400	Net Predominant Air Contaminant Increase	1.9	
Minimum Initial Fee $	500			
		Permit Fee $	400	
Check if Administrative Amendment	☐	Annual Chargeable Emissions (tpy)	62.7	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	23.5	22.4	-1.1
PM_{10}	23.5	22.4	-1.1
$PM_{2.5}$	0	0	0
SO_2	0.2	0.2	0
VOC	60.8	62.7	1.9
CO	0.7	0.7	0
NO_X	0.7	0.7	0
Acetone	14.72	24.42	9.7
Total HAP	12.17	14.15	1.98
Single HAP	0	9.77	9.77