

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1319-AR-7 AFIN: 73-00089

1. PERMITTING AUTHORITY:

Division 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
5/20/2021	Deminimis	Increase solvent and coating usage, remove emission bubble for paint booths

6. REVIEWER’S NOTES:

Eaton Hydraulics operates a facility in Searcy, AR that manufactures hydraulic valves, valve components, filter assemblies, vane pumps, shafts and vane motors. The basic raw materials used in the processes include aluminum castings, cast iron castings, steel bar stock and other component and pre-machined parts. The facility submitted a de minimis application to

- Increase solvent usage to 12,672 gallons/year in the flush system (SN-11)
- Increase coating usage to 1,584 gallons/year for the Spray Paint Booth KDA1 (SN-06)

- Increase coating usage to 11,376 gallons/year for the Paint Booth PL05 (SN-09)
- Remove the emission bubble and separate coating limits for the two coating systems (SN-06 and SN-09)

Permitted emissions decreased by 20.1 tpy PM/PM<sub>10</sub>, 5.22 tpy Single HAP and 4.34 tpy Total HAP. Permitted emissions increased by 22.6 tpy VOC and 51.83 tpy Acetone.

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*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-08	NO <sub>x</sub> & CO	40 CFR Part 63, Subpart ZZZZ 40 CFR 40 Part 60, Subpart JJJJ
SN-03	HAPs	40 CFR Part 63, Subpart WWWW

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
none				

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Division of Environmental Quality 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<sup>3</sup> (except the curing agent\*). The facility emits HAPs related to plating, painting and coating operations.

\*SN-09 Paint Booth – The Urethane Curing Agent contains Hexamethylene diisocyanate (HDI – TLV 0.035 mg/m<sup>3</sup>) which reacts to form a crosslinked polymer in the coating solids and therefore has no HDI emissions.

13. 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 <sup>3</sup> PM, 5.5 lb/MMft <sup>3</sup> VOC, 0.6 lb/MMft <sup>3</sup> SO <sub>x</sub> , 100 lb/MMft <sup>3</sup> NO <sub>x</sub> , 84 lb/MMft <sup>3</sup> 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	41 grams/day Nickel	none	N/A	Nitec 8200A = 0.165 gal/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	EPA's Risk Assessment Tool for Metal Finishing Industry Table 4				
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: 6.2 Single HAP 2.7 Total HAP 3.30	Water Curtain	50% Particulate	0.84 gal/hr 1,584 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 <sub>10</sub> : 0.0095 VOC: 0.0296 SO <sub>x</sub> : 0.000588 NO <sub>x</sub> : 2.27 CO: 3.72	None	N/A	0.3876 MMBtu/hr
SN-09	Mass Balance/MSDS	Superpaint lb/gal VOC: 4.47 PM: 9.78 Acetone: 3.42 Single HAP 0.42 Total HAP 1.23	3-stage filter	99% Particulate	23.8 gal/hr 11,376 gal/yr
SN-11	Mass Balance/MSDS	lb/gal VOC: 2.198 Acetone: 6.64 Single HAP 0.01	N/A	N/A	1.5 gal/hr 12,672 gal/yr

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
See Specific Condition #40				

15. 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				

16. 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	Coating used	1,584 gal/yr	Monthly	N
SN-06	Coating Content	VOC: 5.20 lb/gal Coating Single HAP: 2.7 lb/gal	Annual update of MSDS	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/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 #33 & #34	Continuous	N
SN-08	Notifications for Subpart JJJJ	N/A	Continuous	N
SN-09	Coating used	11,376 gal/yr	Monthly	N
SN-09	Coating Content	VOC: 4.47 lb/gal Coating Single HAP: 0.42 lb/gal	Annual update of MSDS	N
SN-11	Solvent used	12,672 gal/yr	Monthly	N
SN-11	Solvent Content	Acetone - 6.64 lb/gal HAP - 0.01 lb/gal	Annual update of MSDS	N

## 17. OPACITY:

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

## 18. DELETED CONDITIONS:

Former SC	Justification for removal
28	Removed requirement for max acetone content of 6.0 lb/gal – calculated at max of 6.64 lb/gal

## 19. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Pre-Washer Stage 1 #PL03 – 1.5 MMBtu/hr	A-1	0.049	0.0039	0.035	0.54	0.64	0.012	0.012
Pre-Washer Stage 3 #PL03 - 1.5 MMBtu/hr	A-1	0.049	0.0039	0.035	0.54	0.64	0.012	0.012
Paint Booth Combination Oven #PL04 - 1.2 MMBtu/hr	A-1	0.039	0.0031	0.028	0.43	0.52	0.0097	0.0097
Paint Booth Air Make-up Unit #PL05 -2.6 MMBtu/hr	A-1	0.085	0.0067	0.061	0.93	1.11	0.021	0.021
Pre-Washer Tank Heater #PL03 - 0.5 MMBtu/hr	A-1	0.016	0.0013	0.012	0.18	0.21	0.0041	0.0041
Pre-Washer Air Knife #PL03 - 1.0 MMBtu/hr	A-1	0.033	0.0026	0.024	0.36	0.43	0.0081	0.0081
Thermal Deburring Unit #JEJ1 – 0.25 MMBtu/hr	A-1	0.0082	0.00064	0.0059	0.090	0.11	0.002	0.002
Pre-Washer Stage 1 #PW93 – 1.5 MMBtu/hr	A-1	0.049	0.0039	0.035	0.54	0.64	0.012	0.012
<i>Total for A-1 Category</i>		<i>0.33</i>	<i>0.026</i>	<i>0.24</i>	<i>3.62</i>	<i>4.31</i>	<i>0.081</i>	<i>0.081</i>
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

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
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 Small Containers (max 5 gallons in capacity)	A-8			0.152			0.075	0.084
<i>Total for A-8 Category</i>				<i>0.152</i>			<i>0.075</i>	<i>0.084</i>
Pre-Washer #PL03 - DuBois GF Clean 1052 – 0.025 lb/gal VOC	A-9						0.0	0.0
Pre-Washer #PL03 - DuBois Secure – 0.017 lb/gal VOC	A-9						0.02	0.02
Pre-Washer #PL03 - DuBois SpectraLINK – 0.021 lb/gal VOC	A-9						0.0	0.0
Pre-Washer #PW93 - Ransohoff Evercycle 225 – 0.013 lb/gal VOC	A-9							
Pre-Washer #PW93 - Cimclean Producto RI-600 – 0.081 lb/gal VOC	A-9							
<i>Total for A-9 Category</i>							<i>0.02</i>	<i>0.02</i>
Enclosed Sand Blasting Cabinet	A-13	0.45						
Low Vapor-pressure cleaners	A-13			0.9				
Assembly & Test Area	A-13			0.67			0.011	0.011



Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
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							
<i>Total of A-13 Category</i>		<i>1.850</i>		<i>2.301</i>			<i>0.216</i>	<i>0.0252</i>

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1319-AR-6



## 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-7  
 AFIN: 73-00089

			<b>Old Permit</b>	<b>New Permit</b>
\$/ton factor	23.93	Permit Predominant Air Contaminant	62.7	85.3
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	22.6	
Minimum Initial Fee \$	500			
Check if Administrative Amendment <input type="checkbox"/>		Permit Fee \$	<u>540.818</u>	
		Annual Chargeable Emissions (tpy)	<u>85.3</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	22.4	2.3	-20.1
PM <sub>10</sub>	22.4	2.3	-20.1
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0.2	0.2	0
VOC	62.7	85.3	22.6
CO	0.7	0.7	0
NO <sub>x</sub>	0.7	0.7	0
Acetone	24.42	76.25	51.83
Total HAP	14.15	9.81	-4.34
Single HAP	9.77	4.55	-5.22