

IS
Ken Almqvist
3/4/16

125
AIR 001 00011

NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY COMPLIANCE SECTION
INSPECTION REPORT



FACILITY NAME:	Dutton-Lainson Company	FID#	125
MAILING ADDRESS:	P.O. Box 729 Hastings, NE 68901-0729	LOCATION:	1601 W. 2 nd Street Hastings, NE 68901
INSPECTOR(S):	Chris Helms, Program Specialist	DATE/TIME:	2/18/2016 @1200-1430
FACILITY REPRESENTATIVE(S):	Rick Rail, Environmental Compliance/Safety Director Jake Jones, Safety Technician	PHONE #:	(402)462-4141

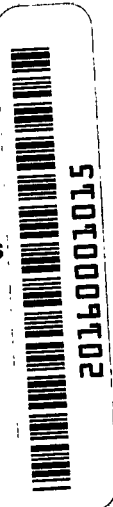
APPLICABLE RULES:	Including, but not limited to Title 129; 40 CFR, Part 63, Subparts T, DDDDD		
EMISSION CONTROLS:	Zinc Electroplating	- 4 wet scrubbers	
	Spray Painting Booth	- Dry fiber filters	
	Burn-off Oven	- Afterburner	
	Halogenated Vapor Degreaser	- Working mode/idling mode cover	
		- Freeboard chiller	
		- Primary condenser	
		- Draft control	

Facility History

Dutton-Lainson has been at its current location since approximately the 1930's. They currently employ approximately 180 staff. Production shifts run 16 hours per day. Plating operates anywhere from 16-24 hours per day. The degreaser area operates 8 hours per day. The plant operates 5 days per week, Monday through Friday, 52 weeks/year with occasional Saturdays. There are no scheduled major shutdowns planned in the next year.

Process Description

Dutton-Lainson is a facility that falls under the category of fabricated metals production (SIC code 3499). Raw materials such as cold rolled steel, hot rolled steel, and zinc are used through a variety of processes such as brazing, degreasing, electroplating, zinc die casting, and painting. The finished products are oil cans, fence stretchers, winches, anchors, tongue jacks, and couplers.



The plant is classified as a major source as the potential to emit of trichloroethylene, a hazardous air pollutant (HAP), from the batch vapor degreaser is greater than 10 tons per year. All equipment in this permit is included in the source's annual air emission inventory report. Emission points are summarized in Table 1.

Pre - Inspection Interview

I arrived at the facility at approximately 1115 on 2/18/2016. I met with Rick Rail, Engineer, and Jake Jones, Safety/EPA Technician. We agreed we would both take lunch and meet at 1200 for the start of the inspection. I explained the reason and nature of the inspection and told Mr. Rail and Mr. Jones that the inspection would consist of a records review, compliance evaluations, a tour of the facility, and an exit interview. Both Mr. Rail and Mr. Jones provided requested documents and escorted me on the inspection.

Attachments

Attachment 1- 2/28/2015 Operating Permit with comments

Attachment 2- 3/26/2015 DL letter explaining TCE spill

Attachment 3- Solvent Emission Calculation Worksheet for 2015

Attachment 4- Calculation sheet for loading

Attachment 5- Monthly hoist speed and Wind Speed logs for 2015 to date

Attachment 6- 7/23/2015 Training memo

Attachment 7- 8/11/2015 Test for Don Hoshaw

Attachment 8- Weekly Temperature and Room Parameter logs for 2016.

Attachment 9- Burnoff Oven Operating log for 2015 to date

Attachment 10- Dry paint filter/replacement log for 11/2015-1/2016

Attachment 11- Liquid HAP paint log for 2015 to date

Attachment 12- DL Energy Assessment Report for August 2015.

Attachment 13- 5 year tune-up documentation for boiler and process heater

Attachment 14- Inspection Exit Summary form

Exit Interview

Based upon information obtained during the inspection on February 18, 2016, I summarized my observations for Mr. Rick Rail, Engineer; and Mr. Jake Jones, Safety/EPA Technician. I said a copy of the inspection report would be prepared and transmitted to the facility. I provided a copy of the Exit Interview Form (Attachment 14), concluded the inspection, and left the site at approximately 1430 on February 18, 2016.



**Chris Helms, Program Specialist
Field Office Section**

REPORT DATE: 2/24/2016

Table 1-Emission Points

Unit No.	Unit Description	Unit Type	Engine Rating (hp)	Fuel Type	Maximum Design Rate (MMBtu/hr)	Date Constructed	Operating Status/Comments
1-1	Brazer #1 Furnas	J.L Becker	---	Natural Gas	0.7 MMBtu/hr	---	Insignificant Activity
3-1	Vapor Degreaser (trichloroethylene)	Detrex	---	---	---	3/7/80	
4-1	Paint Cure Oven	Burdett	---	Natural Gas	0.7 MMBtu/hr	---	Insignificant Activity
5-1	Vapor Degreaser Heater	---	---	Natural Gas	0.4 MMBtu/hr	---	Insignificant Activity
6-1	Zinc Die Cast Heater	---	---	Natural Gas	0.5 MMBtu/hr	---	Insignificant Activity
6-2	Zinc Die Cast Machine	KUX Machine Co.	---	NA	NA	---	
8-1	Paint Burn-off Oven Heater	---	---	Natural Gas	0.3 MMBtu/hr	---	Insignificant Activity
8-2	Paint Burn-off Oven	Pollution Control Products	---	---	---	---	
9-1	Electroplating Operation- Hydrochloric Acid	Scrubbers -Dual Net Pro Corp	---	---	---	---	
9-2	Zinc Electroplating Operation	Scrubbers -Dual Net Pro Corp	---	---	---	---	
10-1	Dry Powder Coating Booth	Reclaim Powder Systems	---	---	---	---	
11-1	Dip Painting Operation- Toluene	---	---	---	---	---	
11-2	Dip Painting Operation-Enamel Paint	---	---	---	---	---	
12-1	45 Misc. Space Heaters	---	---	Natural Gas	6.4 MMBtu/hr	---	Insignificant Activity
	16 Rooftop HVAC's	---	---	Natural Gas	6.03 MMBtu/hr	---	Insignificant Activity
13-1	Boiler	Heggie Simplex	---	Natural Gas	3.6 MMBtu/hr	1928	Insignificant Activity

ATTACHMENT 1

AIR QUALITY CLASS I OPERATING PERMIT

PERMIT NUMBER: OP12R1-015

NDEQ ID: 00125
Program ID: AIR 001 00001

Permit Issued To: Dutton-Lainson Company
Name of Source in Application: Dutton-Lainson Company

Mailing Address: P.O. Box 729, Hastings, NE 68902-729
Source Location: 1601 W. 2nd St., Hastings, Adams County, Nebraska 68901

Project Description: This operating permit approves the operation of a fabricated metal product manufacturing facility.

Primary Standard Industrial Classification (SIC) Code: 3499 (Primary), 3469 (Secondary), and 3451 (Tertiary)

Superseded Operating Permit(s): Operating permit OPSPR1-0026 issued April 29, 2008 and Operating Permit administrative amendment OPSPMOD-0052 issued July 22, 2008.

Pursuant to Title 129, Chapter 14, of the Nebraska Air Quality Regulations, the public has been notified by prominent advertisement of the proposed operation of an air contaminant source and the thirty (30)-day period allowed for comments has elapsed. This Operating Permit approves the operation of a fabricated metal product manufacturing facility. This Operating Permit approves the operation of this source as identified in the Air Quality Operating Permit Application 12R1-015 received May 4, 2012, including any supporting information received prior to issuance of this permit. Additional details on the source, including estimated pollutant emissions, can be found in the accompanying Fact Sheet.

Compliance with this permit shall not be a defense to any enforcement action for violation of an ambient air quality standard. Unless otherwise noted the conditions of this permit are enforceable by the United States Environmental Protection Agency (USEPA) and the Nebraska Department of Environmental Quality (NDEQ). The permit holder, owner, and operator of the source shall assure compliance with all of the terms and conditions in this permit and the Attachments.

The undersigned issues this document on behalf of the NDEQ Director in accordance with Title 129 – Nebraska Air Quality Regulations as amended May 13, 2014.

2/28/15

{ORIGINAL SIGNED}

Date

Shelley Schneider, Administrator
Air Quality Division

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(C) Painting Operations IIIC-1
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(D) Boilers/Process Heaters IIID-1
(Unit #351-2 and 357-2)

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ABBREVIATIONS, SYMBOLS, and UNITS OF MEASURE

AP-42	Compilation of Air Pollutant Emission Factors, Volume I, Stationary Point and Area Sources	NDEQ	Nebraska Department of Environmental Quality
BACT	Best Available Control Technology	NESHAP	National Emission Standards for Hazardous Air Pollutants
Btu	British Thermal Unit	NO ₂	Nitrogen Dioxide
bu	Bushel	NO _x	Nitrogen Oxides
CAA	Clean Air Act	N ₂ O	Nitrous Oxide
CE	Control Equipment	NSPS	New Source Performance Standard
cf	Cubic Feet	NSR	New Source Review
CFC	Chlorofluorocarbons	OP	Operating Permit
CEMS	Continuous Emissions Monitoring System	PAL	Plant-wide Applicability Limit
CFR	Code of Federal Regulations	Pb	Lead
CO	Carbon Monoxide	PEMS	Predictive Emissions Monitoring System
CO ₂	Carbon Dioxide	PM	Particulate Matter
CO ₂ e	Carbon Dioxide Equivalent	PM _{2.5}	Particulate Matter with an aerodynamic diameter equal to or less than 2.5 microns
CP	Construction Permit	PM ₁₀	Particulate Matter with an aerodynamic diameter equal to or less than 10 microns
Director	Director of the Nebraska Department of Environmental Quality	PM ₁₀ (total)	Filterable and condensable particulate matter
dscf	Dry Standard Cubic Feet	ppb	Parts per Billion
dscfm	Dry Standard Cubic Feet per Minute	ppm	Parts per Million
EMIS	Emergency Management Information System	ppmv	Parts per Million by Volume
EQC	Environmental Quality Council	ppmvd	Parts per Million by Volume, dry basis
EP	Emission Point	PSD	Prevention of Significant Deterioration
EU	Emission Unit	PTE	Potential to Emit
FIP	Federal Implementation Plan	scf	Standard Cubic Feet
FR	Federal Register	SIC	Standard Industrial Classification
ft	Feet	SIP	State Implementation Plan
FTIR	Fourier Transform Infrared	SO ₂	Sulfur Dioxide
GHGs	Greenhouse Gases	SO _x	Sulfur Oxides
HAP	Hazardous Air Pollutant(s)	Title 129	Title 129, Nebraska Air Quality Regulations
hp	Horsepower	TDS	Total Dissolved Solids
hr	Hour	tpy	Tons per year
lb	Pound	TRS	Total Reduced Sulfur
LDAR	Leak Detection and Repair	TSP	Total Suspended Particulate Matter
LNB	Low NO _x Burner	USEPA	United States Environmental Protection Agency
MACT	Maximum Achievable Control Technology	UTM	Universal Transverse Mercator
Mgal	One Thousand Gallons	VHAP	Volatile Hazardous Air Pollutant
MMBtu	One Million British Thermal Units	VMT	Vehicle Miles Traveled
MMgal	One Million Gallons	VOC	Volatile Organic Compound
MMscf	One Million Standard Cubic Feet	yr	Year
MSDS	Material Safety Data Sheet		
n/a	Not Applicable		
NAAQS	National Ambient Air Quality Standards		

I. GENERAL CONDITIONS

- (A) Administrative amendment of this permit for a change in ownership or operational control of this source is allowed provided the NDEQ determines that no other change in the permit is necessary and a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the NDEQ (Title 129, Chapter 15, Section 001.01D).
- (B) The permittee shall allow the NDEQ, USEPA or an authorized representative, upon presentation of credentials (Title 129, Chapter 8, Section 012.02) to:
- (1) Enter upon the permittee's premises at reasonable times where a source subject to this permit is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
 - (3) Inspect at reasonable times any facilities, pollution control equipment, including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
 - (4) Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or applicable requirements.
- (C) Regulatory authority:
- (1) Title 40 Protection of Environment, Code of Federal Regulations that apply to the source including those not currently delegated to Nebraska or not yet included in Title 129 - Nebraska Air Quality Regulations, and
 - (2) Title 129 - Nebraska Air Quality Regulations that apply to the source as amended May 13, 2014.
- (D) The permittee shall comply with 40 CFR part 82, Protection of the Stratospheric Ozone. Affected controlled substances include, but are not limited to, chlorofluorocarbons and hydrochlorofluorocarbon refrigerants, halons, carbon tetrachloride, and methyl chloroform (specific affected controlled substances are listed in 40 CFR part 82, Subpart A, Appendices A, (Class I) and B (Class II).

The following subparts and Sections of 40 CFR part 82 are conditions of this permit:

Subpart A - Production and Consumption Controls

Subpart B - Servicing of Motor Vehicle Air Conditioners

Subpart E - Labeling of Products Using Ozone-Depleting Substances: Sections 82.106 Warning statement requirements, 82.108 Placement of warning statement, 82.110 Form of label bearing warning statement, and 82.112 Removal of label bearing warning statement

Subpart F- Recycling and Emissions Reduction: Sections 82.156 Required

practices, 82.158 Standards for recycling and recovery equipment, 82.161 Technician certification, and 82.166 Reporting and recordkeeping requirements

Subpart G -Significant New Alternatives Policy Program

- (E) This permit is issued for a fixed term of five (5) years. A renewal application shall be submitted to the NDEQ a minimum of six (6) months and a maximum of eighteen (18) months before permit expiration. Provided their application is submitted within the above timeframe, the source may continue to operate without a permit from the date the application is determined to be complete until final action on the application is taken by the NDEQ (Title 129, Chapter 8, Section 003, and Chapter 7, Section 002.06 and Section 003.04).
- (F) The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Nebraska Environmental Protection Act and the Federal Clean Air Act, and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application (Title 129, Chapter 8, Section 007.01).
- (G) It shall not be a defense for a permittee in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit (Title 129, Chapter 8, Section 007.02).
- (H) This permit may be modified; revoked, reopened, and reissued; or terminated for cause in accordance with Title 129 and Title 115, Rules of Practice and Procedure. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not supersede any permit condition (Title 129, Chapter 8, Section 007.03).
- (I) Conditions under which this permit will be reopened, revoked and reissued or terminated during its term for cause, include but are not limited to (Title 129, Chapter 8, Section 010, and Chapter 15, Section 006):
 - (1) Additional applicable requirements under the Nebraska Environmental Protection Act or the Federal Clean Air Act, which become applicable to this source with a remaining permit term of three (3) or more years. No such reopening will occur if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended;
 - (2) Additional requirements, including excess emissions requirements, that become applicable to an affected source under the acid rain program under Chapter 26;
 - (3) A determination by the Director or the Administrator of USEPA that:
 - (a) The permit must be revoked and reissued to ensure compliance with the applicable requirements;
 - (b) The permit contains a material mistake or that inaccurate statements were made in the emissions standards or other terms or conditions of the permit;
 - (c) An applicable requirement or applicable requirement under the

Federal Clean Air Act applies which was not identified by the permittee in its application;

- (J) This permit may be revoked during its term for cause, including but not limited to (Title 129, Chapter 8, Section 010, and Chapter 15, Section 006.02):
 - (1) The existence at the source of unresolved noncompliance with applicable requirements or a term or condition of this permit, and refusal of the permittee to agree to an enforceable schedule of compliance to resolve the noncompliance;
 - (2) The submittal by the permittee of false, incomplete, or misleading information to the NDEQ or USEPA;
 - (3) A determination by the Director that the permitted source or activity endangers human health or the environment and that the danger cannot be removed by a revision of this permit; or
 - (4) The failure of the permittee to pay a penalty owed pursuant to court order, stipulation and agreement, or order issued by the Administrator of the USEPA.
- (K) This permit does not convey any property rights of any sort, or any exclusive privilege (Title 129, Chapter 8, Section 007.04).
- (L) The permittee shall furnish to the NDEQ, within the time specified by the NDEQ, any information requested by the NDEQ in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the NDEQ copies of records required to be kept in accordance with the permit or, for information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality pursuant to Title 115 - Rules of Practice and Procedure (Title 129, Chapter 8, Section 007.05).
- (M) The provisions of this permit supersede the provisions of any previously issued operating or construction permit. The applicable requirements of previously issued construction permits are now conditions of this permit (Title 129, Chapter 8, Sections 002 and 007.06).
- (N) In the event of a challenge to any portions of this permit, the unchallenged permit requirements shall remain valid (Title 129, Chapter 8, Section 006).
- (O) The following methods may be used to determine compliance with the terms and conditions in this permit (Title 129, Chapter 34, Section 008):
 - (1) Any compliance test method specified in the State Implementation Plan;
 - (2) Any test or monitoring method approved for the source in a permit issued pursuant to Title 129, Chapter 8, 17, 19, or 26;
 - (3) Any test or monitoring method provided for in Title 129; or
 - (4) Any other test, monitoring, or information-gathering method that produces information comparable to that produced by any method described in I.(O)(1) through (3).
- (P) Open fires are prohibited except as allowed by Title 129, Chapter 30.
- (Q) Particulate Matter – General Requirements (Title 129, Chapter 32):

- (1) The permittee shall not cause or permit the handling, transporting or storage of any material in a manner which allows particulate matter to become airborne in such quantities and concentrations that it remains visible in the ambient air beyond the property line.
- (2) The permittee shall not cause or permit the construction, use, repair or demolition of a building, its appurtenances, a road, a driveway, or an open area without applying all reasonable measures to prevent particulate matter from becoming airborne and remaining visible beyond the property line. Such measures include, but are not limited to, paving or frequent cleaning of roads, driveways and parking lots; application of dust-free surfaces; application of water; and planting and maintenance of vegetative ground cover.
- (R) Application for review of plans or advice furnished by the Director will not relieve the permittee of legal compliance with any provision of these regulations, or prevent the Director from enforcing or implementing any provision of these regulations (Title 129, Chapter 37).
- (S) If and when the Director declares an air pollution episode as defined in Title 129, Chapter 38, Section 003.01B, 003.01C, or 003.01D, the permittee shall immediately take all required actions listed in Title 129, Appendix I, Paragraph 1.1, 1.2, and 1.3, respectively, until the Director declares the air pollution episode terminated (Title 129, Chapter 38, Section 003).

Comments:

- 1) All HVAC work is contracted out. There are no certified CFC techs at the facility.
- 2) Entry was allowed. The facility provided copies of all requested documents.
- 3) No open burning was observed during the inspection. None is allowed according to plant staff.
- 4) No fugitive emissions or opacity was noted during the inspection.

II. SPECIFIC CONDITIONS

Terms and conditions of this permit are in accordance with the requirements of Title 129, Chapter 8, Section 001. The specific applicable requirement that is the basis for each specific permit condition is listed with each permit condition.

- (A) Recordkeeping: To ensure compliance with this permit, records shall be maintained as outlined below. Records include, but are not limited to: copies of all application materials, notifications, reports, test protocols, test results, and plans; and, originals of all required monitoring results, measurements, inspections, and observations (Title 129, Chapter 8, Section 004.02B):
- (1) All records required by this permit shall be kept on-site for a minimum of five (5) years and shall be clear and readily accessible to NDEQ representatives, unless otherwise specified in this permit.
 - (2) Monthly calculations and records required throughout this permit shall be compiled no later than the fifteenth (15th) day of each calendar month and shall include all records and calculations generated through the previous calendar month, unless otherwise specified in this permit.
 - (3) The source shall keep the following records for each malfunction, start-up and shutdown where emissions were, or may have been, in excess of an emission limitation or standard (Title 129, Chapter 6, Sections 002 and 005; Chapter 8, Section 004.03B; Chapter 11; and Chapter 35, Sections 002, 004 and 005):
 - (a) The identity of the equipment.
 - (b) Reason for, or cause of, the malfunction, shutdown, or start-up.
 - (c) Duration of period of excess emissions.
 - (d) Date and time of the malfunction, shutdown, or start-up.
 - (e) Physical and chemical composition of pollutants whose emissions are affected by the action.
 - (f) Methods, operating data, and/or calculations used to determine these emissions.
 - (g) Quantification of emissions in the units of the applicable emission control regulation.
 - (h) All measures utilized to minimize the extent and duration of excess emissions during the malfunction, shutdown, and start-up.
 - (4) The source shall keep records of maintenance performed on all permitted emission units, permitted control equipment, and required monitoring equipment (Title 129, Chapter 8, Section 004.01C; Chapter 11, Section 001; Chapter 34, Section 006; and Chapter 35, Sections 006.02 and 006.05).
 - (5) Except for electronically generated records, all manually entered records of opacity readings, instrument readings, visual equipment inspections, log book entries, and any other record of equipment performance shall be initialed, or otherwise signed, by the individual who entered the record.
 - (6) Operation and maintenance manuals, or equivalent documentation, detailing proper operation and maintenance of all permitted emission

units, required control equipment and required monitoring equipment shall be kept for the life of the equipment.

(B) Submittals/Reporting:

All submittals, including reports, required by Condition II.(B) and Condition II.(D)(1)(g) shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete (Title 129, Chapter 1, Section 135; Chapter 7, Section 008; and Chapter 8, Section 012.01).

The following shall be submitted to the NDEQ as specified:

- (1) The permittee shall submit a report of applicable monitoring and all instances of deviations from permit requirements every six (6) calendar months to the NDEQ. The report for the first six (6) months (January through June) shall be submitted by September 30 of each year. The report for the second six (6) months (July through December) shall be submitted by March 31 of the following year (Title 129, Chapter 8, Section 004.03A).
- (2) The permittee shall report all deviations from permit requirements, including those attributable to start-ups, shutdowns or malfunctions, the probable cause of such deviations, and any corrective actions or preventive measures taken. The probable cause, corrective actions, or preventive measures do not have to be provided if that information has already been submitted in other reports to the NDEQ, such as for 40 CFR 60.7; however reported deviations must reference these other reports. All reports of deviations must be submitted within the time frame as per Conditions II.(B)(2)(a), (b), and (c) below. The following schedule must be followed to report all deviations (Title 129, Chapter 11, Chapter 8, Sections 004.03 and 004.04, and Chapter 35, Sections 004 and 005).
 - (a) Any deviation resulting from emergency or upset conditions shall be reported within two (2) working days of the date on which the permittee first becomes aware of the deviation if the permittee wishes to assert the affirmative defense authorized under Chapter 11 of Title 129. The report may be submitted initially without a certification by the responsible official, as required by Condition II.(B) above, if an appropriate certification is provided within ten (10) days thereafter, together with the information required under Condition II.(A)(3) and any corrected or supplemental information required concerning the deviation.
 - (b) Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported as soon as is practicable. The report may be submitted initially without a certification by a responsible official in accordance with Condition II.(B) above, if an appropriate certification is provided within ten (10) days thereafter, together with any corrected or supplemental information required concerning the deviation.
 - (c) All other deviations shall be reported as per Condition II.(B)(1).
- (3) The permittee shall submit completed emission inventory forms for the

- preceding calendar year to the NDEQ by March 31 of each year (Title 129, Chapter 6).
- (4) The permittee shall submit fees, due July 1 of each year, based on the actual emission tonnage, up to and including 4,000 tons per year for each regulated pollutant for fee purposes, as established in the emission inventory for the previous calendar year (Title 129, Chapter 8, Section 008 and Chapter 29).
- (5) Certification of compliance with the terms and conditions of this permit, including emission limitations, standards, or work practices, for the preceding calendar year, shall be submitted to the NDEQ and to USEPA Region VII's Air Compliance Coordinator by March 31 of each year. The report shall be certified by a responsible official in accordance with Condition II.(B) and shall include the following (Title 129, Chapter 8, Section 012.05).
- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The compliance status;
- (c) A determination of whether compliance was continuous or intermittent; and
- (d) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (6) Any emissions due to malfunctions, unplanned shutdowns, and ensuing start-ups that are, or may be in excess of applicable emission limitations shall be reported to the NDEQ in accordance with Condition II.(B)(2)(a).
- (C) Changes allowed for without an operating permit revision (Title 129, Chapter 15, Section 007):
- (1) The permittee may make the changes identified in Condition II.(C)(1)(a) within a permitted facility without a permit revision if the change is not a modification under Title 129, Chapters 18, 23, 27, or 28; the change does not require a construction permit under Chapters 17 or 19; and the change does not result in the emissions allowable under the permit (whether expressed therein as a rate of emissions or in the terms of total emissions) being exceeded. (Title 129, Chapter 15, Section 007.01).
- (a) Changes in the configuration of the source's equipment, defined as "Section 502(b)(10) changes", as defined in Title 129, Chapter 1, Section 139 (Title 129, Chapter 15, Section 007.01A). Written notification of these changes shall be sent to the NDEQ as follows:
- (i) Non-Emergencies (Title 129, Chapter 1, Section 139; Chapter 15, Section 007.01):
1. Written notification shall be received by the NDEQ a minimum of seven (7) days in advance of the proposed changes;
- (ii) Emergencies (Title 129, Chapter 1, Section 139; Chapter 15, Section 007.01):

1. Initial notification shall be made within two working days of the date on which the permittee first becomes aware of the need for the change;
 2. A follow-up written notification shall be submitted as soon as practicable; and,
 3. The notifications shall include an explanation of the nature of the emergency.
- (iii) Required information (Title 129, Chapter 15, Section 007.01.A):
1. A brief description of the change within the permitted source (Chapter 15, Section 007.01A1);
 2. The date on which the change will occur (Chapter 15, Section 007.01A2);
 3. Any change in emissions (Chapter 15, Section 007.01A3); and,
 4. Any permit term or condition that is no longer applicable as a result of the change (Chapter 15, Section 007.01A4).
- (iv) A copy of the notification shall be attached to the source's copy of the operating permit.
- (2) The permittee may make changes that are not defined as "Section 502(b)(10) changes" within a permitted source without a permit revision if the change is not a modification under Title 129, Chapters 18, 23, 27, or 28; and the change is not a change which would require a construction permit under Chapters 17 or 19 (Title 129, Chapter 15, Section 007.02).
- (a) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition (Title 129, Chapter 15, Section 007.02A).
- (b) The source shall provide contemporaneous written notice to the Director and the Administrator of EPA, except for changes that qualify as insignificant activities under the provisions of Title 129, Chapter 7, Sections 006.03 and 006.04. Such written notice shall include (Title 129, Chapter 15, Section 007.02B):
- (i) A description of each change;
 - (ii) The date the change will be made;
 - (iii) A description of any change in emissions;
 - (iv) A list of the pollutants emitted; and,
 - (v) A list of any applicable requirements that would apply as a result of the change, including terms and conditions established in in the relevant operating permit for synthetic minor purposes.
- (c) A copy of the notification in Condition II.(C)(2)(b) shall be attached to the source's copy of the operating permit.

- (d) Any change under Condition II.(C)(2) shall not qualify for a permit shield under Chapter 8, Section 014 (Title 129, Chapter 15, Section 007.02C).
 - (e) The permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and emissions resulting from those changes (Title 129, Chapter 15, Section 007.02D).
 - (f) Upon review of a notice submitted in accordance with Condition II.(C)(2)(b), the NDEQ may require a source to apply for an operating permit if the change does not meet the requirements of Condition II.(C)(2) [Title 129, Chapter 15, Section 007.02E].
- (3) Testing requirements:
- (a) Testing may be required if a change reported under Condition II.(C)(1) or II.(C)(2) involves an emissions unit that was previously tested (Title 129, Chapter 8, Section 004.01B and 015; Chapter 34).
- (D) Testing:
- (1) Performance tests, when required by the NDEQ, shall be completed as follows:
 - (a) The owner or operator shall provide the NDEQ at least thirty (30) days written notice prior to testing to afford the NDEQ an opportunity to have an observer present. The NDEQ may, in writing, approve a notice of less than 30 days. If the testing is pursuant to an underlying requirement contained in a federal rule, the notice provisions of the underlying requirement apply (Title 129, Chapter 34, Section 003).
 - (b) The owner or operator shall provide the NDEQ with an emissions testing protocol at least thirty (30) days prior to testing (Title 129, Chapter 34, Section 003).
 - (c) Testing shall be conducted according to the methodologies found in Title 129, Chapter 34, Section 002, or other NDEQ approved methodologies (Title 129, Chapter 34, Section 002).
 - (d) Performance tests shall be conducted while operating at full capacity, unless otherwise specified by the NDEQ (Title 129, Chapter 8, Sections 004.01B and 012.01).
 - (e) Performance tests shall be conducted for a minimum of three (3) one-hour runs unless another run-time is specified by the applicable Subpart or as deemed appropriate by the NDEQ (Title 129, Chapter 8, Sections 004.01B and 012.01B).
 - (f) The owner or operator shall monitor and record the operating parameters for process and control equipment during the performance testing required in the permit (Title 129, Chapter 8, Sections 004.01B and 012.01).
 - (g) A certified written copy of the test results, signed by the person

conducting the test, shall be provided to the NDEQ within sixty (60) days of completion of the test and will, at a minimum, contain the following items (Title 129, Chapter 8, Sections 004.01B and 012.01, and Chapter 34, Section 002.07):

- (i) A description of:
 - 1. The operating parameters for the emissions unit during testing. Examples include, but are not limited to, production rates, process throughputs, firing rates of combustion equipment, or fuel usage; and,
 - 2. The operating parameters for the control equipment during testing. Examples include, but are not limited to, baghouse fan speeds, scrubber liquid flow rates, or pressure drop across the control device.
 - (ii) Copies of all data sheets from the test run(s).
 - (iii) A description and explanation of any erroneous data or unusual circumstance(s) and the cause for such situation.
 - (iv) A final conclusion section describing the outcome of the testing.
- (E) A permit shield is not granted (Title 129, Chapter 8, Section 014).
- (F) All permitted emission units, control equipment, and monitoring equipment shall be properly installed, operated, and maintained (Title 129, Chapter 8, Section 004.01C; Chapter 11, Section 001; Chapter 34, Section 006; and Chapter 35, Sections 006.02 and 006.05).
- (G) Requirements Becoming Effective During the Term of this Permit: The source will meet, in a timely manner, applicable requirements that become effective during the permit term, unless a more detailed schedule is expressly required by the applicable requirement. (Title 129, Chapter 7, Section 006.02H, and Chapter 8, Section 012.03).
- (H) In the event of any discrepancies between applicable NSPS or NESHAP standards and the terms and conditions of this permit, the NSPS or NESHAP standards shall take precedence unless they are less stringent (Title 129, Chapter 8, Section 013).
- (I) Source-Wide Limitations:
- (1) Operational and Monitoring Requirements:
 - (a) To demonstrate compliance with Condition II.(D)(1)(d), the permittee shall monitor the daily production/throughput rate for emission units that have had a performance test (Title 129, Chapter 34, Section 006).
 - (2) Recordkeeping and Reporting Requirements:
 - (a) To demonstrate compliance with Condition II.(I)(1)(a) above, the owner or operator of the source shall keep records of the daily production/throughput rate for all emission units that have had a performance test. (Title 129, Chapter 8, Section 004.02, and

Chapter 34, Section 006).

- (b) To demonstrate compliance with Condition II.(D)(1)(d), for emission units that have had a performance test, the permittee shall notify the NDEQ within fifteen (15) days of when there is a ten (10) percent increase in daily production/throughput rate over the tested rate recorded during the most recent valid performance test (Title 129, Chapter 34, Sections 001 and 006).

Exemption: The reporting requirements of this condition do not apply for those pollutants from an emission unit that has been tested and uses a CEMS, PEMS, or COMS to demonstrate compliance..

- (c) The following definitions apply for purposes of Conditions II.(I)(1)(a), II.(I)(2)(a), and II.(I)(2)(b) above:
- (i) "rate" shall mean the production or throughput of an emissions unit in the same units of production or throughput as the "tested rate" as defined below; and,
 - (ii) "tested rate" shall mean the production or throughput rate of an emissions unit as recorded in the most recent valid performance test and reported to the NDEQ in the source's written copy of the test results, or test report, documenting the maximum capacity of the unit(s). The tested rate shall be extrapolated to daily. Examples include, but are not limited to, tons per hour to tons per day or gallons per hour to gallons per day.
- (d) When the source makes physical or operational changes to an emissions unit or associated control equipment that may cause the original testing to not represent current operating conditions or emissions, the source shall submit a notification of the change. Such notification shall be postmarked within fifteen (15) days after such change. The NDEQ may require performance testing based on review of the specific changes identified in the notification and the resulting potential impact on emissions from the unit(s) and/or performance of the control equipment (Chapter 34, Section 001).
- (i) This notification requirement applies to emissions units and/or control equipment that meet the following requirements, except as provide in condition II.(I)(3)(d)(iii):
 1. Emissions from the emissions unit and/or control equipment is subject to an emissions limit; and
 2. A valid performance test has been conducted for the pollutant to which the emissions limit applies.
 3. Changes that may cause emissions to increase or invalidate prior testing include, but are not limited to, increasing the capacity of an emissions unit, changing the operational parameters of any control equipment outside of the range allowed

for under this permit that makes the control equipment less efficient, changing the type of scrubber packing, or increasing the inlet pollutant loading of any control equipment.

- (ii) The notification shall include the date of the changes, a description of the changes made, and an evaluation of the resulting impact on emissions from the emissions units and/or control equipment.
- (iii) The above notification requirements do not apply when compliance with the emission limitation is demonstrated through the use of a CEMS or PEMS.

- 5) All required records were being maintained at the specified time periods.
- 6) Deviation reports were submitted in a complete and timely fashion. On the most recent report, the facility discussed one possible deviation related to a 40 gallon TCE spill. The incident was reported and is documented in NDEQ files. See Attachment 2.
- 7) Emission inventory forms are being submitted. Calculations were not reviewed.
- 8) Emission fees are being paid in a timely fashion.
- 9) COC report is being submitted in a complete and timely fashion.
- 10) No changes have been made to production since the permit was issued.
- 11) No performance testing is required.
- 12) Control equipment appeared properly installed and operated.
- 13) No CEMS or PEMS have been installed.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(A) Specific Conditions for Batch Vapor Degreaser

(1) Permitted Emission Points:

The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application 12R1-015, received May 4, 2012, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
357-1	Freeboard Refrigeration Device, Reduced Room Draft, and a Freeboard Ratio of 1	Existing Batch Vapor Degreaser, installed in 1980, and retrofitted in April 1998.	NESHAP 40 CFR 63 Subpart T; Title 129, Chapter 28, Section <u>001.05</u>

(2) Applicable NSPS and NESHAP Requirements

(a) Upon issuance of this permit, the batch vapor degreaser (Unit #357-1) shall demonstrate compliance with all applicable NESHAP Subpart A and Subpart T requirements [Title 129, Chapter 28, Section 001.01 and 001.05].

(i) When allowed by NESHAP Subpart T, the source has flexibility to change compliance options for each emission unit during the term of this permit. When changing emission unit compliance options, the source shall notify the NDEQ, in writing, a minimum of 30 days prior to the change. The notification shall include the following (Title 129, Chapter 8, Section 013 and 015)

- A. The date of the change; and,
- B. The new compliance option that has been chosen under NESHAP Subpart T for each emission unit.

14) The facility vapor degreaser is 32.11 ft² at the opening. This is not mentioned in the permit or fact sheet. The size puts Dutton-Lainson (DL) in 63.463 (b)(2) (greater than 13 ft²). The compliance option w/in (b)(2) that DL chose was Option 6 in Table 2 which is correctly identified in the permit. This permit, contrary to other new permits, contains all the requirements of Subpart T. This was done at the request of the facility to clarify requirements. Subpart T will be reviewed w/in this permit below.

(b) No NSPS requirements are applicable to the emission units listed in Condition III.(A)(1).

(3) Emission Limitations and Testing Requirements:

(a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Condition II.(D).

Emission Point ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
357-1	Perchloroethylene (PCE) only [CAS #127184]	4,800 kg ^[2]	Weighted 12-month rolling average	40 CFR 63 Subpart T; Title 129, Chapter 28, Section 001.05	No
357-1	Trichloroethylene (TCE) only [CAS #79016]	14,100 kg ^[2]	Weighted 12-month rolling average	40 CFR 63 Subpart T; Title 129, Chapter 28, Section 001.05	No
	Methylene chloride (MC) only [CAS #75092]	60,000 kg ^[2]	Weighted 12-month rolling average	40 CFR 63 Subpart T; Title 129, Chapter 28, Section 001.05	No
	Multiple solvents	60,000 kg ^[1]	Weighted 12-month rolling average	40 CFR 63 Subpart T; Title 129, Chapter 28, Section 001.05	No
357-1	Opacity	< 20 percent ^[3]	6 minutes	Title 129, Chapter 20, Section 004	No

^[1] Compliance based on the MC-weighted emissions using the equation in §63.471(b)(2) – Equation 9 of NESHAP Subpart T.

^[2] Compliance demonstrated as specified in Condition III.(A)(3)(b) and (A)(4).

^[3] VOC's are not visible, therefore the emission units are in compliance with the opacity limit.

(b) The permittee shall comply with all applicable emission limitations and testing requirements in NESHAP Subpart T for emission units 357-1 [Title 129, Chapter 28, Section 001.05].

(i) The following equation is used to determine the weighted 12-month rolling total emissions when multiple solvents are used. [40 CFR 63.471(b)(2) Equation 9]

$$WE = (PCE \times A) + (TCE \times B) + (MC)$$

Where:

WE = Weighted 12-month rolling total emissions in kg (lbs).

PCE = 12-month rolling total PCE emissions from all solvent cleaning machines at the facility in kg (lbs).

A = 12.5 carcinogenic potency for PCE relative to that of MC.

TCE = 12-month rolling total TCE emission from all solvent cleaning machines at the facility in kg (lbs).

B = 4.25 carcinogenic potency for TCE relative to that of MC.

MC = 12-month rolling total MC emissions from all solvent cleaning machines at the facility in kg (lbs).

15) Attachment 3 shows the monthly and rolling totals for HAP emissions. Calculations were not reviewed in the spreadsheet.

(4) Operational and Monitoring Requirements:

(a) The permittee shall comply with all applicable operational and monitoring requirements in NESHAP Subpart T for emission unit #357-1 [Title 129, Chapter 28, Section 001.05].

(i) The batch vapor cleaning machine shall comply with the following standards and design requirements: [§63.463]

1. The vapor cleaning machine shall be employed with a control combination of a freeboard refrigeration device, reduced room draft and a freeboard of 1. [§63.463(b)(2)(i)-Option 6, and §63.463(a)(1)(ii) and (a)(2)]

16) The vapor degreaser has a refrigeration device and reduces room draft. See below. Freeboard is 1 according to staff. See Attachment 4.

2. The cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts. [§63.463(a)(3)]

17) The machine is equipped with automated systems that move material less than 11 fpm. See Attachment 5.

3. The vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser. [§63.463(a)(5)]

18) The unit has a shutoff according to staff.

4. The vapor cleaning machine shall have a primary condenser. [§63.463(a)(6)]

19) Machine has a primary condenser.

- (ii) The batch vapor cleaning machine shall be operated as follows: [§63.463(d)]

1. Control air disturbances across the cleaning machine opening by incorporating a reduced room draft as described in Conditions III.(A)(4)(a)(iii)1.B. and C. [§63.463(d)(1)(ii)]

20) Reduced room draft procedures are being followed, measured, and documented. See Attachment 5.

2. The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less. [§63.463(d)(2)]

21) Parts baskets occupy less than 51% of machine opening. See Attachment 6 and Attachment 4.

3. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine). [§63.463(d)(3)]

22) Parts spraying is done within the vapor zone.

4. Parts shall be oriented so that the solvent drains

from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Department. [§63.463(d)(4)]

23) Parts with cavities are placed in drum so they can be rotated after being placed in the degreaser.

5. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped. [§63.463(d)(5)]

24) Parts baskets are left within the machine until they stop dripping. This is outlined in the operating procedure at the facility.

6. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater. [§63.463(d)(6)]

25) The sump heater can't be operated w/out the primary condenser being on.

7. During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off. [§63.463(d)(7)]

26) The procedure outlined above is followed during shutdown.

8. When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface. [§63.463(d)(8)]

27) Leakproof coupling are used during transfer of TCE.

9. Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Department's satisfaction to

achieve the same or better results as those recommended by the manufacturer.
[§63.463(d)(9)]

28) Manufacturer instructions are being followed.

10. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in Appendix A of 40 CFR 63 if requested during an inspection by the Department. [§63.463(d)(10)]

29) All operators are being trained once per year. Testing is conducted. Attached is the most recent test from the operator that primarily operates the degreaser (Attachment 7).

11. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container. [§63.463(d)(11)]

30) Spent solvent and still bottoms are stored in closed containers and hauled away as a regulated waste. See Attachment 3 for shipped amounts.

12. Sponges, fabric, wood, and paper products shall not be cleaned. [§63.463(d)(12)]

31) None of the listed material is allowed in the degreaser.

- (iii) The batch vapor cleaning machine control combination [Condition III.(A)(4)(a)(i)1.] used to comply with Condition III.(A)(4)(a)(i) shall be monitored as follows: [§63.463(e) and §63.466]

1. Determine during each monitoring period whether each control device used to comply with these standards meets the following requirements. [§63.463(e)(2)]
- A. Ensure weekly that the chilled air blanket temperature (in °F), measured at the center of the air blanket during

idling mode, is no greater than 30% of the solvent boiling point (57 °F for trichloroethylene). Either a thermocouple or thermometer is an acceptable measuring device to measure the temperature at the center of the air blanket during the idling mode.
[§63.463(e)(2)(i) and §63.466(a)(1)]

32) Vapor degreaser is tested for temperature once per week. Data is documented. See Attachment 8.

- B. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in Condition III.(A)(4)(a)(iii)5.
[§63.463(e)(2)(ii)(A)]

33) Air movement is being limited and documented. See Attachment 8 and 5.

- C. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in Condition III.(A)(3)(a)(iii)5. [§63.463(e)(2)(ii)(B)]

34) Air movement is being limited and documented. See Attachment 8 and 5.

2. If any of the requirements of Condition III.(A)(4)(a)(iii)1. are not met, determine whether an exceedance has occurred using the criteria as follows: [§63.463(e)(3)]

- A. An exceedance has occurred if the requirements of Condition III.(A)(4)(a)(iii)1.C. have not been met.
[§63.463(e)(3)(i)]
- B. An exceedance has occurred if the requirements of Conditions III.(A)(4)(a)(iii)1.A. and B. have not

been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits. [§63.463(e)(3)(ii)]

35) Exceedances have been corrected within specified time period.

3. The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in Condition III.(A)(5)(a)(ii)2. [§63.463(e)(4)]

36) Exceedances are being reported. See deviation report discussion above.

4. The Permittee shall monitor the hoist speed as follows: [§63.466(c)]

A. Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute). [§63.466(c)(1)]

B. The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly. [§63.466(c)(2)]

C. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated. [§63.466(c)(3)]

37) Hoist speed is being monitored monthly and falls within the specified parameters. See Attachment 5 and 8.

5. The Permittee shall monitor reduced room draft and record the results as follows: [§63.466(d)]
 - A. Reduced room draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), thus the Permittee shall conduct quarterly monitoring of windspeed, and weekly monitoring of room parameters as follows: [§63.466(d)(1)]
 - a. Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the procedure specified as follows: [§63.466(d)(1)(i)]
 - b. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located. [§63.466(d)(1)(i)(A)]
 - c. Orient a velometer in the direction of the wind current at each of the four corners of the machine. [§63.466(d)(1)(i)(B)]
 - d. Record the reading for each corner. [§63.466(d)(1)(i)(C)]
 - e. Average the values obtained at each corner and record the average wind speed. [§63.466(d)(1)(i)(D)]
 2. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft. [§63.466(d)(1)(ii)]

38) All monitoring and reduced room draft procedures are being followed and documented. See previous comments.

- (iv) The permittee must maintain a log of solvent additions

and deletions for each solvent cleaning machine.
[§63.471(b)(1)]

39) Solvent additions are being documented. See previous comments.

- (v) The permittee shall on the first operating day of every month, demonstrate compliance with the applicable facility-wide emission limit given in Condition III.(A)(3)(a) on a 12-month rolling total basis using the following procedures. [§63.471(c)]
1. The permittee shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soiled materials. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in Conditions III.(A)(4)(a)(v)2. and 3. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations. [§63.471(c)(1)]
 2. The permittee shall, on the first operating day of the month, using the records of all solvent additions and deletions for the previous month, determine solvent emissions (E_{unit}) from the solvent cleaning machine using the following equation: [§63.471(c)(2) and Equation 10]

$$E_{\text{unit}} = SA_i - LSR_i - SSR_i$$

Where:

E_{unit} = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent month i , (kilograms of solvent per month).

SA_i = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent month i , (kilograms of solvent per month).

LSR_i = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent month i , (kilograms of solvent per month).

SSR_i = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in Condition III.(A)(4)(a)(v)3., during the most recent month i , (kilograms of solvent per month).

3. The permittee shall, on the first operating day of the month, determine SSR_i using either of the following two methods. [§63.471(c)(3)]
 - A. From tests conducted using EPA reference method 25d.
 - B. By engineering calculations included in the compliance report.
4. The permittee shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, ET_{unit} , for the 12-month period ending with the most recent month using the following equation: [§63.471(c)(4) and Equation 11]

$$ET_{unit} = \left[\sum_{j=1}^{12} E_{unit} \right]$$

Where:

ET_{unit} = the total halogenated HAP solvent emissions over the preceding 12 months, (kilograms of solvent emissions per 12-month period).

E_{unit} = halogenated HAP solvent emissions for each month (j) for the most recent 12 months (kilograms of solvent per month).

5. The permittee shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, $ET_{facility}$, for the 12-month period

ending with the most recent month using the following equation: [§63.471(c)(5) and Equation 12]

$$ET_{\text{facility}} = \left[\sum_{j=1}^i ET_{\text{unit}} \right]$$

Where:

ET_{facility} = the total halogenated HAP solvent emissions over the preceding 12 months for all cleaning machines at the facility, (kilograms of solvent emissions per 12-month period).

ET_{unit} = the total halogenated HAP solvent emissions over the preceding 12 months for each unit j, where i equals the total number of units at the facility (kilograms of solvent emissions per 12-month period).

- (vi) If the applicable facility-wide emission limit presented in Condition III.(A)(3)(a) is not met, an exceedance has occurred. All exceedances shall be reported as required in III.(A)(5)(a)(ii)2. [§63.471(d)]

40) The TCE is added at the beginning of each month and documented. Emissions are also calculated using the above referenced calculations. See Attachement 3. The facility wide emission limit appears to be met.

(5) Recordkeeping and Reporting Requirements:

- (a) The permittee shall comply with all applicable recordkeeping and reporting requirements in NESHAP Subpart T for emission units #357-1 [Title 129, Chapter 28, Section 001.05].
- (i) The batch vapor cleaning machine recordkeeping requirements shall be the following:
1. The batch vapor cleaning machine complying with provisions of this permit shall maintain records in written or electronic form specified in the following paragraphs for the lifetime of the machine: [§63.467(a)]
 - A. Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning

- machine and control equipment.
[§63.467(a)(1)]
- B. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date of installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993 may be substituted. [§63.467(a)(2)]
 - C. Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of this permit.
[§63.467(a)(5)]
2. The batch vapor cleaning machine complying with provisions of this permit shall maintain records in written or electronic form specified in the following paragraphs for a period of 5 years:
[§63.467(b)]
- A. Records of the results of control device monitoring required by Conditions III.(A)(4)(a)(iii)1., 4., and 5.
[§63.467(b)(1)]
 - B. Information on the actions taken to comply with Conditions III.(A)(4)(a)(iii)1., 2., and 3. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
[§63.467(b)(2)]
 - C. Estimates of annual solvent consumption for the solvent cleaning machine. [§63.467(b)(3)]
- (ii) The batch vapor cleaning machine reporting requirements shall be the following: [§63.468(f)]
- 1. The Permittee shall submit an annual report by March 31 of the year following the one for which the reporting is being made. This report

shall include the requirements as follows:
[§63.468(f)(1) and §63.10(a)(5)]

- A. A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in Condition III.(A)(4)(a)(ii)10." [§63.468(f)(1)]
 - B. An estimate of solvent consumption for each solvent cleaning machine during the reporting period. [§63.468(f)(2)]
2. The Permittee shall submit an exceedance report to the Department semiannually except when, the Department determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under Condition III.(A)(5)(a)(ii)3. is approved. Semiannual exceedance reports shall be delivered or postmarked by March 31 and September 30. Quarterly exceedance reports shall be delivered or postmarked by the last day of the next quarter (i.e., June 30, September 30, December 31, and March 31), as appropriate. The exceedance report shall include the applicable information as given below:
[§63.468(h)]
- A. Information on the actions taken to comply with Conditions III.(A)(4)(a)(iii)1., 2. And 3. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
[§63.468(h)(1)]
 - B. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

[§63.468(h)(2)]

- C. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

[§63.468(h)(3)]

- 3. The Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met. [§63.468(i)]

- A. The source has demonstrated a full year of compliance without an exceedance. [§63.468(i)(1)]

- B. The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63 Subpart A (General Provisions) and in 40 CFR 63 Subpart T. [§63.468(i)(2)]

- C. The Department does not object to a reduced frequency of reporting for the affected source as provided in §63.10(e)(3)(iii) of 40 CFR 63 subpart A (General Provisions). [§63.468(i)(3)]

- (iii) The permittee shall maintain the following records either in electronic or written form for a period of 5 years. [§63.471(e)]

- 1. The dates and amounts of solvent that are added to each solvent cleaning machine. [§63.471(e)(1)]

- 2. The solvent composition of wastes removed from each solvent cleaning machines as determined using the procedure described in Condition III.(A)(4)(a)(v)3. [§63.471(e)(2)]

- 3. Calculation sheets showing how monthly emissions and the 12-month rolling total emissions from each solvent cleaning machine were determined, and the results of all

calculations. [§63.471(e)(3)]

- (iv) The permittee shall submit a solvent emission report every year. This solvent emission report shall contain the following requirements. [§63.471(h)]
1. The average monthly solvent consumption for the affected facility in kilograms per month. [§63.471(h)(1)]
 2. The 12-month rolling total solvent emission estimates calculated each month using the method as described in Condition III.(A)(4)(a)(v). [§63.471(h)(2)]
 3. This report can be combined with the annual report required in Condition III.(A)(5)(a)(ii)1. into a single report for the facility. [§63.471(h)(3)]

41) All required records were being maintained. See previous comments.
--

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(B) Specific Conditions for Paint Burn Off Oven

(1) Permitted Emission Points:

The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application 12R1-015, received May 4, 2012, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
358-4	None	Paint Burn Off Oven (Pyrolysis® Cleaning Furnace, Model: PTR-150), with a 0.3 MMBtu/hr natural gas burner, equipped with an afterburner, installed in 1989	Title 129, Chapter 22

(2) Applicable NSPS and NESHAP Requirements

(a) No NSPS or NESHAP requirements are applicable to the emission unit 385-4.

(3) Emission Limitations and Testing Requirements:

(a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Condition II.(D).

Emission Point ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
358-4	PM (filterable)	.10 gr/dscf @ 7% O ₂ ^[1]	Test Method	Title 129, Chapter 22, Section 002; Construction Permit Issued December 13, 2002, Condition XIII.(A).	No ^[2]
358-4	Opacity	< 20 percent	6 minutes	Title 129, Chapter 20, Section 004	No ^[2]

^[1] The PM emission limit is in terms of grains per dry standard cubic feet (gr/dscf) of exhaust gas, corrected to 7% oxygen.

^[2] Compliance of PM and opacity emission limits are demonstrated by compliance with Conditions III.(B)(4)(a), (b), and (c). The Department may require testing in accordance with Condition III.(B)(3)(b) to demonstrate compliance with these limits.

(b) The Department may require testing to demonstrate compliance with Condition III.(B)(3)(a). [Construction Permit issued December 13, 2002, Condition XIII.(A)]

(i) If the Department requires testing, an emission testing protocol shall be submitted and must be approved by the Department before emission testing is conducted. The source shall notify the Department of the anticipated testing date at least 30 days prior

to such date for any testing performed to demonstrate compliance with this permit. A written report of performance test results shall be furnished to the Department within 60 days after completion of the tests.

- (ii) If the Department requires testing, performance tests shall be by an independent testing firm to demonstrate compliance with Condition III.(B)(3)(a). Testing will be conducted according to EPA Method 5 (40 CFR 60, Appendix A), Title 129, Chapter 22, Section 004, and Title 129, Chapter 34. Three separate test runs shall be conducted. The sampling time and sample volume for each run shall be at least 60 minutes and 31.8 dry standard cubic feet.

42) No required testing.

(4) Operational and Monitoring Requirements:

- (a) The burn-off oven shall be properly installed, maintained, and operated at all times. Instructions for proper inspection, maintenance, and operation of the burn-off furnace, which include the terms and conditions of this permit, shall be posted on-site. [Title 129, Chapter 22, Section 005; Construction Permit issued December 13, 2002, Condition XIII.(C)]
- (b) Materials burned in the burn-off oven shall be limited to coatings on metal parts. [Construction Permit issued December 13, 2002, Condition XIII.(D)].
- (c) Fuel for the burn-off oven's main burner and afterburner shall be limited to natural gas [Construction Permit issued December 13, 2002, Condition XIII.(E)].

43) Burnoff oven is properly installed and operated. Instructions are kept with the machine.

44) Hooks and repaints are the only items placed in the oven. Loads are documented (See Attachment 9). Only natural gas is burned as a fuel in the ovens.

(5) Recordkeeping and Reporting Requirements:

- (a) Records shall be maintained on-site for a minimum period of five (5) years. These records shall be clear and readily accessible to Department representatives and shall include the following: [Construction Permit issued December 13, 2002, Condition XIII(F)]
 - (i) To demonstrate compliance with Condition III.(B)(4)(a):
 1. Written certification that the burn-off oven has

been installed per the manufacturer's recommendations and requirements.

2. Records showing when routine inspection and maintenance was performed and what, if any, corrective actions or repairs were completed.
 3. Written certification that each burn-off oven operator has read and understands the instructions for proper operation of the unit, which includes the terms and conditions of this permit; and intends to comply with the burn-off oven operating instructions.
- (ii) To demonstrate compliance with Condition III.(B)(4)(b), a list of the materials burned during each charge.
- (iii) To demonstrate compliance with Condition III.(B)(4)(c), the type of burn-off oven fuel consumed shall be recorded

45) All required records were being maintained.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(C) Specific Conditions for Painting Operations

(1) Permitted Emission Points:

The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application 12R1-015, received May 4, 2012, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
358-1	Dry Filter system with 98% control efficiency	Powder Paint Booth – automatic spray area; Booth contains a color module which filters and recycles overspray powder paint	None
358-2	Dry Filters with a 98% control efficiency	Powder Paint Booth – touch-up; and Lacquer spray painting	None
358-5	None	Dip Painting Operation - Water Based	None

(2) Applicable NESHAP Requirements

(a) No NSPS or NESHAP requirements are applicable to the emission units listed in Condition III.(C)(1).

(3) Emission Limitations and Testing Requirements:

(a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Condition II.(D).

Emission Point ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
358-1	PM (filterable)	0.66 lb/hr ^[1]	Three 1-hour periods	Title 129, Chapter 20, Section 001	No
358-2	PM (filterable)	0.014 lb/hr ^[1]	Three 1-hour periods	Title 129, Chapter 20, Section 001	No
358-1, 358-2 and 358-5	Opacity	< 20 percent (each) ^[1]	6 minutes	Title 129, Chapter 20, Section 004	No

^[1] Compliance of PM and opacity emission limits are demonstrated by compliance with Condition III.(C)(4).

(4) Operational and Monitoring Requirements:

(a) Operation and maintenance of dry filter system and dry filters shall be in accordance with the following requirements: [Title 129, Chapter 20 Sections 001 and 004, and Chapter 8 Section 004]

- (i) The dry filter system and dry filters shall be operated and be controlling emissions at all times when the associated emission units are in operation.
- (ii) Dry filter system and dry filters shall be inspected and replaced in accordance with the operation and maintenance manual or more frequently, as indicated by filter failure, to ensure proper operation.
- (iii) Routine observations at least once each day during daylight hours of dry filter system and dry filters operation shall be conducted to determine whether there are leaks, noise, or other indications that may necessitate corrective action. If corrective action is necessary, it shall occur immediately.

46) Dry filter system was being operated. System was being inspected daily and inspections are documented. Corrective action was documented. See Attachment 10.

(5) Recordkeeping and Reporting Requirements:

- (a) Monthly records shall be kept for the emission units 358-1, 358-2, and 358-5 to demonstrate this source is not subject to 40 CFR 63, Subpart MMMM (Title 129, Chapter 28, Section 001.81) for NESHAP for Miscellaneous Metal Parts and Products surface coating at major sources of HAP. The records shall include for each chemical used, excluding powder paints, in the surface coating operation (including associated activities, such as surface preparation, cleaning, mixing, and storage) [Title 129, Chapter 8, Sections 004.02 and 013]:
 - (i) Certified Data Product Sheets or Material Safety Data Sheets (MSDS) for each chemical used.
 - (ii) Volume of each chemical used (in gallons)
- (b) The permittee shall maintain the following records for the dry filter system and dry filters: [Title 129, Chapter 8, Section 004.002]
 - (i) Fabric filter replacement records including the date the fabric filter replacement occurred and the type of filter installed. [Title 129 Chapter 20 Sections 001 and 004]
 - (ii) Records documenting the date, time, routine observations and inspections, and any corrective actions taken for each day the associated dry filter system and dry filters are in operation. [Title 129 Chapter 20 Sections 001 and 004]

47) Monthly records were being maintained to document that the facility was not subject to MMMM. Cutoff for

applicability is 250 gallons. The facility currently uses approximately 100 gallons/year. See Attachment 11.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(D) Specific Conditions for Process Boiler/Heaters

(1) Permitted Emission Points:

The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application 12R1-015, received May 4, 2012, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
351-2	None	0.5 MMBtu/hr natural gas zinc die cast process heater (integrated with die cast machine), existing unit, installed in 1946.	NESHAP 40 CFR Part 63, Subparts A and DDDDD
357-2	None	0.4 MMBtu/hr natural gas fired degreaser boiler, existing unit, installed in 1979.	NESHAP 40 CFR Part 63, Subparts A and DDDDD

(2) Applicable NSPA and NESHAP Requirements

(a) The emission units #351-2 and 357-2, shall demonstrate compliance with all applicable NESHAP Subpart A and Subpart DDDDD requirements. [Title 129, Chapter 28, Section 001.70].

(i) Emission units #351-2 and #357-2 shall comply with the requirements for NESHAP Subpart DDDDD by January 31, 2016.

48) Subpart DDDDD requirements were placed in the permit at the request of the facility for clarification. See below.

(b) No NSPS requirements are applicable to the emission units listed in Condition III.(D)(1).

(3) Emission Limitations and Testing Requirements:

(a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Condition II.(D).

Emission Point ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
351-2 and 357-2	PM (filterable)	0.6 lb/MMBtu for each unit ^[1]	Three 1-hour periods	Title 129, Chapter 20, Section 002	No
351-2 and 357-2	Opacity	< 20 percent (each) ^[1]	6 minutes	Title 129, Chapter 20, Section 004	No
351-2	SO _x	2.5 lb/MMBtu ^{[1],[2]}	2 hours	Title 129, Chapter 24, Section 001	No

^[1] Compliance with Condition III.(D)(4)(b) demonstrates compliance with the PM, Opacity and SOx limits

^[2] Applies to combustion units installed prior to February 26, 1974.

- (b) The permittee shall comply with all applicable emission limitations and testing requirements in NESHAP Subpart DDDDD for emission units #351-2 and 357-2 [Title 129, Chapter 8, Section 013].
- (4) Operational and Monitoring Requirements:
 - (a) The permittee shall comply with all applicable operational and monitoring requirements in NESHAP Subpart DDDDD for emission units #351-2 and 357-2 [Title 129, Chapter 8, Section 013].
 - (i) An existing boiler or process heater located at a major source facility must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in NESHAP Subpart DDDDD satisfies the energy assessment requirement. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected requirement. The on-site technical labor hours for the evaluation of the energy assessment will be a maximum of 8 hours, but may be longer at the discretion of the owner or operator of the affected source. The boiler system(s) and any on-site energy use system(s) accounting for at least 50 percent of the affected boiler(s) energy (e.g., steam, hot water, process heat, or electricity) production, as applicable, will be evaluated to identify energy savings opportunities, within the limit of performing an 8-hour on-site energy assessment. The energy assessment must include the following:
 1. A visual inspection of the boiler or process heater system.
 2. An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
 3. An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.
 4. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.

5. A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified.
6. A list of cost-effective energy conservation measures that are within the facility's control.
7. A list of the energy savings potential of the energy conservation measures identified.
8. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

49) An energy assessment has been completed and appears to meet requirements listed above. See Attachment 12.

- (ii) At all times, the process heater and boiler must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determinations of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of source.

50) Boiler and process heater appeared to operating properly.

- (iii) Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to 5 million Btu per hour must complete a tune-up every 5 years as specified in NESHAP Subpart DDDDD. The tune-up consists of the following:

1. As applicable; inspect the burner, and clean or replace any components of the burner as necessary. At units where entry into a piece of process equipment or into a storage vessels is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. The burner inspection may be delayed until the next scheduled or unscheduled unit shutdown, but the owner/operator must inspect each burner at least once every 72 months.
2. Inspect the flame pattern, as applicable, and

adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specification, if available.

3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and function properly. This inspection may be delayed until the next scheduled unit shutdown.
 4. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject.
 5. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
 6. Maintain on-site and submit, if requested by the Department, an annual report containing the following information:
 - A. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; and
 - B. A description of any corrective actions taken as part of the tune-up.
 7. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
- (iv) These standards (Condition III.(D)(4)(a)(ii)-(iii)) apply at all times the affected unit is operating.

51) Initial 5 year tune-up was conducted on each boiler and process heater. Documentation appeared complete.

- (b) Fuel for the emission units #351-2 and 357-2 shall be limited to natural gas [Title 129, Chapter 8, Sections 004.01B and 013; Chapter 20].

52) Only natural gas is being burned in the boiler and process heater.

(5) Recordkeeping and Reporting Requirements:

- (a) The permittee shall comply with all applicable recordkeeping and reporting requirements in NESHAP Subpart DDDDD for emission units #351-2 and 357-2 [Title 129, Chapter 8, Section 013].
- (i) The owner or operator must submit a signed statement in the Notification of Compliance Status report that the owner or operation has conducted a tune-up of each existing unit with a heat input capacity of less than 10 million Btu per hour or each unit in the unit designed to burn gas 1 subcategory.
- (ii) The owner or operator must include with the Notification of Compliance Status a signed certification that the energy assessment was completed according to NESHAP Subpart DDDDD Table 3 and is an accurate depiction of the facility at the time of the assessment.
- (iii) The owner or operator must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the following requirements:
1. The Notification of Compliance Status shall be submitted before the close of business on the 60th day following the completion of all initial compliance demonstrations for all boiler and process heaters at the facility.
 2. The Notification of Compliance Status must contain a description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by you or EPA through a petition process to be a non-waste under §241.3 of Title 40 Chapter 1 of the Code of Federal Regulations, whether the fuel(s) were a secondary material processed by discarded non-hazardous secondary materials within the meaning of §241.3, and justification for the selection of fuel(s) burned during the compliance determination.
 3. A signed certification that the owner or operator has met all applicable emission limits and work practice standards.

4. If a deviation of a work practice standard has occurred, the owner or operator must submit a description of the deviation, the duration of the deviation, and the corrective action taken.
5. The Notification of Compliance Status must include the following certification(s) of compliance, and signed by a responsible official.
 - A. "This facility complies with the required initial tune-up according to the procedures in §63.7540(a)(10)(i) through (vi)."
 - B. "This facility has had an energy assessment performed according to §63.7530(e)."
- (iv) If the owner or operator have made a physical change to the boiler and the physical change resulted in the applicability of a different subcategory, the owner or operator must provide notice of the date upon the physical change was made within 30 days of the change. The notification must identify:
 1. The name of the owner or operator of the affected source, the location of the source, the boiler(s) and process heater(s) that were physically changed, and the date of the notice.
 2. The current applicable subcategory under NESHAP Subpart DDDDD.
- (v) The compliance report must contain the following:
 1. Company and Facility name and address.
 2. Process unit information, emission limitations, and operating parameter limitations.
 3. Date of report and beginning and ending dates of the reporting period.
 4. The total operating time during the reporting period.
 5. The date of the most recent tune-up for each unit for each unit, including the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
 6. If there are no deviations from the requirements for work practice standards in Table 3 of NESHAP Subpart DDDDD that apply to this facility, a statement that there were no deviations from the work practice standards

- during the reporting period.
7. If there is a deviation from a work practice standard during the reporting period, the report must contain:
 - A. A description of the deviation and the work practice standard from which the deviation occurred.
 - B. Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken.
 8. The compliance report must be submitted at least once every 5-year period following the compliance date electronically using CEDRI that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to NESHAP Subpart DDDDD is not available in CEDRI at the time that the report is due, the owner or operator must submit the report to EPA Region 7 and NDEQ.
- (vi) The owner or operator must keep the following records:
1. A copy of each notification and report that was submitted to comply with NESHAP Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or compliance reported that was submitted.
 2. Records of compliance demonstrations.
 3. Records of the type(s) and amount(s) of fuels used during each startup and shutdown.

53) All required records were being maintained. Reports are being submitted.
--

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(E) Specific Conditions for Zinc Process Equipment

- (1) The following table contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application 12R-015, received May 4, 2012, including any supporting information received prior to issuance of this permit:

Emission Point ID#	Control Equipment ID# and Description	Emission Unit Description	Relevant Standards
351-1	None	Zinc die cast machine, maximum capacity of 207 lb/hr zinc, installed in 1946.	None
359-1	None ^[1]	Zinc Electroplating Lines (rack and barrel process) – the chromic acid tank uses passivation (no electrical current) to apply chromium to part.	None

^[1] Emission Point ID# 359-1 has 4 high efficiency (99% control) wet scrubbers to control HCl and alkaline vapors. The facility is not claiming the control efficiency in emission calculations and the scrubbers are not required by any Title 129 regulations. Therefore, the scrubbers are not regulated by this permit.

(2) Applicable NSPS and NESHAP Requirements

- (a) No NSPS or NESHAP requirements are applicable to the emission units listed in Condition III.(E)(1).

(3) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Condition II.(D).

Emission Point ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
351-1	PM (filterable)	0.90 lb/hr ^[1]	Three 1-hour periods	Title 129, Chapter 20, Section 001	No
351-1 and 359-1	Opacity	< 20 percent ^[1] (each)	6 minutes	Title 129, Chapter 20, Section 004	No

^[1] Compliance of PM and opacity emission limits are demonstrated by compliance with Condition II.(F).

(4) Operational and Monitoring Requirements:

Except for applicable requirements prescribed in Specific Condition II, this condition establishes no additional specific operational or monitoring requirements for the emission points or emission units identified in Condition III.(E)(1).

(5) Recordkeeping and Reporting Requirements:

Except for applicable requirements prescribed in Specific Condition II, this condition establishes no additional specific recordkeeping or reporting requirements for the emission points or emission units identified in Condition III.(E)(1).

54) No comments.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(F) Specific Conditions for Insignificant Activities:

- (1) The following table contains a description of insignificant activities at the source at the time of permit issuance, in accordance with operating permit application 12R1-015, received May 4, 2012, including any supporting information received prior to issuance of this permit:

Insignificant Activity ID	Unit Description	Insignificance Criteria
Unit 355-1	Gas Metal Arc Welding in the Welding Department, controlled by indoor filter air cleaners above each welding area.	Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAPs that exceed the reporting level(s) in Title 129, Appendix II or Appendix III.
Unit 358-3	0.7 MMBtu/hr natural gas burner on the powder paint cure oven, installed in 1961	Stationary external combustion units not subject to a NSPS or NESHAP using natural gas and a heat input capacity rated below 10 MMBTU/hr each.
Unit 363-1	Three (3) 0.36 MMBtu/hr natural gas exothermic atmosphere generators totaling 1.1 MMBtu/hr used to produce an oxygen-free environment within the electrically heated Brazer oven, installed in 1972	Stationary external combustion units not subject to a NSPS or NESHAP using natural gas and a heat input capacity rated below 10 MMBTU/hr each.
Unit 369-1	Gas Metal Arc Welding in the Jack Cell, controlled by indoor filter air cleaners above each welding area.	Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAPs that exceed the reporting level(s) in Title 129, Appendix II or Appendix III.
Unit 373-2	48 natural gas fired space heaters throughout the factory totaling 7.265 MMBtu/hr heat input	Stationary external combustion units not subject to a NSPS or NESHAP using natural gas and a heat input capacity rated below 10 MMBTU/hr each
Unit 373-3	17 natural gas fired rooftop HVACs totaling 9.4 MMBtu/hr heat input	Stationary external combustion units not subject to a NSPS or NESHAP using natural gas and a heat input capacity rated below 10 MMBTU/hr each.

Insignificant Activity ID	Unit Description	Insignificance Criteria
Unit 373-4	500 gal propane storage tank used for forklift refueling – annual use 3000 gal/yr average of LPG (Propane)	Fuel storage and distribution equipment, including storage vessels (tanks), with aggregate annual throughput of less than 1 million gallons for the entire source.
--	Maintenance of processing equipment, machinery, and/or control devices, buildings, grounds or facilities to maintain appearance or condition.	Maintenance activities are insignificant activities. The paint booth associated with maintenance activities cannot be used to paint metal parts produced at the facility for sale.

(2) Emission Limitations:

Each insignificant activity shall not exceed the permitted limits identified in the following table (Title 129, Chapter 7, Section 006.04).

Insignificant Activity ID#	Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
All combustion units identified in Condition III.(F)(1)	PM (filterable)	0.6 lb/MMBtu for each unit	Three 1-hour periods	Title 129, Chapter 20, Section 002	No
	SO _x ^[1]	2.5 lb/MMBtu for each unit	2 hours	Title 129, Chapter 24, Section 001	No
Unit 355-1	PM (filterable)	0.05 lb/hr	Three 1-hour periods	Title 129, Chapter 20, Section 001	No
Unit 369-1	PM (filterable)	0.02 lb/hr	Three 1-hour periods	Title 129, Chapter 20, Section 001	No
All units identified in Condition III.(F)(1)	Opacity	< 20 percent (each)	6 minutes	Title 129, Chapter 20, Section 004	No

^[1] Applies to combustion units installed prior to February 26, 1974.

(3) Operational and Monitoring Requirements:

The insignificant activities identified in Condition III.(F)(1) are exempt from operational and monitoring requirements (Title 129, Chapter 7, Section 006.04 and Chapter 8, Section 004.01B).

(4) Recordkeeping and Reporting Requirements:

A contemporaneous written notification shall be made to the NDEQ if there are additions, or changes, to the list of insignificant activities in Specific Condition III.(F)(1) (insignificant activities are as defined in Operating Permit Application Forms). Notification is only required for

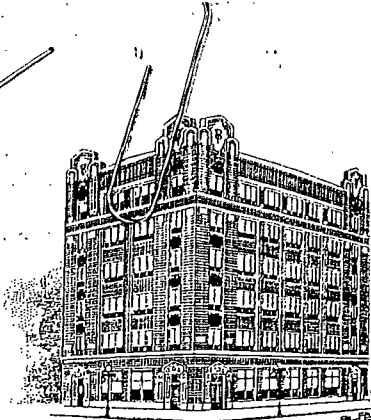
those insignificant activities that must be included in an application. The notification shall include the following (Title 129, Chapter 8, Section 013):

- (i) A brief description of the addition or change within the permitted source;
- (ii) The date on which the addition or change will occur;
- (iii) Any change in emissions; and,
- (iv) The criteria, as defined in the Operating Permit Application Forms, used to determine that the addition or change to the list of insignificant activities qualifies as insignificant.

55) No changes noted.

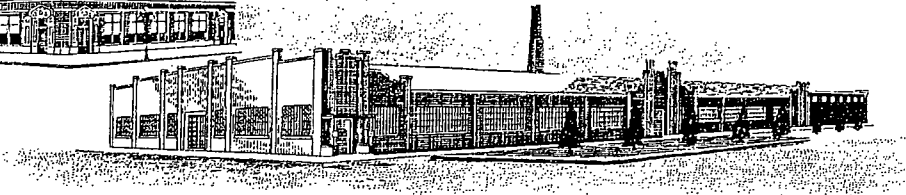
Attachment 2

file



DUTTON-LAINSON COMPANY

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MANUFACTURING DIVISION
1601 WEST 2ND ST.
TEL (402) 462-4141
FAX (402) 460-4615

HASTINGS, NEBRASKA 68902-0729

March 26, 2015

Attn. Mr. Jim Borovich
Department of Environmental Quality
Suite 400, The Atrium, 1200 N Street
P.O. Box 98922
Lincoln, NE. 68509-8922

RE: CERCLA Release Report #032615-JB-1705

Dear Mr. Borovich:

As discussed over the phone this evening, we are submitting this written notification of a CERCLA hazardous chemical release of trichloroethylene (TCE) CAS #79-01-6. The release occurred between the hours of 4:30 PM on March 25th and 7:00 AM on March 26th at our factory located at 1601 W 2nd St, Hastings, NE. This release has been reported to the Adams County LEPC and the EPA via NRC call center. Mr. Mike Davis called from EPA Region VII to provide a case number (111835) and said his report was completed.

Approximately 40 gallons of TCE (489 lbs) was released from a degreaser still water separator petcock. A normally open TCE circulation valve had been closed to collect a solvent sample and had not been reopened after the sample was taken. This caused the water separator tank to over fill, allowing TCE to escape through the water overflow petcock. The TCE then overflowed a water collection bucket in the degreaser pit and spilled out onto a cement floor where it evaporated.

There were no injuries, deaths, or evacuations due to this release. There was no property damage. No environmental cleanup was required. The TCE did not enter the ground or storm water system.

If there is additional information you require, please call Rick Rail or me at 402-462-4141.

Sincerely,

DUTTON-LAINSON COMPANY
MANUFACTURING DIVISION

Ron Haase
Senior Vice President & Director of Engineering

copy

Solvent Emission Calculation Worksheet

(Calculations look back at previous year's work sheet for running totals.)

2015

		Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sept		Oct		Nov		Dec			
		date	amt/gal	date	amt/gal	date	amt/gal	date	amt/gal	date	amt/gal	date	amt/gal	date	amt/gal	date	amt/gal	date	amt/gal	date	amt/gal	date	amt/gal	date	amt/lbs		
SAI = TCE added		1/6	35	2/5	75	3/2	10	4/6	25	5/9	25	6/8	25	7/8	275	8/4	75	9/2	30	10/7	40	11/9	20	12/10	40	Reserve to-tank	
		1/9	55	2/12	25	3/18	330	4/10	25	5/13	35	6/9	45	7/14	100	8/12	25	9/9	25	10/13	30	11/17	80	12/18	50		
		1/23	55	2/17	30	3/26	55	4/20	75	5/19	50	6/17	40	7/27	25	8/24	85	9/15	35	10/19	30	12/1	20	12/28	30		
		1/30	25	2/24	55	3/27	55	4/23	25	5/29	25	6/22	50	8/3	10	9/1	10	9/22	20	10/22	50			1/4	10		
		2/2	10	3/2	10	4/1	10	4/28	35	6/1	15	7/1	emptied					9/30	20	10/27	50						
								5/1	55									10/1	10	11/2	10						
		total	950.09	kg	1029.3	kg	2428	kg	1266.8	kg	791.74	kg	844.52	kg	2164.1	kg	1029.3	kg	738.96	kg	1108.4	kg	633.39	kg	686.18		
LSR _i = TCE removed as liquid		1/8	15	2/9	20	3/11	330	4/3	15	5/9	20	6/9	20	7/1	315	8/4	25	9/1	25	10/7	20	11/5	20	12/7	20	Boil down oil	
		1/16	20	2/17	15	3/27	20	4/10	15	5/19	20	6/16	15	7/24	20	8/12	20	9/4	10	10/13	30	11/11	25	12/18	20		
		1/27	15	2/24	15			4/20	25	5/29	20	6/23	20			8/20	15	9/15	10	10/21	25	11/13	20	12/30	20		
		1/30	15					4/28	15									9/22	15			11/20	10				
		total ¹	44.601	kg	34.309	kg	1755.6	kg	48.032	kg	41.171	kg	37.74	kg	1676.4	kg	41.171	kg	41.171	kg	51.463	kg	51.463	kg	41.171		
SSR _i = TCE removed as solid																										Sump bottom	
		total ²	0	kg	0	kg	0	kg	0	kg	0	kg	0	kg	0	kg	0	kg	0	kg	0	kg	0	kg	0		kg
E _{unit} = SAI - LSR _i - SSR _i	TCE monthly emissions (should average less than 1167 Kg/month)																										
	905.5	kg	995.0	kg	672.5	kg	1218.8	kg	750.6	kg	806.8	kg	487.7	kg	988.1	kg	697.8	kg	1057.0	kg	581.9	kg	645.0				
ET _{unit} =	12 month rolling TCE emissions (14,000 Kg limit)																										
$\sum_{j=1}^{12} E_{unit}$	10849.4	kg	10948.2	kg	10882.7	kg	11218.9	kg	10749.7	kg	10594.8	kg	10262.0	kg	10599.3	kg	10315.9	kg	10414.6	kg	10021.1	kg	9806.5				
12 month ave	904.1	kg	912.3	kg	906.9	kg	934.9	kg	895.8	kg	882.9	kg	855.2	kg	883.3	kg	859.7	kg	867.9	kg	835.1	kg	817.2				
ET _{facility} =	12 month total emissions (14,000 Kg limit)																										
$\sum_{j=1}^i E_{Tunit}$	10849.4	kg	10948.2	kg	10882.7	kg	11218.9	kg	10749.7	kg	10594.8	kg	10262.0	kg	10599.3	kg	10315.9	kg	10414.6	kg	10021.1	kg	9806.5				
WE = (PCE x 12.5) + (TCE x 4.25) + (MC)	weighted 12 month rolling emissions (60,000 Kg limit)																										
	46110	kg	46530	kg	46251	kg	47680	kg	45686	kg	45028	kg	43613	kg	45047	kg	43842	kg	44262	kg	42590	kg	41678				

Attachment 3

on the first working day of each month, operators must top off degreaser tank and record amount in previous month's column

totals are made on the first working day of each month for the preceding month after topping off

total¹ adjusted total TCE to tested percentage for liquid waste @ 13%

total² adjusted total TCE to tested percentage for solid waste @ .1%

only TCE is used at Dutton-Lainson Company therefore ET_{facility} is equal to ET_{unit} and WE is equal to 4.25 times ET_{unit}

TCE
usage on schedule

updated or reviewed on 1/4/2016

memo for record

date 9/15/2015

subject calculations for degreaser load intertace

These calculations were provided by engineering to verify compliance to the vapor degreaser NESHAP requiring less than 50% displacement when moving a load into the degreaser.

inside dimensions of degreaser opening at evaporator coil drip pan

68 " x 68 " = 4624 " or 32.11 sqft

standard large palletainer

40 " x 48 " = 1920 " or 13.33 sqft (41.5% of opening)

footprint of loaded palletainer tumbler w/palletainer rotated 90°

29 " x 62 " = 1798 " or 12.49 sqft (38.9% of opening)

Attachment 4

Rick Rail
Engineer

Halogenated Solvent Cleaner NESHAP
Monthly Hoist Speed and Wind Speed Log

**UNCONTROLLED COPY
INFORMATION ONLY**

Cleaning Machine Identification Number: Degreaser 231

Machine Type: Batch Vapor

Attachment 5

Maximum Allowable Hoist Speed: <u>3.4 meters per minute (or 11 ft/min)</u>					
Date	Initials	Speed mode	Distance moved in inches	Time elapsed in seconds	Hoist speed [(1)/12]/ [(2)/60] x .3 met/ft
1/29/15	JJ	low	36 in.	43 sec.	4.2 ft/min
		high	36 in.	17 sec.	10.6 ft/min
4/29/15	JJ	low	36 in.	36 sec.	5.0 ft/min
		high	36 in.	18 sec.	10.0 ft/min
7/29/15	JJ	low	36 in.	38 sec.	4.7 ft/min
		high	36 in.	17 sec.	10.6 ft/min
10/30/15	JJ	low	36 in.	43 sec.	4.2 ft/min
		high	36 in.	17 sec.	10.6 ft/min
1/28/16	JJ	low	36 in.	40 sec.	4.5 ft/min
		high	36 in.	18 sec.	10.0 ft/min
		low	36 in.	sec.	#DIV/0! ft/min
		high	36 in.	sec.	#DIV/0! ft/min
		low	36 in.	sec.	#DIV/0! ft/min
		high	36 in.	sec.	#DIV/0! ft/min
		low	36 in.	sec.	#DIV/0! ft/min
		high	36 in.	sec.	#DIV/0! ft/min
		low	36 in.	sec.	#DIV/0! ft/min
		high	36 in.	sec.	#DIV/0! ft/min
		low	36 in.	sec.	#DIV/0! ft/min
		high	36 in.	sec.	#DIV/0! ft/min
		low	36 in.	sec.	#DIV/0! ft/min
		high	36 in.	sec.	#DIV/0! ft/min

from top of metal tray on floor to top of guard rail on west wall

Maximum Allowable Average Wind Speed: <u>50 ft/min average</u>						
Date	Initials	SE	NE	SW	NW	Average wind speed
1/29/2015	JJ	10 ft/mir	20 ft/mir	10 ft/mir	30 ft/mir	17.5 ft/min
4/29/2015	JJ	5 ft/mir	10 ft/mir	10 ft/mir	10 ft/mir	8.8 ft/min
7/29/2015	JJ	10 ft/mir	30 ft/mir	10 ft/mir	30 ft/mir	20.0 ft/min
10/30/2015	JJ	5 ft/mir	10 ft/mir	5 ft/mir	5 ft/mir	6.3 ft/min
1/27/2016	JJ	5 ft/mir	30 ft/mir	10 ft/mir	20 ft/mir	16.3 ft/min
		ft/min	ft/min	ft/min	ft/min	0.0 ft/min
		ft/min	ft/min	ft/min	ft/min	0.0 ft/min
		ft/min	ft/min	ft/min	ft/min	0.0 ft/min
		ft/min	ft/min	ft/min	ft/min	0.0 ft/min
		ft/min	ft/min	ft/min	ft/min	0.0 ft/min
		ft/min	ft/min	ft/min	ft/min	0.0 ft/min
		ft/min	ft/min	ft/min	ft/min	0.0 ft/min

measured with Vaneometer

Attachment 6

**UNCONTROLLED COPY
INFORMATION ONLY**

NOTE

July 23, 2015

TO: John Thomsen and All Degreaser Operators

RE: Degreaser Annual Training

In order to be in compliance with EPA regulations, the loads in the rotator are lowered into and exit from the degreaser at an angle.

The EPA requires that the size of parts baskets be less than 50% of the solvent/air interface area. It's because solvent vapor can be pulled or pushed out of the machine when the parts basket goes through the area where the solvent and air meet.

To meet this requirement we need to rotate the load 90 degrees prior to lowering it into and exiting the degreaser.

When dealing with TCE waste operators need to insure that no more than 55 gallons of waste is in the degreaser satellite area.

Once a barrel/drum is full of waste, the operator needs to contact the EPA Tech to have the barrel/drum label dated.

After the barrel/drum label is dated, it has only 72 hours to be moved into storage.

Respectfully Yours,

Jake Jones

Cc: Rick Rail

Jeff Dobbins

Milan Norton

Routing Slip

DUITON-
LAINSON
COMPANY
SQUARED IN LOGS

Date: 7-21-15

PLEASE INITIAL, DATE, & FORWARD

1. Amy Neice	AN	7-24-15
2. John Thomsen	JT	7-28-15
3. Capt. Hess	GH	8-3-15
4. Tim McCoy	TM	8-20-15
5. Don Hoshaw	DH	7-31-15
6. Tom Scott	TK	8-3-15
7. Kirk Keshaw	KK	7-31-15
8. Marty Benzyl	MB	7-31-15
9. Larry Emitt	LE	8-28-15
10. Scott Shreve	SS	8-11-15
Jake Jones	JJ	8-21-15

ADDITIONAL MESSAGE, IF ANY:

Please read the attached memo and sign above.

Form No. 188W

8/11/15

HALOGENATED SOLVENT CLEANER NESHAP
Solvent Cleaning Procedures
Test

-C

General Questions

1. What is the maximum allowable speed (if the size of the parts or basket is less than 50 percent of the solvent-air interface area) for parts entry and removal?
 - A. 85 meters per minute (28 feet per minute)
 - B. 34 meters per minute (11 feet per minute)
 - C. 11 meters per minute (36 feet per minute)
 - D. No limit

2. How do you ensure that parts enter and exit the solvent cleaning machine at the speed required in the regulation?
 - A. Program on computerized hoist monitors speed
 - B. Can judge the speed by looking at it
 - C. Measure the time it takes the parts to travel a measured distance

3. Identify the sources of air disturbances
 - A. Fans
 - B. Open doors
 - C. Open windows
 - D. Ventilation vents
 - E. All of the above

4. What are the three operating modes?
 - A. Idling, working, and downtime
 - B. Precleaning, cleaning, and drying
 - C. Startup, shutdown, off
 - D. None of the above

5. When can parts or parts baskets be removed from the solvent cleaning machine?
 - A. When they are clean
 - B. At any time
 - C. When dripping stops
 - D. Either A or C is correct

7. 1900011A

Y900 C
ONLY

6. How must parts be oriented during cleaning?
- A. It does not matter as long as they fit in the parts basket
 - B. So that the solvent pools in the cavities where the dirt is concentrated
 - C. So that solvent drains from them freely
7. During startup, what must be turned on first, the primary condenser or the sump heater?
- A. Primary condenser
 - B. Sump heater
 - C. Turn both on at same time
 - D. Either A or B is correct
8. During shutdown, what must be turned off first, the primary condenser or the sump heater?
- A. Primary condenser
 - B. Sump heater
 - C. Turn both off at same time
 - D. Either A or B is correct
9. In what manner must solvent be added to and removed from the solvent cleaning machine?
- A. With leak proof couplings
 - B. With the end of the pipe in the solvent sump below the liquid solvent surface
 - C. So long as the solvent does not spill, the method does not matter
 - D. A and B
10. What must be done with waste solvent and still and sump bottoms?
- A. Pour down the drain
 - B. Store in closed container
 - C. Store in a bucket
 - D. A or B
11. What types of materials are prohibited from being cleaned in solvent cleaning machines using halogenated HAP solvents?
- A. Sponges
 - B. Fabrics
 - C. Paper
 - D. All of the above

12. What is the max amount of TCE waste that can be stored in the degreaser dept. satellite area?
- A. 75 gallons
 - B. 110 gallons
 - C. 55 gallons
 - D. No Max amount
13. After a drum has been filled with TCE waste how long can it remain in the degreaser dept. satellite area?
- A. 24 hours
 - B. 48 hours
 - C. 72 hours
 - D. Until the disposal service arrives to pick up
14. After a drum has been filled with TCE waste, you should contact the EPA Technician to have the label dated.
- A. True
 - B. False

Control Device Specific Questions

*****Mark those control devices that apply with an X.*****

Freeboard Refrigeration Device (FRD)

1. What temperature must the FRD achieve?

- A. Below room temperature
- B. 50°F
- C. Below the solvent boiling point
- D. 30 percent below the solvent boiling point

Working-Mode Cover

2. When can a cover be open?

- A. While parts are in the cleaning machine
- B. During parts entry and removal
- C. During maintenance
- D. During measurements for compliance purposes
- E. A and C
- F. B, C, and D

3. Covers must be maintained in what condition?

- A. Free of holes
- B. Free of cracks
- C. So that they completely seal cleaner opening
- D. All of the above

Dwell

4. Where must the parts be held for the appropriate dwell time?

- A. In the vapor zone
- B. In the freeboard area above the vapor zone
- C. Above the cleaning machine
- D. In the immersion sump

Don H. Schenck

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Attachment 9

Code

BURNOFF OVEN OPERATING LOG

This log is to be maintained in accordance with the NDEQ Construction Permit for our model PTR-150 Burn-Off Oven. Operator's will complete a line entry each time this equipment is used. The operator will insure the burn-off oven is in good repair prior to use and will report any malfunctions to maintenance immediately. When completed, this log will be filed in the Safety Office for 5 years.

Date	Start Time	Run Time	Item Being Cleaned	Material Being Incinerated	Operator's Signature	fuel
3/13	7:30am	5 hrs	Hoop Dr. Sh. Assy	Bake Parts	C Hess	gas
3/16	8:20am	4 hrs	Misc Racks	Powder Paint	T Scott	gas
3/23	10:40am	4 hrs	Oil Can Racks	" "	C Hess	gas
3/25	9:30	4 hrs	Reel & Base Racks	" "	C Hess	gas
3/24	2:30	4 hrs	Reel & Oil Can Racks	" "	C Hess	gas
3/31	2:00	4 hrs	Post Racks	Powder Paint	C Hess	gas
4/13	8:45	4 hrs	" "	" "	T Scott	gas
4/16	9:25	4 hrs	Misc Racks	" "	T Scott	gas
4/17	7:45	4 hrs	Oil Can Racks	Powder Paint	C Hess	gas
4/19	12:15	4 hrs	Base & Reel Racks	" "	C Hess	gas
4/13	7:50am	5 hrs	Ratchet Plunger	Bake Parts	C Hess	gas
4/21	10:33	4 hrs	dip tank rack	dip paint	KK	gas
4/22	10:45	4 hrs	Reel Racks	Powder Paint	C Hess	gas
4/23	10:30	4 hrs	" "	" "	C Hess	gas
4/27	7:45	4 hrs	Reel Racks	" "	T Scott	gas
4/30	12:45	4 hrs	Misc Racks	" "	T Scott	gas
5/4	12:50	4 hrs	Base Racks	" "	T Scott	gas
5/5	12:35	4 hrs	Misc Racks	" "	T Scott	gas
5/6	6:45	4 hrs	Oil Can Racks	" "	T Scott	gas
5/8	2:40pm	4 hrs	Misc Racks	Powder Paint	C Hess	gas
5/11	7:30	5 hrs	Hoop Dr. Sh. Assy	Bake Parts	C Hess	gas
5/12	7:00	5 hrs	Hoop Dr. Sh. Assy	Bake Parts	C Hess	gas
"	"	"	Dr. Sh. WG1500	" "	C Hess	gas
5/13	7:40	5 hrs	Dr. Sh. WG1500	Bake Parts	C Hess	gas
5/18	1:10	4 hrs	Post Racks	Powder Paint	T Scott	gas
5/19	9:25	4 hrs	Misc Racks	Powder Paint	T Scott	gas
5/21	3:30	"	Oil Can Racks	" "	T Scott	gas
5/22	7:15	5 hrs	Ball clamps	Bake Parts	C Hess	gas
5/28	6:50am	4 hrs	Base Racks	Powder Paint	T Scott	gas
5/29	2:30	4 hrs	Misc Racks	" "	T Scott	gas
5/31	10:50	4 hrs	Base Racks	" "	T Scott	gas

FORWARD COMPLETED FORM TO THE SAFETY OFFICE FOR FILING

01.60.20.01 R1202

7474

96

total adjusted total only TCE is used at Dutton-Lainson Company therefore E Facility is equal to E Unit and WE is equal to WE

Attachment 10

Dry Filter Inspection/Replacement Log

2015
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		automatic booth				touch up booth			
		pulsating filters Chemco #PP2600127226		final filters Chemco #24241295ASH		hand booth filters Chemco - Duo-Pad Overspray Collector			
date	time	condition or corrective action	meter reads	condition or corrective action	meter reads	condition or corrective action	meter reads	initials	
11/16	7:00	OK	good	OK	good	OK	good	CH	
11/17	7:00	OK	good	OK	good	OK	good	CH	
11/18	"	OK	good	OK	good	OK	good	CH	
11/19	"	OK	good	OK	good	OK	good	CH	
11/20	"	OK	good	OK	good	OK	good	CH	
11/23	7:00	OK	good	OK	good	OK	good	CH	
11/24	"	OK	good	OK	good	OK	good	CH	
11/25	"	OK	good	OK	good	OK	good	CH	
11/30	7:00	OK	good	OK	good	OK	good	CH	
12/1	"	OK	good	OK	good	OK	good	CH	
12/2	"	OK	good	OK	good	OK	good	CH	
12/3	"	OK	good	OK	good	OK	good	CH	
12/4	"	OK	good	OK	good	OK	good	CH	
12/7	7:00	OK	good	OK	good	OK	good	CH	
12/8	"	OK	good	OK	good	OK	good	CH	
12/9	"	OK	good	OK	good	OK	good	CH	
12/10	—								
12/11	—								
12/14	7:00	OK	good	OK	good	OK	good	CH	
12/15	"	OK	good	OK	good	OK	good	CH	
12/16	"	OK	good	OK	good	OK	good	CH	
12/17	"	OK	good	OK	good	OK	good	CH	
12/18	"	OK	good	OK	good	OK	good	CH	
12/21	7:00	OK	good	OK	good	OK	good	CH	
12/22	"	OK	good	OK	good	OK	good	CH	
12/23	—								
12/24	—								
12/28	7:00	OK	good	OK	good	OK	good	CH	
12/29	"	OK	good	OK	good	OK	good	CH	
12/30	"	OK	good	OK	good	OK	good	CH	
12/31	"	OK	good	OK	good	OK	good	CH	
1/4	7:00	OK	good	OK	good	OK	good	CH	
1/5	"	OK	good	OK	good	OK	good	CH	
1/6	"	OK	good	OK	good	OK	good	CH	
1/7	"	OK	good	OK	good	OK	good	CH	
1/8	"	OK	good	OK	good	OK	good	CH	

Attachment 12

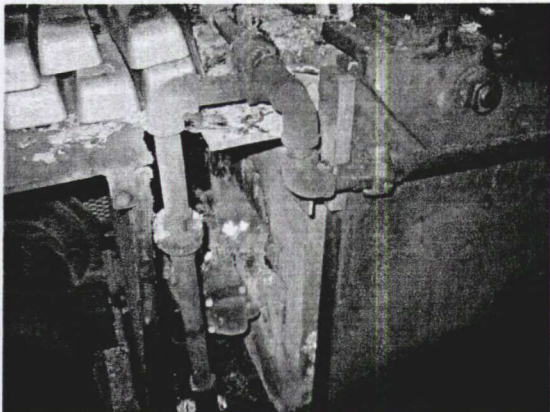
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INFORMATION ONLY

Dutton-Lainson Company Energy Assessment Report Kux Die Cast Machine 13 August 2015

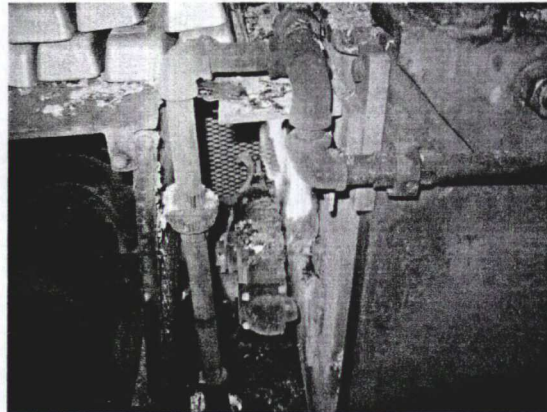
Dutton-Lainson Company is a steel products manufacturing facility located at 1601 W 2nd St. Hastings Nebraska. It is permitted as a major HAPS air emitter by NDEQ. Primary products produced include; trailer jacks, winches, and couplers for the marine and agriculture sectors. Manufacturing activities include: stamping, forming, cutting, welding, turning, cleaning, zinc plating, powder coating, and assembling. In the past 5 years, facility general energy audits were completed by Iowa State University and University of Nebraska. Several energy saving suggestions were outlined in those reports, but none were related to the die cast machine.

The attached checklist was used to conduct this energy assessment in accordance with Subpart DDDDD:

Visual Inspection – the unit uses an open 1 ½ foot straight burner rated at .5MM BTU/hr. The flame directly contacts the melting pot. There was some zinc residue sitting atop the burner. The flame was clear blue indicating a good burn during 'call for heat'. There was some yellow flame when not calling for heat in the idle mode.



full burn



idle

Operating Characteristics - The Dutton-Lainson Company die cast process heater was installed in 1946. It is a stand-alone unit which uses a thermostatically controlled motorized gas valve to control the .5MMBtu output N.G. burner. The heat from the burner; melts and maintains a 600 Lb. pot of molten zinc used for injection molding. The unit normally runs 18 to 19 hours per day, Monday through Thursday and until 2 PM on Friday. It is left on standby from 2 A.M. until 7A.M. during the week for both safety and energy conservation reasons. The unit is turned off, emptied, and cleaned on Fridays. (see attached Data Collection Worksheet for specific operating characteristics.)

Energy use downstream – This burner is only used to operate the zinc die cast machine.

Review of Plans and Records - Although this is a very old unit, there are extensive maintenance records to indicate it is well maintained and that there is scheduled maintenance performed. This unit was not part of the building architectural plans, as it is stand-alone equipment. The die cast machine is indicated

on current floor plans for the press department. 40 CFR Part 63 Subpart DDDDD initial notification was submitted on August 22, 2013 and a 5 year tune-up was completed January 3, 2014.

Energy reducing measures in place – There are side heat barrier panels hung on both sides of the burner and melting pot which reduce heat escape from the open flame. The top of the die cast machine and stack exhaust also was shielded by panels to keep room drafts down.

Energy saving potential – There could be some energy saving potential in changing the die cast operation schedule to run 24 hours per day for 3 consecutive days (and shut down for 4 consecutive days) to reduce idling time. This would impose an extreme scheduling problem for production control and require additional part storage space. There may also be some advantage to regularly scheduled cleaning of the unit burner. The other option would be to replace the die cast machine with a newer unit.

Costs and benefits of energy efficiency improvements - – The calculated minimum energy requirement to run the zinc die cast equipment at 100% efficiency is 125,000 BTU/hr. The calculated energy usage based on utilities billing is 160,276 BTU/hr. The calculated operating efficiency is thus 78%. A new 90% efficient die cast machine would cost approximately \$500,000. The resulting 12% increase in efficiency would save only \$280 natural gas a year. (based on \$.40 / ccf N.G.)

Because of the scheduling and part storage issues created by only running the die cast 3 days a week it is not feasible to change the current operation schedule. (Not to mention the problem of having an operator here for a third shift for only 3 days a week).

Estimating the energy savings of scheduling a burner cleaning for the die cast machine would be extremely difficult. But common sense dictates that having a visibly clean burning flame is more efficient. The most practical energy savings practice that is currently feasible would be to have the die cast operator regularly observe the burner flame and notify the maintenance department when it is not burning clear blue. This recommendation has been made to the department supervisor.

Tom Johnson 8-13-15
date

Tom Johnson
Engineer
Dutton-Lainson Company

Richard Rail 8/13/15
date

Rick Rail
Engineer/Compliance
Dutton-Lainson Company

Dutton Lainson Company
Energy Assessment Checklist

X Pre Audit Meeting

date 6/11/2015

- X Why we need this assessment
- X Scope of assessment
- X Assessor's qualification requirements
- X Assessment process

We held the meeting with Milan, Jeff, Tom and Rick. We talked about the new boiler situation and changes to the air permit and NDEQ notification. Sent letter to William.

X Gather Data

date 6/11/2015

- X visual inspection
- X facility walk through
- X employee interviews
- X plant process data
- X collect maintenance records
- X past energy audits
- X record of utilitie bills
- X list of energy reducing measures are in place
- X determine energy efficiency of process heater
- X determine energy use of down stream equipment

The burner is normally lit on Monday AM and runs until around 2PM Friday. It takes 5 hours to heat up the pot from scratch and the pot must be drained when the burner is shut down (safety issues). It runs from 7AM to 2 AM the next day, not feasible to shut down each night. Interviewed Monte and Dave. Initial environmental tune up completed on 1/3/14. Burner last cleaned in July 2012 and the gas controller was replaced in Sept 2012.

Reviewed PMIs, maintenance records, utility records gas allocations, previous energy audits, interviewed die cast operators, completed unit characterization work sheet. Evaluated the die cast machine.

X Complete Assessment

- X evaluate operating characteristics
- X inventory major systems consuming energy from process heater
- X review architectural and engineering plans and maintenance procedures
- X identify and list energy conversation measures within the facility control
- X list energy saving potential for conservation measures
- X initiate a comprehensive report, to include cost specific improvments, benefits, and time frame to recoup investment.

X Complete written report

- X route in house
- X send to NDEQ

ment 13

From NO. 36

5 Year Environmental Tune-Up

**UNCONTROLLED COPY
INFORMATION ONLY**

Name/ Equipment # 446 boiler Date complete 2-3-14 Technician RG-JR

This Preventive Maintenance tune-up is to be conducted by a qualified technician as determined by the company maintenance supervisor. It will be scheduled as a 5 year service routine through the computerized maintenance scheduling system. A completed copy of this sheet will be sent to the Safety Office for records keeping per 40CFR part 63 subpart DDDDD.

Preservice

measure effluent gases using gas analyzer

CO 15 parts/million
O 20.6 parts/million

Service

service unit using manufacture's service instructions

Inspect the burner X
(replace worn/corroded/damaged components)

Clean the burner X
(as necessary)

Inspect the flame pattern X
(adjust the burner as needed)

Inspect the system controller X
(calibrate as needed)

Post service

Measure effluent gases using gas analyzer

CO 10 parts/million
O 20.7 parts/million

Record additional actions taken as part of the tune up

This unit uses only NG as a fuel.

New
Boiler 5 Year Environmental Tune-Up

**UNCONTROLLED COPY
INFORMATION ONLY**

Name/ Equipment # 446 Date complete 10-21-15 Technician Rob

This Preventive Maintenance tune-up is to be conducted by a qualified technician as determined by the company maintenance supervisor. It will be scheduled as a 5 year service routine through the computerized maintenance scheduling system. A completed copy of this sheet will be sent to the Safety Office for records keeping per 40CFR part 63 subpart DDDDD.

Preservice

measure effluent gases using gas analyzer

CO _____ parts/million
O _____ parts/million

Service

service unit using manufacture's service instructions

Inspect the burner _____
(replace worn/corroded/damaged components)

Clean the burner _____
(as necessary)

Inspect the flame pattern _____
(adjust the burner as needed)

Inspect the system controller _____
(calibrate as needed)

Post service

Measure effluent gases using gas analyzer

CO 6 parts/million
O 19.6 parts/million

Record additional actions taken as part of the tune up

This unit uses only NG as a fuel.

