

EMISSIONS SUMMARY (V-16-025 R2):

Pollutant	2019 Actual (tpy)	Allowable (tpy)	Potential (tpy)
PM/PM ₁₀	6.65		89.4
SO ₂	0.07		2.48
NO _x	8.16		96.7
CO	6.60		59.8
VOC	65.8	249*	378
Hazardous Air Pollutants (HAPS)			
Ethyl Benzene	1.11		22.77
Formaldehyde	0.04		0.77
Hydrochloric Acid	0		1.20
Methanol	0.22		1.74
Methyl isobutyl ketone	0.67		2.40
Napthalene	0.01		0.421
Toluene	1.62		27.12
Xylene	7.40		75.86
Source wide HAPs or Combined HAPs	11.07		132.3
Green House Gases			
Nitrous Oxide	0.17		1.16
Carbon dioxide (CO ₂)	9327		64699
Methane	0.18		1.21
CO ₂ Equivalent (add CO ₂ x 1 + N ₂ O 298 + Methane x 25)	9382		65073

*Limit to preclude 401 KAR 51:017

EMISSIONS SUMMARY (V-16-025 R1):

Pollutant	2018 Actual (tpy)	Allowable (tpy)	Potential (tpy)
PM/PM ₁₀	7.67		88.3
SO ₂	0.06		2.48
NO _x	6.73		96.7
CO	5.48		59.8
VOC	73.0	249*	378
Hazardous Air Pollutants (HAPS)			
Ethyl Benzene	1.04		22.77
Formaldehyde	0.03		0.77
Hydrochloric Acid	0		1.20
Methanol	0.20		1.74
Methyl isobutyl ketone	0.70		2.40
Napthalene	0.01		0.421
Toluene	1.38		27.12
Xylene	6.95		75.86
Source wide HAPs or Combined HAPs	10.31		132.3
Green House Gases			
Nitrous Oxide	0.14		1.03
Carbon dioxide (CO ₂)	7578		57247
Methane	0.15		1.07
CO ₂ Equivalent (add CO ₂ x 1 + N ₂ O 298 + Methane x 25)	7579		57249

*Limit to preclude 401 KAR 51:017

SOURCE DESCRIPTION:

Central Motor Wheel of America (CMWA) operates under three divisions: CMC Division (Steel), CLA Division (Aluminum) and PROACE Division (Aluminum). CMC manufactures steel wheels utilizing raw steel received from off-site locations. The steel wheels are stamped, bent, welded, cleaned and painted prior to shipping offsite. CLA manufactures aluminum wheels from aluminum melt received from an off-site location. After being cast, these rough wheels pass through a machining process where they are deburred, abrasive blasted, and leak tested prior to being cleaned and surface coated before shipping offsite. PROACE manufactures aluminum wheels from aluminum ingots, on-site chips, and on-site off-spec wheels that are melted on site in two melt furnaces. The three manufacturing divisions also includes five natural gas fired boilers to provide

process heat and eleven back up diesel generators.

CMWA utilizes cyclones, bag houses, scrubbers, mist and dust collectors to control particulate emissions. CLA and PROACE each utilizes a regenerative thermal oxidizer (RTO) to control emissions from paint spraying operations. No control equipment will be utilized for the CMC Division to control VOCs and HAPs from the paint spraying operations. CMC Division Paint Line has elected to apply the emission rate without add-on controls option of subpart MMMM. Also, see Statement of Basis.

REVISION 2 (SIGNIFICANT REVISION) (APE20200002):

On July 16, 2020 the Division received an application from CMWA to remove subpart RRR requirements from the PROACE Division aluminum melting operation. CMWA indicates that they are considered a die cast facility and are exempt from the requirement. The only materials they melt are clean charge and internal scrap. Customer returns will not be melted in the furnaces since they contain small amounts of surface coating materials which are not permitted to claim exemption from subpart RRR. CMWA will maintain records of materials melted in the furnaces to demonstrate compliance with the subpart RRR exemption.

Additionally as part of this revision, CMWA requests the following changes:

1. Add (1) 1,000 gallon diesel tank to the PROACE melting department as an insignificant activity.
2. Remove EU 54 and EU 68 (2 hot water boilers).
3. Add 3 additional deburr brush systems (BRS-013, BRS-014 and BRS-015).
4. Change PM control for EP 60, EP 62 and EP 64 from dry filters to water curtains.
5. Add one Henry Filter to the PROACE machining department 13 (LCS-015).
6. Add 8 natural gas burners (2.5 MMBtu/hr total) to the PROACE Division Paint Department.

These activities cumulatively result in facility-wide decreases in emissions of criteria pollutants except for a small increase (<1 tpy) for PM emissions.

REVISION 2 (MINOR REVISION) (APE20200003):

On December 14, 2020 the Division received an application from CMWA to construct an additional natural gas fired boiler (EU 79). This application was deemed complete December 22, 2020. It is combined with the ongoing significant revision as part of revision 2 to V-16-025.

REVISION 1 (SIGNIFICANT REVISION):

On August 7, 2019 the Division received an application from CMWA for the addition of two aluminum melt furnaces as part of a new Melt Department. Units in this department will be subject to 40 CFR Part 63 Subpart RRR for secondary aluminum production. Wheels will be blasted to remove paint and the chips will have coolant removed, however the pre-cleaning of scrap will not meet “clean scrap” definitions and the melt furnaces will not, therefore, be clean scrap units.

Supporting insignificant activities have also been added as part of the revision. These include a Dross Press, Ladles Preheaters, Argon gas bubblers, and an aluminum chip shredder.

CMWA requests to retain the existing 249 tpy emission cap for VOC emissions to preclude applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality and will remain a synthetic minor source.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

- a. The facility will be subject to an emission cap of 249 tons per rolling twelve-month period for VOC emissions. This emission cap will preclude the applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality.

- b. **Equipment Subject to 40 CFR 63 Subpart MMMM:**
Organic HAP emissions to the atmosphere from the affected source shall not be more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

OPERATIONAL FLEXIBILITY:

Operational flexibility is built into the NESHAP, which allows sources the choice of using all compliant coatings, averaging, or a combination in order to achieve compliance. Flexibility within the limit for VOCs allows the emissions to come from any part of the plant with no individual limits at spray booths.