Commonwealth of Kentucky
Division for Air Quality
PERMIT APPLICATION SUMMARY FORM

Completed by: Jonathon Hughes

GENERAL INFORMATION:

Name:	Curtis-Maruyasu America, Inc.
Address:	665 Metts Drive, Lebanon, KY 40033
Date application received:	3/19/2021
SIC Code/SIC description:	3714, Motor Vehicle Parts and Accessories
Source ID:	21-155-00021
Agency Interest:	2896
Activity:	APE20210001
Permit:	F-17-004 R2

APPLICATION TYPE/PERMIT ACTIVITY:

[ ] Initial issuance
[X] Permit modification
__Administrative
__Minor
X Significant
[ ] Permit renewal

[ ] General permit
[X] Conditional major
[ ] Title V
[ ] Synthetic minor
[X] Operating
[ ] Construction/operating

COMPLIANCE SUMMARY:

[ ] Source is out of compliance
[ ] Compliance schedule included
[ ] Compliance certification signed

SOURCE APPLICABLE REQUIREMENTS LIST:

[ ] NSR
__ Non-Attainment
__ PSD
__ Netted out of PSD/NSR
__ Not major modification per 401 KAR 51:001, 1(114)(b)

[ ] NSPS
[X] NESHAPS
[ ] CAM

[X] SIP
[ ] Other

MISCELLANEOUS:

[ ] Acid rain source
[ ] Source subject to 112(r)
[X] Source applied for federally enforceable emissions cap
[ ] Source provided terms for alternative operating scenarios
[X] Source subject to a MACT standard
[ ] Source requested case-by-case 112(g) or (j) determination
[ ] Application proposes new control technology
[X] Certified by responsible official
[X] Diagrams or drawings included
[ ] Confidential business information (CBI) submitted in application
[ ] Pollution Prevention Measures
[ ] Area is non-attainment (list pollutants):

EMISSIONS SUMMARY (F-17-004 R2):

Pollutant	2019 Actual (tpy)	Allowable (tpy)	Potential (tpy)
PM/PM_{10}	0.17		0.38
SO_2	0.01		0.03
NO_x	1.31		4.34
CO	1.10		3.65
VOC	8.17	90*	312**
Hazardous Air Pollutants (HAPS)			
Chromium III	0.016		0.043
Ethyl Benzene	0.018		0.491
Glycol Ether	0.176	9*	28.1
Hydrochloric Acid	0.004		0.005
Isophorone	0.038	9*	135
Methanol	0.018		0.491
Nickel, Total (as Ni)	0.004		0.008
Xylenes	0.022		0.589
Source wide HAPs or Combined HAPs	0.296	22.5*	164
Green House Gases			
Nitrous Oxide	0.03		0.10
Carbon dioxide (CO2)	1574		5214
Methane	0.03		0.10
CO_2 Equivalent (add CO_2 x 1 + N_2O 298 + Methane x 25)	1584		5246

* Limit pursuant to 401 KAR 52:030
** Controlled, uncontrolled PTE VOC is 381 tpy

EMISSIONS SUMMARY (F-17-004 R1):

Pollutant	2017 Actual (tpy)	Allowable (tpy)	Potential (tpy)
PM/PM_{10}	0.22		0.47
SO_2	0.01		0.03
NO_x	2.00		5.50
CO	1.68		4.62
VOC	10.6	90*	70.1**
Hazardous Air Pollutants (HAPS)			
Chromium III	0.001		0.043
Ethyl Benzene	0.020		0.316
Glycol Ether	0.242	9*	14.7**
Hydrochloric Acid	0.0002		0.005
Isophorone	0.492	9*	9.02**
Methanol	0.020		0.316
Nickel, Total (as Ni)	0.002		0.008
Xylenes	0.024		0.379
Source wide HAPs or Combined HAPs	0.801	22.5*	24.8**
Green House Gases			
Nitrous Oxide	0.04		0.12
Carbon dioxide (CO2)	2397		6605
Methane	0.05		0.13
CO_2 Equivalent (add CO_2 x 1 + N_2O 298 + Methane x 25)	2410		6644

* Limit pursuant to 401 KAR 52:030
** Controlled

SOURCE DESCRIPTION:

On November 18, 2016 the Division received an application from Curtis - Maruyasu America, Inc. for the renewal of their Conditional Major permit to operate a fuel and brake tubing manufacturing facility located in Lebanon. The manufacturing process consists of three processes: Tube Mill processing, Coating Processing, and Powertrain Coating Processing. In the Tube Mill processing strips of steel are formed into single-walled tubes (SWT) or double-walled tubes (DWT). The coating process has the SWT or DWT coated in one or a combination of the following: Zinc electroplating, Chromate conversion coating, Nylon or Plastic extrusion, or application of primer and two coats of paint. The Powertrain coating process can have a SWT going one or more of the following coatings: an electroplating of Zinc-Nickel, Chromate conversion coating, or Tin-Zinc electroplating.

Several changes at the facility are reflected during this renewal permit. Packed Bed Scrubber #1 has been removed from the facility. The facility will continue to meet the requirement outlined under 40 CFR 63 Subpart WWWWWW by keeping at least 75% of the process tank surface covered at least 95% of the plating time. Also Emission Point 7 has been removed from the facility.

The source is potentially major source for VOC and HAP emissions. The source took limits to become conditional major for single HAP and combined HAPs emissions as well as VOC emissions. The source has requested to have single HAP and combined HAPs and VOC emission limits of 9 and 22.5 and 90 tons per a year, respectively.

REVISION 2, SIGNIFICANT REVISION:

On March 19, 2021 the Division received an application from Curtis - Maruyasu America, Inc. to request removal of the requirement to operate RTO #2 which controls volatile emissions from EP 30, Single-Walled Tube Coating. There are no applicable regulations for the facility that mandates the use of an RTO with EP 30 for compliance. The facility estimates that projected annual VOC emissions from EP 30 would increase 33 tpy when RTO #2 is shut down. The summary table below outlines the actual source-wide VOC emissions including the emissions from EP30 alone from 2015 through 2020. The source will continue to comply with the VOC and HAP limitations described in section D of the permit.

KY EIS EMISSIONS SURVEY FOR VOC EMISSIONS (TPY)

	2015	2016	2017	2018	2019	2020
Source-wide Controlled Emissions	27.53	15.73	10.59	8.63	8.17	8.17
Controlled Emissions from EP 30 only	1.046	1.271	1.013	0.671	0.269	0.269
Actual Uncontrolled Emissions from EP30	20.92	25.42	20.26	13.42	5.38	5.38
Emission Increase on EP30 after shutting down RTO #2	19.874	24.149	19.247	12.749	5.111	5.111

REVISION 1, MINOR REVISION:

On December 20, 2018 the Division received an application from Curtis - Maruyasu America, Inc. to request removal of the requirement to vent exhaust from EP 28 to RTO #1. There are no applicable regulations for the facility that mandates the use of an RTO with EP 28 for compliance. EP 11 will still be exhausted to RTO #1 and the facility shall operate RTO #1 while EP 11 is in operation. The source will continue to comply with the limitations described in section D of the permit.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than ninety (90) tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than nine (9) tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

OPERATIONAL FLEXIBILITY:

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.