

Commonwealth of Kentucky
Division for Air Quality
STATEMENT OF BASIS / SUMMARY

Title V, Operating
Permit: V-20-021
McKechnie Vehicle Components
801 John C. Watts Drive
Nicholasville, KY 40356
August 17, 2020

Jonathon Hughes, Reviewer

SOURCE ID: 21-113-00017
AGENCY INTEREST: 2297
ACTIVITY: APE20200002

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 3714, Motor Vehicle Parts and Accessories

Single Source Det. Yes No If Yes, Affiliated Source AI:

Source-wide Limit Yes No If Yes, See Section 4, Table A

28 Source Category Yes No If Yes, Category:

County: Jessamine

Nonattainment Area N/A PM₁₀ PM_{2.5} CO NO_x SO₂ Ozone Lead
If yes, list Classification:

PTE* greater than 100 tpy for any criteria air pollutant Yes No
If yes, for what pollutant(s)?

PM₁₀ PM_{2.5} CO NO_x SO₂ VOC

PTE* greater than 250 tpy for any criteria air pollutant Yes No
If yes, for what pollutant(s)?

PM₁₀ PM_{2.5} CO NO_x SO₂ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) Yes No
If yes, list which pollutant(s): *Ethyl Benzene, Ethylene Glycol, Formaldehyde, Methyl Isobutyl Ketone, Naphthalene, Styrene, Toluene, Xylene*

PTE* greater than 25 tpy for combined HAP Yes No

*PTE does not include self-imposed emission limitations.

Description of Facility:

McKechnie Vehicle Components (MVC) manufactures plastic wheel covers for the automotive industry. Plastic pellets are conveyed from storage silos to transfer bins. The bins feed injection molding machines. After molding, the wheel covers are either painted or chrome plated. The major painting is performed in several large, completely enclosed booths using robotic sprayers. Fine work such as the edge of the cover is done on the COE (Chain on Edge) Line, which also has enclosed booths. Many of the covers have a small inset detail, which is painted on the mask painting line. There are two natural gas-fired boilers for process and space heat. Natural gas-fired ovens dry the painted hubcaps. Additionally, there are chrome-plating processes in-house for the hubcaps that are chrome plated.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: V-20-021

Activities: APE20200002

Received: July 16, 2020

Application Complete Date: August 6, 2020

Permit Action: Initial Renewal Significant Rev Minor Rev Administrative

Construction/Modification Requested? Yes No NSR Applicable? Yes No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action Yes No

Description of Action:

Renewal permit only. Facility indicates no changes since last permitting action (V-15-043 R3).

| V-20-021 Emission Summary | | |
|------------------------------------------------|-------------------|-----------------------|
| Pollutant | 2019 Actual (tpy) | PTE V-20-021 (tpy) |
| CO | 1.94 | 9.78 |
| NO _x | 2.31 | 11.6 |
| PT | 0.396 | 6.95 |
| PM ₁₀ | 0.396 | 6.95 |
| PM _{2.5} | 0.283 | 6.76 |
| SO ₂ | 0.014 | 0.07 |
| VOC | 27.5 | 1788 |
| Lead | 0 | 0 |
| Greenhouse Gases (GHGs) | | |
| Carbon Dioxide | 2777 | 13970 |
| Methane | 0.053 | 0.27 |
| Nitrous Oxide | 0.051 | 0.26 |
| CO ₂ Equivalent (CO ₂ e) | 2794 | 14060 |
| Hazardous Air Pollutants (HAPs) | | |
| 1,6 Hexamethylene Diisocyanate | 0 | 2.58 |
| Chromium, Total (as Cr) | 0.002 | 0.004 |
| Cumene | 0 | 7.01 |
| Ethyl Benzene | 0 | 102 |
| Ethylene Glycol | 0 | 99.5 |
| Formaldehyde | 0 | 75.4 |
| Methanol | 0 | 1.29 |
| Methyl Isobutyl Ketone | 1.65 | 668 |
| Naphthalene | 0 | 21.5 |
| Styrene | 0.08 | 11.2 |
| Toluene | 1.79 | 934 |
| Xylene | 8.00 | 987 |
| Combined HAPs: | 11.5 | 2909 |

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

| Emission Points #10, 11, 12 and 14 Surface Coating Operations | | | | |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------|-----------------------------------------------|
| Pollutant | Emission Limit or Standard | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis | Compliance Method |
| VOC | Source wide 90 tpy | 401 KAR 50:012, 401 KAR 51:017 | Material Balance & MSDS | Monthly Recordkeeping, 12 month rolling total |
| HAPs | 0.16 lb organic HAP/ lb coating solids | 40 CFR 63 Supart PPPP | Material Balance & MSDS | Recordkeeping |
| PM | 2.34 lbs/hr | 401 KAR 59:010, Section 3(2) | Material Balance & MSDS | 3 stage, Tridem Fabric Filter, 99.6% control |
| Opacity | 20% | 401 KAR 59:010, Section 3(1) | N/A | Weekly Visual Observation |
| Initial Construction and/or Modification Date: See Below | | | | |
| Process Description: | | | | |
| EP 10 | Primecoat Booth 1 and 2 | | | |
| (PB1) | Binks reciprocating HVLP, spray gun | | | |
| (PB2) | Fanuc Robot, HVLP spray gun | | | |
| | Binks maximum application rate 10 gallons/hour Fanuc maximum application rate 4.76 gallons/hour Total application rate 14.76 gallons/hour Construction commenced: 1992, robot 2017 | | | |
| EP 11 | Basecoat Booths 1-4 | | | |
| (BC1) | Binks reciprocating HVLP | | | |
| (BC2) | Fanuc Robot, HVLP spray gun | | | |
| (BC3) | Binks reciprocating HVLP | | | |
| (BC4) | Fanuc Robot, HVLP spray gun | | | |
| | Binks maximum application rate 10 gallons/hour Fanuc maximum application rate 4.76 gallons/hour Total application rate 29.5 gallons/hour total Construction commenced: 1992, robots 2017 | | | |
| EP 12 | Clearcoat Booths 1-4 | | | |
| (CC1) | Binks reciprocating HVLP | | | |
| (CC2) | Fanuc Robot, HVLP spray gun | | | |
| (CC3) | Binks reciprocating HVLP | | | |
| (CC4) | Fanuc Robot, HVLP spray gun | | | |
| | Binks maximum application rate 10 gallons/hour Fanuc maximum application rate 4.76 gallons/hour | | | |

Emission Points #10, 11, 12 and 14 Surface Coating Operations

Total application rate 29.5 gallons/hour total
Construction commenced: 1992, robots 2017

Control Equipment for EP10-12: Venturi Scrubber and Dry filters

Dry Filtration System

- Smith Engineering 3 stage, Tridem Fabric Filter
- Stage 1: 2 pocket cube
- Stage 2: 8 pocket TriSac
- Stage 3: 8 pocket Syn-pac
- PM control for EP 10, EP11, EP12
- Installation date: July 1992

EP 14 Curing Ovens (2)
 Fuel: Natural Gas,
 Usage Rate: 1.5 MMBtu/hr

Applicable Regulation:

401 KAR 63:002 Section 2(4)(uuu) *40 C.F.R. 63.4480 to 63.4581, Tables 1 to 4, and Appendix A (Subpart PPPP), National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*

401 KAR 59:010, New process operations

Non-applicable Regulation:

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*, is not applicable to emissions elsewhere subject to the provisions of the administrative regulations of the Division. Emission subjected to or exempted by 40 CFR Part 63, Subpart PPPP are not subject to the requirements of 401 KAR 63:020.

Precluded Regulations:

401 KAR 50:012, *General application*, effective June 24, 1992, requiring implementation of standards for national primary and secondary ambient air quality, specifies that control procedures that are reasonable, available, and practical be used is precluded since the source has accepted a limit on VOCs (90 tons per year) that is below a major source threshold.

Comments:

For PM control devices, the venturi scrubber is the primary control and the baghouse (dry filtration) is the secondary control.

| Emission Points #13 Mask Paint Booths | | | | |
|----------------------------------------------|----------------------------------------|--------------------------------------------------------|---------------------------------------|-----------------------------------------------|
| Pollutant | Emission Limit or Standard | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis | Compliance Method |
| VOC | Source wide 90 tpy | 401 KAR 50:012, 401 KAR 51:017 | Material Balance & MSDS | Monthly Recordkeeping, 12 month rolling total |
| HAPs | 0.16 lb organic HAP/ lb coating solids | 40 CFR 63 Supart PPPP | Material Balance & MSDS | Recordkeeping |
| PM | 2.34 lbs/hr | 401 KAR 59:010, Section 3(2) | Material Balance & MSDS | Dry Filters, 90% control |
| Opacity | 20% | 401 KAR 59:010, Section 3(1) | N/A | Weekly Visual Observation |

Initial Construction and/or Modification Date: 1989

Process Description:

EP 13 Mask Paint Booths (Decko)
(MP1 - MP7) Manual HVLP Gun
 Maximum application rate 5.0 gallons/hour total
 Construction commenced: 1989
 Control Equipment: Dry filters

Applicable Regulation:

401 KAR 63:002 Section 2(4)(uuu) 40 C.F.R. 63.4480 to 63.4581, Tables 1 to 4, and Appendix A (Subpart PPPP), National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

401 KAR 59:010, New process operations

Non-applicable Regulation:

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*, is not applicable to emissions elsewhere subject to the provisions of the administrative regulations of the Division. Emission subjected to or exempted by 40 CFR Part 63, Subpart PPPP are not subject to the requirements of 401 KAR 63:020.

Precluded Regulations:

401 KAR 50:012, *General application*, effective June 24, 1992, requiring implementation of standards for national primary and secondary ambient air quality, specifies that control procedures that are reasonable, available, and practical be used is precluded since the source has accepted a limit on VOCs (90 tons per year) that is below a major source threshold.

Comments:

Dry filters estimated at 90% control.

| Emission Points #18, 22, 28, 29, 30 Chain-on-Edge Operation | | | | |
|--------------------------------------------------------------------|----------------------------------------|--------------------------------------------------------|---------------------------------------|-----------------------------------------------|
| Pollutant | Emission Limit or Standard | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis | Compliance Method |
| VOC | Source wide 90 tpy | 401 KAR 50:012, 401 KAR 51:017 | Material Balance & MSDS | Monthly Recordkeeping, 12 month rolling total |
| HAPs | 0.16 lb organic HAP/ lb coating solids | 40 CFR 63 Supart PPPP | Material Balance & MSDS | Recordkeeping |
| PM | 2.34 lbs/hr | 401 KAR 59:010, Section 3(2) | Material Balance & MSDS | Dry Filters, 90% control |
| Opacity | 20% | 401 KAR 59:010, Section 3(1) | N/A | Weekly Visual Observation |

Initial Construction and/or Modification Date: See Below

Process Description:

EP 28 (COE-P) Chain-on-Edge (COE)
 Prime Coat Booth
 Maximum application rate 0.81 gallon/hour
 Construction commenced: March 1998
 Control Equipment: Dry filters

EP 29 (COE-B) Chain-on-Edge (COE)
 Base Coat Booth
 Maximum application rate 0.81 gallon/hour
 Construction commenced: March 1998
 Control Equipment: Dry filters

EP 30 (COE-C) Chain-on-Edge (COE)
 Clear Coat Booth
 Maximum application rate 0.81 gallon/hour
 Construction commenced: March 1998
 Control Equipment: Dry filters

EP 22 COE Curing Oven
 Fuel: Natural Gas
 Usage Rate: 1.0 MMBtu/hr

EP 18 COE Pre-treat Oven
 Fuel: Natural Gas
 Usage Rate: 1.0 MMBtu/hr

Emission Points #18, 22, 28, 29, 30 Chain-on-Edge Operation

Applicable Regulation:

401 KAR 63:002 Section 2(4)(uuu) 40 C.F.R. 63.4480 to 63.4581, Tables 1 to 4, and Appendix A (Subpart PPPP), National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

401 KAR 59:010, New process operations

Non-applicable Regulation:

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*, is not applicable to emissions elsewhere subject to the provisions of the administrative regulations of the Division. Emission subjected to or exempted by 40 CFR Part 63, Subpart PPPP are not subject to the requirements of 401 KAR 63:020.

Precluded Regulations:

401 KAR 50:012, *General application*, effective June 24, 1992, requiring implementation of standards for national primary and secondary ambient air quality, specifies that control procedures that are reasonable, available, and practical be used is precluded since the source has accepted a limit on VOCs (90 tons per year) that is below a major source threshold.

Comments:

Dry filters estimated at 90% control.

| Emission Points #34 and 35, Chromium Plating Lines | | | | |
|-----------------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------|---------------------------------------|-------------------------------------------------------|
| Pollutant | Emission Limit or Standard | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis | Compliance Method |
| VOC | Source wide 90 tpy | 401 KAR 50:012, 401 KAR 51:017 | Material Balance & MSDS | Monthly Recordkeeping, 12 month rolling total |
| PM | 2.34 lbs/hr | 401 KAR 59:010, Section 3(2) | Material Balance & MSDS | Assumed based on rates of emissions |
| Chromium | 0.007 mg/dscm for EP34 tanks subject to Subpart N only | 40 CFR 63 Subpart N | N/A | Assumed when operating according to permit conditions |
| Opacity | 20% | 401 KAR 59:010, Section 3(1) | N/A | Weekly Visual Observation |

Initial Construction and/or Modification Date: See Below

Process Description:

EP 34 Chromium Plating Line #2 (Hexavalent Chrome System)

Chrome Plating Process consisting of the following tanks:
 Pre-etch, Etch, Neutralizer, Pre-Activator, Activator, Accelerator, Electroless Copper, Electroless Nickel Bath, Acid Copper Strike, Acid Copper Plate, Acid Activator, Semi-bright Nickel, Bright Nickel, Microporous Nickel, **Chrome Plate* (two tanks)**, Chrome Strip and Nitric Strip, Waste Water Treatment Plant (WWTP)

***Tank(s) subject to NESHAPS Subpart N**
 Chrome Plating, rectifier capacity 27,500 amps

Construction commenced: November 2006

Control Equipment for the PM emissions:

Monitoring of surface tension at the chromium anodizing bath, foam blanket
 Composite mesh pad/packed-bed fume scrubber

EP 35 Chromium Plating Line #3 (Trivalent Chrome System)

Chrome Plating Process consisting of the following tanks:
 Tank 1: Chrome Strip, Tank 2: Rinse, Tank 3: Rinse, Tank 4: Nickel Activator, Tank 5: Rinse, Tank 6: Rinse, **Tank 7: Trivalent Chrome Plating***, Tank 8: Rinse, Tank 9: Rinse, **Tank 10: Passivate***, Tank 11: Rinse, Tank 12: Deionized Water, Tank 13: Dryer

*** Tank(s) subject to NESHAPS Subpart N**
 Chrome Plating, rectifier capacity 12,000 amps

Construction commenced: December 2018

Control Equipment for the PM emissions:

Composite mesh pad/packed-bed fume scrubber

Emission Points #34 and 35, Chromium Plating Lines

Applicable Regulations:

401 KAR 63:002 Section 2(4)(h) 40 C.F.R. 63.340 to 63.348, Table 1 (Subpart N), National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

401 KAR 59:010, New process operations

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*, is applicable to emissions of HAPs/toxics not covered by Subpart N above.

Precluded Regulations:

401 KAR 50:012, *General application*, effective June 24, 1992, requiring implementation of standards for national primary and secondary ambient air quality, specifies that control procedures that are reasonable, available, and practical be used is precluded since the source has accepted a limit on VOCs (90 tons per year) that is below a major source threshold.

Comments:

On December 8, 2005, chromium emission testing was conducted by the source. The emission rate was 7.91 E-05 lb/hr for Cr⁺⁶ and 2.64 E-04 lb/hr for total chromium.

Since EP 35 is a trivalent chrome plating line it is not subject to the same requirements in NESHAPS Subpart N as EP 34 which is a hexavalent chrome plating line. For tanks subject to subpart N, MVC shall monitor the surface tension of the bath in EP 34 as required by subpart N (33 dynes/cm as measured with a tensiometer or 40 dynes/cm as measured by a stalagmometer) and in EP 35 as per manufacturer's recommendation (40 dynes/cm as measured by a tensiometer). Additionally MVC has indicated which specific tanks in EP 34 and EP 35 are subject to NESHAPS Subpart N based on the definition of applicability. The tanks that are not subject to NESHAPS Subpart N and have the potential to emit HAPs or toxics are subject to 401 KAR 63:020.

The Division performed air dispersion modeling on the tanks subject to 401 KAR 63:020. All tanks passed the modeling except for the nickel plating tanks (nickel chloride did not pass) which are a part of EP 34. This is in part due to control credit for scrubbers not being valid to claim as they are in the alternate operating scenario, Section B.8. However if the emissions from the nickel plating tanks are vented to its scrubber (Scrubber #2) and control credit can be claimed, then the nickel plating passes the air dispersion modeling. (This is using the emission factor for nickel plating with control – wet scrubber provided in AP-42 Table 12.20-4.) As a part of this revision and to claim control credit, the permittee will be required to operate scrubber #2 according to manufacturer's specification at all times plating takes place in the nickel tanks and will be required to monitor/record the pressure drop daily. With these conditions, all plating emission units are in compliance with 401 KAR 63:020 based on the rates of emissions supplied by MVC.

| Emission Unit #23, 32, 37 Boilers | | | | |
|------------------------------------------|----------------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------|-------------------------------------------|
| Pollutant | Emission Limit or Standard | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis | Compliance Method |
| PM | 0.45 lb/MMBtu (EP 23) 0.51 lb/MMBtu (EP 32) 0.45 lb/MMBtu (EP 37) | 401 KAR 59:015, Section 4(1)(c) | AP-42 Chapter 1.4. | Assumed based upon natural gas combustion |
| Opacity | 20% opacity | 401 KAR 59:015, Section 4(2) | N/A | Assumed based upon natural gas combustion |
| SO ₂ | 2.09 lbs/MMBtu (EP 23) 2.56 lbs/MMBtu (EP 32) 2.10 lbs/MMBtu (EP 37) | 401 KAR 59:015, Section 5(1) | AP-42 Chapter 1.4. | Assumed based upon natural gas combustion |

Initial Construction and/or Modification Date: see below

Process Description:

EP 23 Bryan Boiler for Parts Washer

Description:

Fuel Usage Natural Gas
 Fuel Input: 4.5 MMBtu/hr
 Date Commenced: 2018

EP 32 Rite – Model 1050S Steam Heating Boiler

Description:

Construction date: 1999
 Fuel input: 10.5 MMBtu/hr
 Primary fuel: Natural gas
 Control device: Industrial boiler multi-clone collector with fly-ash reinjection

EP 37 Hurst Boiler

Description:

Fuel Usage Natural Gas
 Fuel input: 9 MMBtu/hr
 Date Commenced: 2010

Applicable Regulations:

401 KAR 59:015, New Indirect Heat Exchangers,

401 KAR 60:005 Section 2(2)(d) 40 C.F.R. 60.40c to 60.48c (Subpart Dc), Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units

Emission Unit #23, 32, 37 Boilers

401 KAR 63:002 Section 2(4)(iii) 40 C.F.R. 63.7480 to 63.7575, Tables 1 to 13 (Subpart DDDDD), *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

Comments:

Emission limits for EP23 based on total heat input capacity of 24.0 MMBtu/hr

Emission limits for EP32 based on total heat input capacity of 14.6 MMBtu/hr

Emission limits for EP37 based on total heat input capacity of 23.6 MMBtu/hr

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements/Results

N/A

Footnotes:

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

| Emission and Operating Limit | Regulation | Emission Unit |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------|----------------------|
| 90 tpy of VOC emissions | 401 KAR 50:012, General application 401 KAR 51:017, Prevention of significant deterioration of air quality | Source-wide |

Table B - Summary of Applicable Regulations:

| Applicable Regulations | Emission Unit |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| 401 KAR 59:010 , <i>New Process Operations</i> | 10-13, 28-30, 34, 35 |
| 401 KAR 59:015 , <i>New Indirect Heat Exchangers</i> | 23, 32, 37 |
| 401 KAR 63:020 , <i>Potentially hazardous matter or toxic substances</i> | 34, 35 |
| 401 KAR 63:002 Section 2(4)(h) 40 C.F.R. 63.340 to 63.348, <i>Table 1 (Subpart N), National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks</i> | 34, 35 |
| 401 KAR 63:002 Section 2(4)(uuu) 40 C.F.R. 63.4480 to 63.4581, <i>Tables 1 to 4, and Appendix A (Subpart PPPP), National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products</i> | 10-13, 28-30 |
| 401 KAR 63:002 Section 2(4)(iii) 40 C.F.R. 63.7480 to 63.7575, <i>Tables 1 to 13 (Subpart DDDDD), National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters</i> | 23, 32, 37 |
| 401 KAR 60:005 Section 2(2)(d) 40 C.F.R. 60.40c to 60.48c (<i>Subpart Dc</i>), <i>Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units</i> | 32 |

Table C - Summary of Precluded Regulations:

| Precluded Regulations | Emission Unit |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| 401 KAR 51:017 , <i>Prevention of significant deterioration of air quality</i> , the source is accepting a source wide VOC emission limitation of 90 (reduced to 90 from 225 to also preclude 401 KAR 50:012) tons per year in order to preclude the applicability of this regulation. | |
| 401 KAR 50:012 , <i>General Application</i> , the source is accepting a source wide VOC emission limitation of 90 tons per year. By accepting a limit below a major source threshold, MVC has precluded this regulation. | |

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Table D - Summary of Non Applicable Regulations:

| Non-Applicable Regulations | Emission Unit |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <p>40 CFR Part 64, <i>Compliance Assurance Monitoring (CAM)</i>, applicable to pollutant-specific emission units that have potential pre-control device emissions required for the source to be classified as a major source and that use a control device to achieve compliance with emission limitations. CAM is not applicable for EP 10, EP 11 or EP 12 HAP emissions due to the fact that the source is subject to 40 CFR Part 63, Subpart PPPP, pursuant to 40 CFR 64.2(b)(1)(i). CAM is not applicable for EP 10, EP 11, or EP 12 VOC emissions because there is no unit specific emission limitation pursuant to 40 CFR 64.2(a)(1).</p> | |
| <p>401 KAR 63:020, <i>Potentially Hazardous Matter or Toxic Substances</i>, is not applicable to emissions elsewhere subject to the provisions of the administrative regulations of the Division. Emission subjected to or exempted by 40 CFR Part 63, Subpart PPPP and Subpart N are not subject to the requirements of 401 KAR 63:020.</p> | |

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*

The Division for Air Quality (Division) has performed SCREEN View on August 17, 2020 of potentially hazardous matter or toxic substances (Nickel Chloride) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

Single Source Determination

N/A

SECTION 5 – PERMITTING HISTORY

| Permit | Permit type | Activity# | Complete Date | Issuance Date | Summary of Action | PSD/Syn Minor |
|-------------|----------------|-------------|---------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| V-04-014 | Initial | APE20040001 | 2/2/1999 | 3/2/2005 | Initial Permit | Syn Minor |
| V-04-014 R1 | Minor Revision | APE20060002 | 12/25/2006 | 3/7/2007 | Addition of 2 nd Plating Line | N/A |
| V-04-014 R2 | Minor Revision | APE20090001 | 8/7/2009 | 11/20/2009 | Modification of a plating line. Addition of Subpart PPPP requirements. | N/A |
| V-10-011 | Renewal | APE20100001 | 5/4/2010 | 1/24/2011 | Renewal Permit | N/A |
| V-10-011 R1 | Sig Revision | APE20140001 | 10/29/2014 | 4/17/2015 | Add EP35 and EP36 | N/A |
| V-15-043 | Renewal | APE20150001 | 9/22/2015 | 3/22/2016 | Renewal Permit, 90 TPY VOC limit added to preclude 401 KAR 50:012 and allow shutdown of RTO | N/A |
| V-15-043 R1 | Minor Revision | APE20170001 | 6/14/2017 | 9/3/2017 | Add robotic painters | N/A |
| V-15-043 R2 | Minor Revision | APE20180003 | 12/13/2018 | 3/30/2019 | Add plastic substrate trivalent chrome plating line | N/A |
| V-15-043 R3 | Minor Revision | APE20200001 | 3/10/2020 | 6/24/2020 | Address typographical error in Subpart N applicability. Also to remove automated filter monitoring system, replace with daily pressure drop reading | N/A |

SECTION 6 – PERMIT APPLICATION HISTORY

N/A

APPENDIX A – ABBREVIATIONS AND ACRONYMS

| | |
|-------------------|---------------------------------------------------------------|
| AAQS | – Ambient Air Quality Standards |
| BACT | – Best Available Control Technology |
| Btu | – British thermal unit |
| CAM | – Compliance Assurance Monitoring |
| CO | – Carbon Monoxide |
| Division | – Kentucky Division for Air Quality |
| ESP | – Electrostatic Precipitator |
| GHG | – Greenhouse Gas |
| HAP | – Hazardous Air Pollutant |
| HF | – Hydrogen Fluoride (Gaseous) |
| MSDS | – Material Safety Data Sheets |
| mmHg | – Millimeter of mercury column height |
| NAAQS | – National Ambient Air Quality Standards |
| NESHAP | – National Emissions Standards for Hazardous Air Pollutants |
| NO _x | – Nitrogen Oxides |
| NSR | – New Source Review |
| PM | – Particulate Matter |
| PM ₁₀ | – Particulate Matter equal to or smaller than 10 micrometers |
| PM _{2.5} | – Particulate Matter equal to or smaller than 2.5 micrometers |
| PSD | – Prevention of Significant Deterioration |
| PTE | – Potential to Emit |
| SO ₂ | – Sulfur Dioxide |
| TF | – Total Fluoride (Particulate & Gaseous) |
| VOC | – Volatile Organic Compounds |