

Facility Name: **Precision Hose, Inc.**  
 City: Stone Mountain  
 County: Gwinnett  
 AIRS #: 04-13-135-00237

Application #: TV-15151  
 Date Application Received: March 25, 2004  
 Date Application Deemed  
 Administratively Complete: May 24, 2004  
 Date of Draft Permit:  
 Permit No: 3599-135-0237-V-02-0

Program	Review Engineers	Review Managers
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## Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Precision Hose, Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Facility Identification**

1. Facility Name: Precision Hose, Inc.
2. Parent/Holding Company Name: Precision Hose
3. Previous and/or Other Name(s): N/A.
4. Facility Location

2200 Centre Park Court  
Stone Mountain, Georgia 30087

5. Attainment or Non-attainment Area Location

The facility is located in a Non-Attainment area.

6. Class I Area Impacts

The facility is located within 200 km of the Cohutta W.A. Class I area.

**B. Site Determination**

There are no other facilities which could possibly be contiguous or adjacent and under common control.

**C. Existing Permits**

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility.

**Table 1: List of Current Permits as Amended**

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
3599-135-0237-E-01-0	February 24, 2004		X
3599-135-0237-E-01-1	December 8, 2004		X

Note that the facility originally estimated their emissions below major source thresholds and intended to apply for a Synthetic Minor permit during their original permit application in February of 2001. However, subsequent emission reports resulted in actual emissions above major source thresholds. This resulted in enforcement action by the Division, the change of the planned permits into transitional permits, and the facility immediately submitting Title V application forms. A consent order was then signed by the facility that contained penalties for failing to apply for a Title V Permit in a timely manner, in addition to past due fees.

D. Process Description

1. SIC Codes(s): 3599

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

Precision Hose manufactures spiral-wound metal hose.

3. Overall Facility Process Description

Precision Hose manufactures spiral-wound metal hose for industrial applications, including large and small diameter flexible metal conduit, similar to that used to cover the cable going to a pay telephone receiver.

Metal strips that are 1/2 – 1 inch wide are formed into spiral-wound hose on one of ten winding machines. A forming oil used during the winding process must be cleaned from the metal hose, which is done using either water-based cleaners or a vapor degreaser containing a halogenated solvent. Perchloroethylene is the halogenated solvent generally used, and it comprises all of the significant emissions from this facility.

In addition to winding and cleaning, hoses may be welded, cut, sanded and/or buffed before being inspected and shipped off-site.

4. Overall Process Flow Diagram (optional)

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is non-major under PSD/NSR regulations. Although the facility is located in the non-attainment area, their only emissions are in the form of perchloroethylene, which is defined as a HAP but not a VOC [see 391-3-1-.01(III) for the definition of "VOC"]. Therefore, their potential VOC emissions are currently zero.

## 2. Title V Major Source Status by Pollutant

**Table 3: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	No			
PM <sub>10</sub>	No			
SO <sub>2</sub>	No			
VOC	No			
NO <sub>x</sub>	No			
CO	No			
TRS	No			
H <sub>2</sub> S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

## 3. MACT Standards

The facility is a major source of the HAP perchloroethylene, and as such is subject to the MACT standard for Halogenated Solvent Cleaning under 40 CFR Part 63, Subpart T.

## 4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 8 – Part 61 NESHAP	no
Program Code 9 - NSPS	no
Program Code M – Part 63 NESHAP	yes
Program Code V – Title V	yes

## Regulatory Analysis

Note that all applicable regulations contained in this permit are federally enforceable.

### II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

The “National Emission Standards for Halogenated Solvent Cleaning” under 40 CFR Part 63, Subpart T apply to each individual batch vapor solvent cleaning machine (i.e. degreaser) that uses one of six specified halogenated solvents in total concentrations greater than 5 percent by weight.

Precision Hose currently operates a single batch vapor open top degreaser utilizing perchloroethylene as the solvent. Since perchloroethylene is one of the specified halogenated solvents, and it is used in concentrations greater than 5 percent, the requirements of 40 CFR Part 63, Subpart T apply to the operation of their degreaser.

C. Compliance Status

The facility is currently operating in compliance with all applicable rules and regulations.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition 2.2.1 states the applicability of 40 CFR Part 63, Subpart T, “National Emission Standards for Halogenated Solvent Cleaning” including all applicable requirements of the General Provisions within 40 CFR Part 63, Subpart A. The applicable requirements of this standard are then detailed within Sections 3, 5 and 6 of this permit.

### III. Regulated Equipment Requirements

#### A. Brief Process Description

Although a number of pieces of equipment are used to wind, cut, sand or buff the metal hose, the only significant source of emissions from the facility arises from the solvent degreaser that is used to clean forming oil from the parts.

For the last few years, Precision Hose has been operating a single solvent degreasing unit. On August 23, 2004, the facility removed its older degreaser and replaced it with a new batch open top vapor degreaser. The new degreaser still utilizes perchloroethylene (a non-VOC HAP) as the solvent. This degreaser has a solvent/air interface area of 40 square feet and, therefore, a potential to emit of approximately 70 tons per year when calculated as per 40 CFR 63.465(e). A toxic impact assessment was performed for perchloroethylene at this potential emission level, and the resulting ambient concentrations showed minimal impact. Actual emissions of the degreaser have been approximately 18 to 19 tons per year.

#### B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
DEGR	Solvent Degreasing Machine	40 CFR Part 63, Subpart T	2.2.1, 3.3.1 through 3.3.7, 5.2.1 through 5.2.4, 6.2.1, 6.2.2, 6.2.3	n/a	n/a

#### C. Equipment & Rule Applicability

##### Emission and Operating Caps –

None applicable.

##### Applicable Rules and Regulations –

All of the applicable rules and regulations related to this equipment are already listed within the General Provisions of the permit, with the exception of the “National Emission Standards for Halogenated Solvent Cleaning” under 40 CFR Part 63, Subpart T. This standard applies to each individual batch vapor solvent cleaning machine (i.e. degreaser) that uses a halogenated solvent in total concentrations greater than 5 percent by weight. Since Precision Hose operates a degreaser utilizing pure perchloroethylene, this standard applies.

#### D. Compliance Status

All of the equipment are currently operating in compliance with all applicable rules and regulations.

## E. Operational Flexibility

None applicable.

## F. Permit Conditions

Conditions 3.3.1 through 3.3.7 represent all of the operational requirements of 40 CFR Part 63, Subpart T. These conditions are nearly identical to Conditions 2.3 through 2.7, 2.9 and 5.5 of the previous permit for this facility (i.e. Permit No. 3599-135-0237-E-01-0), with some minor changes made in order to clarify the requirements and to ensure consistency with Subpart T.

Condition 3.3.1 specifies the various design parameters that are required for all batch vapor solvent cleaning machines.

Each batch vapor solvent cleaning machine must also employ a combination of control techniques in order to limit the evaporation of the solvent, and thus decrease overall emissions. These control techniques are selected by the facility from the allowed combinations that are listed in Table 2 of 40 CFR Part 63, Subpart T. Condition 3.3.2 describes the control combination chosen by the facility: minimum dwell time of parts, a freeboard refrigeration device (to ensure that excess solvent does not evaporate), and a reduced room draft near the top of the degreaser.

Conditions 3.3.3 through 3.3.6 describe in detail the requirements of the control techniques chosen and listed in Condition 3.3.2.

Condition 3.3.7 states the various work practices that must be performed in order to comply with 40 CFR Part 63, Subpart T.

**IV. Testing Requirements (with Associated Record Keeping and Reporting)****A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 60 days prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

**B. Specific Testing Requirements****1. Individual Equipment**

None applicable.

**2. Equipment Groups (all subject to the same test requirements):**

None applicable.

**V. Monitoring Requirements (with Associated Record Keeping and Reporting)****A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

**B. Specific Monitoring Requirements****1. Individual Equipment:**

Conditions 5.2.1 through 5.2.4 of the permit specify the various monitoring procedures required by 40 CFR Part 63, Subpart T. All of these are found within 40 CFR 63.466 and involve monitoring parameters that are sufficient to determine compliance with the control combination listed in Condition 3.3.2 as well as the design requirements of Condition 3.3.1.a and 3.3.1.c. Note that these conditions appeared as Conditions 5.1 through 5.4 of the previous permit for this facility (i.e. Permit No. 3599-135-0237-E-01-0), with only minor modifications made in order to correct typographical errors. Note that, just as was done in the previous permit, the options for maintaining and monitoring reduced room draft specified in Condition 5.2.4 are limited to controlling room parameters since the option of a full enclosure is not used by this facility.

**2. Equipment Groups (all subject to the same monitoring requirements):**

None applicable.

**C. Compliance Assurance Monitoring (CAM)**

Not Applicable.

## VI. Other Record Keeping and Reporting Requirements

### A. General Record Keeping and Reporting Requirements

The standard general requirements are included in the permit. Modifications to these standard requirements are explained in item 1, below.

#### 1. Exceptions to General Record Keeping and Reporting Requirements

Due to the specialized reporting requirements of 40 CFR Part 63, Subpart T, some modifications were made to Condition 6.1.4. In addition, a new Condition 6.1.8 was added to this section.

Condition 6.1.4 normally requires semi-annual reporting. However, 40 CFR 63.468(h) allows semi-annual reporting only until an exceedance occurs, after which the facility must begin submitting reports on a quarterly basis. The quarterly reporting must then continue until the requirements of Condition 6.1.8 have been met. The main paragraph of Condition 6.1.4 has been modified to reflect this requirement. In addition, subparagraphs 'f.' and 'g.' have been added to this condition to ensure that the report contains all the information required by 40 CFR 63.468(h).

Condition 6.1.8 was added to this section in order to specify the conditions that must be met before the facility may be allowed to switch from quarterly reporting back to semiannual reporting. These stipulations come directly from 40 CFR 63.468(i).

Also note that 40 CFR 63.463(e)(3) contains very specific definitions of what constitutes an exceedance of the standards within Subpart T, which are then listed within subparagraph 'b.' of Condition 6.1.7.

### B. Specific Record Keeping and Reporting Requirements

Conditions 6.2.1 through 6.2.3 describe the record keeping and reporting that is required under 40 CFR 63, Subpart T.

Condition 6.2.1 requires that, for the lifetime of the degreaser, the facility must keep on hand the owner's manual, the installation date of the equipment, the results of all tests done to determine the appropriate dwell time(s) for all parts cleaned (or for the most complex parts cleaned), and the halogenated HAP solvent content for any solvents used in the degreaser.

Condition 6.2.2 requires other records to be kept for five years, including all degreaser monitoring results, actions taken to comply with the control combinations chosen and/or actions taken to correct any exceedances, plus estimates of annual solvent consumption.

Condition 6.2.3 requires an annual report to be submitted certifying that all operators of the degreaser have been properly trained, and an estimate of the actual solvent consumption of the degreaser during the previous calendar year.

**VII. Specific Requirements**

## A. Operational Flexibility

None Requested.

## B. Alternative Requirements

None Requested.

## C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

## D. Temporary Sources

Not Applicable.

## E. Short-Term Activities

Not Applicable.

## F. Compliance Schedule/Progress Reports

None Applicable.

## G. Emissions Trading

Not Applicable.

## H. Acid Rain Requirements

Not Applicable.

## I. Prevention of Accidental Releases

Not Applicable.

J. Stratospheric Ozone Protection Requirements

General conditions covering Stratospheric Ozone Protection are included in Part 7.11 of this permit. These conditions satisfactorily cover this facility, and no additional conditions were required.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

Not Applicable.

**VIII. General Provisions**

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

**Addendum to Narrative**

The 30-day public review started on September 29, 2005 and ended on October 29, 2005. Comments were not received by the Division.