OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

MEMORANDUM November 2, 2022

TO: Lee Warden, P.E., Permits and Engineering Group Manager

THROUGH: Richard Kienlen, P.E., Manager, New Source Permits Section

THROUGH: Ryan Buntyn, P. E., New Source Permits Section

FROM: David S. Schutz, P. E., New Source Permit Section

SUBJECT: Evaluation of Permit Application No. **2011-845-O** (M-1)

Dexter Axle Company

Dexter Axle Division Plant 15 (SIC 3792/NAICS 336214) Section 21, T12N, R7W, Canadian County, Oklahoma

Lat: 35.507249° N Long: 97.949935° W 500 SE 27th Street, El Reno, Oklahoma 73036

FAC ID 2296

INTRODUCTION

Dexter Axle Company (Dexter Axle) currently operates a manufacturing facility located at 500 SE 27th Street in El Reno, Oklahoma. The facility fabricates and paints running gear for R.V., cargo, horse, utility, and equipment trailers. The facility is currently operating under Permit No. 2011-845-O issued February 11, 2014.

Dexter has applied for a modified operating permit to update and correct information on the previous operating permit. On issuance, this permit will be a Federally Enforceable State Operating Permit (FESOP).

DESCRIPTION

<u>Fabrication</u> – Dexter Axle receives metal shapes and various components which are cut, formed, welded, ground, and assembled. No control devices are used in the fabrication process. Negligible pollutants are emitted during the fabrication process.

<u>Painting Operations</u> – After fabrication, axle assemblies are conveyed through the stations described below.

<u>Flow Coating</u> – There are two lines designated as Spring Axle 1 (SA1) and Spring Axle 2 (SA2). Axles are assembled on the automated lines and then soaked with flow coater paint in an open trough. Gemini Dexter Black Flow Coater (product code 480-0021) is used for both flow coating lines.

There is a touch-up spray gun at the end of the coating for the possibility that an axle is damaged during the bundling process. That gun is rarely used.

<u>Paint Booths</u> – There are two paint booths designated as Torflex Paint Booth and Dual Wheel Paint Booth. Gemini Dexter Black Waterborne Paint (product code 480-0023) is used in both paint booths. No thinner is used. Media booth filters that have an average PM control efficiency of 99.5% are used to collect overspray particulates. Those filters have an initial flow resistance of 0.08-inch WG and a final resistance of 1.0-inch WG. Manometers are used to indicate when booth filters need to be changed. All painting is done by Titan airless spray guns.

Equipment Clean Up

The spray guns are cleaned with acetone. Approximately 55 gallons per month are used. Crystal-Clean disposes of the used paint and cleaning solvent. Hoses and other equipment are flushed with acetone as well. All acetone is kept in closed containers when not being used.

Normal operating hours for coating operations are 20 hours per day, 6 days per week, 50 weeks per year, 6,000 hours per year. Coated products are air-dried; there are no drying heaters.

The facility normally produces up to 1,500 - 2,000 axles per day, with weights varying from 50 to 800 pounds apiece (average = 425 pounds, average process weight rate 4.47 TPH).

All other facility activities have negligible air emissions.

EQUIPMENT

Paint Booths

The paint booths measure 14 feet long and 14 feet wide. The spray booths can be fully enclosed during spray application. The booths exhaust to the atmosphere from two separate vent stacks. The specifications for the exhaust fans used to ventilate the paint booths are shown in the table below. The paint booth design features "filter grille" on each half of the room with dry particulate filters used in each outlet. For emissions calculations purposes, the filter material will be estimated at 98% efficiency to collect over-spray particulates generated during the spraying process. Manometers are used to indicate when booth filters need to be changed.

| Stack Exit Data | | | | | | | |
|-------------------|---------------------------------|------------------------------|-------------------------------------|--------------------|-------------------|------------------|--------------|
| Emission Point | Description | Building Height (feet) | Height Above Ground (feet) | Diameter (feet) | Velocity (fps) | Volume (ACFM) | Temp (°F) |
| 99263 | Paint Booth Dual Wheel | 24 | 30 | 2.5 | 40.8 | 12,600 | 70 |
| 197894 | Paint Booth Torflex | 24 | 30 | 2.5 | 40.8 | 12,600 | 70 |
| 99264 | Flow Coat Spring Axle Line 1 | 24 | 30 | 2.0 | 35.0 | 7,800 | 70 |

| Stack Exit Data | | | | | | | |
|-------------------|---------------------------------|------------------------------|-------------------------------------|--------------------|-------------------|------------------|--------------|
| Emission Point | Description | Building Height (feet) | Height Above Ground (feet) | Diameter (feet) | Velocity (fps) | Volume (ACFM) | Temp (°F) |
| 197915 | Flow Coating Spring Axle Line 2 | 24 | 30 | 2.0 | 35.0 | 7,800 | 70 |

EMISSIONS

This permit will continue a federally-enforceable VOC emissions limit of 99.90 TPY, single HAP limit of 9.9 TPY and combination HAP limit of 24.9 TPY. The applicant will be allowed to make coating product substitutions. The applicant will be allowed to operate the facility continuously (8,760 hr/yr).

Coating PM Emissions

| Operation | Hourly Annual Solids Content, Transfer | | Filter | PM En | nissions | | |
|-------------------|--|-------------------|-------------------|-------|------------|-------|------|
| Operation | Usage, Gallons | Usage, Gallons | lb/gal Efficiency | | Efficiency | lb/hr | TPY |
| Spray Painting | 5.77 | 34,632 | 3.4 | 50% | 98% | 0.20 | 0.59 |

Welding emission factors were taken from AP-42 (1/95), Table 12.19-1.

Welding PM Emissions

| Oneration | Welding | Annual Electrode | ual Electrode Emission Factor | | PM Emissions | |
|-----------|---------|------------------|---------------------------------|-------|--------------|--|
| Operation | Type | Usage lb/year | lb/1,000 lb | lb/hr | TPY | |
| Welding | GMAW | 200,000 | 5.2 | 0.17 | 0.52 | |

SUMMARY OF CRITERIA POLLUTANT EMISSIONS BY OPERATION

| Emission Unit | PM ₁₀ | | VOC | |
|---------------|------------------|------|-------|-------|
| Emission Unit | lb/hr | TPY | lb/hr | TPY |
| Welding | 0.17 | 0.52 | -1 | |
| Painting | 0.20 | 0.59 | 31.17 | 99.90 |
| Total | 0.37 | 1.09 | 31.17 | 99.90 |

OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions)

[Applicable]

Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference)

[Applicable]

This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations listed in OAC 252:100, Appendix Q. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments)

[Applicable]

Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in "attainment" of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable] Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories were submitted and fees paid for previous years as required.

OAC 252:100-7 (Permits for Minor Facilities)

[Applicable]

Subchapter 7 sets forth the permit application fees and the basic substantive requirements of permits for minor facilities. Since criteria pollutant emissions are less than 100 TPY for each pollutant, and emissions of Hazardous Air Pollutants (HAP) will not exceed 10 TPY for any individual HAP or 25 TPY for any aggregate of HAP, the facility is defined as a minor source. As such, BACT is not required.

OAC 252:100-9 (Excess Emissions Reporting Requirements)

[Applicable]

Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning)

[Applicable]

Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter)

[Applicable]

<u>Section 19-4</u> regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. There are no fuel-burning sources at the facility used to convert the combustion of fuel into usable energy.

<u>Section 19-12</u> limits particulate emissions from emission points in an industrial process based on process weight rate, as specified in Appendix G. Based on a total process weight rate of 4.43 TPH, the allowable particulate limitation for this rate is limited to 11.11 lbs/hr.

| Operation | Appendix G Emission Limit (lbs/hr) | Potential Emission Rate (lbs/hr) |
|-----------|--|--|
| Painting | 11.11 | 0.17 |
| Welding | 11.11 | 0.20 |

OAC 252:100-25 (Visible Emissions and Particulates)

[Applicable]

No discharge of greater than 20% opacity is allowed except for short-term occurrences that consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. There is very little possibility of exceeding these standards because of the efficiency of the paint booth filters.

OAC 252:100-29 (Control of Fugitive Dust)

[Applicable]

No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility has negligible potential to violate this requirement; therefore, it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds)

[Not Applicable]

<u>Part 5</u> limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. There is no fuel-burning equipment at the facility subject to this subchapter.

OAC 252:100-33 (Nitrogen Oxides)

[Not Applicable]

This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NO_X per MMBTU, three-hour average. There is no fuel-burning equipment at the facility subject to this subchapter.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds)

[Applicable]

<u>Part 3</u> requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia at maximum storage temperature to be equipped with a permanent submerged fill pipe or with an organic vapor

recovery system. There are no VOC storage tanks at this facility.

Part 5 limits the VOC content in various types of coating materials in terms of pounds per gallon. VOC emissions from coating and cleaning equipment at this operation will be greater than 100 lb for each 24-hr day and are, therefore, subject to the standards of 252:100-37-25. No owner or operator of any coating line or coating operation with VOC emissions shall use coatings that as applied contain VOCs in excess of the amounts listed below. Limits are expressed in pounds of VOC per gallon of coating, excluding the volume of any water and exempt organic compounds.

- (1) Alkyd primer 4.8 lb VOC per gallon
- (2) Vinyls 6.0 lb VOC per gallon
- (3) NC lacquers 6.4 lb VOC per gallon
- (4) Acrylics 6.0 lb VOC per gallon
- (5) Epoxies 4.8 lb VOC per gallon
- (6) Maintenance finishes 4.8 lb VOC per gallon
- (7) Custom products finish 6.5 lb VOC per gallon

<u>Part 7</u> requires fuel-burning equipment to be operated and maintained so as to minimize VOC emissions. Temperature and available air must be sufficient to provide essentially complete combustion. There is no equipment at this location subject to this requirement.

OAC 252:100-39 (VOC in Nonattainment and Former Nonattainment Areas) [Not Applicable] This subchapter imposes additional conditions beyond those of Subchapter 37 on emissions of organic materials from new and existing facilities in Tulsa and Oklahoma Counties. This rule will not apply as the facility is not in Tulsa or Oklahoma County.

OAC 252:100-42 (Toxic Air Contaminants (TAC))

[Applicable]

This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping)

[Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in

compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

FEDERAL REGULATIONS

NSPS, 40 CFR Part 60

[Not Applicable]

<u>Subparts K, Ka, and Kb, VOL Storage Vessels.</u> These subparts regulate hydrocarbon storage tanks larger than 19,813 gallons and are built after July 23, 1984. There are no hydrocarbon storage tanks at this site and is therefore not subject to the requirements of these subparts.

The following subparts affect surface coating, but not this facility:

| Subpart | Description | Applicability | Comments |
|---------|--|---------------|-------------------------|
| EE | Metal Furniture Coating | No | Not in source category |
| MM | Automobiles and Light-Duty Trucks Coating | No | Not in source category |
| QQ | Graphic Arts (Rotogravure) | No | Not in source category |
| RR | Pressure-Sensitive Tape and Label Coating | No | Not in source category |
| SS | Surface Coating of Large Appliances | No | Not in source category |
| TT | Metal Coil Surface Coating | No | Not in source category |
| WW | Beverage Can Surface Coating | No | Not in source category |
| FFF | Flexible Vinyl and Urethane Coating | No | Not in source category |
| SSS | Magnetic Tape Coating | No | Not in source category |
| TTT | Surface Coating Plastic Parts & Business | No | Not in source category |
| 111 | Machines | 110 | Thou in source category |
| VVV | Polymeric Coating of Supporting Substrates | No | Not in source category |

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride.

NESHAP, 40 CFR Part 63

[Not Applicable]

The following subparts affect surface coating, but not this facility:

| Subpart | Description | Applicability | Comments |
|---------|--|----------------------|------------------------|
| N | Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks | No | Not in source category |
| GG | Aerospace Manufacturing and Rework Facilities | No | Not in source category |
| II | Shipbuilding and Ship Repair (Surface Coating) | No | Not in source category |
| IIII | Surface Coating of Automobiles and Light Trucks | No | Not in source category |
| JJJJ | Paper and Other Web Coating | No | Not in source category |
| KKKK | Surface Coating of Metal Cans | No | Not in source category |

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| Subpart | Description | Applicability | Comments |
|---------|--|---------------|---|
| MMMM | Paint Stripping and Surface Coating of Miscellaneous Metal Parts and Products | No | Not a major source of HAPs |
| NNNN | Surface Coating of Large Appliances | No | Not in source category |
| 0000 | Coating of Fabrics and Other Textiles | No | Not in source category |
| PPPP | Surface Coating of Plastic Parts and Productgs | No | Not in source category |
| QQQQ | Surface Coating of Wood Building Products | No | Not in source category |
| RRRR | Surface Coating of Metal Furniture | No | Not in source category |
| SSSS | Surface Coating of Metal Coil | No | Not in source category |
| ННННН | Miscellaneous Coating Manufacturing | No | Not in source category |
| НННННН | Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources | No | Not engaged in following operations as defined in 40 CFR §63.11169: a) No paint stripping operations that involve the use of chemical strippers that contain MeCl. b) No auto body refinishing operations. c) No spray application of coating containing Target HAPs (Cr, Pb, Mn, Ni or Cd). |
| wwwwww | Area Source Standards for Plating and Polishing Operations | No | Not in source category |

| Subpart | Description | Applicability | Comments |
|---------|--|---------------|---|
| XXXXXX | Area Source Standards for Nine Metal Fabrication and Finishing Source Categories | No | Not in any of these 9 source categories (1) Electrical and Electronic Equipment Finishing Operations; (2) Fabricated Metal Products; (3) Fabricated Plate Work (Boiler Shops); (4) Fabricated Structural Metal Manufacturing; (5) Heating Equipment, except Electric; (6) Industrial Machinery and Equipment Finishing Operations; (7) Iron and Steel Forging; (8) Primary Metal Products Manufacturing; and (9) Valves and Pipe Fittings. |
| CCCCCCC | Area Source Standards for Paints and Allied Products Manufacturing | No | Not in source category |

COMPLIANCE

Tier Classification and Public Review

This application has been determined to be Tier I based on the request for an operating permit for a minor facility. The draft permit will undergo public notice on the DEQ's web site as required in OAC 252:4-7-13(g). The public, tribal governments, and the EPA will have 30 days to comment on the draft permit. Permits available for public review and comment are found at this location: https://www.deq.ok.gov/permits-for-public-review/

The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the land. Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page: www.deq.ok.gov/.

Environmental Justice Review

All people should be protected from the impacts of environmental pollution regardless of race, national origin, or income. DEQ is committed to ensuring such protection through the development, implementation, and consistent enforcement of environmental laws and regulations.

AQD has determined that no communities with environmental justice concerns are impacted by the issuance of this permit. This determination is based on this permit qualifying as a minor source under OAC 252:100-7.

Fee Paid

Minor facility operating permit application fee of \$750.

SUMMARY

The facility has been constructed and is operating as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues. Issuance of the operating permit is recommended, contingent on public review.

PERMIT TO OPERATE AIR POLLUTION CONTROL FACILITY SPECIFIC CONDITIONS

Dexter Axle Company Dexter Axle Div Plt. 15 Permit No. 2011-845-O (M-1)

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on November 8, 2021. The Evaluation Memorandum, dated November 2, 2022, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operation under this permit constitutes acceptance of, and consent to, the conditions contained herein.

1. Point of emissions and emission limitations:

| Source | POLLUTANT | FACILTY- WIDE TPY |
|---------------------|------------------|-------------------------|
| | VOC (non-HAP) | 99.9 |
| Painting operations | Single HAP | 9.9 |
| _ | Combination HAPs | 24.9 |

- 2. Alternative products other than the product list submitted as part of the permit application may be used. The permittee is not required to notify Air Quality of any change in the quantity and types of products used at the facility unless such action would change the status of the permit. Operator is required to maintain records to demonstrate and verify compliance with emission limits in Specific Condition No. 1.
- 3. The permittee shall be authorized to operate the facility continuously (24 hours per day, every day of the year).
- 4. VOC emissions from clean-up solvents may be determined as the difference between the amounts used minus the amounts recovered for disposal.
- 5. VOC emissions from cleanup solvents shall be included when determining compliance with the limitations of VOC per gallon of coating less water and exempt solvents, unless those solvents are recycled into the system or disposed of in such a manner that would prevent their evaporation into the atmosphere.
- 6. The permittee shall calculate emissions of each pollutant emitted to the atmosphere from the coating operations. Volatile compounds shall be calculated based on usage of each paint, thinner, and solvent. Solid compounds shall be calculated based on gallons of each paint used in the spray operations, percentage by weight, and density of the paint of each compound times 50% of overspray reaching filter, times 2%, or less, for filter efficiency (1 FE).
- 7. Paint spraying equipment shall be cleaned with VOCs being drained into a closed container.

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- 8. Particulate emissions from paint booth overspray shall be controlled by dry filters, with an efficiency rating of at least 98%. The filters or alternative device with the same or better control efficiency shall be maintained and operated in accordance with manufacturer's specifications. A properly functioning manometer will be required to indicate when booth filters need to be changed.
- 9. The permittee shall maintain paint spray guns in good working order so as to minimize paint overspray during operations.
- 10. GMAW welding electrode shall not exceed 200,000 lb/year, 12-month rolling totals.
- 11. The following records shall be maintained on-site. All such records shall be made available to regulatory personnel upon request. These records shall be maintained for a period of at least five years after the time they are made.
 - a. Usage of coatings, thinners, and solvents by type and volume (monthly and 12-month rolling total).
 - b. Total emissions of all VOCs and HAPs (monthly and 12-month rolling total).
 - c. Material Safety Data Sheets (MSDS) for all products used, which document the volatile organic solvent content expressed in pounds of VOC per gallon of coating or grams per liter of each product.
 - d. Inspection and maintenance of all air pollution control devices, including manometer (weekly).
 - e. Amount of collected cleaning solvent or wastes for disposal (monthly and 12-month rolling total).
 - f. Welding electrode usage (monthly and 12-month rolling total).
- 12. This permit supersedes all previous Air Quality permits for this facility, which are now canceled.



Mr. Daniel Vaughn Plant Manager Dexter Axle Company 500 SE 27th Street El Reno, OK 73036 **Permit Number: 2011-845-O (M-1)**

Permit Writer: David Schutz

SUBJECT: Facility: Dexter Axle Company

Location: Sec 21, T12N, R7W, Canadian County, Oklahoma

500 SE 27th Street, El Reno, Oklahoma 73036

FAC ID 2296

Dear Mr. Vaughn:

Enclosed is the permit authorizing operation of the referenced facility above. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation in this matter. If we may be of further service, please contact the permit writer at david.schutz@deq.ok.gov, or at (405) 702-4198.

Sincerely,

Lee Warden, P.E.
Permits and Engineering Section Manager
AIR QUALITY DIVISION

Enclosure



PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 N. ROBINSON, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

FESOP No. 2011-845-O (M-1)

| Dexter Axle Company, | |
|--|-----------------------------|
| having complied with the requirements of the law, is hereby gr | anted permission to operate |
| a paint booth facility, located at 500 SE 27th Street, El Re | eno, Oklahoma, subject to |
| standard conditions dated February 13, 2020, and specific cond | itions, both attached. |
| | |
| | |
| | |
| | |
| | |
| <u>DRAFT</u> | |
| | |
| Lee Warden, P.E. | Date Issued |

Permits and Engineering Group Manager

MINOR SOURCE PERMIT TO OPERATE/CONSTRUCT AIR POLLUTION CONTROL FACILITY STANDARD CONDITIONS

(February 13, 2020)

- A. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ) in accordance with and under the authority of the Oklahoma Clean Air Act. The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. This specifically includes compliance with the rules of the other Divisions of DEQ: Land Protection Division and Water Quality Division.
- B. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-7-15(g)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-7-15(f)]
- C. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-7-18(a)]
- D. Unless specified otherwise, the term of an operating permit shall be unlimited.
- E. Notification to the Air Quality Division of DEQ of the sale or transfer of ownership of this facility is required and shall be made in writing by the transferor within 30 days after such date. A new permit is not required.

 [OAC 252:100-7-2(f)]
- F. The following limitations apply to the facility unless covered in the Specific Conditions:
- 1. No person shall cause or permit the discharge of emissions such that National Ambient Air Quality Standards (NAAQS) are exceeded on land outside the permitted facility.

[OAC 252:100-3]

- 2. All facilities that emit air contaminants are required to file an emission inventory and pay annual operating fees based on the inventory. Instructions are available on the Air Quality section of the DEQ web page. www.deq.ok.gov [OAC 252:100-5]
- 3. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-9]
- 4. Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning subchapter.

[OAC 252:100-13]

- 5. No particulate emissions from new fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lbs/MMBTU. [OAC 252:100-19]
- 6. No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity.

 [OAC 252:100-25]

- 7. No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards.

 [OAC 252:100-29]
- 8. No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lbs/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide.

 [OAC 252:100-31]
- 9. Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with an organic material vapor-recovery system. [OAC 252:100-37-15(b)]
- 10. All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]
- G. Any owner or operator subject to provisions of NSPS shall provide written notification as follows: [40 CFR 60.7 (a)]
- 1. A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
- 2. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in §60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.
- 3. A notification of the actual date of initial start-up of an affected facility postmarked within 15 days after such date.
- 4. If a continuous emission monitoring system is included in the construction, a notification of the date upon which the test demonstrating the system performance will commence, along with a pretest plan, postmarked no less than 30 days prior to such a date.
- H. Any owner or operator subject to provisions of NSPS shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility or any malfunction of the air pollution control equipment. [40 CFR 60.7 (b)]
- I. Any owner or operator subject to the provisions of NSPS shall maintain a file of all measurements and other information required by this subpart recorded in a permanent file suitable for inspection. This file shall be retained for at least five years following the date of such measurements, maintenance, and records.

 [40 CFR 60.7 (f)]
- J. Any owner or operator subject to the provisions of NSPS shall conduct performance test(s) and furnish to AQD a written report of the results of such test(s). Test(s) shall be conducted within 60 days after achieving the maximum production rate at which the facility will be operated, but not later than 180 days after initial start-up. [40 CFR 60.8]

Department of Environmental Quality (DEQ) Air Quality Division (AQD) Acronym List 9-10-21

| ACFM | Actual Cubic Feet per Minute | GDF | Gasoline Dispensing Facility |
|--------------|--|------------------------|--|
| AD | Applicability Determination | GEP | Good Engineering Practice |
| AFRC | Air-to-Fuel Ratio Controller | GHG | Greenhouse Gases |
| API | American Petroleum Institute | GR | Grain(s) (gr) |
| ASTM | American Society for Testing and | | |
| | Materials | H_2CO | Formaldehyde |
| | | H_2S | Hydrogen Sulfide |
| BACT | Best Available Control Technology | HAP | Hazardous Air Pollutants |
| BAE | Baseline Actual Emissions | HC | Hydrocarbon |
| BBL | Barrel(s) | HCFC | Hydrochlorofluorocarbon |
| BHP | Brake Horsepower (bhp) | HFR | Horizontal Fixed Roof |
| BTU | British thermal unit (Btu) | HON | Hazardous Organic NESHAP |
| | | HP | Horsepower (hp) |
| C&E | Compliance and Enforcement | HR | Hour (hr) |
| CAA | Clean Air Act | | |
| CAM | Compliance Assurance Monitoring | I&M | Inspection and Maintenance |
| CAS | Chemical Abstract Service | IBR | Incorporation by Reference |
| CAAA | Clean Air Act Amendments | ICE | Internal Combustion Engine |
| CC | Catalytic Converter | | • |
| CCR | Continuous Catalyst Regeneration | LAER | Lowest Achievable Emission Rate |
| CD | Consent Decree | LB | Pound(s) [Mass] (lb, lbs, lbm) |
| CEM | Continuous Emission Monitor | LB/HR | Pound(s) per Hour (lb/hr) |
| CFC | Chlorofluorocarbon | LDAR | Leak Detection and Repair |
| CFR | Code of Federal Regulations | LNG | Liquefied Natural Gas |
| CI | Compression Ignition | LT | Long Ton(s) (metric) |
| CNG | Compressed Natural Gas | | |
| CO | Carbon Monoxide or Consent Order | \mathbf{M} | Thousand (Roman Numeral) |
| COA | Capable of Accommodating | MAAC | Maximum Acceptable Ambient |
| COM | Continuous Opacity Monitor | | Concentration |
| | • • | MACT | Maximum Achievable Control |
| D | Day | | Technology |
| DEF | Diesel Exhaust Fluid | $\mathbf{M}\mathbf{M}$ | Prefix used for Million (Thousand- |
| DG | Demand Growth | | Thousand) |
| DSCF | Dry Standard (At Standard Conditions) | MMBTU | Million British Thermal Units (MMBtu) |
| | Cubic Foot (Feet) | MMBTUH | Million British Thermal Units per Hour |
| | | | (MMBTUH) |
| EGU | Electric Generating Unit | MMSCF | Million Standard Cubic Feet (MMscf) |
| EI | Emissions Inventory | MMSCFD | Million Standard Cubic Feet per Day |
| EPA | Environmental Protection Agency | MSDS | Material Safety Data Sheet |
| ESP | Electrostatic Precipitator | MWC | Municipal Waste Combustor |
| EUG | Emissions Unit Group | MWe | Megawatt Electrical |
| EUSGU | Electric Utility Steam Generating Unit | | - |
| | • | NA | Nonattainment |
| FCE | Full Compliance Evaluation | NAAQS | National Ambient Air Quality Standards |
| FCCU | Fluid Catalytic Cracking Unit | NAICS | North American Industry Classification |
| FEL | Federally Enforceable Limit(s) | | System |
| FESOP | Federally Enforceable State Operating | NESHAP | National Emission Standards for |
| | Permit | | Hazardous Air Pollutants |
| FIP | Federal Implementation Plan | NH_3 | Ammonia |
| FR | Federal Register | NMHC | Non-methane Hydrocarbon |
| | - | NGL | Natural Gas Liquids |
| GACT | Generally Achievable Control | NO_2 | Nitrogen Dioxide |
| | Technology | NOx | Nitrogen Oxides |
| GAL | Gallon (gal) | NOI | Notice of Intent |
| | · · · · · · · · · · · · · · · · · · · | | |

| NSCR | Non-Selective Catalytic Reduction | SO_2 | Sulfur Dioxide |
|-------------------|--|--------------|---|
| NSPS | New Source Performance Standards | SOx | Sulfur Oxides |
| NSR | New Source Review | SOP | Standard Operating Procedure |
| | | SRU | Sulfur Recovery Unit |
| O_3 | Ozone | | |
| O&G | Oil and Gas | T | Tons |
| O&M | Operation and Maintenance | TAC | Toxic Air Contaminant |
| O&NG | Oil and Natural Gas | TEG | Triethylene Glycol |
| OAC | Oklahoma Administrative Code | THC | Total Hydrocarbons |
| OC | Oxidation Catalyst | TPY | Tons per Year |
| | , | TRS | Total Reduced Sulfur |
| PAH | Polycyclic Aromatic Hydrocarbons | TSP | Total Suspended Particulates |
| PAE | Projected Actual Emissions | TV | Title V of the Federal Clean Air Act |
| PAL | Plant-wide Applicability Limit | - ' | 11110 01 1110 0401111 0401111 1111 1111 |
| Pb | Lead | $\mu g/m^3$ | Micrograms per Cubic Meter |
| PBR | Permit by Rule | US EPA | U. S. Environmental Protection Agency |
| PCB | Polychlorinated Biphenyls | 05 2212 | |
| PCE | Partial Compliance Evaluation | VFR | Vertical Fixed Roof |
| PEA | Portable Emissions Analyzer | VMT | Vehicle Miles Traveled |
| PFAS | Per- and Polyfluoroalkyl Substance | VOC | Volatile Organic Compound |
| PM | Particulate Matter | VOL | Volatile Organic Liquid |
| PM _{2.5} | Particulate Matter with an Aerodynamic | VRT | Vapor Recovery Tower |
| 1 1412.5 | Diameter <= 2.5 Micrometers | VRU | Vapor Recovery Unit |
| PM_{10} | Particulate Matter with an Aerodynamic | VIC | vapor recovery cine |
| 1 14110 | Diameter <= 10 Micrometers | YR | Year |
| POM | Particulate Organic Matter or Polycyclic | 110 | Tour |
| 10111 | Organic Matter | 2SLB | 2-Stroke Lean Burn |
| ppb | Parts per Billion | 4SLB | 4-Stroke Lean Burn |
| ppm | Parts per Million | 4SRB | 4-Stroke Rich Burn |
| ppmv | Parts per Million Volume | 45 KD | + Stroke Rich Buill |
| ppmvd | Parts per Million Dry Volume | | |
| PSD | Prevention of Significant Deterioration | | |
| psi | Pounds per Square Inch | | |
| psia | Pounds per Square Inch Absolute | | |
| psia | Pounds per Square Inch Gage | | |
| paig | 1 outius per square men Gage | | |
| RACT | Reasonably Available Control | | |
| MICI | Technology | | |
| RATA | Relative Accuracy Test Audit | | |
| RAP | Regulated Air Pollutant or | | |
| KAI | Reclaimed Asphalt Pavement | | |
| RFG | Refinery Fuel Gas | | |
| RICE | Reciprocating Internal Combustion | | |
| RICE | Engine Engine | | |
| RO | Responsible Official | | |
| ROAT | Regional Office at Tulsa | | |
| RVP | Reid Vapor Pressure | | |
| KVI | Reid Vapor Fressure | | |
| SCC | Source Classification Code | | |
| SCF | Standard Cubic Foot | | |
| SCFD | Standard Cubic Feet per Day | | |
| SCFM | Standard Cubic Feet per Minute | | |
| SCR | Selective Catalytic Reduction | | |
| SER | Significant Emission Rate | | |
| SI | Spark Ignition | | |
| SIC | Standard Industrial Classification | | |
| SIP | State Implementation Plan | | |
| SNCR | <u> </u> | | |
| SHUN | Selective Non-Catalytic Reduction | | |