

C-B Reciprocating Products Division

PTE Determination

12/95

C-B Reciprocating Products divisions (C-B Reciprocating) PTE for each criteria pollutant is less than 100 TPY. However, the PTE a hazardous air pollutant from the coating operation (R005) exceeds 10 TPY. The current PTI 08-3049 has an allowable organic compound emission rate of 5.4 lbs/hr, 54 lbs/day and 9.83 TPY. PTI 08-3049 was not issued in draft, nor does it have a short term usage restriction. Therefore, the daily and annual allowable emission rates are not federally enforceable. The PTE is determined as follows:

$$5.4 \text{ lbs VOC/hr} \times 8,760 \text{ hrs/yr} = 23.7 \text{ TPY VOC}$$

Two of the coatings employed by C-B Reciprocating employ varying amount of HAP's. Nothing in the PTI 08-3049 restricts the usage of these coatings with high HAP contents. Therefore, it could be assumed that any or all of the 23.7 TPY PTE may be a single HAP. This FESOP application will create a federally enforceable limit less than 10 TPY VOC, thereby eliminating the possibility of Title V applicability. C-B Reciprocating actual emission rate of HAP's is less than 50% of the threshold. In accordance with Engineering Guide #61, C-B Reciprocating is permitted two years to obtain this FESOP. However, the purpose of this application is two-fold. First, to obtain a FESOP and second to request a change in the applicability of OAC rule 3745-21-09(U).

PTI 08-3049 sites OAC rule 3745-21-09(U)(1)(d) as the applicable rule. Compliance with this rule is based on a daily weighted average. C-B Reciprocating has experienced some difficulty in maintaining compliance the 3.5 lbs VOC/gal ctg limit, on a daily weighted average. C-B Reciprocating requests that the applicable rule for source R005 be changed to 3745-21-09(U)(2)(e). C-B Reciprocating does not operate on a consistent production basis. Units are not manufactured and painted until they are ordered by a customer. Units can also take several weeks to months to manufacture. It is therefore, very difficult to manage the painting schedule in a manner which meets the intent of the daily volume-weighted average of OAC rule 3745-21-09(U)(1)(d).

C-B Reciprocating's usage since this source initiated operation in April, 1995 has been consistently less than 8 gallons in any one day. The 8 gallon/day usage limitation of OAC rule 3745-21-09(U)(2)(e) and a proposed allowable VOC content limitation of 6.0 lbs VOC/gallon of coating, less water (worst case) serve to establish the federally enforceable short term limitation for the FESOP. It should be noted that the proposed annual allowable emission rate for the source is less than that currently permitted by PTI 08-3049. C-B Reciprocating is currently, and will continue to work with its coating suppliers to find an acceptable lower VOC coating for the Polane and Sheffield paints. It should also be noted that these solvent based coatings only represent about 25% of the total coating usage. The balance are coatings less than 3.5 lbs VOC/gal ctg. Therefore, the actual emissions from R005 will be considerably less than the annual allowable emission rate. It is the ultimate goal of C-B Reciprocating to replace the solvent based coatings with acceptable water based replacements.