



<b>PROJECT/PROPOSAL NAME:</b> V.W.T., Inc.	<b>Permit Writer:</b> Michael Robertson <b>Date:</b> DRAFT
<b>LOCATION (STREET, CITY):</b> 4926 Morrison Road – Richburg	
<b>PERMIT NUMBER:</b> 0640-0042 -- Renewal	
<b>SIC/NAIC CODE(S):</b> 3499 / 332999	

**DATE APPLICATION RECEIVED:** March 31, 2009

**DATE OF LAST INSPECTION:** January 26, 2009 – Facility owner Mr. Vernon Terry was contacted and confirmed facility stopped operations in February 2006.

**FACILITY CONTACT**

Vernon W. Terry, V.W.T. Incorporated, (803) 324 – 1250, vwtinc@aol.com  
 Richard Nelson, (704) 650-4679, zephyrstouch@earthlink.net

**FACILITY DESCRIPTION**

The site reconditions steel reels. The reels are thermal “treated” with propane-fired manual burners to destroy old paint integrity. The reels are then blasted to remove all old paint, rust, and surface contaminates. Any structural flaws are taken care of before they are repainted. Occasionally, other miscellaneous items are painted on site as well.

**PROJECT DESCRIPTION**

V.W.T. Incorporated is requesting the renewal of the Conditional Major Operating Permit No. CM-0640-0042, which expired June 30, 2009. No operational or production rates relevant to emissions operations at the facility have changed since the last permit application renewal.

However, there have been changes in the operation of the plant since the last permitting. The plant ceased operation in February 2006 but would like to retain permitting should start up and operation develop in the future. The completion of the steel grit blaster installation is currently on hold and Construction permit 0640-0042-CF expired due to the business closing (construction permit will be reapplied for should the business resume operations). The maximum plant capacity is 40 reels/day with an equivalent reduction in plant emissions due to the steel grit blaster emissions being zero.

**CHANGES SINCE LAST OP ISSUANCE** N/A

**SOURCE TEST REQUIREMENTS** N/A

**SPECIAL CONDITIONS, MONITORING, LIMITS** N/A

**PUBLIC NOTICE**

The 30-day public notice period will run from June 24, 2009 to July 23, 2009.

**SOURCE DESCRIPTION**

OP/CP ID	Equip ID	Equipment Description	Installation Date	Modification Date	Control Device ID	Stack ID
01/CA	SBU	<b>Sand Blasting Unit</b> – an air-pressurized pot delivering 18 lb/min of standard silica blasting sand to remove coatings from reels	1996	N/A	N/A	N/A
01/CC/CF	SGB <sup>1</sup>	<b>Steel Grit Blaster</b> – an Empire (or a make/model with similar design characteristics) industrial-scale steel grit/shot blaster to remove coatings from reels (Future Installation?)	Future	N/A	DC	N/A
01/CC	PAC	<b>Portable Air Compressor</b> rated at 80 horsepower for use in powering the Sand Blasting Unit when the electric air compressor is either not functional or when additional air compression is needed	1997	N/A	N/A	N/A
01/CA	PT1	<b>Propane Torch #1</b> rated at 1.5x10 <sup>6</sup> BTU/hr used as needed to soften paint prior to abrasive blasting	1996	N/A	N/A	N/A



**STATEMENT OF BASIS**  
**Page 2 of 7**  
 BAQ Engineering Services Division  
 2600 Bull Street, Columbia, SC 29201  
 Phone: 803-898-4123 Fax: 803-898-4079

<b>PROJECT/PROPOSAL NAME:</b> V.W.T., Inc.	<b>Permit Writer:</b> Michael Robertson <b>Date:</b> DRAFT
<b>LOCATION (STREET, CITY):</b> 4926 Morrison Road – Richburg	
<b>PERMIT NUMBER:</b> 0640-0042 -- Renewal	
<b>SIC/NAIC CODE(S):</b> 3499 / 332999	

OP/CP ID	Equip ID	Equipment Description	Installation Date	Modification Date	Control Device ID	Stack ID
01/CA	PT2	<b>Propane Torch #2</b> rated at 1.5x10 <sup>6</sup> BTU/hr used as needed to soften paint prior to abrasive blasting	1996	N/A	N/A	N/A
02/CB/CE	CB1	<b>Coating Booth #1</b> – a Binks Special PFA-12-10-T-LH Floor Type (or similar make/model in design characteristics) spray paint booth	1996	2003	Filter	N/A
02/CD/CE	CB2	<b>Coating Booth #2</b> – a Binks Special PFA-12-10-T-LH Floor Type (or similar make/model in design characteristics) spray paint booth	1997	2003	Filter	N/A
02/CE	LIC	<b>Large Item Coating</b> – spray coating of very large reels and items using the paint sprayers outside the coating booths	2003	N/A	N/A	N/A
02/CE	CDP	<b>Coating Drying Pad</b> – a 50' X 60' concrete pad on the south side of the painting building where coated items are moved to air dry	2003	N/A	N/A	N/A

**CONTROL EQUIPMENT**

Control Device ID	Control Device Description	Installation Date	Pollutant(s) Controlled	Efficiency Capture / Removal (%)
Filter	Paint Filter	1995/2003	PM (overspray)	95
DC	Dust Collector <sup>1</sup>	Future	PM, PM <sub>10</sub>	99
N/A	Enclosure <sup>2</sup>	1996	PM	90

1. This unit will be installed in the future. The Bureau shall be notified in writing as per construction permit #0640-0042-CF when the unit is ready to be operating, and this permit shall be modified to incorporate the installation date. (Construction permit will expire within 18 months so if they don't start the construction then they have to re-apply for CP)

2. BAQ toured the facility and determined that the building containing the sand blasting operation can absorb at least 90% of the PM emissions.

**EXEMPT SOURCE/INSIGNIFICANT ACTIVITIES DESCRIPTION**

Equip ID	Source Description (Date Listed)	Basis
N/A	Welding Operations (April 7, 2004)	SC Regulation 61-62.1 Section II (B)(2)(h)

**EMISSIONS**

UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)					
ID	Equip/ID	Pollutant	lb/hr	TPY @ 8760 hrs	Method for Estimating Emissions
01	SBU PAC PT1 PT2	PM	13.542	59.315	*AP-42 Table 13.2.6-1
		PM10	4.038	17.687	**AP-42 Table 13.2.6-1
		PM2.5	0.401	1.757	***AP-42 Table 13.2.6-1
		SO <sub>2</sub>	0.169	0.740	AP-42 5th Ed, Tables 1.3-1,-2,-3,-7 9/98 Updat & EPA 8/01 Guidance
		NO <sub>x</sub>	0.481	2.108	AP-42 5th Ed, Tables 1.3-1,-2,-3,-7 9/98 Updat & EPA 8/01 Guidance
		CO	0.257	1.126	AP-42 5th Ed, Tables 1.3-1,-2,-3,-7 9/98 Updat & EPA 8/01 Guidance
	SGB <sup>1</sup>	PM	6.605	28.931	*AP-42 Table 13.2.6-1
		PM10	1.960	8.587	**AP-42 Table 13.2.6-1
		PM2.5	0.196	0.859	***AP-42 Table 13.2.6-1



**STATEMENT OF BASIS**

**Page 3 of 7**

BAQ Engineering Services Division  
 2600 Bull Street, Columbia, SC 29201  
 Phone: 803-898-4123 Fax: 803-898-4079

<b>PROJECT/PROPOSAL NAME:</b>	V.W.T., Inc.	<b>Permit Writer:</b> Michael Robertson <b>Date:</b> DRAFT
<b>LOCATION (STREET, CITY):</b>	4926 Morrison Road – Richburg	
<b>PERMIT NUMBER:</b>	0640-0042 -- Renewal	
<b>SIC/NAIC CODE(S):</b>	3499 / 332999	

02	CB1 CB2 LIC <sup>2</sup> CDP <sup>3</sup>	PM/PM10	10.418	45.629	Best Engineering Estimate; (Material Balance Calculations)
		Toluene (htv)	6.799	29.778	Best Engineering Estimate; (Material Balance Calculations)
		Ethylbenzene (htv)	2.226	9.748	Best Engineering Estimate; (Material Balance Calculations)
		Xylene (htv)	12.251	53.658	Best Engineering Estimate; (Material Balance Calculations)
		VOC	21.989	96.311	Best Engineering Estimate; (Material Balance Calculations)

**CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)**

ID	Equip/ ID	Pollutant	lb/hr	TPY @ 8760 hrs	Method for Estimating Emissions
01	SBU PAC PT1 PT2	PM	1.379	6.039	*AP-42 Table 13.2.6-1; enclosure efficiency 90%
		PM10	0.428	1.876	**AP-42 Table 13.2.6-1; enclosure efficiency 90%
		PM2.5	0.040	0.176	***AP-42 Table 13.2.6-1; enclosure efficiency 90%
		SO <sub>2</sub>	0.169	0.740	AP-42 5th Ed, Tables 1.3-1,-2,-3,-7 9/98 Updat & EPA 8/01 Guidance
		NO <sub>x</sub>	0.481	2.108	AP-42 5th Ed, Tables 1.3-1,-2,-3,-7 9/98 Updat & EPA 8/01 Guidance
		CO	0.257	1.126	AP-42 5th Ed, Tables 1.3-1,-2,-3,-7 9/98 Updat & EPA 8/01 Guidance
	SGB <sup>1</sup>	PM	0.066	0.289	*AP-42 Table 13.2.6-1; dust collector efficiency 99%
		PM10	0.020	0.086	**AP-42 Table 13.2.6-1; dust collector efficiency 99%
		PM2.5	0.002	0.009	***AP-42 Table 13.2.6-1; dust collector efficiency 99%
02	CB1 CB2 LIC <sup>2</sup> CDP <sup>3</sup>	PM/PM10	0.521	2.281	Best Engineering Estimate; (Material Balance Calculations) Filter efficiency 95%,
		Toluene (htv)	N/A	N/A	Best Engineering Estimate; (Material Balance Calculations)
		Ethylbenzene(htv)	N/A	N/A	Best Engineering Estimate; (Material Balance Calculations)
		Xylene (htv)	N/A	N/A	Best Engineering Estimate; (Material Balance Calculations)
		VOC	21.989	96.311	Best Engineering Estimate; (Material Balance Calculations)

- Note:**
1. this unit will be installed in the future
  2. Fugitive emissions from "large item coating"(LIC) and Equipment cleaning of CB1 are included; the facility estimates those emissions are 3% of uncontrolled emissions rates for the coating booths (CB1 and CB2).
  3. Fugitive emissions are included from 50' X 60' concreat drying pad (CDP), Haps/Taps/Voc, outside the booth during working and non-working hrs while drying.
  4. PTE/TPY numbers for CF take into account machine maintenance downtime and actual blasting time per reel cycle. No cobalt compounds are currently present in V.W.T.'s paint however recent past usage of cobalt – containing paints has occurred in minimal amounts. The facility will be prohibited from using cobalt – containing paints without appropriate approval from the Department (see condition 7.A.3).
  5. The facility has agreed to limit, by appropriate recordkeeping, the amount of paint used such that major source thresholds are not exceeded for HAPs, and will be required to notify the Bureau when any new HAPs/TAPs are introduced via new coatings (see condition GC6).

Blasting

Sample calculations uncontrolled abrasive blasting

Emission factors for PM were obtained from AP-42 Table 13.2.6-1. Particulate Emission factors for abrasive blasting (unconfined).

\* Emission factor for PM (worst case estimate of 8mph-wind), 43.8 lb/1,000 lb of abrasive = 0.0438 lb/lb of abrasive x 1080 lb/hr =47.3 lb/hr.

\*\*Emission factor for PM10 =13 lb/1,000 lb of abrasive = 0.013 lb/lb of abrasive x 1080 lb/hr =14.04 lb/hr.

\*\*\*Emission factor for PM2.5 = 1.3 lb/1,000 lb of abrasive = 0.0013 lb/lb of abrasive x 1080 lb/hr =1.404 lb/hr.

Facility estimates the amount of time needed in preparation-staging from storage 6 minutes, actual blasting 5 minutes, and transport for repair/coating 3 minutes. It is determined that it actually takes 5 minutes out a total of 14 minutes to sand blast one reel. Facility also estimates equipment runs continuously for 80% of the time.



<b>PROJECT/PROPOSAL NAME:</b> V.W.T., Inc.	<b>Permit Writer:</b> Michael Robertson <b>Date:</b> DRAFT
<b>LOCATION (STREET, CITY):</b> 4926 Morrison Road – Richburg	
<b>PERMIT NUMBER:</b> 0640-0042 -- Renewal	
<b>SIC/NAIC CODE(S):</b> 3499 / 332999	

Example PM

$$\left(47.3 \frac{lb}{hr}\right) \left(\frac{5 \text{ min}}{14 \text{ min}}\right) \left(\frac{80}{100}\right) \left(8760 \frac{hr}{year}\right) \left(\frac{1 \text{ ton}}{2000 \text{ lb}}\right) = 59.19 \frac{ton}{year}$$

Painting

Sample calculation for uncontrolled VOC/HAP/TAP: Maximum VOC/HAP/TAP pollutant content of paint, estimated paint usage, and equipment run time. This example does not include Fugitive emissions from LIC.

Example: Toluene

$$\left(1.650 \frac{lb}{gal}\right) \left(10400 \frac{gal}{year}\right) \left(\frac{1 \text{ year}}{2080 \text{ hrs}}\right) \left(\frac{80}{100}\right) \left(8760 \frac{hr}{year}\right) \left(\frac{1 \text{ ton}}{2000 \text{ lb}}\right) = 28.91 \frac{ton}{year}$$

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions TPY @ 8760 hrs	Controlled Emissions TPY @ 8760 hrs
PM	133.9	8.61
PM10	26.28	1.96
PM2.5	2.62	0.18
SO <sub>2</sub>	0.740	0.740
NO <sub>x</sub>	2.108	2.108
CO	1.126	1.126
VOC	96.31	96.31
Highest single Hap	53.66	< 10
Total Haps/Taps	93.18	< 25

PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
<b>South Carolina Regulation 61-62.1 through 62.99: Air Pollution Regulations (PROJECT ONLY)</b>			
<b>Section II(E): Synthetic Minor</b>		X	The facility is taking a federally enforceable limitation to stay below 100 tpy for VOC and 10tpy for individual and 25tpy aggregate HAPs to apply for a Conditional Major Permit.
<b>Section II(G): Conditional Major</b>	X		The facility already holds a conditional major permit limiting, VOC, and HAP below 100 tpy for VOC and 10 tpy for individual and 25 tpy aggregate HAP respectively.
<b>Standard 1: Fuel Burning Operations</b>		X	This facility has no fuel burning sources.
<b>Standard 2: Ambient Air Quality Standards</b>	X		This facility is in compliance with standard 2, under the condition that the facility must comply with a limit of less than 8,640 pounds of abrasive per day in sandblasting (ID 01) and keeping both large doors (used to move equipment in and out of the building) closed during sandblasting operations to maintain the allowable PM <sub>10</sub> emission rate. This is shown in condition 01.2, 7.A.1, and in the modeling on February 3, 2003.
<b>Standard 3: Waste Combustion/Reduction (state only)</b>		X	This facility does not operate any waste combustion or reduction sources.
<b>Standard 3.1: HMI Waste Incinerators</b>		X	This facility contains no medical waste incineration.



<b>PROJECT/PROPOSAL NAME:</b> V.W.T., Inc.	<b>Permit Writer:</b> Michael Robertson <b>Date:</b> DRAFT
<b>LOCATION (STREET, CITY):</b> 4926 Morrison Road – Richburg	
<b>PERMIT NUMBER:</b> 0640-0042 -- Renewal	
<b>SIC/NAIC CODE(S):</b> 3499 / 332999	

PROJECT REGULATORY APPLICABILITY REVIEW																								
Regulation	Applicable		Comments																					
	Yes	No																						
<b>Standard 4:</b> Emissions from Process Industries	X		ID 01 and 02 have the following opacity limits (including any fugitives) and Particulate Matter (PM) allowable emissions rates (based on a process weight rate in tons per hour) imposed by this standard. <table border="1" style="margin: 10px auto;"> <thead> <tr> <th>ID</th> <th>Limit</th> <th>Pollutant/Standard</th> <th>Process</th> <th>PM Emission Limit (lbs/hr)</th> <th>Process Weight Rate (tons/hr)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">01</td> <td rowspan="2">20%</td> <td rowspan="2">Opacity</td> <td>Sand Blasting</td> <td>10.08 *</td> <td>3.829</td> </tr> <tr> <td>Steel grit Blasting</td> <td>10.08 **</td> <td>3.829</td> </tr> <tr> <td>02</td> <td>20%</td> <td>Opacity</td> <td>Coating Operations</td> <td>7.72</td> <td>2.572</td> </tr> </tbody> </table> <p>* In order to comply with this limit, the facility must keep both large doors closed while sand blasting is in operation.            ** In order to comply with this limit, the associated dust collector must be in place and properly functional when the steel grit shot blaster is</p>	ID	Limit	Pollutant/Standard	Process	PM Emission Limit (lbs/hr)	Process Weight Rate (tons/hr)	01	20%	Opacity	Sand Blasting	10.08 *	3.829	Steel grit Blasting	10.08 **	3.829	02	20%	Opacity	Coating Operations	7.72	2.572
ID	Limit	Pollutant/Standard	Process	PM Emission Limit (lbs/hr)	Process Weight Rate (tons/hr)																			
01	20%	Opacity	Sand Blasting	10.08 *	3.829																			
			Steel grit Blasting	10.08 **	3.829																			
02	20%	Opacity	Coating Operations	7.72	2.572																			
<b>Standard 5:</b> Volatile Organic Compounds		X	This facility was not in existence in 1979 or 1980, therefore this regulation is not applicable.																					
<b>Standard 5.1:</b> BACT/LAER For VOC (state only)		X	The facility was built after July 1, 1979. The facility's baseline VOC emissions, current actual VOC emissions, and current PTE of VOC emissions are 0 TPY, 96.31 TPY, and 96.31 TPY respectively. The facility is not subject BACT/LAER at this time.																					
<b>Standard 5.2:</b> Control of Oxides of Nitrogen		X	The #1 and #2 Propane Torches are less than the 10 million Btu/hr heat input threshold for applicability to this regulation.																					
<b>Standard 7:</b> Prevention of Significant Deterioration		X	The facility's PTE for any pollutant is less than 250 TPY; therefore the facility is not major for PSD. Additionally, the facility does not contain any emission sources that are subject to any Synthetic Minor Emission Limitations																					
<b>Standard 7(c):</b> Ambient Air Increments	X		This facility has demonstrated compliance through modeling for the PSD Class II increments (PM <sub>10</sub> ), for Spartanburg County; see modeling summary dated February 3, 2003.																					
<b>Standard 7.1:</b> Standards for Non Attainment Areas		X	The facility is in an attainment area.																					
<b>Standard 8:</b> Toxic Air Pollutants (state only)	X		This facility has demonstrated compliance through modeling for all TAPs; see modeling summary dated February 3, 2003.																					
<b>Regulation 61-62.6:</b> Control of Fugitive Particulate Matter	X		The fugitive PM (Dust) emissions shall be controlled in a manner that should not produce undesirable levels of PM (Dust) emissions.																					
<b>Regulation 61-62.60:</b> SC Designated Facility Plan and NSPS		X	There are no applicable NSPS' for this process.																					



<b>PROJECT/PROPOSAL NAME:</b> V.W.T., Inc.	<b>Permit Writer:</b> Michael Robertson <b>Date:</b> DRAFT
<b>LOCATION (STREET, CITY):</b> 4926 Morrison Road – Richburg	
<b>PERMIT NUMBER:</b> 0640-0042 -- Renewal	
<b>SIC/NAIC CODE(S):</b> 3499 / 332999	

PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
<b>Regulation 61-62.61:</b> NESHAP		X	This facility does not contain any processes/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radionuclide, radon, or vinyl chloride).
<b>Regulation 61-62.63:</b> NESHAP For Source Categories		X	The facility is taking a federally enforceable limitation to stay below 100 tpy for VOC and 10tpy for individual and 25tpy aggregate HAPs to apply for a Conditional Major Permit. Therefore this facility is a minor source for HAP and not subject to 40 CFR Part 63, Subpart_MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
<b>Regulation 61-62.68:</b> Chemical Accident Prevention		X	This facility does not store or use chemicals subject to 112(r) above the threshold quantities.
<b>Regulation 61-62.70:</b> Title V		X	The facility already possesses a conditional major permit limiting, VOC, and HAP below 100 tpy for VOC and 10tpy for individual and 25tpy aggregate HAPs respectively.
<b>Regulation 61-62.72:</b> Acid Rain		X	The facility is not an electric generating utility.
<b>Regulation 61-62.96:</b> Nitrogen Oxides (NO <sub>x</sub> ) Budget Trading Program		X	The facility is not a participant in the program.
<b>Regulation 61-62.99:</b> Nitrogen Oxides (NO <sub>x</sub> ) Budget Program Requirements for Stationary Sources Not In the Trading Program		X	The sources are not kilns that have NO <sub>x</sub> emissions greater than 1 ton per day.
Other			
Federal Regulations (PROJECT ONLY)			
NSPS (Part 60) Subpart(s)		X	This process does not contain sources subject to this standard.
NESHAP (Part 61) Subpart(s)		X	This process does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
MACT (Part 63) Subpart(s)		X	The facility is taking a federally enforceable limitation to stay below 100 tpy for VOC and 10tpy for individual and 25tpy aggregate HAPs to apply for a Conditional Major Permit, therefore this facility is a minor source for HAP and not subject to 40 CFR Part 63, Subpart_MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.
Area Source Standards (Part 63) Subpart(s)		X	Facility is not subject to 40 CFR Part 63, Subpart HHHHHH-National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources because it does not have target HAPs [compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)] -- 40 CFR §63.11180.
Compliance Assurance Monitoring (CAM) (Part 64)		X	This facility is not a Title V
Other			



<b>PROJECT/PROPOSAL NAME:</b> V.W.T., Inc.	<b>Permit Writer:</b> Michael Robertson <b>Date:</b> DRAFT
<b>LOCATION (STREET, CITY):</b> 4926 Morrison Road – Richburg	
<b>PERMIT NUMBER:</b> 0640-0042 -- Renewal	
<b>SIC/NAIC CODE(S):</b> 3499 / 332999	

**OPERATIONAL RESTRICTION**

OP/CP ID	Nature of Restriction	Limit lb/day	Explanation Reasons for Operational Restriction
01/CA Sand Blasting	Material Usage	8,640	Material Usage correlates to the 8 hours per day modeling restriction in order to ensure compliance with standard 2*

\* Derivation of the lb/day usage rate is as follows, knowing that the sand blaster uses 18 pounds of sand per minute at normal capacity:  
 18 lb/min \* 60 min/hr \* 8 hr/day = 8,640 lb/day

**COMPLIANCE MONITORING AND REPORTING ASSOCIATED WITH THE ABOVE EMISSION LIMITATION AND OPERATIONAL RESTRICTION**

COMPLIANCE MONITORING AND REPORTING					
OP ID	Pollutant/Parameter/Operational Restriction	Limit	Required Monitoring	Monitoring Frequency	Reporting Frequency
02	VOC/HAPs	99.9 TPY VOC; 9.9 TPY single HAP; 24.9 TPY total HAP	Recordkeeping	Monthly	Semiannual
02	Paint Booth Operation and Maintenance	N/A	Recordkeeping	As specified	On-site
01	Dust Collector Pressure Drop	As specified	Recordkeeping	Daily	Semiannual
01	Dust Collector Operation and Maintenance	N/A	Recordkeeping	Weekly	On-site
01	Sand Blaster Material Usage	8,640 lb/day	Recordkeeping	Daily	On-site

**SUMMARY AND CONCLUSIONS**

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.

