



STATEMENT OF BASIS

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

Company Name: Wright Metal Products
Permit Number: 1200-0427

Permit Writer: Michael G. Daugherty
Date: October 1, 2009

DATE APPLICATION RECEIVED: September 30, 2009

DATE OF LAST INSPECTION: March 25, 2009 No violations of the permit were noted.

FACILITY DESCRIPTION: Wright Metal Products is a metal fabrication company which produces metal packaging solutions, custom machining for several companies such as Honda, Yamaha, BMW, and others. They have been located in the same building as Alexander Machinery and performed contract painting for Alexander Machinery with no collocation issues. Recently Alexander Machinery has ceased operations.

FACILITY INFORMATION

Physical Address 378 Neely Ferry Road
 Simpsonville, SC 29680
 Greenville County

Mailing Address PO Box 609
 Simpsonville, SC 29680

Facility Contact Danny Cooper
 Phone Number (864) 688-6540
 Fax Number (864) 688-6550
 E-mail dcooper@wrightmetalproducts.com

SIC/NAICS 3499/332999
 AFS Code 4504500427

PROJECT DESCRIPTION

Wright Metal Products is requesting the renewal of their Conditional Major Operating Permit.

CHANGES SINCE LAST OP ISSUANCE

Wright Metal Products was issued an exemption on April 29, 2005 to add an additional 17 MIG welders which will bring the number at the facility to 26 MIG welders. Alexander Machinery has since gone out of business therefore Wright Metal Products no longer paints for them so Condition 7.A.1 in the current permit will be omitted from this renewal. The company has also removed 2 saws from the facility which were controlled by a dust collector (DC02) which remains on site.

PUBLIC NOTICE

The facility is requesting the renewal of their Conditional Major Operating Permit therefore the permit will require a Public Notice period.

EMISSION UNIT

OP ID	Equip ID	Equipment Description	Installation Date	Modification Date	Control Device ID	Stack ID
01	Paint Booth	Paint Booth: Paint used for painting metal parts using two (2) HVLP guns. Both primer and color paint are applied to fabricated metal products.	2004	N/A	DC 01	PB



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OP ID	Equip ID	Equipment Description	Installation Date	Modification Date	Control Device ID	Stack ID
02	Cutting	(8) Saws, manual and automatic capable of processing 3500 pounds per 8 hour shift. This equipment is used to cut stock metal into various shapes to fabricate desired end products.	2004	N/A	DC 02 *	Vents Inside
03	Grinding/Sanding /Blasting	Three (3) Belt sanders, one (1) grinding booth with three (3) surface grinders, one (1) blasting booth: capable of processing 3000 pounds per 8-hour shift. This equipment is used to prepare and/or finish the metal product surface.	2004	N/A	DC 03 DC 04 DC 05	Vents Inside

* Two (2) saws which were controlled by DC 02 have been removed from the facility with the collector remaining on site.

CONTROL DEVICES

Control Device ID	Control Device Description	Installation Date	Pollutant(s) Controlled	Efficiency Capture	Efficiency Removal
DC 01	Plenum Paint Booth filter	2004	PM	100%	90%
DC 02*	Dust Collectors: Unidentified dust collector similar in design to Torit.	2004	PM	100%	90%
DC 03	Internal dust collector (Torit) for one surface grinder; Removal efficiency of 90%.	2004	PM	100%	90%
DC04	4 sock filters for grinding booth Removal efficiency of 90%.	2004	PM	100%	90%
DC05	Internal dust collector for blasting booth Removal efficiency of 90%.	2004	PM	100%	90%

* The collector remains on site but the saws which it controlled have been removed and it does not control any other equipment.

EXEMPT SOURCE LIST

Equip ID	Source Description (Exemption Date: October 12, 2004)	Basis
Welding	Twenty six (26) MIG welders, six (6) TIG welders, and five (5) spot welders: using AP42 factors for determination of emissions. See appendix for determination of emissions for these processes.	SC Regulation 61-62.1, Section II (B)(2)(h)
Mills	Twenty nine (29) CNC and Manual Mills: There are no PM emissions associated with this equipment as all particles generated are greater than 300 microns and do not become airborne.	No air emissions.
Presses	Thirteen (13) Punch, Drill and Brake Presses: There are no PM emissions associated with this equipment as all particles generated are greater than 300 microns and do not become airborne.	No air emissions.
Lathes	Eight (8) CNC and Manual Lathes: There are no PM emissions associated with this equipment as all particles generated are greater than 300 microns and do not become airborne.	No air emissions.
Tumblers	Four (4) Tumblers: There are no PM emissions associated with this equipment as all particles generated are greater than 300 microns and do not become airborne.	No air emissions.



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Equip ID	Source Description (Exemption Date: October 12, 2004)	Basis
Miscellaneous Operations	Eleven (11) Miscellaneous Operations. These operations include equipment designated as bender, roller, honer, knotcher and shear. There are no PM emissions associated with this equipment, as all particles generated are greater than 300 microns and do not become airborne.	No air emissions.
Heat Treat Oven	One (1) electric heat treat oven	No air emissions
Stove	One (1) electric stove for heat-treating metal.	No air emissions
Parts Washer	One (1) small parts washer	No air emissions
Air Compressor	Used for the operation of pneumatically driven tools in the assembly area.	No air emissions.
Air dryer	Used to feed air to the Air compressor unit.	No air emissions.

EMISSIONS

UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
01	PM [1]	4.7	20.6	Material Balance Calculations
	Xylene [2]	13.0	57.0	Material Balance Calculations
	Ethyl benzene	1.03	4.51	Material Balance Calculations
	Glycol ethers	0.94	4.11	Material Balance Calculations
	Toluene[3]	4.67	20.5	Material Balance Calculations
	MIBK	1.03	4.51	Material Balance Calculations
	Chromium Cmpds. [1]	0.506	2.22	Material Balance Calculations
	Total HAPs [5]	13.4	58.7	Material Balance Calculations
	VOC	17	74.5	Material Balance Calculations
02	PM [4]	0.29	1.28	Material Balance Calculations
03	PM [4]	4.5	19.7	Material Balance Calculations

CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
01	PM [1]	0.47	2.06	Material Balance Calculations
	Xylene [2]	2.26	[6]	Material Balance Calculations
	Ethyl benzene	0.18	[6]	Material Balance Calculations
	Glycol ethers	0.17	[6]	Material Balance Calculations
	Toluene[3]	2.26	[6]	Material Balance Calculations
	MIBK	0.18	[6]	Material Balance Calculations
	Chromium Cmpds. [1]	0.051	[6]	Material Balance Calculations
	Total HAPs [5]	5.68	[6]	Material Balance Calculations
	VOC	17	[6]	Material Balance Calculations
02	PM [4]	0.374	1.64	Material Balance Calculations
03	PM [4]	1.02	4.47	Material Balance Calculations

[1] Assumed 20% overspray from f two (2) spray guns at 3.75 gph (total) paint used.

[2] An MSDS for xylene was provided in the construction permit application package. After discussion with Cheri Buehring, RTP Environmental, consultant for Wright Metal Products, it was determined that the xylene is part of the paint system, as supplied by the paint manufacturer. Wright does not mix paint at the facility, apart from the use of thinners. The MSDS for xylene was provided only as



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information by the paint supplier.

[3] Worse case emissions for toluene are from the lacquer thinner and calculated based on 1 gallon per hour maximum usage.

[4] These operations assume that 1% of the material cut is loss.

[5] Total HAPs are based on the worse case paint usage, therefore the sum of the individual HAPs does not equal total HAPs. VOCs were calculated the same way.

[6] The facility has taken Federally Enforceable limits of less than 10 tpy (single) HAP, 25 tpy (total) HAPs, and 100 tpy VOCs.

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled Emissions
	TPY	TPY
PM	41.6	8.16
Xylene	57.0	*
Ethyl benzene	4.51	*
Glycol ethers	4.11	*
Toluene	20.5	*
MIBK	4.51	*
Chromium Cmpds.	2.22	*
Total HAPs	58.7	*
VOC	74.5	*

* The facility has taken Federally Enforceable limits of less than 10 tpy (single) HAP, 25 tpy (total) HAPs, and 100 tpy VOCs.

PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
South Carolina Regulation 61-62.1 through 62.99: Air Pollution Regulations (PROJECT ONLY)			
Section II(E): Synthetic Minor		X	The facility is requesting the renewal of their Conditional Major Operating Permit
Section II(G): Conditional Major		X	The facility already has a Conditional Major Operating Permit.
Standard 1: Fuel Burning Operations		X	The facility does not have any fuel burning sources.
Standard 2: Ambient Air Quality Standards	X		The facility has shown compliance through modeling dated June 3, 2004.
Standard 3: Waste Combustion/Reduction (state only)		X	The facility does not have any waste combustion/reduction processes.
Standard 3.1: HMI Waste Incinerators		X	The facility does not incinerate any hospital or medical waste.



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PROJECT REGULATORY APPLICABILITY REVIEW

Regulation	Applicable		Comments									
	Yes	No										
Standard 4: Emissions from Process Industries	X		<p>(ID 01-03)In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section IX - Visible Emissions (Where Not Specified Elsewhere), where construction or modification began after December 31, 1985, emissions (including fugitive emissions) shall not exhibit an opacity greater than 20%.</p> <p>(ID01-03)In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section VIII - Other Manufacturing, particulate matter emissions shall be limited to the rate specified by use of the following equations: for process weight rates less than or equal to 30 tons per hour ($E = 4.10P^{0.67}$) and for process weight rates greater than 30 tons per hour ($E = 55.0P^{0.11} - 40$) where E = the allowable emission rate in pounds per hour and P = process weight rate in tons per hour. As such, each process's allowable particulate matter emission limit is limited to the amount shown in the table below at its nominal production rating:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Process</th> <th>Emission Limit (lbs/hr)</th> <th>Process Weight Rate (tons/hr)</th> </tr> </thead> <tbody> <tr> <td>01</td> <td>1.43</td> <td>0.208</td> </tr> <tr> <td>02</td> <td>1.48</td> <td>0.219</td> </tr> </tbody> </table>	Process	Emission Limit (lbs/hr)	Process Weight Rate (tons/hr)	01	1.43	0.208	02	1.48	0.219
Process	Emission Limit (lbs/hr)	Process Weight Rate (tons/hr)										
01	1.43	0.208										
02	1.48	0.219										
Standard 5: Volatile Organic Compounds		X	The facility was not in existence in 1979 or 1980 and does not have any of the sources listed.									
Standard 5.1: BACT/LAER For VOC (state only)		X	The facility was constructed after July 1, 1979 and their PTE of VOCs is 74.5 tpy which is less than 100 tpy therefore they are not subject to BACT at this time.									
Standard 5.2: Control of Oxides of Nitrogen		X	The facility does not have any fuel burning processes at this time.									
Standard 7: Prevention of Significant Deterioration		X	The facility's PTE of any pollutant is less than 250 tpy and the facility does not have any sources which are subject to Synthetic Minor limits.									
Standard 7(c): Ambient Air Increments	X		The facility has shown compliance through modeling dated June 3, 2004.									
Standard 7.1: Standards for Non Attainment Areas		X	The facility is located in Greenville County which is not a designated Non-attainment area at this time.									
Standard 8: Toxic Air Pollutants (state only)	X		The facility has shown compliance through modeling dated June 3, 2004.									
Regulation 61-62.6: Control of Fugitive Particulate Matter	X		The fugitive PM (Dust) emissions are controlled in a manner that should not produce undesirable levels of PM (Dust) emissions.									
Regulation 61-62.60: SC Designated Facility Plan and NSPS		X	The facility does not have any of the sources listed.									
Regulation 61-62.61: NESHAP		X	The facility does not contain any processes/operations that emit pollutants from the standard asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride									



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PROJECT REGULATORY APPLICABILITY REVIEW

Regulation	Applicable		Comments
	Yes	No	
Regulation 61-62.63: NESHAP For Source Categories		X	The facility would be subject to 40CFR63 MMMM except they have Federally Enforceable limits to reduce their HAP emissions to Less Than 10/25 tpy.
Regulation 61-62.68: Chemical Accident Prevention		X	The facility does not use or store chemicals subject 112(r) above applicable thresholds.
Regulation 61-62.70: Title V		X	The facility is a Conditional Major so they are minor for Title V.
Regulation 61-62.72: Acid Rain		X	The facility is not a generating utility.
Regulation 61-62.96: Nitrogen Oxides (NO _x) Budget Trading Program		X	The facility is not a generating utility.
Regulation 61-62.99: Nitrogen Oxides (NO _x) Budget Program Requirements for Stationary Sources Not In the Trading Program		X	The facility does not operate any fuel burning kilns.
Other			
Federal Regulations (PROJECT ONLY)			
NSPS (Part 60) Subpart(s)		X	The facility does not have any of the sources listed.
NESHAP (Part 61) Subpart(s)		X	The facility does not contain any processes/operations that emit pollutants from the standard asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride
MACT (Part 63) Subpart(s)		X	The facility would be subject to 40CFR63 MMMM except they have Federally Enforceable limits to reduce their HAP emissions to Less Than 10/25 tpy.
Area Source Standards (Part 63) Subpart(s)	X		The facility is a source (metal fabricated products) as listed in 40CFR XXXXXX and is an existing source which will have a compliance date of July 25, 2011. The facility will be subject to the standard because the paint booth sprays paint which contains a MFHAP (Chromium.).
Compliance Assurance Monitoring (CAM) (Part 64)		X	The facility is not a Title V facility therefore CAM does not apply.
Other			

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.