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From: ccarrothers@c2air.com
To: Familiare, Christopher S.
Cc: Glass, Geoffrey; Wade Wolcott; craig@mcclarincomposites.com
Subject: Re: McClarin Title V Renewal Additional Information Request
Date: Monday, July 18, 2022 3:09:33 PM
Attachments: image002.png
McClarin Plastics Wapato CAM Plan and 2020 Emissions Inventory.pdf

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Hi Christopher!

I've attached one file that contains the CAM Plan for the McClarin Plastics Wapato spray booths (1st three pages of file) and the rest of the pages are the 2020 emissions inventory for McClarin Plastics Wapato.

I hope this satisfies your request and please let me know if you need additional information.

Also, thank-you for answering the "wet signature" question I had (#3 below).

Cathryn

On Mon, 13 Jun 2022 23:50:14 +0000, "Familiare, Christopher S." <familiare.christopher@epa.gov> wrote:

Hi Cathryn,

Region 10 is requesting the following information for the processing of McClarin's Title V renewal application:

1. Pursuant to 40 CFR 64.5, the application must contain a compliance assurance monitoring (CAM) plan for the Booth emission unit and the associated fabric filter control device. CAM applies for emission units at time of Title V renewal that:
   - (a) are subject to an emission limit,
   - (b) employ a control device to comply with the limit, and
   - (c) have pre-control device potential emissions equal to or greater than the major source threshold defined in Title V (generally, 100 tons per year).
   - Criteria (a) and (b) are satisfied as McClarin employs fabric filters to achieve compliance with the Federal Air Rules for Reservations PM limit for source stacks for air pollution sources. Criteria (c) is also satisfied based on the pre-control PTE for PM being above the major source threshold of 100 tons per year as illustrated below:
   -

Emission Unit:	**BOOTH**	**Note: 2 booths are permitted to operate at facility.** One included in 2007 initial TV permit and 2nd beginning 2010 with														
Activity:	**Coating application**	Notice of Off-Permit Change submitted to EPA Nov. 12, 2010.														
2 booths total Maximum Rating		**Annual Operating Hours**	**Emission Factors, lb/gal**							**Annual Emissions (tons per year)**						
			CO	**Lead**	**NOx**	**PM**	**PM10**	**SO2**	**VOC**	**CO**	**Lead**	**NOx**	**PM**	**PM10**	**SO2**	**VOC**
298,342	gal/year	NA				4.9758	4.9758						742.24	742.24		< 249[1]
Basis for rating:	Minimum VOC content of typical coating (DuPont Nason tints, toners and binders):									25.12%	by weight					
	Maximum coating density of typical coating (DuPont Nason tints, toners and binders):									13.29	lbs/gal					
	VOC emission limit (established in Non-Title V Operating Permit):									249	tons/year					
Basis for emission factors:	Maximum coating density of typical coating (DuPont Nason tints, toners and binders):									13.29	lbs/gal					
	Maximum solids content of typical coating (DuPont Nason tints, toners and binders):									74.88%	by weight					
	Transfer efficiency (Air Pollution Engineering Manual, Surface Coating, Table 2)									50%						
	Minimum control efficiency (6/16/2006 e-mail from Scott Barber, Amtech):									0%	0%	**Note: Cond. 9.2 of TV permit requires**				
	All PM emissions are PM10									{93}	{98}	**dual-layer exhaust filter;**				
												1st@ 93% control, 2nd@ 98% control.				

This emission estimate assumes that coating operations in the booth comprise all VOC-emitting operations at the facility. If additional activities (e.g. fiberglass operations) are also conducted, coating use in the spray booth will be lower in order to remain below the facility-wide VOC emissions limit.
This emission estimate assumes that proper use of the spray booth filters are federally enforceable requirements.

[1] VOC emissions for this emission unit are variable based on project needs. The facility is subject to a facility-wide VOC emission limit.

   - Pursuant to 40 CPR part 64, a CAM plan must:
     - 1. Describe the indicators to be monitored [40 CPR. 64.4(a)(l)].
     - 2. Describe the ranges or the process to set indicator ranges [40 CPR 64.4(a)(2)].
     - 3. Describe the performance criteria for the monitoring, including [40 CPR 64.4(a)(3)].
       - a. Specifications for obtaining representative data;
       - b. Verification procedures to confirm the monitoring's operational status;
       - c. Quality assurance and control procedures;
       - d. Specifications for the frequency of conducting the monitoring.
     - 4. Describe indicator ranges and performance criteria for a continuous emission monitoring systems, continuous opacity monitoring system, or predictive emission monitoring system [40 CFR 64.4(a)(4)].
     - 5. Provide a justification for the use of parameters, ranges, and monitoring approach [40 CFR 64.4(b)].
     - 6. If available, provide control device operator parameter data obtained during emissions testing conducted consistent with the underlying applicable rule [40 CFR 64.4(d)].
     - 7. Provide an implementation plan for installing, testing, and operating the monitoring [40 CFR 64.4(e)].
       - CAM creation guidance can be found in EPA's Technical Guidance Document: Compliance Assurance Monitoring from August 1998 (https://www.epa.gov/sites/default/files/2016-05/documents/cam-tgd.pdf).
2. The 2019 actual emission inventory was included with the application. Please submit 2020 actual emissions.
3. Question from application: Are wet signatures still required?
   - Yes, original signatures are still necessary on all official documents, communications, and CTACs that are required to be sent via hard copy mail to the EPA Region 10 mailing address located at the Seattle office.

We would ask that you please respond to this request by no later than **Monday 7/18/22**. Let me know if you have any questions, comments, or concerns. Thank you.

Christopher Familiare

Environmental Engineer | Air Permits and Toxics Branch

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