

Permit by Rule (PBR) Registration Technical Review

Company:	Victaulic Company	Registration No.:	170092
Nearest City:	Justin	Project No.:	377167
County:	Denton	Project Type:	Revision
Project Reviewer:	Guillermo Reyes, P.E.	Regulated Entity No.:	RN111558664
Unit Name:	Victaulic - Fort Worth Facility	Customer Reference No.:	CN606052751
PBR No(s).:	106.262, 106.433	Project Received Date:	July 26, 2024
Physical Location:	Physical address provided by fire marshall for emergencies 15550 blue mound road, justin tx, 76247. the nearest intersection is old blue mound road and fm 156, and the site is located approximately half a mile to the west of the intersection.		

Project Overview / Process Description

The Victaulic Fort Worth Facility is authorized under PBR 170092 to operate a ventilation booth on the polyiso foam manufacturing dial/equipment under 106.262.

With this PBR registration, Victaulic proposes to authorize emissions from the spray paint booth to be installed for coating pipes ranging in diameters of 14 to 36 inches. The pipes are either supplied by customers of Victaulic or purchased by Victaulic. Once received, the pipes are cut to length, cut with various holes, shot-blasted, lined, and coated with a combination of red, black, and/or orange enamel-coatings. The coatings are cured without heat before moving into assembly and applied fittings. Finally, the finished goods are packaged and shipped to customers. The pipes are being moved in and out of the spray paint booth for coating while curing is allowed to occur in the booth. The paint booth is being authorized under 106.433.

The enamel coatings are water-based or an epoxy with emissions of VOC's and PM. The spray paint booth (EPN – Paint Booth 1) will capture the fugitive emissions within the booth and release them to the atmosphere through a dedicated stack. The spray paint booth will be equipped with a PM filter.

Water will be used for the clean-up of water-based paint jobs, and organic solvent will be used for the clean-up of solvent-based paint jobs. The organic solvent to be used is 100% acetone (an exempt solvent).

The cutting and hole perforation activities will be performed using hand held and manually operated machines on an as-needed basis. Any emissions from these activities will be authorized under a claimed PBR 106.265.

The shot-blasting activities will be conducted in an enclosed abrasive cleaning process. Particulate matter emissions will be vented through a particulate matter filter. This process will be authorized under a claimed PBR 106.452.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

Registration Fee Reference No.:	Application fee: 714645 / 582EA000619055
Is this registration certified?	Yes
Is planned MSS included in the registration?	No
Are there affected NSR or Title V authorizations for the project?	No
Are there any upstream or downstream affects associated with this registration?	No
Are associated upstream/downstream emissions either included in the registration OR within current permitted limits with no changes to underlying air authorizations for the applicable units regarding BACT, health and environmental impacts, or other representations.	NA
Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits?	Yes
Are total emissions from all sitewide PBR authorized facilities less than the § 106.4(a)(4) limits, OR has the site been subject to public notice requirements? Sitewide emissions are less than the § 106.4(a)(4) limits.	Yes
Are there permit limits on using PBRs at the site?	No
Is the facility in compliance with all other applicable rules and regulations?	Yes

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Federal Applicability

Does this project trigger a PSD or Nonattainment review?	No
Does the Major NSR applicability analysis include all associated upstream and/or downstream emissions?	NA
Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)?	No

Permit by Rule Requirements - Compliance Demonstrations

PBR 106.433 Surface Coat Facility

Surface coating or stripping facilities, excluding vehicle repair and refinishing shops, shall meet the following conditions of this section to be permitted by rule.

(1) This section does not cover metalizing (spraying molten metal onto a surface to form a coating). However, this section does cover the use of coatings which contain metallic pigments.

(2) All facilities covered by this section at a site shall implement good housekeeping procedures to minimize fugitive emissions, including the following.

(2)(A) All spills shall be cleaned up immediately.

(2)(B) The booth or work area exhaust fans shall be operating when cleaning spray guns and other equipment.

(2)(C) All new and used coatings and solvents shall be stored in closed containers. All waste coatings and solvents shall be removed from the site by an authorized disposal service or disposed of at a permitted on-site waste management facility.

(4) No add-on control equipment shall be used to meet the emissions limits of this section. The total uncontrolled emissions from the coating materials (as applied) and cleanup solvents shall not exceed the following for all operations:

(4)(A) 25 tons per year (tpy) of volatile organic compounds (VOC) and ten tpy of exempt solvents for all surface coating and stripping operations covered by section at a site; **6.20 tpy VOC; 0.66 tpy exempt solvents**

(4)(B) 30 pounds per hour (lb/hr) of VOC and 5.0 lb/hr of exempt solvents for all surface coating and stripping operations covered by this section at a site; **5.96 lb/hr VOC; 4.93 lb/hr exempt solvents**

(5) Opacity of visible emissions shall not exceed 5.0%. Compliance shall be determined by the United States Environmental Protection Agency Method 9 averaged over a six-minute period.

(6) The following conditions apply to surface coating operations performed indoors, in a booth, or in an enclosed work area:

(6)(A) no more than six lb/hr of VOC emissions, averaged over any five-hour period, and 500 pounds per week per booth or enclosed work area; **5.96 lb/hr VOC; lb/week VOC**

(6)(B) minimum face velocity at the intake opening of each booth or work area is 100 feet per minute (ft/min). Emissions shall be exhausted through elevated stacks that extend at least 1.5 times the building height above ground level. All stacks shall discharge vertically; rain protection shall not restrict or obstruct vertical flow; **150 ft/min**

(6)(C) for spraying operations, emissions of particulate matter must be controlled using either a water wash system or a dry filter system with a 95% removal efficiency as documented by the manufacturer. The face velocity at the filter shall not exceed 250 ft/min or that specified by the filter manufacturer, whichever is less. Filters shall be replaced whenever the pressure drop across the filter no longer meets the manufacturer's recommendation. **99.9 %; 150 ft/min**

(8) The following records shall be maintained at the plant site for the most recent 24 months and be made immediately available to the commission or any pollution control agency with jurisdiction:

(8)(A) material safety data sheets for all coating materials and solvents;

(8)(B) data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation;

(8)(C) a monthly report that represents actual hours of operation each day, and emissions from each operation in the following categories:

(8)(C)(i) pounds per hour;

(8)(C)(ii) pounds per day;

(8)(C)(iii) pounds per week; and

(8)(C)(iv) tons emitted from the site during the previous 12 months;

(8)(D) examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions.

(9) Before construction begins, the facility shall be registered with the commission using Form PI-7.

Compliance History and Site Review

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In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on: **August 20, 2024**
 Site rating / classification: **Unclassified** Company rating / classification: **Unclassified**
 Has any action occurred on the basis of the compliance history or rating? **No**
 Did the Regional Office provide site approval and confirm distances? **NA**

Emission Summary

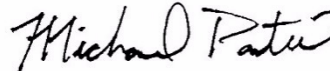
EPN / Emission Source	VOC		NOx		CO		PM ₁₀		PM _{2.5}		SO ₂		Exempt Solvent	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Previously Authorized Emissions														
EPN – Foam Dial 1	0.99	4.35												
Newly Authorized Emissions														
EPN – Paint Booth 1	5.96	6.20					<0.01	<0.01	<0.01	<0.01			4.93	0.66
TOTAL EMISSIONS (TPY):		10.55					<0.01		<0.01					0.66
MAXIMUM OPERATING SCHEDULE:			Hours/Day			Days/Week			Weeks/Year			Hours/Year		8,760



August 20, 2024

Mr. Guillermo Reyes, P.E.
Permit Reviewer
Rule Registration Section

Date



August 22, 2024

Michael Partee, Manager
Rule Registrations Section
Air Permits Division
Section Manager

Date