

Permit by Rule (PBR) Registration Technical Review

Company:	HPC Industrial Services, LLC	Registration No.:	179553
Nearest City:	La Porte	Project No.:	390680
County:	Harris	Project Type:	Initial
Project Reviewer:	John Ma	Regulated Entity No.:	RN100561554
Unit Name:	HPC Industrial Services	Customer Reference No.:	CN602308462
PBR No(s).:	106.433	Project Received Date:	March 26, 2025
Physical Location:	1980 Highway 146 N		

Project Overview / Process Description

HPC Industrial Services LLC owns and operates an ultrasonic paint stripping operation under 106.433. The site also has a degreasing operation authorized at the site under 106.454, Permit No. 176030. Reviewer has confirmed that sitewide emissions will be within 106.4 limitations.

The large metal parts are received from off-site clients. Pre-cleaning inspection to ensure there are no loose components. Items are positioned by the Ultrasonic for proper lift position by the crane. The crane will place the object within the Ultrasonic. The parts are then transferred to the Ultrasonic remote reservoir cleaner for this paint stripping operation. The solvent-based stripper is n-Methyl Pyrrolidone (NMP), which has a low vapor pressure.

The cycle time is approximately 2 hours. Post Ultrasonic inspection will then take place. If additional time is required, the parts will be placed back into the Ultrasonic. When Ultrasonic time is completed, the item will be suspended above the Ultrasonic to allow NMP to drip back into the Ultrasonic. The metal part is transferred to a wash pad for rinsing. If necessary, a water lancing is conducted. This step is claimed under PBR 106.451 for Wet Blast Cleaning. Post clean inspection will then take place. Parts are then loaded onto the trailer and transported back to client. The Ultrasonic will be covered when not in use. For extended days of non-use, the NMP is put back into holding tank until next process.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

Registration Fee Reference No.:	Application fee: 759269 / 582EA000660994
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 within 106.4 limits.	Yes
Are there permit limits on using PBRs at the site?	No
Is the facility subject to the NO _x Mass Cap and Trade Program?	No NOx emissions with project.
Is the facility in compliance with all other applicable rules and regulations?	Yes
Notes: Site will comply with Chapter 115.	

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

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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.

(3) n/a; Drying or curing ovens will not be used.

(4) No add-on control equipment will be used to meet the emissions limits of this section. The total uncontrolled emissions from the coating materials (as applied) and cleanup solvents will 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; **VOC & ES Emission Rates: 12.87tpy VOC; 0.00tpy 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; **VOC & ES Emission Rates: 4.419lb/hr VOC; 0.00lb/hr exempt solvents**

(4)(C) if emissions are less than 0.25 lb/hr of VOC and/or exempt solvents, a facility is exempt from the remaining requirements of this section, including paragraphs (5)-(9) of this section.

(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) n/a; coating activities will take place in a non-enclosed environment.

(7) For surface coating operations that are performed outdoors or in a non-enclosed work area, or for indoor operations that do not meet the conditions of paragraph (6) of this section, the following conditions apply.

(7)(A) No more than six lb/hr of VOC emissions, averaged over any five-hour period, and 500 pounds per week shall be emitted at any time for all operations authorized by this paragraph. **VOC Emission Rate: 4.419lb/hr VOC, 494.9lb/week VOC**

(7)(B) Coatings contain less than 0.1% by weight of chromates, lead, cadmium, selenium, strontium, or cobalt. Coatings will be applied with non-spray equipment (dipping).

(7)(C) n/a; Coatings will be applied with non-spray equipment (dipping).

(7)(D) Comments of concern were submitted by **Hoda Eltayeb, Region 12**.

(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) Form PI-7 CERT submitted via STEERS.

Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on:

April 3, 2025

Site rating / classification: **0.00 / High**

Company rating / classification:

0.00 / High

Has any action occurred on the basis of the compliance history or rating?

No

Did the Regional Office provide site approval and confirm distances?

Yes

Reviewed by: **Hoda Eltayeb, Region 12**

Date:

4/3/2025

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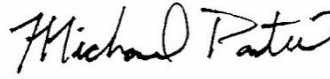
Emission Summary

EPN / Emission Source	VOC		NOx		CO		PM ₁₀		PM _{2.5}		SO ₂		Other	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
EPN 2 / Ultrasonic Paint Stripping	4.42	12.87												
TOTAL EMISSIONS (TPY):		12.87												
MAXIMUM OPERATING SCHEDULE:			Hours/Year										8,760	



April 3, 2025
Date

Mr. John Ma
Permit Reviewer
Rule Registration Section



April 3, 2025
Date

Michael Partee, Manager
Rule Registrations Section
Air Permits Division