City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7001 2510 0006 1130 7776
RETURN RECEIPT REQUESTED

July 9, 2009

Frank Geraci
Erieview Metal Treating Company
4465 Johnston Parkway
Cleveland, OH 44128

FACILITY ID: 13-18-00-7275
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Mr. Geraci:

On February 24, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Erieview Metal Treating Company to submit city permit fees, a new recordkeeping template for K001 through K003, a quarterly deviation report for K003, PTIO renewal applications for K001 through K003, emissions calculations for P001, P005, P006, P007, and L001, as well as initial notification forms and notification of compliance status reports for 40 CFR 63 Subparts WWWWWW and MMMM. CDAQ is in receipt of a corrective action plan dated July 9, 2009. All of the items requested above were submitted and/or explained via certified mail or hand-delivered within the required period of time.

The corrective action plan was received in a timely manner and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Marantides at (216) 420-8049. All correspondence with CDAQ must include the Ohio EPA facility identification number for Erieview Metal Treating Company: 13-18-00-7275.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/AM

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318007275\2-5-2009 NEAR.docx

ENDER: COMPLETE THIS SECTION

- Complete items 1, 2, a[illegible]. Also complete item 4 if Restricted De[illegible]y is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

. Article Addressed to:

Frank Geraci
Erieview Metal Treating Co.
4465 Johnston Parkway
Cleveland, OH 44128

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addresse

B. Received by (Printed Name) Sue Ciccarelli | C. Date of Deliver 4/2/19

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandis
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

. Article Number
(Transfer from service label) 7001 2510 0006 1130 7837

S Form 3811, August 2001 Domestic Return Receipt 102595-02-M-10

T.D. Kmiec and Associates
1520 Commodore Road
Lyndhurst, OH 44124-2826

Phone (440) 449-4720 FAX (440) 449-2827

FINAL REPORT:

RESPONSE to the NOTICE of VIOLATION from

CLEVELAND DIVISION of AIR QUALITY (CDAQ) -

Dated February 24, 2009

from

ERIEVIEW METAL TREATING COMPANY
4465 Johnston Parkway
Cleveland, OH 44128

FACILITY ID: 13-18-00-7275

July 09, 2009

TABLE OF CONTENTS

EXECUTIVE SUMMARY 1

REPORT DISCLOSURE 2

1.0 ITEM 1 - Past Due Fees 3

2.0 ITEM 2 - Daily Recordkeeping for K001, K002 & K003 5

3.0 ITEM 3 - Deviation Reports for K003 7

4.0 ITEM 4 - PTIO Applications for K001, K002 & K003 10

5.0 ITEM 5 - Emission Calculations for P001, P005, P006, P007 & L001 12

6.0 ITEM 6 - Initial Notification Form for 40 CFR 63, Subpart WWWWWW 19

7.0 ITEM 7 - Initial Notification Form for 40 CFR 63, Subpart MMMM 21

APPENDICES . . . . . .

FACILITY ID: 13-18-00-7275

EXECUTIVE SUMMARY:

At the request of Erieview Metal Treating Company (hereinafter **Erieview),** T.D. Kmiec & Associates (hereinafter the Consultant) prepared a **RESPONSE to the NOTICE of VIOLATION from the CLEVELAND DIVISION of AIR QUALITY (CDAQ) - Dated February24, 2009** for the **Erieview** located at 4465 Johnston Parkway, Cleveland, Cuyahoga County, OH 44128 (hereinafter the Facility) for the purpose of responding to the subject NOV.

This Response contains the information requested by CDAQ with Support Documentation..

This Response was performed by qualified persons with diligence and in accordance with regulatory and good engineering standards. To the best of our knowledge, the results are complete and accurate.

Prepared by:
Thomas D. Kmiec, J.D., P.E.,
Professional Engineer
T.D. Kmiec & Associates

Thomas D Kmiec
Signature

July 09, 2009
Date

RECEIVED
JUL - 9 2009

REPORT DISCLOSURE:

The information and conclusions contained herein are based on the best professional judgment of the Consultant resulting from an analysis of the best information obtained and are made in light of the current rules, regulations, guidelines, and interpretations by the regulating agencies.

The Consultant shall not be accountable for any liability to the Company because of an adverse latent condition that exists but could not be reasonable determined within the scope of this evaluation or, in the alternative, if a condition currently exists that becomes adverse at some future date because of changed rules, regulations, guidelines, or interpretations by any and all Federal, State, and/or Local Regulating Agencies.

The Consultant has no obligation to update or to revise the results because of events occurring subsequent to the date of the report, including but not limited to new or revised laws, codes, regulations, or standards.

Item 1:

Permit Fees for the Calendar Years of 2006 through 2008:

ITEM 1

This Item was completed on or about March 03, 2009 with the submission of three (3) checks, as follows:

Amount	Check No.	Year
$1062.50	20647	2006
$1062.50	20648	2007
$1062.50	20649	2008

Item 2:

A Copy of the New Daily Recordkeeping Log Template for K003

ITEM 2

This Item was completed by letter dated April 09, 2009 with the submission of a SAMPLE DAILY RECORDKEEPING Template for Coating Line #3 (K003).

Item 3:

Deviation Report for K003: 4th Quart of 2008, 1st & 2nd Quarter, 2009

ITEM 3

DISCUSSION:

There are two (2) Categories of coatings that are used on Coating Line #3 (K003):

1.0 Coating Compliance Status (Appendix 1):

1.1 Compliant Coating [OAC 3745-21-09(U)(1)(l)] are Coatings which contain 3.0 lbs VOC/gal - minus water and exempt solvents (or less)

The following Metal Coatings International (MCI) coatings were used on line K003 from 01/01/2009 to 06/30/2009:

Dacromet 320 LV,
Dacromet Plus L, and
Geomet 321.

1.2 Non-Compliant Coating are Coatings which contain more than 3.0 lbs VOC/gal - minus water and exempt solvents. These Coatings can be used to "surface coat miscellaneous metal products" if the rate of coating application is 3 gallons/day or less [OAC 3745-21-09(U)(2)(e)(ii)]:

The following Magni Industries Incorporated (Magni) coatings were used on line K003 from 01/01/2009 to 06/30/2009:

Magni B06J, and
Magni B-18.

2.0 Quarterly Deviation Reports (Appendix 2):

2.1 Fourth Quarter of 2008:

Coating Line #3 (K003) was not in operation during the fourth quarter of 2008.

2.2 First Quarter of 2009:
MCI (compliant coatings) were applied on 31 of 43 days of operation during this quarter.

Magni (non-compliant coatings) were applied on 12 of 43 days of operation during this quarter. However, the Coating Line III Addition Log for this quarter was not clear as to how many gallons/day of these coatings were used on each day.

2.3 Second Quarter of 2009:

MCI (compliant coatings) were applied on 33 of 41 days of operation during this quarter.

Magni (non-compliant coatings) were applied on 8 of 41 days of operation during this quarter. However, again, the Coating Line III Addition Log for this quarter was not clear as to how many gallons/day of these coatings were used on each day.

CONCLUSION:

The information obtained during the preparation of the response for Item 3 disclosed information about the operation, scheduling and recordkeeping that combined to utilize more Non-Compliant Coating on K003 than was desired.

The management team met yesterday to discuss this situation and to consider options to improve the operation, scheduling and recordkeeping procedures to avoid a repeat of these first two (2) quarters.

Also, it was learned yesterday that Erieview had purchased a Thermal Oxidizer in anticipation of this current situation. Erieview is reviewing the equipment and the accessories that was purchased in order to determine what it will take to make it operative and how should it be installed.

In the mean-time, Erieview will monitor the operation more closely for the purpose of scheduling the use of the Non-Compliant coating with the regulation in mind and review the recordkeeping for the purpose improving the information that is obtained so the records will be more accurate.

Item 4:

Prepare Applications for the Renewal of the PTIO's for K001, K002, and K003

ITEM 4

Applications for the Renewal of the OEPA/PTIO Permits-to-Operate for all three (3) emission units K001, K002 and K003 have been submitted to the CDAQ at the same time as this Response Final Report.

Copies of the Permit Application forms for the City of Cleveland, Division of Air Pollution Control for each emission unit are provided with this response.

• **Appendix 3** is a Table of the (1) Dimensions of the Dip Tanks for each Line and (2) the heat input (in BTU/hour) for the Natural Gas Pe-Cure and Curing Ovens for each Line.

• **Appendix 4** is a copy of the detailed information about the coating which represents the WORST CASE for OC/VOC emissions.

• **Appendix 5** is a Table of ALL the Coatings currently being applied on Coating Lines #1 (K001), #2 (K002) and #3 (K003).

Item 5:

Prepare Emission Calculations for Emission Units:

P001 - Zinc Phosphate Automatic Barrel Plating Line,

P005 - Zinc Automatic Barrel Plating Line,

P006 - Zinc Nickel Automatic Barrel Plating Line,

P007 - Electroless Nickel Automatic Barrel Plating Line, and

L001 - Cleaning Line.

ITEM 5

Emission Calculations for the following Emission units **(Appendix 6)**:

P001 - Zinc Phosphate Automatic Barrel Plating Line,
P005 - Zinc Automatic Barrel Plating Line,
P006 - Zinc Nickel Automatic Barrel Plating Line,
P007 - Electroless Nickel Automatic Barrel Plating Line, and
L001 - Cleaning Line.

REFERENCES:

(1) USEPA - AP-42, Fifth Edition - "Compilation of Air Pollutant, Emission Factors; Volume 1 - Stationary Point & Area Sources",

(2) National Association of Metal Finishers (NAMF): "Emission Factors for Toxic Air Contaminants of Concern to the Metal Finishing Industry", April, 1999 **(Appendix 7)**.

RECAP of PROJECTED EMISSIONS from SELECTED PLATING OPERATIONS

Emission Unit	lbs Emissions/ day	DeMinimis Limit [OAC 3745-15-05]	DeMinimis Source
P001 - Zinc Phosphate Automatic Barrel Line	(?)	10 lbs/day	(?)
P005 - Zinc Automatic Barrel Plating Line	1.35	10 lbs/day	YES
P006 - Alkaline Zinc/Nickel Automatic Barrel Line	1.38	10 lbs/day	YES
P007 - Electroless Nickel Automatic Barrel Line	0.00	10 lbs/day	YES
L001 - Cleaning Line	0.012	10 lbs/day	YES

CONCLUSION:

Pursuant to OAC 3745-15-05, plating Lines P005, P006, P007 and L001 are exempted from obtaining an OEPA/PTIO.

An emission factor for calculating the emissions from the Zinc Phosphate Automatic Barrel Plating Line was not available

FACILITY ID: 13-18-00-7275

P001 - Zinc Phosphate Automatic Barrel Plating Line,

Basis-of-Calculation:

1. Surface Area of Tanks **113** sq ft
2. Operating Schedule: **24** Hrs/day; **5** Days/wk; **52** Wks/yr = **6240** Hrs/year
3. Amps **N/A**

Discussion:

1. There is NO emission factor for this type of emission unit in AP-42, Volume 1, 5th Edition [Reference 1]
2. There is NO emission factor this type of emission unit in the Report developed by the NAMF. [Reference 2]
3. This writer will continue to search the literature in an effort to obtain a reasonable and feasible emission factor for the airborne emissions from a Zinc Phosphate Automatic Barrel Plating Line to determine the projected emissions.

Calculation:

Not Available. This writer is trying to obtain an "emission factor" for Electroless, Zinc Phosphate Coating.

P005 - Zinc Automatic Barrel Plating Line,

Basis-of-Calculation: Zinc Emissions/Day

1. Surface Area of Tanks **182** sq ft
2. Operating Schedule: **10** Hrs/day; **5** Days/wk; **52** Wks/yr . = **2600** Hrs/year
3. Amps **4000**
4. Amp-Hrs (@ 8760 hrs/yr) **35,040,000**
   (@ 24 hrs/day) **96,000**
5. Emission Factor : **6.40 mg Zn/A-H** [Reference (2)]

Discussion:

1. There is NO emission factor for this type of emission unit in AP-42, Volume 1, 5th Edition [Reference 1]
2. In the alternative, this writer used an emission factor developed by the NAMF, (Test #98-105) and published in the "Report of Source Tests". [Reference 2]

Calculation:

1. Calculation: (PTE Emissions of **Zinc** in a 24-hour day)

Emission Factor *(Ref 2)* mg/A-H	A-H/day	lbs/mg	=	**lbs Zn/day**	DeMinimis Source OAC 3745-15-05	
					Reg Limit	**DeMinimis**
6.40	96000	2.2×10^{-6}	=	**1.35**	10 lbs/day	**YES**

FACILITY ID: 13-18-00-7275

P006 - Alkaline Zinc Nickel Automatic Barrel Plating Line,

Basis-of-Calculation: Zinc and Nickel Emissions/Day

1. Surface Area of Tanks **142** sq ft
2. Operating Schedule: **10** Hrs/day; **5** Days/wk; **52** Wks/yr **2600** Hrs/year
3. Amps **4000**
4. Amp-Hrs (@ 8760 hrs/yr) **35,040,000**
   (@ 24 hrs/day) **96,000**
5. Emission Factor for Zinc (only) : **6.40 mg Zn/A-H** [Reference (2)]
6. Emission Factor for Nickel (only) : **6.5^{-6} mg Ni/ hr-ft^2 tank** [Reference (2)]
   w/Air Agitation

Discussion:

1. There is NO emission factor for this type of emission unit in AP-42, Volume 1, 5th Edition [Reference 1]
2. In the alternative, this writer used an emission factor developed by the NAMF, (Test #98-105) and published in the "Report of Source Tests". [Reference 2]

Calculation:

1. Calculation: (PTE Emissions of **Zinc** in a 24-hour day)

Emission Factor *(Ref 2)* mg/A-H	A-H/day	lbs/mg	=	**lbs Zn/day**	DeMinimis Source OAC 3745-15-05	
					Reg Limit	Actual
6.40	96000	0.00000220	=	**1.35**	10 lbs/day	**1.35**

2. Calculation: (PTE Emissions of **Nickel** in a 24-hour day)

6.5 lbs x 10^{-6}	Hours	Tank Area	=	**lbs Ni/day**	10 lbs/day	
0.0000065	24	182	=	**0.03**		**0.03**
					DeMinimis	------
				Total Emissions	**YES**	**1.38**

FACILITY ID: 13-18-00-7275

P007 - Electroless Nickel Automatic Barrel Plating Line,

Basis-of-Calculation: Nickel Emissions/Day

1. Surface Area of Tanks **47** sq ft
2. Operating Schedule: **8** Hrs/day; **5** Days/wk; **52** Wks/yr = **2080** Hrs/year
3. Amps **N/A**
4. Amp-Hrs (@ 8760 hrs/yr) **N/A**
   (@ 24 hrs/day) **N/A**
5. Emission Factor for Nickel (only): **7.5 x 10^{-7} lbs Ni/ hr-ft^2 tank** [Reference (2)]

Discussion:

1. There is NO emission factor for this type of emission unit in AP-42, Volume 1, 5th Edition [Reference 1]
2. In the alternative, this writer used an emission factor developed by the NAMF, (Test #98-105) and published in the "Report of Source Tests". [Reference 2]

Calculation:

1. Calculation: (PTE Emissions of **Nickel** in a 24-hour day)

7.5 lbs x 10^{-7}	Hours	Tank Area	=	**lbs Ni/day**		
0.00000075	24	47	=	**0.001**		**0.00**
					DeMinimis	------
				Total Emissions	**YES**	**0.00**

L001 - Cleaning Line

Basis-of-Calculation: Particulate Emissions

1. Surface Area of Tanks **16** sq ft
2. Operating Schedule: **16** Hrs/day; **5** Days/wk; **52** Wks/yr = . . **4160** Hrs/year
3. % Hydrochloric Acid in Tank **40%**
4. Amps **N/A**
5. Amp-Hrs (@ 8760 hrs/yr) **N/A**
   (@ 24 hrs/day) **N/A**
6. Emission Factor for Part Matter : **3.0 x 10^{-5} lbs HCl/ hr-ft^2 - % of HCl tank** [Reference (2)]

Discussion:

1. There is NO emission factor for this type of emission unit in AP-42, Volume 1, 5th Edition [Reference 1]

2. In the alternative, this writer used an emission factor developed by the NAMF, (Test #98-107) and published in the "Report of Source Tests" as Test #98-107, "HCl emissions from a Hydrochloric Acid Metal Etching Tank". [Reference 2]

3. Since the Hydrochloric Acid etching has a more aggressive action on the metal surface than **Acid Cleaning**, using the HCl etching emission factor will result in reporting a higher amount of Particulate Emissions.

Calculation:

1. Calculation: (PTE Emissions of **Hydrochloric Acid** in a 24-hour day)

3.0 lbs x 10^{-5}	Hours	Tank Area	- % HCl	**lbs HCl /day**		
0.00003	24	16	*40*	*0.012*		
					DeMinimis	
				Total Emissions	*YES*	

Item 6:

Initial Notification Form and Notification of Compliance Status Report: - 40 CFR 63 - Subpart WWWWWW:

ITEM 6

DISCUSSION:

1.0 Initial Notification Report:

Attached is a completed and signed Form for "40 CFR 63, Subpart A, §63.9(b) - Initial Notification; NESHAP: Area Source Standards for Plating and Polishing Operations (40 CFR 63 Subpart WWWWWW) for Erieview Metal Treating (Facility ID 13-18-00-7275).

An executed copy of this Form was also mailed to (1) Robert Hodanbosi, OEPA/DAPC and (2) Director, Air and Radiation Division; US EPA; Region 5.

2.0 Notification of Compliance Status (NOCS) Report:

40 CFR 63, Subpart A, §63.9(h) - Notification of Compliance Status (NOCS) - General Provisions.

Since the Erieview Facility is an "Existing Facility" (having been constructed before March 14, 2008), this NOCS Report is due on July 01, 2010.

National Emission Standards for Hazardous Air Pollutants:
Area Source Standards for Plating and Polishing Operations
40 CFR 63 subpart WWWWWWW

Section 1. Facility Information

☒ Yes, I am subject to 40 CFR Part 63 subpart WWWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Compliance Date: ☒ Existing source: July 1, 2010 ☐ New source: _____
(Date of startup)

☐ No, I am NOT subject to 40 CFR Part 63 subpart WWWWWWW. Reason not applicable:

If you checked the "No" box above, please complete this Section 1 and then proceed directly to Section 3 of this form (skip Section 2).

Company name: ERIEVIEW METAL TREATING COMPANY

Facility ID number (if available): 13-18-00-7275

Facility name (if different): SAME

Facility (physical location) address: 4465 JOHNSTON PARKWAY
CLEVELAND OH 44128

Owner name/title: ALEXANDER G KAPPOS; PRESIDENT

Owner/company Address: 4465 JOHNSTON PARKWAY

Owner telephone number: (216) 663-1780

Owner email address (if available): alexk@erieview.us

Is the Operator the same person as the Owner? Yes ☒ No ☐

If the Operator information is different from the Owner, please provide the following:
[a] This is an example of the type of information that must be submitted to fulfill the Initial Notification requirement of 40 CFR 53, subpart WWWWWWW. You may submit the information in another form or format or you may use this form.

Operator name/title: _____
Operator telephone number: _____
Operator email address (if available): _____

cc: Robert Hodanbosi, OEPA/DAPC
Director, Air and Radiation Division; US EPA, Region V

Section 2. Identification of Affected Operations

Operating permit number (if available): _____

(1) The following are the operations at this facility subject to subpart WWWWWWW (check all that apply):[a]

Electroplating (noncyanide) ☐

Continuous electroplating (noncyanide) ☐

Short-term electroplating (noncyanide) ☐

Electropolishing ☐

Electroforming ☐

Electroplating (cyanide) ☐

Electroless nickel ☒

Chrome conversion coating ☐

Other electroless plating/coating/dipping ☒

Thermal spraying (permanent line) ☐

Thermal spraying (temporary, in-situ) ☐

Dry mechanical polishing ☐

[a] *Important Note: These operations are affected sources under subpart WWWWWWW* ***only if/when*** *they use materials that contain or have the potential to emit Plating and Polishing metal HAP. Plating and Polishing HAP* ***containing/potential*** *is defined to be when the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental or compounds of manganese.*

Section 3. Certification

I hereby certify that the information presented herein is correct to the best of my knowledge.

(Signature) _____ (Date) JULY 08, 2008

(Name/title) ALEX KAPPOS, PRESIDENT (Telephone No.) (216) 663 - 1780

Section 4. Submittal

Submit original to:
Director, Air and Radiation Division
US EPA Region V
77 West Jackson Blvd.
Chicago, IL 60604-3507

Send copy to:
Robert Hodanbosi, Division Chief
Ohio EPA, Div. of Air Pollution Control
PO Box 1049
Columbus, OH 43216

Send copy to:
Ohio EPA District Office or Air Local (see next page for address)

CUYAHOGA COUNTY

Cleveland Division of Air Quality
Ohio EPA - Agency 13
Department of Public Health
1925 St. Clair Avenue
Cleveland, OH 44114-2080

NORTHEAST OHIO

Ohio EPA,
Northeast District Office
Div of Air Pollution Control
2110 East Aurora Road
Twinsburg, OH 44087

Item 7:

Initial Notification Form and Notification of Compliance Status Report: - 40 CFR 63 - Subpart MMMM:

ITEM 7

Erieview takes exception to the CDAQ conclusion that • • • "(1) the Initial Notification Form and (2) Notification of Compliance Status Report for 40 CFR 63, Subpart MMMM applies to the three (3) Dip Coating Booths" • • • (K001, K002 & K003).

Pursuant to the Preamble to the Final Rules and Regulations (40 CFR 63 MMMM), published in the Federal Register, Vol. 69, No.1, January 2, 2004 (copy attached), • • • "This action promulgates a NESHAP for "miscellaneous metal parts and products surface coating operations LOCATED AT MAJOR SOURCES OF HAZARDOUS AIR POLLUTANTS (HAPs)".

Erieview IS NOT A MAJOR SOURCE OF HAPs as defined at 40 CFR 70 and OAC 3745-77-01(X)(1)(a).

Therefore, it is the opinion of this writer that Erieview is not subject to this MACT Standard, and consequently, does not have to submit (1) an Initial Notification Form nor (2) a Notification of Compliance Status Report.

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 63

[OAR–2003–0116–FRL–7549–7]

RIN 2060–AG56

National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final rule.

APPLICABILITY CRITERIA

SUMMARY: This action promulgates national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating operations located at major sources of hazardous air pollutants (HAP). The final rule implements section 112(d) of the Clean Air Act (CAA) by requiring these operations to meet HAP emission standards reflecting the application of the maximum achievable control technology (MACT). The final rule will protect air quality and promote the public health by reducing emissions of HAP from facilities in the miscellaneous metal parts and products surface coating source category. The organic HAP emitted by these operations include xylenes, toluene, methyl ethyl ketone (MEK), phenol, cresols/cresylic acid, glycol ethers (including ethylene glycol monobutyl ether (EGBE)), styrene, methyl isobutyl ketone (MIBK), and ethyl benzene. Exposure to these substances has been demonstrated to cause adverse health effects such as irritation of the lung, skin, and mucous membranes, and effects on the central nervous system, liver, and heart. In general, these findings have only been shown with concentrations higher than those typically in the ambient air. The final standards are expected to reduce nationwide organic HAP emissions from major sources in this source category by approximately 48 percent.

EFFECTIVE DATES: The final rule is effective January 2, 2004. The incorporation by reference of certain publications listed in the final rule is approved by the Director of the Federal Register as of January 2, 2004.

ADDRESSES: *Docket.* Docket ID No. OAR–2003–0116 (formerly Docket No. A–97–34) is located at the EPA Docket Center, EPA West (6102T), 1301 Constitution Avenue, NW., Room B–102, Washington, DC 20460.

Background Information Document. A background information document (BID) for the promulgated NESHAP may be obtained from the docket; the U.S. EPA Library (C267–01), Research Triangle Park, NC 27711, telephone (919) 541–2777; or from the National Technical Information Service, 5285 Port Royal Road, Springfield, VA 22161, telephone (703) 487–4650. Refer to "National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products—Summary of Public Comments and Responses on Proposed Rule" (EPA–453/R–03–008).

FOR FURTHER INFORMATION CONTACT: Ms. Kim Teal, Coatings and Consumer Products Group, Emission Standards Division (C539–03), U.S. EPA, Research Triangle Park, NC 27711; telephone number (919) 541–5580; facsimile number (919) 541–5689; electronic mail address: *teal.kim@epa.gov.*

SUPPLEMENTARY INFORMATION: *Regulated Entities.* The source category definition includes facilities that apply coatings to miscellaneous metal parts and products. In general, facilities that coat miscellaneous metal parts and products are covered under the North American Industrial Classification System (NAICS) codes listed in Table 1. However, facilities classified under other NAICS codes may be subject to the final standards if they meet the applicability criteria. Not all facilities classified under the NAICS codes in the following table will be subject to the final standards because some of the classifications cover products outside the scope of the NESHAP for miscellaneous metal parts and products.

TABLE 1.—CATEGORIES AND ENTITIES POTENTIALLY REGULATED BY THE FINAL RULE

Category	NAICS	Examples of potentially regulated entities
Automobile Parts	335312, 336111, 336211, 336312, 33632, 33633, 33634, 33637, 336399.	Engine parts, vehicle parts and accessories, brakes, axles, etc.
Extruded Aluminum	331316, 331524, 332321, 332323	Extruded aluminum, architectural components, rod, and tubes.
Heavy Equipment	33312, 333611, 333618	Tractors, earth moving machinery.
Job Shops	332312, 332722, 332813, 332991, 332999, 334119, 336413, 339999.	Any of the products from the miscellaneous metal parts and products segments.
Large Trucks and Buses	33612, 336211	Large trucks and buses.
Magnet Wire	331319, 331422, 335929	Magnet wire.
Metal Buildings	332311	Prefabricated metal: buildings, carports, docks, dwellings, greenhouses, panels for buildings.
Metal Containers	33242, 81131, 322214, 326199, 331513, 332439	Drums, kegs, pails, shipping containers.
Metal Pipe and Foundry	331111, 331513, 33121, 331221, 331511	Plate, tube, rods, nails, spikes, etc.
Rail Transportation	33651, 336611, 482111	Brakes, engines, freight cars, locomotives.
Recreational Vehicles	3369, 331316, 336991, 336211, 336112, 336213, 336214, 336399.	Motorcycles, motor homes, semitrailers, truck trailers.
Rubber-to-Metal Products.	326291, 326299	Engine mounts, rubberized tank tread, harmonic balancers.
Structural Steel	332311, 332312	Joists, railway bridge sections, highway bridge sections.
Other Transportation Equipment.	336212, 336999, 33635, 56121, 8111, 56211	Miscellaneous transportation related equipment and parts.

This table is not intended to be exhaustive, but rather provides a guide for readers regarding entities likely to be regulated by this action. To determine whether your coating operation is regulated by this action, you should examine the applicability criteria in § 63.3881 of the final rule.

Docket. The EPA has established an official public docket for this action under Docket ID No. OAR–2003–0116 (formerly docket A–97–34). The official public docket consists of the documents specifically referenced in this action, any public comments received, and other information related to this action. Although a part of the official docket, the public docket does not include

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44128 APS 13-18-00-7275

Appendices

LIST of APPENDICES
TYPICAL for ALL PLATING & COATING LINES

as of July 8, 2009
July 7, 2009

C:_00351-00540_Erieview\00493_Final.Report_Final.Appendices.wpd

Appendix 1 - Table for the Determination of Compliant[(A)] and Non-Compliant[(B)] Coatings.

- **(A) - Compliant coatings contain 3.0 pounds VOC/gallon (or less) minus water and exempt solvents [OAC 3745-21-09(U)(1)(i)]**, and
- **(B) - Non-Compliant coatings contain more than 3.0 pounds VOC/gallon minus water and exempt solvents**

Appendix 2 - List of Coatings Applied during the first two (2) quarters of 2009 on Coating line #3 (K003) for the purposes of obtaining information to prepare the deviation reports for these two (2) quarters.

NOTE: K003 was not operated during the fourth quarter of '08.

Appendix 3 - Dip Tank Dimensions and BTU Heat Input to the Pre-Cure/Curing Oven(s),

Appendix 4 - Coating Composition, As Applied , **featuring** the "Worst Case" Coating for OC/VOC emissions - [Metal Coating International - Geomet 312], including:

- 4A • Calculation of pounds OC/VOC/hour and tons OC/VOC/year,
- 4B • Calculation for Photochemically Reactive Material Determination and
- 4C • Calculation of pounds VOC/gallon minus water and exempt solvents

Appendix 5 - Table of ALL Coatings currently being applied on Coating Lines #1 (K001), #2 (K002) and #3 (K003) identified to the Coating Lines on which they are being used

Appendix 6 - Table of the Operating Parameters and Physical Dimensions for the Calculation of Airborne Emissions from the Listed Plating Lines.

Appendix 7 - Publication: "Emission Factors for the Toxic Air Contaminants of Concern to the Metal Finishing Industry"; April, 1999

A report of source tests conducted by the;

- South Coast Air Quality Management District, and
- Metal Finishing Association of Southern California, with
- Collaboration by the California Air Resources Board (CARB)

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44128

***DETERMINATION of COMPLIANT* and**
Non-COMPLIANT COATINGS

as of July 8, 2009
June 18, 2009

C:_00351-00540_Erieview\00493_Final.Report\App.1.wpd

Description	Lbs OC/Gal **(Actual)**	**Emission[A] Limitation** *(3 lbs VOC/g minus water)*	Compliant		Coating		OC/VOC Emissions/year	
			Yes[A]	No[B]	lbs/gal[C]	gal/year[E]	lbs/yr[F]	tns/yr
METAL COATINGS INTERNATIONAL								
Dacromet 320 LV	0.66	3.0[C]	Y	-	11.92	26280	17345	8.67
Dacromet Plus	0.20	<0.1[C]	Y	-	9.42	26280	5256	2.63
Dacromet Plus L	0.20	<0.1[C]	Y	-	9.72	26280	5256	2.63
Plus ML Black	0.20	1.00[D]	Y	-	9.22	26280	5256	2.63
Dacrokote 107	0.28	1.04[D]	Y	-	9.30	26280	7358	3.68
Geokote 147	0.60	2.88[D]	Y	-	8.72	26280	15768	7.88
Geomet 321	***1.02***	***2.39[D]***	***Y***	***-***	***11.38***	***26280***	***26806***	***13.40***
MAGNI INDUSTRIES INCORPORATED								
B06J	5.07	3 gal/day	-	N	12.68	1095	5552	2.78
B-18	***5.71***	***3 gal/day***	***-***	***N***	***9.51***	***1095***	***6252***	***3.13***
NEW SURFACE TECHNOLOGIES								
Coat Black P[E]	0.46	0.46	Y	-	9.38	26280	12089	6.04
Techniseal 440BK	0.00	0.00	Y	-	8.92	26280	0	0

(A) - OAC 3745-21-09(1)(I) - Emission Limit @ 3.00 lbs VOC/gallon minus H_2O & exempt Solvents
(B) - OAC 3745-21-09(2)(e)(ii) - Non-Compliant: Emission Limit @ 3.00 gal/day (as applied)
[C] - From Supplier MSDS(s)
(D) - As calculated by the Engineer preparing the PTIO Applications
[E] - Gallons of Coating/year based on 3.0 gallons/hour x 8760 hours/year.
(F)- OC/VOC emissions/year based on gallons/year x lbs OC/VOC/gallon

"WORST CASE" COATING (by EMISSION UNITS) used for PTIO CALCULATIONS

Description	Lbs OC/Gal **(Actual)**	**Emission[A] Limitation** *(3 lbs VOC/g minus water)*	Compliant		Coating		OC/VOC Emissions/year	
			Yes[A]	No[B]	lbs/gal[C]	gal/year[E]	lbs/yr[F]	tns/yr
			K001		***(X) - WORST CASE COATING for OC/VOC***			
Dacromet 320 LV	0.66	3.0[C]	Y	-	11.92	26280	17345	8.67
B-18[X]	***5.71***	***3 gal/day***	***-***	***N***	***12.68***	***1095***	***6252***	***3.13***
			K002					
Geokote 147	0.60	2.88[D]	Y	-	8.72	26280	15768	7.88
Coat Black P	0.46	0.46	Y	-	9.38	26280	12089	6.04
			K003		***(X) - WORST CASE COATING for OC/VOC***			
Geomet 321[X]	***1.02***	***2.39[D]***	***Y***	***-***	***11.38***	***26280***	***26806***	***13.40***
B06J	5.07	3 gal/day	-	N	12.68	1095	5552	2.78

APPENDIX 1

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44128

ITEM 3
K003 - Quarterly Deviation Reports
List of Coatings from Jan, 2009 to Jun, 2009

as of July 8, 2009
June 18, 2009

C:_00351-00540_Erieview\00493_Final.Report\App.2.wpd

Description	Lbs OC/Gallon (Actual)	Emission[A] Limitation	Compliant		Coating Emissions - OC/Year			
			Yes[A]	No[B]	lbs/gal	gal/year	lbs/yr	tns/yr
METAL COATINGS INTERNATIONAL								
Dacromet 320 LV	0.66	3.0[C]	Y	-	11.92			
Dacromet Plus L	0.00	<0.1[C]	Y	-	9.72			
Geomet 321	1.02	2.39[D]	Y		11.38			
MAGNI INDUSTRIES INCORPORATED								
B06J	5.07	3 gal/day	-	N	12.68			
B-18	5.71	3 gal/day	-	N	9.51			

(A) - OAC 3745-21-09(1)(l) - Emission Limit @ 3.00 lbs VOC/gallon minus H_2O & exempt Solvents
(B) - OAC 3745-21-09(2)(e)(ii) - Non-Compliant Emission Limit @ 3.00 gal, (as applied)/day
[C] - From Supplier MSDS(s)
(D) - As calculated by the Engineer preparing the PTIO Applications

APPENDIX 2

Erieview Metal Treating
4465 Johnston Parkway
Cleveland, OH 44128

COATING LINES - K001, K002 & K003
DIP TANK DIMENSIONS &
CURING OVEN(S) HEAT INPUT

as of July 8, 2009
June 15, 2009

C:_00351-00540_Erieview\00493_Final.Report\App.3.wpd

NOTE 1: COATING TANKS are cleaned with an Alkaline Cleaner.
NOTE 2: COATINGS are Applied "As Received" (i.e. there are no thinners, etc)
NOTE 3: COATING TANK SIZES:

K001 - 50 Gallons,
K002 - 80 Gallons,
K003 - 120 Gallons,

EU	Π/4	Diameter		Dia^2 (ft^2)	Height		Volume	gal/ft^3	Volume	
		in	ft		in	ft	ft^3		Actual	Oper
K001	0.785	33	**2.75**	7.56	29.0	**2.42**	14.35	7.48	**107**	**50**
K002	0.785	31.5	**2.63**	6.89	36.0	**3.00**	16.24	7.48	**121**	**80**
K003	0.785	47	**3.92**	15.34	43.0	**3.58**	43.17	7.48	**323**	**120**

NATURAL GAS FIRED CURING OVENS				
Emission Unit	**Pre-Curing Zone**	**Curing Zone**		
K001	N/A	1.0 x 10^6 BTU/Hour		
K002	1.0 x 10^6 BTU/Hour	2.0 x 10^6 BTU/Hour		
K003	1.5 x 10^6 BTU/Hour	3.5 x 10^6 BTU/Hour		

APPENDIX 3

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44128

TABLE 2
COATING COMPOSITION, As Applied
CALCULATIONS OF EMISSIONS
WORST CASE
GEOMET 321

as of July 7, 2009
June 18, 2009

C:_00351-00540_Erieview\00493\Coating.Lines\Composition\2-AsApplied\WorstCase321.wpd

Basis of Calculation:

1.1 Projected Operating Schedule				
24 hrs/da	x 7 da/wk	x 52 wks/yr	=	**8760 hrs/yr**

1.2 Annual MAXIMUM Consumption (as applied)		
3.00 gal/hour X	8760 hours/year =	**26280 gal/year**

1.3 Composition, As Applied

	Total Consumption		%, vol	x gal/hr	=	Component	
1.3.1	3.00	gal, Coating	100.0	3.00		3.000	gal/hr
1.3.2	3.00	gal, Accelerator		3.00		0.000	gal/hr
1.3.3	3.00	gal, Thinner		3.00		0.000	gal/hr
		Total Mixture, as applied				**3.00**	**gal/hr**

1.4 Composition Information

COATING: METAL COATINGS INTERNATIONAL - Geomet 321		
Density of Coating	11.38	pounds/gallon
OC Content (wt)	1.02	pounds/gallon
OC Content (vol)	14.20	%
Water Content (wt)	4.78	pounds/gallon
Water Content (vol)	57.30	%
Solid Content (wt)	5.58	pounds/gallon
Solid Content (vol)	28.50	%

Density of Accelerator	0.00	pounds/gallon
OC Content (wt)	0.00	pounds/gallon
OC Content (vol)	0.00	%
Water Content (wt)	0.00	pounds/gallon
Water Content (vol)	0.00	%
Solid Content (wt)	0.00	pounds/gallon
Solid Content (vol)	0.00	%

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44128

TABLE 2
COATING COMPOSITION, As Applied
CALCULATIONS OF EMISSIONS
WORST CASE
GEOMET 321

as of July 7, 2009
June 18, 2009

C:_00351-00540_Erieview\00493\Coating.Lines\Composition\2-AsApplied\WorstCase321.wpd

Density of Thinner	0.00	pounds/gallon
OC Content (wt)	0.00	pounds/gallon
OC Content (vol)	0.00	%
Water Content (wt)	0.00	pounds/gallon
Water Content (vol)	0.00	%
Solids Content (wt)	0.00	pounds/gallon
Solids Content (vol)	0.00	%

Density of Mixture						Lbs OC/gal Mixture						% OC (vol) of Mixt					
3.00	g	11.38	#/g	34.14	#	3.00	g	1.02	#/g	3.06	#	3.00	g	14.2	%	0.43	g
0.00	g	0.00	#/g	0.00	#	0.00	g	0.00	#/g	0.00	#	0.00	g	0	%	0.00	g
0.00	g	0.00	#/g	0.00	#	0.00	g	0.00	#/g	0.00	#	0.00	g	0	%	0.00	g
3.00		gal		34.14	#	3.00		gal		3.06		3.00		gal		0.43	
34.1	#	3.00	gal	**11.38**	**#/g**	3.06		3.00		**1.02**	**#/g**	0.43		3.00		**14.2**	**%**
						Lbs H_2O/gal Mixture						% H_2O (vol) of Mixt					
						3.00	g	4.78	#/g	14.34	#	3.00	g	57.3	%	1.72	g
						0.00	g	0.00	#/g	0.00	#	0.00	g	0.0	%	0.00	g
						0.00	g	0.00	#/g	0.00	#	0.00	g	0.0	%	0.00	g
						3.000		gal		14.34	#	3.000		gal		1.72	g
						14.3	#	3.00	gal	**4.78**	**#/g**	1.72	g	3.00	g	**57.3**	**%**

Density of Mixture	11.38	pounds/gallon
OC Content (wt)	1.02	pounds/gallon
OC Content (vol)	14.20	%
Water Content (wt)	4.78	pounds/gallon
Water Content (vol)	57.30	%
Solid Content (wt)	5.58	pounds/gallon
Solid Content (vol)	28.50	%

APPENDIX 4A

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44128

TABLE 2
COATING COMPOSITION, As Applied
CALCULATIONS OF EMISSIONS
WORST CASE
GEOMET 321

as of July 7, 2009
June 18, 2009

C:_00351-00540_Erieview\00493\Coating.Lines\Composition\2-AsApplied\WorstCase321.wpd

PARTICULATE MATTER					
UNCONTROLLED					
3.00	gal/hr	5.58	lbs/gal	16.74	lbs PM/hr applied
16.74	lbs/hr	0.00	% over-spray	0.00	lbs PM/hr overspray
0.00	lbs/hr	8760	hrs/year	0.00	tons PM/yr
				8760	hours/year
CONTROLLED					
0.00	lbs/hr	0.00	% pass-through	0.00	lbs PM/hr emitted
0.00	lbs/hr	8760	hrs/year	0.00	tons PM/yr emitted
ORGANIC COMPOUNDS					
UNCONTROLLED					
3.00	gal/hr	1.02	lbs/gal	**3.06**	**lbs OC/hr as applied**
3.06	lbs/hr	8760	hrs/year	13.40	tons OC/yr emitted
3.06	lbs/hr	24.00	hrs/day	**73.44**	**lbs OC/day as applied**
CONTROLLED					
3.06	lbs/hr	100.00	% pass-through	3.06	lbs OC/hr emitted
3.06	lbs/hr	8760	hrs/year	13.40	tons OC/yr emitted
3.06	lbs/hr	24.00	hrs/day	**73.44**	**lbs OC/day as applied**

CAUSTIC SOLUTION - Cleanup				
lbs/months	x months	÷ 2000 lbs/ton		
0.00	12	2000	0.000	tons/yr
		TOTAL OC from Cleanup	0.000	tons/year

APPENDIX 4A

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44128

TABLE 2
COATING COMPOSITION, As Applied
CALCULATIONS OF EMISSIONS

as of July 7, 2009
June 18, 2009

WORST CASE

GEOMET 321

C:_00351-00540_Erieview\00493\Coating.Lines\Composition\2-AsApplied\WorstCase321.wpd

ACTUAL EMISSIONS					
8760	hours/year	Uncontrolled		Controlled	
Air Contaminant		lbs/hour	tons/year[A]	lbs/hour	tons/yr[B]
Particulate Matter		0.00	0.00	0.00	0.00
Organic Compounds (OC) + Cleanup ⇒		3.06	13.40	3.06	13.40
		0.00	0.00	0.00	0.00
TOTAL OC		3.06	13.40	3.06	13.40
		A - Based on 100% coating transfer efficiency		B - Based on 0% Control efficiency	
POTENTIAL to EMIT					
8760	hours/year	Uncontrolled		Controlled	
Air Contaminant		lbs/hour	tons/year[A]	lbs/hour	tons/yr[B]
Particulate Matter		0.00	0.00	0.00	0.00
Organic Compounds (OC) + Cleanup ⇒		3.06	13.40	3.06	13.40
		0.00	0.00	0.00	0.00
TOTAL OC		3.06	13.40	3.06	13.40

~~1.5 Transfer Efficiency of the Air Gun @ 75%~~
Overspray of Solids @ = 0%
PM Control Efficiency @ = N/A

1.6 OC Control Efficiency @ 0%

1.7 ASSUME: All OC Components are released to the atmosphere.

1.8 OC's **ARE NOT** Photochemically Reactive:

1.9 Does/is this Coating [OAC 3745-21-07(G)(1)]:

- come into contact with flame ? ___ Yes XX No
- baked ? ___ Yes XX No
- heat-cured ? XX Yes ___ No
- Heat-polymerized in the presence of Oxygen ? ___ Yes XX No

1.10 Regulatory Limitations:
OAC 3745-21-09(U)(1)(i) 3.0 lbs VOC/gal minus water & exempt solvents

APPENDIX 4A

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44124

Photochemically Reactive Calculations
TABLE 3
WORST CASE
GEOMET 321

as of July 4, 2009
June 16, 2009

C:_00351-00540_Erieview\00493\Coating.Lines\Composition\3-PRM\WorstCase.321.wpd

COATING - **GEOMET 321**		1.000	gal	11.38	lbs/gal	11.38	lbs	**REGULATORY EMISSION LIMITS**						
METAL COATINGS INTERNATIONAL			gal		lbs/gal	0.00	lbs	**OAC 3745-21-09(1)(i)**						
THINNER -			gal		lbs/gal	0.00	lbs	**3 lbs VOC/gal (minus water & exempt solvents)**						
								Photochemically Reactive Material					HAP	TLV
CONSTITUENT	CAS #	PRM	TOTAL Wght	Const % wt	Const wgt	Const dens	Const vol	%	5%	8%	20%	UNK	Y/N	mg/m³
COATING - **METAL COATINGS INTERNATIONAL - GEOMET 321**														
Mineral Spirits	64742-48-9	N	11.38	2.5	0.285	7.51	0.038	5.30	-	-	-			
Methanol	00067-56-1	N	11.38	4.0	0.455	7.39	0.062	8.62	-	-	-			
Ethanol	00064-17-5	N	11.38	2.5	0.285	6.75	0.042	5.90	-	-	-			
			11.38		0.000		??	ERR	-	-	-			
Water	07732-18-5	N	11.38	42.0	4.780	8.34	0.573	80.18	-	-	-			
		N	11.38		0.000		??	ERR	-	-	-			
			11.38		0.000		??	ERR	-	-	-			
COATING - Sub-Total							0.715	100.00	0.00	0.00	0.00			
ACCELERATOR														
			0.00		0.00		??	ERR	-	-	-			
			0.00		0.00		??	ERR	-	-	-			
			0.00		0.00		??	ERR	-	-	-			
ACCELERATOR - Sub-Total					0.00		0.000	0.00	0.00	0.00	0.00			
THINNER -														
			0.00		0.00		??	ERR	-	-	-			
			0.00		0.00		??	ERR	-	-	-			
			0.00		0.00		??	ERR	-	-	-			
THINNER - Sub-Total					0.00		0.000	0.00	0.00	0.00	0.00			
TOTAL								100.00	0.00	0.00	0.00			
TOTAL, Cumulative					0.00		0.715	100.0	0.00					

PHOTOCHEMICALLY REACTIVE: Yes ___ No **XX**

APPENDIX 4B

ERIEVIEW METAL TREATING CO.
4465 Johnston Parkway
Cleveland, OH 44128

TABLE 4
CALCULATION of Lbs VOC/Gallon
MINUS Water & Exempt Solvents
WORST CASE
GEOMET 321

as of July 7, 2009
June 27, 2009

C:_00351-00540_Erieview\00493\Coating.Lines\Composition\4-Minus.Water\WorstCase.321.wpd

DENSITY (lbs/gal) 11.38			
VOLUME		WEIGHT	
Parameter	gal/gal	lbs/gal	% (weight)
VOC	0.142	1.02	9.0
Water	0.573	4.78	42.0
Exempt Solvents	0.000	0	0.0
Solids	0.285	5.58	49.0
Solids + VOC	0.427	*11.38*	*100.0*
1.02	lbs VOC	=	X lbs VOC
0.427	gal		1.00 gallon
2.39	**lbs VOC/gallon MINUS water and exempt solvents**		

APPENDIX 4C

Erieview Metal Treating
4465 Johnston Parkway
Cleveland, OH 44128

COATING LINES - K001, K002 & K003
COATINGS CURRENTLY BEING APPLIED
IDENTIFIED by COATING LINES

as of July 8, 2009
June 15, 2009

C:_00351-00540_Erieview\00493_Final.Report\App.5.wpd

IDENTIFICATION of COATING LINES and COATING MATERIAL				
COATING	Coating Line(s) ID	Solvent	Coating: Solvent Ratio	Clean-up Material
METAL COATINGS INTERNATIONAL				
Dacromet 320 LV	1, 3	N/A	N/A	Alkaline Cleaner
Dacromet Plus	1, 2	N/A	N/A	Alkaline Cleaner
Dacromet Plus L	1, 2	N/A	N/A	Alkaline Cleaner
Plus ML Black	1, 2	N/A	N/A	Alkaline Cleaner
Dacrokote 107	1,2	N/A	N/A	Alkaline Cleaner
Geokote 147	2	N/A	N/A	Alkaline Cleaner
Geomet 321	3	N/A	N/A	Alkaline Cleaner
MAGNI INDUSTRIES INCORPORATED				
B06J	1, 3	N/A	N/A	Alkaline Cleaner
B-18	1, 3	N/A	N/A	Alkaline Cleaner
NEW SURFACE TECHNOLOGIES				
Coat Black Plus	1, 2	N/A	N/A	Alkaline Cleaner
440 Black	1, 2	N/A	N/A	Alkaline Cleaner

NOTE 1: BASKETS are cleaned with an Alkaline Cleaner.
NOTE 2: COATINGS are Applied "As Received" (i.e. there are no thinners, etc)
NOTE 3: COATING TANK SIZES:
K001 - 50 Gallons,
K002 - 80 Gallons,
K003- 120 Gallons

APPENDIX 5

ERIEVIEW METAL TREATING
4465 Johnston Parkway
Cleveland, OH 44128

PLATING LINES -
OPERATING PARAMETERS and
PHYSICAL DIMENSIONS for the
CALULATION of EMISSIONS

as of July 7, 2009
June 15, 2009

C:_00351-00540_Erieview\00493\Plating.Lines_Operations.wpd

Line ID			Tank Surface Area			Temp	Amps	Operating Schedule					Annual Amp-Hours	
			length (in)	width (in)	area (ft^2)			hrs/da	da/wk	wk/yr	Actual hrs/yr	Potential hrs/yr	Actual	Potential
~~P004~~ P005	**ALKALINE Zn/Ni PLATING LINE** (Formerly Line #1)		436	60	182	Amb	4000	10	5	52	2600	8760	10400000	35040000
P002	**ZINC PLATING LINE** (Formerly Line #3)		373	55	142	Amb	2700	8	5	52	2080	8760	5616000	23652000
P003	**ZINC PLATING LINE** (Formerly Line #4)		373	55	142	Amb	2700	8	5	52	2080	8760	5616000	23652000
$MnPO_4$ P001	**PHOSPHATE LINE** - 2500 gal (Formerly Line #5)		144	62	62	170°F	N/A	24	5	52	6240	8760	0	0
$ZnPO_4$ P001	**PHOSPHATE LINE** - 2500 gal (Formerly Line #5)		108	62	47	170°F	N/A	24	5	52	6240	8760	0	0
$ZnPO_4$ P001	**PHOSPHATE LINE - 3000 gal** (Formerly Line #5)		108	62	47	170°F	N/A	24	5	52	6240	8760	0	0
L001	**CLEANING LINE** (Formerly Line #7)	1	40	56	16	Amb	N/A	16	5	52	4160	8760	0	0
P007	**ELECTROLESS NICKEL LINE** (Formerly Line #9)	3	40	56	47	Amb	N/A	8	5	52	2080	8760	0	0

APPENDIX 6

EMISSION FACTORS FOR TOXIC AIR CONTAMINANTS OF CONCERN TO THE METAL FINISHING INDUSTRY

A report of source tests conducted by the
South Coast Air Quality Management District and
Metal Finishing Association of Southern California
with collaboration by the
California Air Resources Board

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APPENDIX 7

TABLE 1
EMISSION FACTORS FOR TOXIC AIR CONTAMINANTS OF CONCERN TO THE METAL FINISHING INDUSTRY

Process	Emission Factor
Cadmium Plating	0.15 mg/A-H
Copper Plating	0.59 mg/A-H
Chromium Plating	5.20 mg/A-H
Tin Plating	3.86 mg/A-H
Zinc Plating	6.40 mg/A-H
Nickel Plating w/o Air Agitation*	0.057 mg/A-H
Nickel Plating with Air Agitation *	6.5 E-6 lb./hr-ft^2 tank or 11.6 E-6 lb./(hr-scfm air)
Electroless Nickel *	7.5 x 10^{-7} lb./hr-ft^2 tank
Hydrochloric Acid Etching *	3.00 E-5 lb./(hr-ft^2 tank - % HCl)
Sodium Hydroxide Spray *	32 E-4 lb./(hr-gpm - % NaOH)
Sodium Hydroxide Electrocleaning *	5.4 x 10^{-7} lb./hr-ft^2 tank - % NaOH
Sodium Hydroxide Etch	Assumed same as NaOH electrocleaning
Sodium Hydroxide Soak	Assumed same as NaOH electrocleaning
All other acids and bases **	
Heated	0.01 lbs/hr-ft^2 tank
Cold	0.001 lbs/hr-ft^2 tank

- Data developed in 1998 by the Metal Finishing Association of Southern California and the South Coast Air Quality Management District

** Emission factors used by the South Coast Air Quality Management District unless source test data are provided

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