



west virginia department of environmental protection

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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-3253
Plant ID No.: 059-00117
Applicant: TRAMCO Services, Inc. (Tramco)
Facility Name: TRAMCO Services, Inc.
Location: Williamson, Mingo County, WV
NAICS Code: 335312 - Motor and Generator Manufacturing
SIC Code: 7694 - Armature Rewinding Shop
Application Type: Construction
Received Date: May 26, 2015
Engineer Assigned: John Legg
Fee Amount: \$1,000.00
Fee Received: June 23, 2015
Date Assigned: June 2, 2015
Complete Date: June 23, 2015 (Paid permitting fee and received legal affidavit of publication)
Due Date: September 23, 2015
Applicant Ad Date: May 22, 2015
Newspaper: *Charleston Gazette*
UTM's: Easting: 389.134 km Northing: 4,174.322 km Zone: 17S
Description: Electric Motor Build and Re-build Shop consisting of:
1) Four (4) Ovens:
 - Two (2) Burnout Ovens (One Electric; One Natural Gas)
 - Two (2) Bake Ovens (Both Electric)
2) Two (2) Paint Booth (#1 and #2)
3) One (1) Vacuum Pressure Impregnation (VPI) Tank
4) One (1) Varnish Dip Tank
5) One (1) Emergency Generator (#1).
 [Emergency Generator (#2) is not operated.]

DESCRIPTION OF PROCESS

The following process description came from Attachment G of the permit application:

Tramco Services provides industry-leading service:

- A.C. & D.C. electric motor repair
- Machine department
- Fabrication department
- Equipment rebuild shop
- Complete inventory of new parts
- On site vibration analysis
- Laser alignment

VPI (Vacuum Pressure Impregnation) System insures quality treatment of electrical motor windings. Vacuum Pressure Impregnation is a process that is a step above the conventional vacuum system. VPI includes pressure in addition to vacuum, thus assuring good penetration of the varnish in the coil. The result is improved mechanical strength, electrical properties and thermal performance. This means improved heat transfer by eliminating air/gas pockets and makes it impossible for moisture or other contamination to degrade the system. The solid void-free structure reduces the possibility of internal corona damage on high-voltage machines. VPI minimizes coil movement, slots are completely filled, and by the use of suitable fibers, laminated structures and bracing materials, a solid reinforced end winding structure is obtained. This ensures improved reliability and long service life. The core wire is completely filled and sealed. This eliminates problems due to loose cores and provides positive protection against migration of moisture and other contamination through the core.

Process: Motors or equipment are cleaned, broken down, and then placed in burn out ovens to remove insulation and other solid materials. Bale ovens remove any remaining water. Refurbished motors and equipment are placed in the dip tank, or VPI tank, for processing. The equipment is then dried in the drying ovens. The equipment may or may not be painted using water-based paints or powder coatings in paint booths (no VOCs or HAPs). The equipment is left to air dry in the paint booth prior to transport to the warehouse.

Operational usage based upon 1 shift, 5.5 days/wk and 50 weeks/year;

- Dip Tank (varnish) - 1,600 hrs/yr
- VPI Tank (no VCS or HAPS) - 1,600 hrs/yr
- Drying ovens - 1,600 hrs/yr each
- Paint Booth #1 - 1,600 hrs/year (no VOCs or HAPs)
- Paint Booth #2 - 800 hrs/year (no VOCs or HAPS)
- Paint booths use powder coatings or water-based paints

Given below is the Emission Units Table developed by the writer, based on information from the permit application: Emission Units Table (Attachment I), plot plan (Attachment E&F), the Process Flow Diagram (Attachment E&F) and Process Description (Attachment G):

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Table 1: Emission Units Table.

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Main Building (Electric Motor Build & Rebuild Shop)					
1S (No VOC or HAP Emissions per Application)	E01	Vacuum Pressure Impregnation (VPI) Tank (pressurized) (resin filled)	Mid-1990s	150 gallon	None (Enclosed System)
2S	E01	Dip Tank (varnish)	Mid-1990s	110 gallon	None
Not Assigned	E01	Electric Bake Oven * (Steelman 4x4x6 ETC)	1977	500 lb	None
Not Assigned	E01	Electric Bake Oven * (Steelman 7x7x20 ETC)	Mid 1990s	2,500	None
3S	E02	⁽¹⁾ Generator #1 (Detroit Diesel, Model 71637305) (outside Main Building)	2002	590 HP	None
4S	E02	⁽¹⁾ Generator #2 (Standby Unit) (Detroit Diesel, Model 71637305) (outside Main Building)	2002	590 HP	None
5S	E03	Natural Gas-fired ** Burnout Oven (PCP Model CPI 1504215)	1997	0.398 MM Btu/hr	Afterburner
Not Assigned (No VOC or HAP Emissions per Application)	Not Assigned	Electric Burnout Oven ** (Armature 321-E)	1980	200 lb	None
Not Assigned (No VOC or HAP Emissions per Application)	Not Assigned	Paint Booth #1 *** (water-based paints powder coatings)	1977	400 lb	PM Filter Bank
PM Emissions					
Not Assigned (No VOC or HAP Emissions per Application)	Not Assigned	Electric Water Evaporator (Inside Building)	1970	Not Given	None
Not Assigned (No VOC or HAP Emissions per Application)	Not Assigned	Electric Water Evaporator #2 (Outside Building)	2009	Not Given	None
Fabrication Shop					

Not Assigned PM Emissions (No VOC or HAP Emissions per Application)	Not Assigned	Paint Booth #2 *** (water-based paints & powder coatings)	2000	2,500 lb	PM Filter Bank
<p>* Bake off/dries motors/equipment. ** Final removal of stripped pieces - No VOC emissions from stripped pieces. *** Paints are water-based or powder coatings.</p> <p>(1) Generator #1 and Generator #2 are identical model generators having the same emissions. Only one of the two generators is to be run at a time. At the time the application was submitted Generator #1 was to be operated in the event of an emergency and Generator #2 was designated as the "Standby Generator" to be operated only if something mechanically went wrong with Generator #1.</p>					

SITE INSPECTION

The writer did not inspect the facility for the issuance of this (construction) permit. Tramco is an existing facility constructed forty-plus years ago in 1970. The facility's location is known to DAQ enforcement. The distance from Charleston to Williamson is approximately 83 miles. Directions as given in the permit application are:

I-64 west to Oakwood Road exit. Turn right onto US119 and follow it to Harris Hollow Road and turn left onto old US Rt. 119. On old US 119, continue north to a right turn onto Buffalo Creek Road. The facility is on the left, approximately 2.4 miles from turn onto Buffalo Creek Road.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Advertised Emissions

Tramco advertised the following emissions in their May 22, 2015 legal advertisement which appeared in the Charleston Gazette:

Advertised		As Permitted Under Permit R13-3253			
Pollutant	Emission Rate (ton/yr)	Section 5 Emergency Generator #1 (ton/yr)	Section 6 Bakeout Oven (ton/yr)	Section 7 Facility-Wide VOC/HAP Emissions (ton/yr)	Total (ton/yr)
NOx	5	4.57	0.17	0.00	4.74
CO	2	0.99	0.44	0.00	1.43
PM	4	---	---	---	---
PM10	2	0.32	0.09	— (1)	0.41 (1)
SO2	1	---	---	---	---
HAPs	11	0.36 TOC/VOCs 0.002 HAPs	0.09 VOCs	10.55 VOCs (2) 10 - Individual HAPs 25 - Aggregated HAPs	11 VOCs 10 - Individual HAPs 25 - Aggregated HAPs
*TAPs	0.1	---	---	---	---
*Formaldehyde	0.1	---	---	---	---

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Advertised		As Permitted Under Permit R13-3253			
		Section 5	Section 6	Section 7	Total (ton/yr)
Pollutant	Emission Rate (ton/yr)	Emergency Generator #1 (ton/yr)	Bakeout Oven (ton/yr)	Facility-Wide VOC/HAP Emissions (ton/yr)	

- * From 590 HP, diesel-fired Emergency Generator #1 (3S, E02).
- (1) Tramco calculated PM-10 emissions from spraying degreaser (S00703) inside a building at 1.17 ton/yr. The writer did not think these emissions were real, and did not limit PM-10 emissions in permit section 7.
- (2) Facility-Wide VOCs = 11 ton/yr - (0.36 + 0.09) ton/yr = 10.55 ton/yr.

Section 5 of R13-3253 - Emergency Generator #1 (3S, E02) Emissions

Note: Generator #1 and Generator #2 are identical model generators having the same emissions. Only one of the two generators is to be run at a time. At the time the application was submitted Generator #1 was to be operated in the event of an emergency and Generator #2 was designated as the "Standby Generator" to be operated only if something mechanically went wrong with Generator #1.

The writer reviewed Tramco's emission calculations for the Emergency Generator #1 (Detroit Diesel Model 71637305 operating at 440 kW (590 HP) and found the calculations to be correct (see permit application, page 56 of 62).

Emission factors came from EPA AP-42, Chapter 3.3, "Gasoline and Diesel Industrial Engines." Emergency Generator #1 is permitted under section 5 of the permit (R13-3253).

- 5.1.3. Emissions from Emergency Generator #1's diesel engine (4S) shall not exceed the following limitations:

Pollutant	Emission Rate	
	(lb/hr)	(ton/yr)*
Nitrogen Oxides (NOx)	18.29	4.57
Carbon Monoxide (CO)	3.94	0.99
Particulate Matter (PM ₁₀)	1.30	0.32
Volatile Organic Compounds (VOC)	**1.46	**0.36

* Based on 500 hours per year of operation.

** These VOC limitations are included in the facility-wide VOC limitations established in section 7.1.2 of this permit.

Section 6 of R13-3253 - Natural Gas-fired Burnout Oven (5S, E03) Emissions

The writer reviewed Tramco's emission calculations for the 0.398 MM Btu/hr, natural gas-fired, PCP Burnout Oven, Model CPI 15041215 and found the calculations to be correct (see permit application, page 58 of 62).

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The writer asked Teresa Schuller, Tramco's Consultant, the source of the Burnout Oven's emission factors. Ms. Schuller's response was as follows:

"Lacking any unit specific-emission data for burn-off/bake off ovens, I defaulted to the emission rates provided by Ed Andrews during the 2009 Kanawha Electric air permit application for similar units. The values used are ones he used in verifying our calculations."

The Burnout Oven is covered under section 6 of the permit (R13-3253).

6.1.2. Emissions from the Burnout Oven (5S) shall not exceed the following limitations:

Pollutant	Emission Rate	
	(lb/hr)	(ton/yr)
Particulate Matter (PM ₁₀)	0.02	0.09
Nitrogen Oxides (NOx)	0.04	0.17
Carbon Monoxide (CO)	0.10	0.44
⁽¹⁾ Volatile Organic Compounds (VOC)	**0.02	**0.09

(1) VOC emission rate controlled by Afterburner.

** These VOC limitations are included in the facility-wide VOC limitations established in section 7.1.2 of this permit.

VOC Emissions

Sources Having No VOC Emissions

The following sources located at Tramco's Williamson, WV facility were identified in the permit application (pages 12 and 13 of 62) as not having VOC or HAP emissions:

Emission Unit ID	Emission Point ID	Building	Emission Unit Description
1S	E01	Main Building	VPI Tank
Not Assigned	Not Assigned	Main Building	Armature Burn Out Oven (Final removal of stripped pieces - No VOC's.)
Not Assigned	Not Assigned	Main Building	Paint Booth #1 (Paints are water-based or powder coatings.)

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Emission Unit ID	Emission Point ID	Building	Emission Unit Description
Not Assigned	Not Assigned	Fabrication Shop	Paint Booth #2 (Paints are water-based or powder coatings.)
Not Assigned	Not Assigned	Main Building	Electric Water Evaporator (Inside Building)
Not Assigned	Not Assigned	Main Building	Electric Water Evaporator (Outside Building)

Sources Having VOC Emissions

The following sources located at Tramco's Williamson, WV facility were identified in the permit application (pages 12 and 13 of 62) and are thought by the writer to have VOC or HAP emissions:

Emission Unit ID	Emission Point ID	Building	Emission Unit Description
2S	E01	Main Building	Dip Tank (varnish)
Not Assigned	E01	Main Building	Steelman Bake Oven (446ETC) electric (Bake off/dries motors/equipment)
Not Assigned	E01	Main Building	Steelman Bake Oven (7720ETC) electric (Bake off/dries motors/equipment)
5S	E03	Main Building	Natural Gas-fired Burn Out Oven PCP UPI 1504215 (Final removal of stripped pieces - No VOC's.)
3S	E02	Main Building	Emergency Generator #1 (outside building)
4S	E02	Main Building	Emergency Generator #2 (outside building) (not in use)

Section 7 of R13-3253 - VOC/HAP Emissions

To insure that the facility remains an area source of HAPs, per section 7.7.1 of the permit, HAP emissions can not exceed 10 ton/yr for any individual HAP and 25 ton/yr for total/aggregated HAPs.

VOC and HAP emissions result from the use of process materials such as solvents (cleaning/degreaser), varnishes, etc.

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Tramco listed 11 ton/yr of HAP emissions in their legal advertisement. There was no listing in the advertisement for VOC emissions.

General Comment: All HAP emissions are VOC's. And HAP emissions are the worst kind of the VOCs.

The writer had to assume that Tramco meant to advertise for VOCs and HAPs instead of just HAPs.

Tramco calculated the actual facility-wide HAP emission rate by determining the HAP emissions from the varnish (BC-346-A) and Spray-on degreaser (S00703) used at the facility over a period of one year. This was determined by Tramco to be 1.57 ton/yr. [The writer determined it to be 1.40 ton/yr, i.e., 1.29 ton/yr (no change) from the spray-on degreaser plus 0.112 ton/yr (a decrease of 0.17 ton/yr from varnish (BC-346-A)).]

Tramco then multiplied the actual annual HAP emission rate (1.57 ton/yr) by a factor of 6.6 to get the potential annual HAP emission rate of 10.4 ton/yr. Tramco then rounded up to 11 ton/yr. (The writer got 9.24 ton/yr instead of 10.4 ton/yr .)

(The 6.6 factor used to convert from actual to potential emissions is based on the average hours Tramco operated the facility, i.e., out of 8,760 hr/yr, Tramco ran the facility on average only 1,314 hr/yr. Dividing 8,760 hr/yr by 1,314 hr/yr yields the 6.6 factor.)

The writer calculates the HAP to VOC ratio to be equal to about 83.7%.

HAP/VOC = (Varnish HAPs + De-greaser HAPs) lb/yr

(Varnish VOCs + De-greaser VOCs) lb/yr

$$= \frac{[(\text{Varnish VOCs} \times 0.30 \text{ HAPs/VOC}) \times 210 \text{ gal/yr}] + [(\text{De-greaser VOCs} \times 1.0 \text{ HAPs/VOCs}) \times 200 \text{ gal/yr}]}{[(\text{Varnish VOCs}) \times 210 \text{ gal/yr}] + [(\text{De-greaser VOCs}) \times 200 \text{ gal/yr}]}$$

$$= \frac{[(3.8 \text{ lb/gal} \times 0.30) \times 210 \text{ gal/yr}] + [(13.17 \text{ lb/gal} \times 1.00) \times 200 \text{ gal/yr}]}{[(3.8 \text{ lb/gal}) \times 210 \text{ gal/yr}] + [(13.17 \text{ lb/gal}) \times 200 \text{ gal/yr}]}$$

$$= \frac{239.4 \text{ lb/yr} + 2634 \text{ lb/yr}}$$

$$\text{HAP/VOC} = \frac{798 \text{ lb/yr} + 2634 \text{ lb/yr}}{2873.4 \text{ lb/yr} / 3432 \text{ lb/yr}} = 83.7\%$$

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Bottom-line

Conclusion: The assumption that the 11 ton/yr of HAPs advertised in the newspaper is equal to 11 ton/yr of VOCs + HAP is okay/acceptable because 83.7 % of the 11 ton/yr is equal to 9.2 ton/yr of HAPs. Dividing the 9.2 ton/yr of HAPs by 1.57 ton/yr which Tramco calculated to be the annual HAP emission rate for the facility still yields a factor of 5.86 (instead of 6.6), i.e., Tramco over estimated actual HAP emissions for the facility by a factor of 5.86 times the actual HAP emission rate.

Facility-wide VOC emission limitations were established under section 7 of the permit and are equal to 3.75 lb/hr and 11 ton/yr (as advertisement in the newspaper).

The facility-wide hourly VOC limitation of 3.75lb/hr was calculated from Tramco's summary table found on page 54 of the permit application and as shown below:

Pollutant	Source	PTE (# / hr)	Comments
TOC	Emergency Generator #1	1.46	Hourly limitation for Emergency Generator #1 given in section 5.1.3 of the permit.
VOCs	Building Units	0.33	VOCs from vanish use in section 7 of the permit (0.31) + VOCs (0.02) from NG-fired Burnout Oven (5S, E03) in section 6.1.2 of the permit.
Ethylbenzene	Building Units	0.28 *	From Varnish. Already accounted for in VOCs - Building Units
Xylene	Building Units	0.14	From Varnish. Already accounted for in VOCs - Building Units
Tetrachloroethylene	Building Units	1.96	From Spray-on Degreaser (S00703).
Total		3.75	
* Ethylbenzene emissions were calculated too high. Should have been calculated at 5% by weight instead of 50% by weight. VOCs were calculated correctly and ethylbenzene is accounted for in the VOCs.			

The Facility-wide hourly and annual VOC emission rates include VOC emissions from Emergency Generator #1 (3S, E02) and the Natural Gas-fired Burnout Oven (E03) covered under permit sections 5 and 6 of this permit.

Permit Section 5 VOC emissions from Emergency Generator #1 (3S, E02) were calculated by Tramco to be 1.46 lb/hr and 0.36 ton/yr. (See the permit application, page 56 of 62.)

Permit Section 6 VOC emissions from the natural gas-fired Burnout Oven (5S, E03) were calculated by Tramco to be 0.02 lb/hr and 0.09 ton/yr. (See the permit application, page 58 of 62.)

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Permit Section 7 Annual VOC emissions from the use of VOC containing materials can not exceed 10.55 ton/yr [11 ton/yr (as advertised in newspaper) - 0.36 ton/yr (emergency generator #1) - 0.09 ton/yr (burnout/oven)]

Hourly VOC emissions from the use of VOC containing materials can go up as high as 3.75 lb/hr when the generator and the natural gas-fired burnout oven are not in operation; when both the generator and burnout oven are in operation, the hourly VOC emission rate from the use of VOC containing materials can not exceed 2.27 lb/hr [3.75 lb/hr - 1.46 lb/hr - 0.02 lb/hr].

**Table: Physical Location of Equipment at Facility.
And Section # of Permit that the Equipment is Covered Under.**

Location			Permit Section	Equipment Covered Under Permit Section	
Building	Emission Point ID	Emission Unit ID			
Main Building Electric Motor Build & Rebuild Shop	Outside	E02	3S	5	Emergency Generator #1
			4S		Emergency Generator #2 (not operated)
	Inside	E01	5S	7	Natural Gas-fired Burn Out Oven (5S) (PCP UPI 1504215)
			2S		VPI Tank (1S)
			Not Assigned		Dip Tank (2S)
			Not Assigned		Electric Steelman Bake Oven (446ETC)
			Not Assigned		Electric Steelman Bake Oven (7720ETC)
			Not Assigned		Electric Armature Burn Out Oven
	Not Assigned	Not Assigned	Paint Booth #1		
	Not Assigned	Not Assigned	Paint Booth #2		
Building 2 Fabrication Shop	Not Assigned	Not Assigned			

REGULATORY APPLICABILITY

Tramco's Williamson, WV facility is a non-major stationary source, not subject to Title V (45SCR30) because it is not subject to a substantive standard or other requirement under § 112 of the Clean Air Act.

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Applicable State Rules:

45CSR6 - Control of Air Pollution from Combustion of Refuse

Rule 6 establishes emission standards for particulate matter and requirements for activities involving incineration of refuse which are not subject to, or are exempted from regulation under a federal counterpart for specific combustion sources.

Various items, such as motors with electrical damage, are heated in the natural gas-fueled burnout oven to remove varnish, epoxy, paint, grease, rubber and other combustible materials from metal. A burnout oven has a high-temperature afterburner that breaks down and eliminates any chemical residues or VOC fumes that could be released into the environment.

Tramco's Burnout Oven (5S) is considered by the DAQ to be an incinerator under Rule 6. Particulate matter emission limitations for the oven are set in section 5.1.2. of the permit at 0.02 lb/hr and 0.09 tons/yr (based on 8,760 hours per year of operation).

Sections of 45CSR§6 quoted in the permit are:

- 45CSR§6-4.1. - An allowable hourly PM emission rate can be calculated using the equation in this section. The rate, however, is too large and the more conservative emission limitation established in section 5.1.2. of the permit is used instead.
- 45CSR§6-4.3. - Opacity must be less than 20% [Burnout Ovens 1S and 2S].
- 45CSR§6-4.4. - Allowable opacity during startup & stoking operations, quoted in permit Section 5.1.6; and
- 45CSR§6-4.6. - No objectionable odors [Burnout Ovens 1S and 2S].

45CSR7 - To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations

The purpose of Rule 7 is to prevent and control particulate matter air pollution from manufacturing processes and associated operations.

The paint booths (#1 and #2) are subject to the emissions standards of 45CSR7.

- 45CSR§7-3.1. - Opacity must be less than 20%.
- 45CSR§7-5.1. - Must be equipped with control sytem(s) to

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- 45CSR§7-8.1. - minimize fugitive PM.
- 45CSR§7-8.1. - Director may required PM stack testing.
- 45CSR§7-8.2. - Director or his representative may conduct tests to evaluate emissions.
- 45CSR§7-9.1. - Continued operation allowances for unavoidable malfunction of equipment.

45CSR13 - **Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation**

Tramco's Williamson, WV facility is considered to be a stationary source and is therefore required to have an air permit, i.e., the facility has the potential to discharge more than five (5) tons per year of hazardous air pollutants considered on an aggregated basis. This is confirmed by the company's May 22, 2015 legal advertisement which estimates HAP emissions as being 11TPY.

The facility is also subject to substantive requirements of emission control rules promulgated by the Secretary:

- The Burnout Oven (5S) is considered by the DAQ to be an incinerator and as such is subject to Rule 6.
- The paint booths (#1 and #2) and other process equipment located at the facility are subject to the emissions standards of 45CSR7.

Tramco ran the required legal advertisement, submitted a complete permit application, and paid the required permitting fee.

Applicable Federal Rule:

40 CFR 63, Subpart ZZZZ - This regulation applies to Tramco's 2002 year, 590 hp emergency generator.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

Three (3) MSDS were submitted in Attachment H to the application. Hazardous Air Pollutants (HAPs) are identified below:

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1) H1 - Varnish Dip Tank & Drying Ovens:

BC-346-A, Clear Baking Varnish; Contains:

- **Xylene** (CAS# 1330-20-7), **HAP**, 10 - 25% by weight.
- **Ethyl Benzene** (CAS# 100-4104), **HAP**, less than 5% by weight.

2) H2 - VPI Tank & Drying Ovens

Permafill # 74041 Epoxy Resin (no VOC or HAPs), Insulating Varnish, Catalyzed Epoxy Resin.

- Bisphenol A-Epichlorocrydin Polymer (CAS# 2506-38-6), **not a HAP**, 30 - 60% by weight.
- p-tert-Butylphenyl Glycidyl Ether (CAS# 3101-60-8), **not a HAP**, 30 -60% by weight.
- Trade Secret Component (TS000001), **not identified as being a HAP**, 1 - 5% by weight.

3) H3 - Sprayon Electric Motor Degreaser & Safety Solvent. Note that this MSDS is not listed on the cover sheet listing of "Attachment H - MSDSs".

- Tetrachloroethylene (CAS# 127-18-4), **HAP**, 98% by weight.
- Carbon Dioxide (CAS# 124-38-9), **not a HAP**, 2% by weight.

Although stated on the cover sheet listing of "Attachment H - MSDSs" the following MSDS was not included in attachment:

- Paint Booth (per Tramco: NO VOCs or HAPs)
 - Water-based paints
 - Powder Coating

AIR QUALITY IMPACT ANALYSIS

Tramco's Williamson, WV facility is consider to be an non-major source under State Rules 14 and 19. It is considered to be an area source of HAPs under 40 CFR 63, Subpart ZZZZ. For these reasons, no impact analysis study was conducted for the source.

MONITORING OF OPERATIONS

Section 5

- Emergency Generator #1
- Monitor to insure maintenance work is conducted to manufacturer's specifications.
 - Monitor hours of operation not to exceed 500 hr/yr.

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- Monitor diesel fuel usage not to exceed 28 gal/hr and 14,000 gal/yr.

Section 6

Natural Gas-fired Burnout Oven - Conduct monthly opacity checks.

Section 7

- Monthly opacity checks of paint booths.
- Facility-Wide VOC Emissions - Monitor VOC/HAP usage on a daily bases.
- Paint Booths #1 and #2 - Keep records of paint booth maintenance/filter changeouts.

RECOMMENDATION TO DIRECTOR

Based on the information contained in the permit application, the writer believes that Tramco can operation its Williamson, WV facility in compliance with all applicable state and federal air pollution control rules and regulations, and further recommends that Tramco be issued construction permit R13-3253.

John Legg
Permit Writer

September 25, 2015

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