



west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
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MEMORANDUM

To: Beverly McKeone
From: William T. Rothwell II
Date: October 25, 2016
Subject: S.P.M. Flow Control, Inc. – Buckhannon – Upshur County, WV
ID #: 097-00069
APP #: PD16-047

BACKGROUND INFORMATION:

In January of 2016, S.P.M. Flow Control, Inc. submitted a PDF (PD16-006) proposing to install a paint booth and parts washing operation to paint oilfield parts that are made of iron. The applicant submitted emission calculations that utilized hourly and yearly limitations of the paint booth usage and a used a control device (filter) rated at 98.81%. They also proposed using coatings with HAP and VOC contents of 0.0 lbs/gal as a maximum and did not supply official OSHA MSDS sheets supporting these HAP & VOC contents. Therefore, the emissions shown in PD16-006 were incorrect and shown to be far below the emission limits of 6 pph and 10 TPY. A No Decision letter was mailed to the applicant on March 29, 2016 requesting official MSDS documentation for the proposed coatings to be used.

On August 5, 2016, This Division received a new PDF containing official MSDS from the coating supplier PPG on all coatings utilized in the application. The highest/maximum VOC coating was shown to be Pitt-Tech Plus 90-1310 Series which contained a VOC content of 90 g/L (0.75 lbs./gal.).

Upon further conversation with Wayne Bell, a PPG technical representative on September 25, 2016, he indicated that the VOC content was correct for the highest specified coating and furthermore that ammonia and water was used as the carrier of the coating in the spraying operation (not solvents).

Based on these findings, the estimated maximum potential emissions are as follows:

<u>Pollutant</u>	<u>Hourly PTE (LB/HR)</u>	<u>Yearly PTE (TON/YR)</u>
VOCs	1.24	1.58
PM	5.06	9.23

RECOMMENDATION:

The emission rates are below the emission limits of six (6) lb/hr and ten (10) TPY; 2 lb/hr, or 5 TPY of HAPs set forth set forth in 45CSR13 - 2.17.a&b. Therefore, a permit is not required by this Division for the above installation of a paint booth and parts washing operation.



William T. Rothwell II, P.E.
Engineer

10/26/2016

Date