NON-TITLE V PERMIT APPLICATION INSTRUCTIONS SURFACE COATING DESCRIPTION FORM (APC 107)

This form should be used for all surface coating operations, instead of the Process or Fuel Burning Source Description (APC 102) and Emission Point Description (APC 101) forms.

If any of the information requested is considered confidential, two application forms should be submitted, along with the Confidential Information Request form. One application form must be clearly marked to indicate that it contains confidential information, which is not to be made public and another application form, which does not contain the confidential information and can be placed in our general files. Emission data normally cannot be treated as confidential by the Division. Please contact the APC Division if there are any questions concerning confidentiality of information. The Confidential Information Request form can be found on the Division's website at: http://tn.gov/environment/article/permit-air-other-information.

The Tennessee Air Pollution Control Division prefers that application forms be submitted via email to the email address <u>Air.Pollution.Control@TN.gov</u>. All application forms should be scanned/combined into one PDF document and sent as an attachment to the email. If email is not available, then application forms can be mailed to the address on the form.

The items below give a brief explanation of the information being requested on the form. The following numbers refer to the specific box on the form:

- 1. The organization's legal name is the name under which the company is registered with the Tennessee Secretary of State (SOS). The organization's legal name and SOS control number can be found on the SOS website at https://tnbear.tn.gov/Ecommerce/FilingSearch.aspx. If the organization is not registered with the SOS, then the owner's name must be listed.
- 2. The Emission Source Reference Number(s) will be assigned by the Tennessee Air Pollution Control Division. It is an eight digit number in the following format NN-NNNN-NN.
- 3. Check "Yes" or "No" depending on whether the air contaminant source is subject to an NSPS rule (New Source Performance Standards) or NESHAP rule (National Emission Standard for Hazardous Air Pollutants). List the rule citation, including Part, Subpart, and applicable Sections. For example, a boiler may be subject to 40 CFR Part 60 Subpart Dc and sections \$60.42c, \$60.42c, \$60.46c, \$60.47c, and \$60.48c.
- 4. The Unique Source ID should be a simple name/number/letter designated by the applicant which uniquely identifies the equipment covered by the application. Examples of a Unique Source ID are Spray Booth #1, Spray Booth A, Dip Tank #1, Dip Tank A, Paint Line #1, or Paint Line A. It will be used to identify the equipment under consideration and to distinguish it from other possibly similar equipment. If a facility diagram or process flow chart is required for any additional forms, the Unique Source ID should match the designations on the diagram or chart. It should be referenced on all future correspondence concerning the equipment in question. Once assigned, the Unique Source ID should not be changed. If a change is required, the reason for the change as well as the previous Unique Source ID and the new Unique Source ID should be well explained in item 15.
- **5.** For the coating operation, check either spray booth , dip tank, or other. If you check "other", please describe the type of coating operation.
- **6.** Complete this item only for spray booths. Enter the dimensions of the spray booth. Enter the width (in feet), height (in feet), and depth (in feet). Enter the number of open sides of the spray booth.

- 1. If coating application is by spraying, check the method of spraying as either airless, air atomized, or electrostatic (airless, disc, air atomized). Estimate the approximate percent of overspray. Overspray is defined as excess paint or other liquid which spreads or blows beyond an area being sprayed and does not adhere to the article being coated. The date purchased refers to the actual surface coating equipment (spray gun, spray heads, etc.) and not the spray booth per se determines the status of the source (new or existing).
- **8.** Enter the number of exhaust fans specifically associated with this coating operation. Enter the total combined horsepower and exhaust air volume (in cubic feet per minute (CFM)) for all fans.
- **9.** For the exhaust control, check either none, waterwash, exhaust filters, baffle plates, adsorption, or other. If you check "other", then please describe the exhaust control. Attach a detailed description if necessary.
- **10.** For the exhaust stack data, enter the diameter (in feet), height (in feet) above grade, flow (in cubic feet per minute (CFM)). Enter the requested data for any stack used to vent this equipment to the atmosphere. If the vent is shared by other equipment, list the equipment serial, or plant identification numbers for the other equipment sharing the vent.
- 11. Include a description and the operating parameters of any control devices. Examples include bag house pressure drop, scrubber flow rate and pH of flow, temperature of thermal oxidizer, how often fabric filters are changed, etc. Typically this information can be found in the operating manual for the control device. If the control device is covered by a federal regulation, it is acceptable to cite the applicable section(s) of the federal regulation.
- 12. List all types of coatings, thinners, and clean-up solvents used and attach a statement of the chemical composition of each (i.e. Safety Data Sheet). This statement usually may be obtained from the coating, thinner, or clean-up solvent supplier. The minimum information required is the percent of solids by weight, the percent volatile by weight, the hydrocarbon composition and/or description of the volatile component, and the density of the coating, thinner, or clean-up solvent in pounds per gallon. A permit will not be issued without the additional statement of the chemical composition of all coatings and thinners as requested on the application form. If needed, attach additional copies of this page of the form.
- 13. Emission estimates for each pollutant emitted from this source should be based on stack sampling results or engineering calculations. In certain cases, other estimates may be accepted. Calculations should be attached on a separate sheet. Full details regarding the calculation method and emission factors used should be included. For example:
 - (1) If U.S. EPA's Compilation of Air Emission Factors (AP-42) is used, submit the version, chapter, table, equation, etc. AP-42 can be found on the U.S. EPA's website: https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emission-factors.
 - (2) Attach sample calculations and fully explain any assumptions, bottlenecks, etc.
 - (3) Submit any supporting information such as manufacturer's data or safety data sheets (SDS).
 - (4) If the emissions are from a source test, provide details on the source test such as the date of the test, was the test approved by the Department, etc. If the source test was not approved by the Department, submit the test details and results.
 - (5) If multiple fuels are used, use the worst case fuel to calculate emissions for each pollutant, and list the fuel in the calculation method details. Include the percent sulfur in the fuel and the BTU content of fuel, when appropriate.

Average emissions (lbs./hr.) should be representative of the following: (1) For continuous or long-run, steady-state, operations it is the total weight of pollutant emitted to the atmosphere for the entire period of

continuous operation or for a typical portion thereof divided by the number of hours of such period or portion thereof; (2) for cyclical or batch type operation, it is the total weight of the pollutant emitted to the atmosphere for a period which covers a complete or an integral number of cycles divided by the hours of actual process operation during such periods.

Maximum emissions (lbs./hr.) should be determined by dividing the total highest emissions possible during any 3 hour period with control equipment working properly, by 3. This will be dependent upon such things, either singly or in combination, as maximum possible operating rate, a particular input material, product, or fuel which may result in increased emissions; periods of highest emissions for cyclical or batch type operations, etc. Concentrations should be determined for stack emissions only and should reflect average exit gas concentrations reported in the units specified on the form.

Average emissions (ton/yr) should be calculated by multiplying the average emissions (lb/hr) by the normal operating hours (hr/yr) and converting the units from pounds (lb) to tons.

Potential emissions (ton/yr) or "Potential to emit" means the maximum capacity of a source to emit an air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit an air contaminant, including air contaminant control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design only if the limitation or the effect it would have on emissions is "legally enforceable." Secondary emissions do not count in determining the "potential to emit" of a source.

Emission estimation method code and control device descriptions, along with corresponding codes, can be found on the last page of these instructions. The codes which most accurately describe the estimation methods and control equipment should be used; along with the estimated control equipment efficiency for each pollutant present. Any estimation methods of control devices other than those listed in the tables should be described in the comments section.

Some hazardous air pollutants (HAPs) are considered both a HAP and an organic compound. Include these HAPs when determining organic compound totals. If necessary, additional HAPs can be listed in the Other (specify) areas or attached as an additional sheet.

- 14. List the coating equipment manufacturer. Enter the equipment model and serial numbers if applicable. Enter the approximate original installation or construction date. If the equipment has been modified since installation, enter date of the most recent modification. Briefly describe any modifications to original equipment, if any. Please note that the equipment which actually applies the coating, such as a spray gun or spray head, is the emission source. For example, an existing spray gun used in a new spray booth would be modification of an old source instead of being considered a new source.
- **15.** Briefly describe the articles which are coated and include any other comments which might be helpful.
- **16.** Use the comments space for further descriptions or other needed information that was not included in other sections of the form
- 17. If this form is being submitted at the same time as an APC 100 form, then a signature is not required on this form. Date this form regardless of whether a signature is provided. If this form is NOT being submitted at the same time as an APC 100 form, then a signature is required. Applications should be signed by the responsible person listed in Item 7 of the APC 100 form.

Table of Pollution Control Device and Method Codes

Note: For cyclones, settling chambers, wet scrubbers, and electrostatic precipitators; the efficiency ranges correspond to the following percentages:

Medium: 80-95% And Low: Less than 80%. High: 95-99+%.

If the system has several pieces of connected control equipment, indicate the sequence. For example: 008, 010 If none of the below codes fit, use 999 as a code for other and specify in the comments.

No Equipment 000	Gas Adsorption Column Packed	050
Activated Carbon Adsorption 048	Gas Adsorption Column – Tray Type	051
Afterburner – Direct Flame 021	Gas Scrubber (General: Not Classified)	013
Afterburner – Direct Flame with Heat Exchanger 022	Limestone Injection – Dry	041
Afterburner – Catalytic 019	Limestone Injection – Wet	042
Afterburner – Catalytic with Heat Exchanger 020	Liquid Filtration System	049
Alkalized Alumina040	Mist Eliminator – High Velocity	014
Cartridge Filter070	Mist Eliminator – Low Velocity	015
Catalytic Oxidation – Flue Gas Desulfurization 039	Process Enclosed	054
Cyclone – High Efficiency007	Process Gas Recovery	060
Cyclone – Medium Efficiency	Settling Chamber – High Efficiency	004
Cyclone – Low Efficiency 009	Settling Chamber - Medium Efficiency	005
Dust Suppression by Chemical Stabilizers or	Settling Chamber – Low Efficiency	006
Wetting Agents 062	Spray Tower (Gaseous Control Only)	052
Electrostatic Precipitator – High Efficiency 010	Sulfuric Acid Plant – Contact Process	043
Electrostatic Precipitator – Medium Efficiency 011	Sulfuric Acid Plant – Double Contact Process	044
Electrostatic Precipitator – Low Efficiency 012	Vapor Recovery System (Including Condensers,	
Fabric Filter – High Temperature 016	Hooding and Other Enclosures)	047
Fabric Filter – Medium Temperature 017	Venturi Scrubber (Gaseous Control Only)	053
Fabric Filter – Low Temperature 018	Wet Scrubber – High Efficiency	001
Fabric Filter – Metal Screens (Cotton Gins) 059	Wet Scrubber – Medium Efficiency	002
Flaring	Wet Scrubber – Low Efficiency	003
	Wet Suppression by Water Sprays	061
<u>Table of Emission Es</u>	timation Method Codes	
Not applicable / Emissions are known to be zero		0
Emissions based on source testing Emissions based on material balance using engineering expertise and knowledge of process		1
		2
Emissions calculated using emission factors from EPA pu	ıblications No. AP-42 Compilation of Air Pollution	
Emissions Factors		3
Judgment		4

Emissions calculated using a special emission factor different from that in AP-425 Other (Specify in comments)......6