

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
November 11, 2014

Federally Enforceable District Origin Operating Permit
Statement of Basis

Company: Component Finishing Unlimited, Inc.

Plant Locations: 3138 Del Park Terrace, Louisville, Kentucky 40211 and
3000 Magazine Street, Louisville, Kentucky 40211

Date Application Received: 04/14/2008

Date of Draft Permit: 11/11/2014

Date of Public Notice: 11/11/2014

District Engineer: Shannon Hosey

Permit No: O-0322-14-F

Plant ID: 322

SIC Code: 2491

NAICS: 321114

AFS: 00322

Introduction:

This permit will be issued pursuant to District Regulation 2.17- *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}); and partial non-attainment area for sulfur dioxide (SO₂).

Application Type/Permit Activity:

Initial Issuance

Permit Revision

Administrative

Minor

Significant

Permit Renewal

Compliance Summary:

Compliance certification signed

Compliance schedule included

Source is out of compliance

Source is operating in compliance

I. Source Information

1. **Product Description:** Component Finishing Unlimited, Inc. is a wood furniture coating operation.
2. **Process Description:** Specialize in wood finish
3. **Site Determination:** Component Finishing Unlimited, Inc. has two different locations because one location generates the products that the other location coats. The two locations are contiguous or adjacent and under common control.

As of the issuance of this permit the following table lists the equipment at each location.

3138 Del Park Terrace
Three (3) spray paint booths with one (1) drying oven
One (1) Col-Met paint booth
48” roll coat UV cure paint line
Spray coating UV line with an overspray reclaim/filter system.
3000 Magazine Street
One (1) Col-Met paint booth
12” Spray Coat UV Cure Coat Line

4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	Three (3) spray paint booths with one (1) drying oven
U2	Two (2) Col-Met paint booth 48” roll coat UV cure paint line 12” spray coat UV cure coat line Spray coating UV line with an overspray reclaim/filter system

5. **Fugitive Sources:** There are no fugitive source emissions at this facility.

6. **Permit Revisions:**

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
99-01-F	11/05/2001	06/03/2001	Initial	Entire Permit	Initial Issuance
O-322-14-F	xx/xx/2014	11/11/2014	Renewal	Entire Permit	Permit Renewal

7. Emission Summary:

Pollutant	Company Actual Emissions (tn/yr) 2013 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	0	No
NO _x	0	No
SO ₂	0	No
PM/PM ₁₀	0	No
VOC	23.11	Yes
GHG – CO _{2e}	0	No
Single HAPs	0	Yes
Total HAP	0.68	Yes

8. Applicable Requirements:

PSD 40 CFR 60 SIP 40 CFR 63
 NSR 40 CFR 61 District-Origin Other

9. MACT Requirements: The source has no future MACT requirements.

10. Referenced Federal Regulations in Permit: None

II. Regulatory Analysis

- 1. Acid Rain Requirements:** Component Finishing Unlimited, Inc. is not subject to the Acid Rain Program.
- 2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. Component Finishing Unlimited, Inc. does not manufacture, sell, or distribute any of the listed chemicals. The source’s use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
- 3. Prevention of Accidental Releases 112(r):** Component Finishing Unlimited, Inc. does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.

4. Basis of Regulation Applicability

Regulation	Basis for Applicability	Type
2.17	Federally Enforceable District Origin Operating Permits	SIP
7.08	Regulation 7.08 establishes the requirements for PM emission from new processes that commences construction after September 1, 1976.	SIP
7.25	Establishes the requirements for VOC emissions, apply to a process not elsewhere regulated in District Regulation 7, and apply to new processes commenced after June 13, 1979	SIP

a. Plant-wide

Component Finishing Unlimited, Inc. is a potential major source for the pollutant VOC, Single HAP and Total HAP. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued shall submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an Annual Compliance Report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

b. STAR Program

Regulations 5.00, 5.01, 5.21, and 5.23 (STAR Program) establish requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards.

c. **Emission Units**

i. **Equipment:**

EU	Emission Point	Description Make/Model	Applicable Regulation
U1	E1	Spray Paint Booth	7.25
	E2	Spray Paint Booth	
	E3	Spray Paint Booth	
	E4	Drying Oven	
U2	E5	Col-Met off-line Paint Booth	7.08 and 7.25
	E6	Col-Met Spray Booth	
	E7	48" Roll Coat UV Cure Paint Line	
	E8	12" Spray Coat UV Cure Coat Line	
	E9	Spray Coat UV Line	

ii. **Standards/Operating Limits**

1) **VOC**

Regulation 7.25, sections 2.1 and 3.1 establish emission standards for processes producing VOC emissions. VOC emissions plant wide shall be limited to less than 40 tons based on the BACT submitted on May 22, 2001.

2) **PM**

For equipment subject to Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2. Using the minimum spray gun transfer efficiency of 65%, the percent solids of the material 45.9%, and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booths cannot be exceeded.

3) **Opacity**

Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

4) **HAP**

Regulation 2.17, section 5.1 allows the source to set a synthetic limit below the major source threshold.

5) **TAC**

Per Regulations 5.00 and 5.21, TAC emissions must not exceed environmentally acceptable levels. Usage of any TAC containing raw material shall not exceed 14,098 gallons per calendar year to remain de minimis. (Construction Permit 699-08-C)

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request any operation flexibility.
5. **Compliance History:**

Incident #	Date	Regulation Violated	Result
02262	08/29/2000	Reg. 2.03, section 5, Permit Conditions – Not in accordance with application	Agreement with fine \$1250
06269	04/20/2012	Reg. 1.13, section 2, Failure to control objectionable odors	Agreement
06285	05/04/2012	Reg. 1.13, section 2, Failure to control objectionable odors	Agreement with fine \$750
06294	05/31/2012	Reg. 1.13, section 2, Failure to control objectionable odors	Agreement with fine \$375
06307	06/19/2012	Reg. 1.13, section 2, Failure to control objectionable odors	Agreement with fine \$375

6. **Calculation Methodology or Other Approved Method:**

The VOC emission calculations are based upon VOC content of the material used and the HAP emission calculations are based upon the throughput of HAP containing material used and weight percent of the HAP.

7. **Insignificant Activities:**

Description	Quantity	Basis
Natural Gas Combustion Sources < 10 MMBtu/Hr	3	Regulation 1.02, Appendix A, section 1.1
Internal combustion engines, whether fixed or mobile, and vehicles used for transport of passengers or freight,	2	Regulation 1.02, Appendix A, section 2

Description	Quantity	Basis
except as may be provided for in subsequent regulations (propane powered fork truck)		
Brazing, soldering or welding equipment (electric wire feed MIG welder)	1	Regulation 1.02, Appendix A, section 3.4
Equipment commonly used in wood-working operations, except for conveying, hogging or burning of sawdust or wood waste (chop saw and band saw)	2	Regulation 1.02, Appendix A, section 3.5
All pressurized VOC storage vessels (propane tanks for fork trucks)	10	Regulation 1.02, Appendix A, section 3.26

- 1) Insignificant activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.
- 3) Activities identified in regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE), as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.