



Louisville Metro Air Pollution Control District
 850 Barret Avenue
 Louisville, Kentucky 40204-1745



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0322-14-F

Plant ID: 322

Effective Date: xx/xx/2014

Expiration Date: xx/xx/2019

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Component Finishing Unlimited, Inc.
 3138 Del Park Terrace
 Louisville, KY 40211

Component Finishing Unlimited, Inc.
 3000 Magazine Street
 Louisville, KY 40211

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	Total HAP	HAP
Tons/year:	<40 tpy	<25tpy	<10 tpy

Permit Writer: Shannon Hosey

Public Notice Date: 11/11/2014

{manager1}
 Air Pollution Control Officer
 {date1}

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Permit Revisions/Changes

Revision No.	Issue Date	Public Notice Date	Type	Page No.	Description
99-01-F	11/01/2001	06/03/2001	Initial	Entire Permit	Initial Permit Issuance
O-0322-14-F	xx/xx/2014	11/11/2014	Renewal	Entire Permit	Renewal

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mm Hg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of applicable fees is not made after receipt of the statement of fees (SOF). The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-0.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)). Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745***

Emission Unit U1**U1 Description**

Three (3) spray paint booths with one (1) drying oven.

U1 Applicable Regulations

Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 3

U1 Equipment

Emission Process ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E1	Spray Paint Booth	7.25	C1
E2	Spray Paint Booth		C2
E3	Spray Paint Booth		C3
E4	Drying Oven		N/A

U1 Control Devices

Control Device ID	Description Make/Model	Pollutant Controlled
C1	Dry Filters	PM
C2	Dry Filters	
C3	Dry Filters	

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

The owner or operator shall not allow *plant-wide* VOC emissions to equal or exceed 40 tons during any consecutive 12-month period¹. (BACT) (Regulation 7.25, section 2.1 and 3.1) (Regulation 2.17, section 3)

b. HAP

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 10 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 25 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)

c. TAC

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21)
- ii. The owner or operator shall not allow the plant-wide usage of all TAC containing raw materials to exceed 14,098 gallons per calendar year. (Construction Permit 699-08-C)(Regulation 5.21, section 4.7)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

a. VOC

- i. The owner or operator shall, monthly, record the total monthly amount used plant-wide in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.

¹ An updated BACT analysis was submitted for Regulation 7.25 on May 22, 2001, changing the VOC allowable from twenty tons per year (20 tpy) to forty tons per year (40 tpy).

- iii. The owner or operator shall maintain a copy of the material safety data sheets (MSDS), or environmental data sheets, product certification sheets, etc. for each VOC containing material used at this plant.

b. **HAP**

The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

c. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- iii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above de minimis at the time of the change.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified in accordance with General Condition 12.

a. **VOC**

- i. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- ii. Identification of all periods of exceedance of the VOC emissions limits; and
- iii. A description of corrective actions taken for each exceedance.

b. **HAP**

The plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

c. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental

Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The plant-wide monthly total and calendar year total usage of TAC containing raw material for each calendar month to show compliance with the 14,098 gal/yr limit.
- iv. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in S2.c.iii.

Emission Unit U2**U2 Description**

Two (2) Col-Met paint booths, one (1) 48” roll coat UV cure paint line, one (1) 12” spray coat UV cure coat line and one (1) spray coating UV line with an overspray reclaim/filter system.

U2 Applicable Regulations

Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
7.08	Standards of Performance for New Process Operations	1 through 3
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 3

U2 Equipment

Emission Process ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E5	Col-Met Paint Booth	7.08 and 7.25	C4
E6	Col-Met Paint Booth		C5
E7	48” Roll Coat UV Cure Paint Line		C6
E8	12” Spray Coat UV Cure Coat Line		C7
E9	Spray Coating UV Line		C8

U2 Controls

Control Device ID	Description Make/Model	Pollutant Controlled
C4	Dry Filters	PM
C5	Dry Filters	
C6	Indoor Exhausting Bag Collector	
C7	Indoor Exhausting Bag Collector	
C8	Overspray Reclaim/Filter System	

U2 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

The owner or operator shall not allow *plant-wide* VOC emissions to equal or exceed 40 tons during any consecutive 12-month period². (BACT) (Regulation 7.25, section 2.1 and 3.1) (Regulation 2.17, section 3)

b. PM

The owner or operator shall not allow PM emissions from each piece of equipment to exceed 2.34 lb/hr³. (Regulation 7.08, 3.1.2)

c. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

d. HAP

i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 10 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)

ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 25 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)

e. TAC

i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21)

ii. The owner or operator shall not allow the plant-wide usage of all TAC containing raw materials to exceed 14,098 gallons per calendar year. (Construction Permit 699-08-C) (Regulation 5.21, section 4.7)

² An updated BACT analysis was submitted for Regulation 7.25 on May 22, 2001, changing the VOC allowable from twenty tons per year (20 tpy) to forty tons per year (40 tpy).

³ 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.

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**a. VOC**

- i. The owner or operator shall, monthly, record the total monthly amount used plant-wide in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.
- iii. The owner or operator shall maintain a copy of the material safety data sheets (MSDS), or environmental data sheets, product certification sheets, etc. for each VOC containing material used at this plant.

b. PM

See Specific Condition S2.c.

c. Opacity

- i. The owner or operator shall inspect the filters in the spray booths at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

d. HAP

The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

e. TAC

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- iii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is

introduced or the content of a TAC in a raw material increases above de minimis at the time of the change.

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified in accordance with General Condition 12.

a. VOC

- i. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- ii. Identification of all periods of exceedance of the VOC emissions limits; and
- iii. A description of corrective actions taken for each exceedance.

b. PM

See Specific Condition S3.c.

c. Opacity

Any deviation from the requirements to perform monthly visible inspections of the paint booth PM filter system.

d. HAP

The plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

e. TAC

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)

- iii. The plant-wide monthly total and calendar year total usage of TAC containing raw material for each calendar month to show compliance with the 14,098 gal/yr limit.
- iv. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in S2.e.iii.

Plant-wide Comment

- 1. 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

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, except as may be provided for in subsequent regulations (propane powered fork truck)	2	Regulation 1.02, Appendix A, section 2
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.