



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



## Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-144-14-F

Plant ID: 144

Effective Date: xx/xx/2015

Expiration Date: xx/xx/2020

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:

Marcus Paint Company, Inc.  
235 East Market Street  
Louisville, KY 40202

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	Single HAP
Tons/year:	<25 tpy	<12.5 tpy	<5 tpy

Permit Writer: Shannon Hosey

Public Notice Date: 12/06/2014

{manager1}  
Air Pollution Control Officer  
{date1}

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**FEDOOP Permit Revisions/Changes**

<b>Permit No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Attachment No./ Page No.</b>	<b>Description</b>
124-03-F	05/30/2003	04/13/2003	Initial	Entire Permit	Initial Permit Issuance
O-0144-14-F	xx/xx/20xx	12/06/2014	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
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- 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 <sub>2</sub>	- 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

### 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, sulfur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, nitrogen oxides, lead, gaseous fluorides, or Volatile Organic Compounds (VOC) as listed in District Regulation 3.04; 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 CO<sub>2</sub>-equivalent, as defined in 40 CFR 98. 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	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
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:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.01	General Provisions (Standards for Toxic Air Contaminants and 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

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 Unit Description:** Paint Manufacturing System

Four (4) Red Head sand mills

Eight (8) high-speed dispersers

Test panel spray booth area for quality control and evaluation

Eighteen (18) product process and storage tanks

**U1 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
6.09	Standards of Performance for Existing Process Operations	1 through 3
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5
40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing	63.11599, 63.11600, 63.11601, 63.11602, 63.11603, 63.11605, 63.11606 and 63.11607

**U1 Equipment:**

<b>Emission Process ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E1	Red Head Sand Mill 16 Gallons	6.09, 6.24 and 40 CFR 63 Subpart CCCCCC	C1
E2	Red Head Sand Mill 16 Gallons		
E3	Red Head Sand Mill 3 Gallons		
E4	Red Head Sand Mill 3 Gallons		
E5	High-Speed Dispenser Twin 30 HP		
E6	High-Speed Dispenser 30 HP		
E7	High-Speed Dispenser 25 HP		
E8	High-Speed Dispenser 25 HP		
E9	High-Speed Dispenser 15 HP		
E10	High-Speed Dispenser 15 HP		
E11	High-Speed Dispenser 15 HP		
E12	High-Speed Dispenser 15 HP		
E13	High-Speed Dispenser 20 HP		
E14	High-Speed Dispenser 2 HP		
E15	High-Speed Dispenser 2 HP		
E16	Test Panel Spray Booth	6.09, 6.24 and 40 CFR 63 Subpart CCCCCC	C2
E17	Storage Tank 1300 Gallons	6.13 and 40 CFR 63 Subpart CCCCCC	N/A
E18	Storage Tank 1300 Gallons		
E19	Storage Tank 1300 Gallons		
E20	Storage Tank 1300 Gallons		
E21	Storage Tank 1300 Gallons		
E22	Storage Tank 1300 Gallons		
E23	Storage Tank 1300 Gallons		
E24	Storage Tank 1300 Gallons		

<b>Emission Process ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E25	Process Tank 550 Gallons	6.24 and 40 CFR 63 Subpart CCCCCC	N/A
E26	Process Tank 550 Gallons		
E27	Process Tank 1100 Gallons		
E28	Process Tank 1100 Gallons		
E29	Process Tank 1300 Gallons		
E30	Process Tank 1300 Gallons		
E31	Process Tank 4000 Gallons		
E32	Process Tank 4000 Gallons		
E33	Process Tank 2250 Gallons		
E34	Process Tank 2250 Gallons		

**U1 Control Devices:**

<b>Control Device ID</b>	<b>Description Make/Model</b>	<b>Pollutant Controlled</b>	<b>Stack ID</b>
C1	Torit Dust Collector	PM	S1
C2	Dry Filters	PM	N/A

## U1 Specific Conditions

### S1. Standards (Regulation 2.17, section 5.2)

#### a. VOC

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 25 tons during any consecutive 12-month period<sup>1</sup>. (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1)
- ii. For Emission Processes E1, E2, E3, E4, E5, E6, E7, E8, E9, E10, E11, E12, E13, E14, E15, E16, E25, E26, E27, E28, E29, E30, E31, E32, E33 and E34:
  - 1) The owner or operator shall not discharge into the atmosphere more than forty (40) pounds of VOC in any one day, nor more than eight (8) pounds in any one hour, from any existing affected facility in which any Class II solvent is used unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.2)
  - 2) The owner or operator shall not discharge into the atmosphere more than three thousand (3,000) pounds of VOC in any one day, nor more than four hundred fifty (450) pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.3)
- iii. For Emission Processes E17, E18, E19, E20, E21, E22, E23 and E24, the owner or operator shall not store VOC materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe<sup>2</sup>. (Regulation 6.13, section 3.3)

#### b. Opacity

- i. For Emission Processes E1, E2, E3, E4, E5, E6, E7, E8, E9, E10, E11, E12, E13, E14, E15 and E16, the owner or operator shall not allow visible emissions to equal or exceed 20% opacity, except during addition of dry pigments and solids that contain compounds of cadmium, chromium, lead,

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<sup>1</sup> On 5/14/14, source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

<sup>2</sup> All of the storage tanks are atmospheric tanks equipped with submerged fill pipe. Therefore, records are not required for change of contents and/or vapor pressure of materials stored.

or nickel and the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel, when the visible emission standard is 10%. (Regulation 6.09, section 3.1)

- ii. The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere. (40 CFR 63.11601(a)(5))

c. **PM**

For Emission Processes E1, E2, E3, E4, E5, E6, E7, E8, E9, E10, E11, E12, E13, E14, E15 and E16<sup>3</sup>, the owner or operator shall not allow PM emissions to exceed 2.58 lb/hr per piece of equipment based on actual operating hours in a calendar day.<sup>4</sup> (Regulation 6.09, section 3.2)

d. **HAP**

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period<sup>5</sup>. (Regulation 5.00, section 1.13.5.2)
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period<sup>5</sup>. (Regulation 5.00, section 1.13.5.3)
- iii. The owner or operator must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process. (40 CFR 63.11601(a)(1))

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3 Emission Process E13 is used to spray sample panels for quality control of each batch. A sample panel is approximately 3" x 5". The estimated paint usage is conservatively estimated at 1.5 fluid ounces per panel. The District has determined, based on solids content, transfer efficiency and a conservative maximum of 0.5 gallon per hour spraying capacity, that the uncontrolled PM emissions of 1.32 lb/hr do not exceed the 2.58 lb/hr limit. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

4 The District has performed a one-time PM compliance demonstration for this equipment and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

5 On 5/14/14, source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

- iv. The owner or operator must capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form. (40 CFR 63.11601(a)(2))
- v. The owner or operator must:
  - 1) Capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or (40 CFR 63.11601(a)(3)(i))
  - 2) Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form. (40 CFR 63.11601(a)(3)(ii))
- vi. The owner or operator must:
  - 1) Capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or (40 CFR 63.11601(a)(4)(i))
  - 2) Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or (40 CFR 63.11601(a)(4)(ii))
  - 3) Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel. (40 CFR 63.11601(a)(4)(iii))

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

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

**a. VOC**

- i. For Emission Processes E1, E2, E3, E4, E5, E6, E7, E8, E9, E10, E11, E12, E13, E14, E15, E16, E25, E26, E27, E28, E29, E30, E31, E32, E33 and E34, the owner or operator shall maintain the following records to demonstrate ongoing compliance with Regulation 6.24, Section 3:

- 1) The hours of operation of the equipment or usage for each day;
  - 2) The daily amount used in gallons of each solvent, cleaner, etc; and
  - 3) Monthly calculations showing the average hourly and daily VOC emissions.
- ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.

**b. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the Emission Processes E1, E2, E3, E4, E5, E6, E7, E8, E9, E10, E11, E12, E13, E14, E15 and E16. No more than four emission processes shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission processes where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.
- iv. For each particulate control device, the owner or operator shall conduct a 5-minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, you must conduct a Method 203C (40 CFR 51, appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids

containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in §63.11601(a)(5), you must comply with the requirements in the following paragraphs (a)(2)(iii)(A) through (C). (40 CFR 63.11602(a)(2)(iii))

- a. Take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. You must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in §63.11601(a)(5).
- b. Prepare a deviation report in accordance with §63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in §63.11601(a)(5).
- c. Resume the visible determinations of emissions from the particulate control device in accordance with paragraph (a)(2)(iii) 3 months after the previous visible determination.

c. **PM**

For Emission Processes E1, E2, E3, E4, E5, E6, E7, E8, E9, E10, E11, E12, E13, E14, E15 and E16, the owner or operator shall, monthly, perform visual inspection of the structural and mechanical integrity of the dust collectors for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

d. **HAP**

- i. Ongoing particulate control device inspections and tests. The owner or operator shall inspect and maintain each dry particulate control unit according to the following requirements in §§63.11602(a)(2)(ii)(A) and (B). (40 CFR 63.11602(a)(2)(ii))
  - a. Conduct weekly visual inspections of any flexible ductwork for leaks.
  - b. Conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.

- ii. The owner or operator shall record the information specified in the following paragraphs for each inspection and testing activity as required in 40 CFR 63.11602(a)(2). (40 CFR 63.11602(b))
  - 1) The date, place, and time;
  - 2) Person conducting the activity;
  - 3) Technique or method used;
  - 4) Operating conditions during the activity;
  - 5) Results; and
  - 6) Description of correction actions taken.
- iii. 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.
- iv. The owner or operator must maintain the records specified in §63.11603(c)(1) through §63.11603(c)(4) in accordance with §63.11603(c)(5) through §63.11603(c)(6), for five years after the date of each recorded action. (40 CFR 63.11603(c))
  - 1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted in accordance with §63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted. (40 CFR 63.11603(c)(1)) (See U1 Comment 4)
  - 2) You must keep a copy of each Annual Compliance Certification Report prepared in accordance with §63.11603(b). (40 CFR 63.11603(c)(2))
  - 3) You must keep records of all inspections and tests as required by §63.11602(b). (40 CFR 63.11603(c)(3))
  - 4) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). (40 CFR 63.11603(c)(4))
  - 5) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each recorded action. (40 CFR 63.11603(c)(5))
  - 6) You must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). You may keep the records offsite for the remaining 3 years. (40 CFR 63.11603(c)(6))

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

The owner or operator shall include the following information in the annual compliance report.

**a. VOC**

The owner or operator shall report the following information:

- 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**

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

- ii. The owner or operator shall prepare an annual compliance certification report according to the requirements in §63.11603(b)(1) through §63.11603(b)(3). This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report. (40 CFR 63.11603(b))

- (1) The owner or operator shall prepare and, if applicable, submit each annual compliance certification report according to the dates specified in §63.11603(b)(1)(i) through §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(1))

- (a) Each annual compliance certification report must cover the annual reporting period from January 1 through December 31. (40 CFR 63.11603(b)(1)(ii))

- (b) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15. (40 CFR 63.11603(b)(1)(iii))

- (2) The annual compliance certification report must contain the information specified in §63.11603(b)(2)(i) through §63.11603(b)(2)(iii). (40 CFR 63.11603(b)(2))
  - (a) Company name and address; (40 CFR 63.11603(b)(2)(i))
  - (b) A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and (40 CFR 63.11603(b)(2)(ii))
  - (c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31. (40 CFR 63.11603 (b)(2)(iii))
- (3) If a deviation has occurred during the reporting period, you must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(3))

c. **Opacity**

- i. Identification of all periods of exceedances;
- ii. The number of surveys where visible emissions were observed;
- iii. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- iv. Description of any corrective action taken for each exceedance.

d. **PM**

There are no routine compliance reporting requirements for this equipment.

**U1 Comment**

1. The company has portable tanks that are used in manufacturing that do not have emission processes:

<b>Number of Tanks</b>	<b>Gallons</b>
4	268
2	306
2	315
1	343
1	353
2	372
3	390
1	585
1	603

**Insignificant Activities**

Description	Quantity	Basis
Natural Gas Boiler < 10 MMBTU/hr	1	Regulation 1.02, Appendix A, section 1.1
Emergency relief vents, stacks and ventilating systems	1	Regulation 1.02, Appendix A, section 3.10
Laboratory ventilating and exhausting systems which are not used for radioactive air contaminants	2	Regulation 1.02, Appendix A, section 3.11
Research and Development (R&D) Lab Equipment: Five (5) 2 liter sand mills, six (6) air-powered lab mixers, two (2) Electric lab mixers, two (2) electric oven for curing test panels coated in the lab and one (1) gas-fired oven for curing test panels coated in the lab	-	Regulation 1.02, Appendix A, section 3.27

- 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 15<sup>th</sup>.

**Emission Unit IA1**

**IA1 Unit Description:** Natural Gas Combustion

One (1) natural gas boiler

**IA1 Applicable Regulations:**

Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permit	All (1 – 9)
7.06	Standards of Performance for New Indirect Heat Exchangers	All (1 – 5)

**IA1 Equipment**

Emission Point ID	Description Make/Model	Maximum Capacity	Applicable Regulation	Control Device (Control ID)	Stack ID
IA1	Natural Gas Boiler	< 10 MMBTU/hr	7.06	N/A	N/A

### IA1 Specific Conditions

**S1. Standards** ( Regulation 2.17, section 5.2)

**a. PM**

The owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.56 pounds per million BTU actual total heat input. ( Regulation 7.06, section 4.1.4)<sup>6</sup>

**b. Opacity**

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity.<sup>7</sup>

**c. SO<sub>2</sub>**

The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 1.0 pounds per million BTU actual total heat input for combustion of gaseous fuels. ( Regulation 7.06, section 5.1.1)<sup>6</sup>

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

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. PM**

There are no monitoring or record keeping requirements for PM compliance with respect to the emission standard.

**b. Opacity**

There are no monitoring or record keeping requirements for Opacity compliance.

**c. SO<sub>2</sub>**

There are no monitoring or record keeping requirements for SO<sub>2</sub> compliance.

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6 A one-time compliance demonstration has been performed for PM and SO<sub>2</sub> for the boiler using AP-42 emission factors and combusting natural gas, and the pound per million BTU emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, or reporting requirements for this boiler with respect to the PM or SO<sub>2</sub> emission limits.

7 The District has determined that using a natural gas fired boiler will inherently meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.

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

a. **PM**

There are no routine compliance reporting requirements for this equipment.

b. **Opacity**

There are no routine compliance reporting requirements for this equipment.

c. **SO<sub>2</sub>**

There are no routine compliance reporting requirements for this equipment.