AIR POLLUTION CONTROL DISTRICT
LOUISVILLE, KENTUCKY

GREG FISCHER
MAYOR

LAUREN ANDERSON, DIRECTOR

October 18, 2011

Caldwell Tanks, Inc.
Mr. Wilson Frazier
PO BOX 35770
Louisville, KY 40232-5770

Dear Mr. Frazier:

Enclosed is the approved Title V renewed permit P-134-97-TV (R2), accompanying Statement of Basis (SoB), Response to EPA Comment Document, and Administrative Change Document issued by the Louisville Metro air Pollution District. This permit includes both general and specific conditions. Compliance with these permit conditions help maintain a healthy environment for the citizens of Louisville.

The District encourages facilities to investigate pollution prevention. These efforts can save you money, while reducing pollution and energy consumption. For more guidance on identifying opportunities for waste reduction and energy efficiency, please contact the Kentucky Pollution Prevention Center at (502) 852-0965.

Please do not hesitate to contact the Permit Engineer identified on the permit at (502) 574-6000 if you have any questions regarding the permit or permit conditions.

Sincerely,

Paul G. Aud, P.E.
Engineer Manager

Enclosures: Permit: Title V Operating Permit: P-134-97-TV (R2)
Title V Permit Statement of Basis (SoB)
Response to EPA Comments Document
Administrative Change Document

PA: ema

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

Title V Operating Permit

Permit No.: 134-97-TV (R2) Plant ID: 0034

Effective Date: 11/18/2011 Expiration Date: 11/30/2016

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:

Caldwell Tanks, Inc.
4000 Tower Road
Louisville, KY 40219

The applicable procedures of District Regulation 2.16 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 eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Application No.: 10452 Application Received: 3/30/2006

Permit Writer: Yiqiu Lin

Administratively Complete: 5/29/2006

Air Pollution Control Officer

Date of Public Notice: 9/6/2011

Date of proposed permit: 9/6/2011

Table of Contents

Title V Permit Revisions/Changes

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
Initial	9/28/2001	1/14/2001	Initial	Entire Permit	Initial Permit Issuance
R1	12/6/2002	N/A	Administrative	Emission Unit U1	Incorporate new performance indicator range for control device C5
R2	10/18/2011	9/6/2011	Renewal and Revision	Entire Permit	Permit renewal; R.O. addition; Add MACT, 40 CFR 63, Subpart MMMM; Incorporate CAM Plan

Abbreviations and Acronyms

AFS - AIRS Facility Subsystem
AIRS - Aerometric Information Retrieval System
APCD - Air Pollution Control District
ASL - Adjusted Significant Level
atm - Atmosphere
BACT - Best Available Control Technology
Btu - British Thermal Unit
CEMS - Continuous Emission Monitoring System
CAAA - Clean Air Act Amendments (15 November 1990)
HAP - Hazardous Air Pollutant
hr - hour
lbs - Pounds
l - Liter
MACT - Maximum Achievable Control Technology
m - Meter
mg - Milligram
mm - Millimeter
MM - Million
MOCS - Management of Change System
NAICS - North American Industry Classification System
NSR - New Source Review
NO_x - Nitrogen oxides
NSPS - New Source Performance Standards
PM - Particulate Matter
PM_{10} - Particulate matter less than 10 microns
ppm - Parts per million
PSD - Prevention of Significant Deterioration
PMP - Preventive Maintenance Plan
psia - Pounds per square inch absolute
RACT - Reasonably Available Control Technology
SC - Specific Condition
SIC - Standard Industrial Classification
SIP - State Implementation Plan
SO_2 - Sulfur dioxide
TAC - Toxic Air Contaminant
TAL - Threshold Ambient Limit
TAP - Toxic Air Pollutant
tpy - Tons per year
UTM - Universal Transverse Mercator
VOC - Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Louisville Metro Air Pollution Control District (LMAPCD) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of LMAPCD. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a current table of "insignificant activities."

Insignificant activities are defined in District Regulation 2.16 section 1.22, as of the date the permit was proposed for review by U.S. EPA, Region 4.

Insignificant activities identified in District Regulation 2.02, Section 2 may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.

Insignificant activities identified in District Regulation 2.02, Section 2 shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)

2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

   US EPA - Region IV
   Air Enforcement Branch
   Atlanta Federal Center
   61 Forsyth Street
   Atlanta, GA 30303-8960

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:

   a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.

   b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.

4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall,

upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

i. An emergency occurred and that the owner or operator can identify the cause of the emergency.

ii. The permitted facility was at the time being properly operated.

iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)

7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.

8. **Enforceability Requirements** - Except for the conditions that are specifically designated as “District Only Enforceable Conditions”, all terms and conditions of this permit,

including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6)

If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall:

a. Notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

b. Submit a current list of insignificant activities by April 15 of each year with the annual compliance certification, including an identification of the additions and removals of insignificant activities that occurred during the preceding year. (Regulation 2.16, section 4.3.5.3.6)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

a. Enter the premises to inspect any emissions-related activity or records required in this permit.

b. Have access to and copy records required by this permit.

c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.

d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements. (Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record Keeping and Reporting Requirement** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes. 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. All semi-annual compliance reports shall include the following certification statement per Regulation 2.16.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete".

- Signature and title of company responsible official.

If a change in the "Responsible Official" (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form 9400-A or Form AP-0208) to the District within 30 calendar days following the date a change in the designated RO occurs for this facility.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

Reporting Period	Report Due Date
January 1 through June 30	August 29th
July 1 through December 31	March 1st[1]

Note:
[1] The date for leap years is February 29.

15. **Off-permit Documents**- Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit

document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)

16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.

17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.

18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.

19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.

20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.

21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)

22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.

23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and Permit renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.

b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.

c. Knowingly making any false statement in any permit application.

d. Noncompliance with Regulation 1.07, section 4.2; or

e. Noncompliance with KRS Chapter 77.

25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.

26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.

27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.

28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.

29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.

30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.

31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.

32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.

34. **Startups, Shutdowns, and Upset Conditions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

Louisville Metro Air Pollution Control District
850 Barret Ave
Louisville, KY 40204-1745

b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

Regulation	Title
1.01	General Provisions
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 and Reporting
1.07	Emissions During Shutdowns, Malfunctions, Startups, and Emergencies
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
2.02	Air Pollution Regulation Requirements and Minor Facility 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 Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits

Regulation	Title
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V 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)

District Only Enforceable:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
5.01	Standards for Toxic Air Contaminants and Hazardous air Pollutants
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants
5.12	Standards of Performance for New or Modified Sources Emitting Toxic 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

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:

    a. Any facility having any refrigeration equipment normally containing fifty (50) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added according to 40 CFR 82.166;

b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;

c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166.

d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;

e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40
CFR 82.166;

f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;

g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40CFR82 Subpart A, Production and Consumption Controls. (Regulation 2.16, section 4.1.5)

Emission Unit U1: Three (3) shot blast booths

U1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, 5
7.08	Standards of Performance for New Process Operations	1, 2, 3
40 CFR 64	Compliance Assurance Monitoring for Major Stationary Sources	64.1 through 64.10

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1, 2
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

U1 Equipment:

Emission Point	Description	Applicable Regulation	Control ID
E1	One (1) Wheelabrator blast booth, make Wheelabrator, serial # A-122157, capacity 198,000 lb/hr internal circulation rate, equipped with an air wash separator and a storage tank/hopper.	5.01 and 6.09	C1

Emission Point	Description	Applicable Regulation	Control ID
E2	One (1) shot blast booth, make Clemco, serial # 133231, capacity 825 lb/hr, equipped with a Clemco screened air wash abrasive cleaner and a storage tank/hopper.	5.01 and 7.08	C2
E3	One (1) Pipeabrator blast booth, make US Filter/BCP, serial # A4-8279, capacity 132,000 lb/hr internal circulation rate, equipped with an air wash separator and a storage tank/hopper.	5.01 and 7.08	C3

U1 Control Devices:

ID	Description	Performance Indicator	Stack ID
C1	One (1) baghouse, make Carbo-Tech, model 9-4-1800 CUPFL	Pressure drop range 2" - 6" water column	N/A, Vent inside
C2	One (1) baghouse, make DCE, model DLM 2/7/15	Pressure drop range 3/4" - 5" water column	N/A, Vent inside
C3	One (1) baghouse, make Farr, model 16D-T3	Pressure drop range 2" - 8" water column	N/A, Vent inside

U1 Alternative Operating Scenarios:

Emission Point	Description	Primary Operating Scenario	Alternative Operating Scenario
E1A	Wheelabrator blast booth E1 controlled by baghouse C1	Baghouse C1 vents inside	Baghouse C1 vents outside through Stack S5
E2A	Clemco shot blast booth E2 controlled by baghouse C2	Baghouse C2 vents inside	Baghouse C2 vents outside through Stack S6
E3A	Pipeabrator blast booth E3 controlled by baghouse C3	Baghouse C3 vents inside	Baghouse C3 vents outside through Stack S7

U1 Specific Conditions

S1. **Standards** (Regulation 2.16, section 4.1.1)

a. **PM**

i. The owner or operator shall not allow PM emissions from Wheelabrator blast booth (E1) to exceed 51.2 lb/hr. (Regulation 6.09, section 3.2)

ii. The owner or operator shall not allow PM emissions from Clemco blast booth (E2) to exceed 2.34 lb/hr. (Regulation 7.08, section 3.3.1)

iii. The owner or operator shall not allow PM emissions from Pipeabrator blast booth (E3) to exceed 33.8 lb/hr. (Regulation 7.08, section 3.3.1)

iv. The owner or operator shall utilize the associated baghouses at all times the shot blast booths are in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 2.03, section 5.1)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1) (Regulation 7.08, section 3.1.1)

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 5.01 and 5.21) (See Comment 1)

ii. See Specific Condition S1.a.iv. (See Comment 1)

S2. **Monitoring and Record Keeping** (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)

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**

i. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the baghouses (C1, C2, and C3) for signs of damage, air leakage, corrosion, etc. and repair as needed.

The owner or operator shall maintain monthly records of the results of each visual inspection of the structural and mechanical integrity of the baghouses. The records shall include the date of the inspection, the name of the person that performed the inspection, identification and description of any equipment defects observed, and the date of repair or replacement of defective components. (40 CFR 64) (See Comment 2)

ii. The owner or operator shall monitor and record the pressure drop across the baghouses at least once per each operating day. The owner or operator shall take corrective action if the pressure drop for any baghouse is out of the normal pressure drop range. (40 CFR 64) (See Comment 2)

iii. The owner or operator shall monitor and maintain daily records of any periods of time where the shot blast booths were operating and the associated baghouses were not operating, or a declaration that the baghouses operated at all times that day when the shot blast booths were operating. If there is any time that the associated baghouses were bypassed or not in operation when the shot blast booths were operating, then the owner or operator shall keep a record of the following for each bypass event:

1) Date;
2) Start time and stop time;
3) Identification of the control device and process equipment;
4) PM emissions for each hour during the bypass in lb/hr;
5) Summary of the cause or reason for each bypass event;
6) Corrective action taken to minimize the extent or duration of the bypass event; and
7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

b. **Opacity**

i. *For primary operating scenarios:*

The owner or operator shall conduct a *monthly* one-minute visible emissions survey, during normal operation and daylight hours, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the indoor exhaust points or on the building exhaust points if the process is inside an enclosure.

For alternative operating scenarios:

The owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the

emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the outside emission points (stack S5, S6, and S7).

ii. For an emission point without observed visible emissions during 12 consecutive operating weeks, the owner or operator may elect to conduct a monthly on-minute visible emission survey, during normal operation and daylight hours, of the emission points. (See Comment 2)

iii. At emission points 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.

iv. The owner or operator shall maintain monthly records (or weekly records for alternative operating scenarios) of the results of all visible emissions surveys and Method 9 tests performed.

The records 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 period, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

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. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

S3. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. **PM**

i. The owner or operator shall identify all periods of exceeding a PM emission standard during a reporting period. The report shall include the following:

1) Emission Unit ID number and emission point ID number;

2) The date and duration (including the start and stop time) during which a deviation occurred;
3) The quantity of excess emissions;
4) Summary information on the cause or reason for excess emissions;
5) Corrective action taken to minimize the extent and duration of each excess emissions event;
6) Measures implemented to prevent reoccurrence of the situation that resulted in excess PM emissions;
7) If no deviations occur during a semi-annual reporting period, the report shall contain a negative declaration.

ii. The owner or operator shall report any deviation from the requirement of performing monthly visual inspection of the structural and mechanical integrity of the baghouses (C1, C2, and C3).

iii. Any deviation from the requirement to utilize the associated baghouses at all times the shot blast booths are in operation, including the following:

1) Number of times the shot blast booths by-passes the baghouses and are vented to the atmosphere;
2) The date, duration (including the start and stop time) of each by-pass to the atmosphere;
3) Calculated quantity of tons of PM emitted for each by-pass.
4) A negative declaration if no by-passes occurred.

b. **Opacity**

i. Any deviation from the requirement to perform monthly (or weekly for alternative operating scenarios) visible emission surveys or Method 9 tests;
ii. Any deviation from the requirement to record the results of each VE survey and Method 9 test performed;
iii. The number, date, and time of each VE Survey where visible emissions were observed and the results of the Method 9 test performed;
iv. Identification of all periods of exceeding an opacity standard; and
v. Description of any corrective action taken for each exceedance of the opacity standard.

c. **TAC**

Within 6 months of a change of a raw material as described in S2.c.ii, the owner or operator shall submit the re-evaluated EA demonstration to the District.

U1 Comments

1. Caldwell Tanks submitted a revised STAR EA Demonstration on 8/12/2011 and demonstrated the TAC emissions from this unit are in compliance with the STAR EA Goals. In according to the EA Demonstration, only the controlled TAC emission are in compliance with EA Goals, therefore the source is required to utilize controls at all time the process equipment is in operation.

2. Caldwell Tanks is major for PM, VOC, and HAPs. Only PM control devices are needed to achieve compliance with PM/Opacity standards. In accordance with 40 CFR 64, Compliance Assurance Monitoring for Major Stationary Sources, Caldwell Tanks is required to propose a CAM Plan for PM, based on current process and control device operating requirements and practices. Caldwell Tanks submitted the CAM Plan on October 5, 2009.

3. This requirement applies to alternative operating scenarios only. All other Specific Conditions for this unit apply to both primary operating scenarios and alternative operating scenarios.

4. The PM emissions from the shot blast booths shall be calculated according to the following methodology or other approved method:

$$E_{PM} = \frac{(EF_{PM})(RR_b/1000)(OH_b)}{(2000, lbs/ton)}(1 - Ef_c)$$

where

E_{PM} = PM emissions, tons

EF_{PM} = Emission factors
E1 and E3: 0.179 lb PM/1000 lb abrasive from approved stack test
E2: 2.7 lb PM/1000 lb abrasive from AP-42, 13.2.6

RR_b = Maximum recirculation rate of the abrasive of each blast booth, lbs/hr
Wheelabrator blast booth (E1): RR_b = 198,000 lbs/hr
Clemco shot blast booth (E2): RR_b = 825 lbs/hr
Pipeabrator blast booth (E3): RR_b = 132,000 lbs/hr

OH_b = Operation hours of each blast booth, hours

EF_c = Control efficiency of the baghouse, %

Emission Unit U2: Two (2) paint booths

U2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
1.05	Compliance with Emission Standards and Maintenance Requirements	1.1, 4.1, 4.1.1
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, 5
6.31	Standard of Performance for Existing Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 7
40 CFR 63 Subpart MMMM	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products	63.3880-3883, 3890-3893, 3900, 3901, 3910, 3920, 3930, 3940-3942, 3950-3952, 3980, 3981

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.01	General Provisions	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1, 3
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
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

U2 Equipment:

Emission Point	Description	Applicable Regulation	Control ID
E4	One (1) custom-made paint booth, designated as South Paint Booth #1.	6.09, 6.31, 40CFR63 Subpart MMMM	C4, C5
E5	One (1) custom-made paint booth, designated as North Paint Booth #2.	6.09, 6.31, 40CFR63 Subpart MMMM	C6, C7

U2 Control Devices:

ID	Description	Performance Indicator	Stack ID
C4	One (1) custom-made dry filter consisted of primary pre-filters and secondary pleated filters	Pressure drop range 0.05" - 2" water column	S1
C5	One (1) custom-made dry filter consisted of primary pre-filters and secondary pleated filters	Pressure drop range 0.05" - 2" water column	S2
C6	One (1) custom-made dry filter consisted of primary pre-filters and secondary pleated filters	Pressure drop range 0.05" - 2" water column	S3
C7	One (1) custom-made dry filter consisted of primary pre-filters and secondary pleated filters	Pressure drop range 0.05" - 2" water column	S4

U2 Specific Conditions

S1. **Standards** (Regulation 2.16, section 4.1.1)

a. **VOC**

i. The owner or operator shall not allow or cause the emission of VOC from this emission unit resulting from the coating of metallic surface in excess of the following: (Regulation 6.31, section 3.1)

1) 4.3 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for clear coatings;
2) 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for air-dried coatings;
3) 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings;
4) 3.0 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for all other coatings.

ii. Compliance with these emission limits shall be based upon coatings used for this emission unit during a calendar-day averaging period. (Regulation 6.31, section 3.2)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1)

c. **PM**

i. The owner or operator shall not allow PM emissions to exceed 2.58 lb/hr. (Regulation 6.09, section 3.2) (See Comment 1)

ii. The owner or operator shall utilize primary filters and secondary filters at all times the process is in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 2.03, section 5.1)

d. **HAP** (40 CFR 63, Subpart MMMM and Regulation 5.02, section 3.74)

i. The owner or operator shall limit the organic HAP emissions to the atmosphere to no more than 2.6 lb organic HAP per gallon of coating solids used during each 12-month compliance period. (40 CFR 63.3890(b)(1)) (See Comment 3)

ii. The owner or operator must include all coatings (as defined in §63.3981), thinners and/or additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit specified in §63.3890. To make this determination, you must use at least one of the following compliance options. You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by §63.3930(c), and you must report it in the next semiannual compliance report required in §63.3920. (40 CFR 63.3891)

1) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. You must meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option. (40 CFR 63.3891(a)) (See Comment 4)

2) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners, and/or other additives, and cleaning material used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to 2.60 lb organic HAP per gallon of coating solids used, calculated as a rolling 12-month emission rate and determined on a monthly basis. The owner or operator must meet all the requirements of 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option. (40 CFR 63.3891(b))(See Comment 4)

iii. 40 CFR Part 63, Subpart MMMM applies to the following items that are used for surface coating of miscellaneous metal parts and products: (40 CFR 63.3882(b))

1) All coating operations as defined in §63.3981;
2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

iv. *Work Practice Standards.* For any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls, the owner or operator is not required to meet any work practice standards. (40 CFR 63.3893(a))

v. *Operating Limits.* For any coating operation for which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any operating limits. (40 CFR 63.3892(a))

vi. Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls, as specified in 63.3891(a) and (b), must be in compliance with the applicable emission limit in 63.3890 (2.60 lb organic HAP per gallon of coating solids) at all times. (40 CFR 63.3900(a)(1))

vii. The owner or operator must always operate and maintain the affected source, including all air pollution control and monitoring equipment you use for purposes of complying with Subpart MMMM, according to the provisions in 63.6(e)(1)(i). (40 CFR 63.3900(b))

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 5.01 and 5.21)

ii. The owner or operator shall not allow Ethyl Benzene emissions to exceed 28,546 pounds during any 12 consecutive month period from this unit. (Regulation 5.21, section 4.3) (See Comment 6)

S2. **Monitoring and Record Keeping** (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)

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. **VOC**

i. An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 6.31, section 6.1)

1) The regulation and section number applicable to the affected facility for which the records are being maintained,

2) The application method and substrate type (metal, plastic, etc.), (See Comment 2)

3) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during the averaging period.

4) The VOC content as applied in each coating and solvent, (See Comment 2)

5) The date, or usage record period, for each application of coating and solvent,

6) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the averaging period.

ii. The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulation 6.31, section 6.2)

iii. The averaging period weighted average VOC content, which means the VOC content of two or more coatings as applied on a coating line during any averaging period and weighted according to the fraction of the total coating volume that each coating represents, shall be calculated using the following equation:

$$VOC_{\mathrm{W}} = \sum_{\mathrm{i}=1}^{\mathrm{n}} \frac{\mathrm{V_i C_i}}{\mathrm{VT}}$$

where:

VOC_w = The average VOC content of two or more coatings as applied each averaging period on a coating line, in kg VOC/l (lb of VOC/gal) of coating, excluding water and exempt solvents.

V_i = The volume of each coating as applied each averaging period on a coating line in units of liters (gallons), excluding water and exempt solvents.

C_i = The VOC content of each coating as applied each averaging period on a coating line in units of kg of VOC/l (lb of VOC/gal) of coating, excluding water and exempt solvents.

VT = The total volume of all coatings as applied each averaging period on a coating line in units of liters (gallons), excluding water and exempt solvents.

n = The number of different coatings as applied each averaging period on a coating line.

The owner or operator, by performing the daily record keeping, as defined in Regulation 6.31 and specified above, thus complies with the requirements of Regulation 1.05, section 4.1.1.

b. **Opacity**

i. The owner or operator shall inspect the filters in the paint booth(s) 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.

c. **PM**

i. The owner or operator shall weekly monitor and record the pressure drop across the filters. The normal pressure drop range is 0.05 to 2.0 inches water column. The owner or operator shall take corrective action if the pressure drop across the filters is less than 0.05 inch or greater than 2.0 inches water column. (See Comment 1)

ii. The owner or operator shall monitor and maintain daily records of any periods of time where the paint booths were operating and the filters were damaged or not utilized, or a declaration that the control device operated at all times that day when the process was operating. If there is any time that the filters are not in operation when the paint booths are operating, then the owner or operator shall keep a record of the following for each bypass event:

1) Date;
2) Start time and stop time;
3) Identification of the control device and process equipment;
4) PM emissions for each hour during the bypass in lb/hr;
5) Summary of the cause or reason for each bypass event;
6) Corrective action taken to minimize the extent or duration of the bypass event; and

7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

d. **HAP**

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.

i. Compliance requirements for *compliant material option*.

1) You must complete the initial compliance demonstration for the initial compliance period according to the requirements in §63.3941. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to §63.3941 and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the applicable emission limit in §63.3890, and that you used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to §63.3941(a). (40 CFR 63.3940) (See Comment 6)

2) You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in §63.3890 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in §§63.3892 and 63.3893 , respectively. You must conduct a separate initial compliance demonstration for each general use, high performance, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you

are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. (40 CFR 63.3941)

3) *Determine the mass fraction of organic HAP for each material used.* You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the following: (40 CFR 63.3941(a))

(a) *(Method 311 appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test. (40 CFR 63.3941(a)(1))

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (*e.g.,* 0.3791). (40 CFR 63.3941(a)(1)(i))

(ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three

places after the decimal point (*e.g.*, 0.763). (40 CFR 63.3941(a)(1)(ii))

(b) *(Method 24 appendix A to 40 CFR part 60)*. For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to subpart PPPP of this part, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart PPPP of this part, as a substitute for the mass fraction of organic HAP. (40 CFR 63.3941(a)(2))

(c) *Alternative method.* You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval. (40 CFR 63.3941(a)(3))

(d) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA- defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. (40 CFR 63.3941(a)(4))

(e) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total

organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. (40 CFR 63.3941(a)(5))

4) *Determine the volume fraction of coating solids for each coating.* You must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (4) of this section. If test results obtained according to paragraph (b)(1) of this section do not agree with the information obtained under paragraph (b)(3) or (4) of this section, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. (40 CFR 63.3941(b))

(a) *ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003).* You may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see §63.14), or ASTM Method D6093-97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. (40 CFR 63.3941(b)(1))

(b) *Alternative method.* You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval. (40 CFR 63.3941(b)(2))

(c) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. (40 CFR 63.3941(b)(3))

(d) *Calculation of volume fraction of coating solids.* You may determine the volume fraction of coating solids using Equation 1 of this section: (40 CFR 63.3941(b)(4))

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$$

(Equation 1)

Where:

V_s = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{volatiles}$ = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

5) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM Method D1475-98, "Standard Test Method for

Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475-98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. (40 CFR 63.3941(c))

6) *Determine the organic HAP content of each coating.* Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of this section: (40 CFR 63.3941(d))

$$H_c = \frac{(D_c)(W_c)}{V_s}$$

(Equation 2)

Where:

H_c	=	Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.
D_c	=	Density of coating, kg coating per liter (gal) coating, determined according to paragraph (c) of this section.
W_c	=	Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.
V_s	=	Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to paragraph (b) of this section.

7) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in §63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to paragraph (a) of this section. You must keep all records required by §§63.3930 and 63.3931. As part of the notification of compliance status required in §63.3910, you must identify the coating operation(s) for which you used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinners and/or other additives, or cleaning materials that contained organic

HAP, determined according to the procedures in paragraph (a) of this section. (40 CFR 63.3941(e))

8) Continuous compliance demonstration.

(a) For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the applicable emission limit in §63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a).

(d) You must maintain records as specified in §63.3930 and §63.3931. (40 CFR 63.3942(d))

ii. Compliance requirements for e*mission rate without add-on controls option*.

1) The owner or operator must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890 . (40 CFR 63.3950) (See Comment 6)

2) You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.3890, but is not required to meet the operating limits or work practice standards in §§63.3892 and 63.3893, respectively. You must conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of §63.3951. When calculating the organic HAP emission rate according to §63.3951, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to re-determine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation

showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. (40 CFR 63.3951)

(a) *Determine the mass fraction of organic HAP for each material.* The owner or operator shall determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a). (40 CFR 63.3951(a))

(b) *Determine the volume fraction of coating solids.* The owner or operator shall determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in §63.3941(b). (40 CFR 63.3951(b))

(c) *Determine the density of each material.* The owner or operator shall determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965- 02, "Standard Test Methods for Specific Gravity of Coating Powders" (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475-98 or ASTM Method D5965-02 test results and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of

section §63.3951 (See Specific Condition S2.d.ii.6)). (40 CFR 63.3951(c))

(d) *Determine the volume of each material used.* The owner or operator shall determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of section §63.951 (See Specific Condition S2.ii.6)). (40 CFR 63.3951(d))

(e) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. The owner or operator shall calculate the mass of organic HAP emissions using Equation 1 of §63.3951 as follows: (40 CFR 63.3951(e))

$$H_e = A + B + C - R_w$$

(Equation 1)

Where:

He = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C.

Rw = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of §63.3951. (You may assign a value of zero to R_w if you do not wish to use this allowance.)

(i) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of §63.3951 as follows: (40 CFR 63.3951(e)(1))

$$A = \sum_{i=1}^{m} (Vol_{c,i})(D_{c,i})(W_{c,i})$$

(Equation 1A)

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.

$D_{c,i}$ = Density of coating, i, kg coating per liter coating.

$W_{c,i}$ = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of Part 63.

M = Number of different coatings used during the month.

(ii) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of §63.3951 as follows: (40 CFR 63.3951(e)(2))

$$B = \sum_{j=1}^{m} (Vol_{t,j})(D_{t,j})(W_{t,j})$$

(Equation 1B)

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

$Vol_{t,j}$ = Total volume of thinner and/or other additive, j, used during the month, liters.

$D_{t,j}$ = Density of thinner and/or other additive, j, kg per liter.

Wt,j = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or

other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of Part 63.

N = Number of different thinners and/or other additives used during the month.

(iii) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of §63.3951 as follows: (40 CFR 63.3951(e)(3))

$$C = \sum_{k=1}^{p} (Vol_{s,k})(D_{s,k})(W_{s,k})$$

(Equation 1C)

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

$Vol_{s,k}$ = Total volume of cleaning material, k, used during the month, liters.

$D_{s,k}$ = Density of cleaning material, k, kg per liter.

$W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

P = Number of different cleaning materials used during the month.

(iv) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section. (40 CFR 63.3951(e)(4))

(f) *Determine the total volume of coating solids used.* Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of §63.3951 as follows: (40 CFR 63.3951(f))

$$V_{st} = \sum_{i=1}^{m} (Vol_{c,i})(V_{s,i})$$

(Equation 2)

Where:

V_{st} = Total volume of coating solids used during the month, liters.

$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.

$V_{s,i}$ = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.3941(b).

M = Number of coatings used during the month.

(g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of §63.3951 as follows. (40 CFR 63.3951(g))

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}}$$

(Equation 3)

Where:

H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

H_e = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1.

V_{st} = Total volume of coating solids used during month, y, liters, as calculated by Equation 2.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(h) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of section §63.3951 must be less than or equal to the applicable emission limit for each subcategory in §63.3890 or the predominant activity or facility-specific emission limit allowed in §63.3890(c). You must keep all

records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, determined according to the procedures in this section. (40 CFR 63.3951(h))

3) The owner or operator shall meet the following requirements to demonstrate continuous compliance with emission limitation:

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the applicable emission limit in §63.3890 (2.60 lb organic HAP per gallon of coating solids). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. (40 CFR 63.3952(a))

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890 (2.60 lb organic HAP per gallon of coating solids), this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6). (40 CFR 63.3952(b))

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g). (40 CFR 63.3952(c))

(d) You must maintain records as specified in §63.3930 and §63.3931 (Specific Condition S2.d.iv). (40 CFR 63.3952(d))

iii. The owner or operator shall maintain the following records:

1) The owner or operator must collect and keep records of the data and information specified in section §63.3930. Failure to collect and keep these records is a deviation from the applicable standard. (40 CFR 63.3930)

2) A copy of each notification and report that you submitted to comply with Subpart MMMM, and the documentation supporting each notification and report. (40 CFR 63.3930(a))

3) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. (40 CFR 63.3930(b))

4) For each compliance period, the records specified in paragraphs §63.3930 (c)(1) and (c)(3) as follows: (40 CFR 63.3930(c))

(a) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used. (40 CFR 63.3930(c)(1))

(b) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each

month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951. (40 CFR 63.3930(c)(3))

5) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. (40 CFR 63.3930(d))

6) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. (40 CFR 63.3930(e))

7) A record of the volume fraction of coating solids for each coating used during each compliance period. (40 CFR 63.3930(f))

8) If you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period. (40 CFR 63.3930(g))

9) If you use an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), you must keep records of the information specified in paragraphs (h)(1) through (3) of §63.3930 as follows: (40 CFR 63.3930(h))

   (a) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265 , and 266 apply to the facility; and the date of each shipment. (40 CFR 63.3930(h)(1))

   (b) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.3951. (40 CFR 63.3930(h)(2))

   (c) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials.

This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. (40 CFR 63.3930(h)(3))

10) The owner or operator shall keep records of the date, time, and duration of each deviation. (40 CFR 63.3930(j))

iv. The owner or operator shall keep records in the form and time period as the following:

1) The owner or operator must keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. (40 CFR 63.3931(a))

2) As specified in 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63.3931(b))

3) The owner or operator must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years. (40 CFR 63.3931(c))

v. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS) for each HAP-containing material used at this plant. (Regulation 2.16, section 4.1.9)

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. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

iii. The owner or operator shall monthly calculate and record the Ethyl Benzene emissions and calculate total Ethyl Benzene emissions during each 12 consecutive month period, in order to demonstrate compliance with the standard in Specific Condition S1.e.2.

S3. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance reports:

a. **VOC**

The owner or operator shall identify all periods of exceeding a VOC emission standard during a reporting period. The report shall include the following:

i. Emission Unit ID number and emission point ID number;
ii. The date and duration during which a deviation from the coating VOC limits occurred;
iii. The quantity of excess emissions;
iv. Summary information on the cause or reason for excess emissions;
v. Corrective action taken to minimize the extent and duration of each excess emissions event;
vi. Measures implemented to prevent reoccurrence of the situation that resulted in excess VOC emissions;
vii. If no deviations occur during a semi-annual reporting period, the report shall contain a negative declaration.

b. **Opacity**

The owner or operator shall report any deviation from the requirement to perform the monthly inspection of the filters during a reporting period. If no deviations occur during the reporting period, the report shall contain a negative declaration.

c. **PM**

i. The owner or operator shall identify all periods of exceeding a PM emission standard during a reporting period. The report shall include the following:

1) Emission Unit ID number and emission point ID number;
2) The date and duration during which a deviation occurred;
3) The quantity of excess emissions;
4) Summary information on the cause or reason for excess emissions;
5) Corrective action taken to minimize the extent and duration of each excess emissions event;
6) Measures implemented to prevent reoccurrence of the situation that resulted in excess PM emissions;
7) If no deviations occur during a semi-annual reporting period, the report shall contain a negative declaration.

ii. For the primary and secondary filters:

1) The beginning and ending date of the reporting period;
2) Identification of the operating parameter being monitored;
3) Identification of the number, duration, and cause of all excursions (Excursions are defined as any departure from the performance indicator range); and
4) Description of any corrective action taken for each excursion;
5) A negative declaration if no excursions occurred.

iii. Any deviation from the requirement to utilize the filters at all times the paint booth is in operation, including the following:

1) The date, duration (including the start and stop time) of each time the filters are damaged or not utilized while the process is in operation,
2) The number of filters damaged,
3) Corrective action taken,
4) Summary information on the cause or reason for missing or damaged filters and measures implemented to prevent reoccurrence of the situation that damaged or missing filters.
5) A negative declaration if no deviations occurred.

d. **HAP**

i. Notifications

1) *General.* You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section. (40 CFR 63.3910(a))

2) *Initial Notification.* You must submit the initial notification required by §63.9(b) for an existing affected source no later than 1 year after January 2, 2004. (40 CFR 63.3910(b)) (See Comment 6)

3) *Notification of compliance status.* You must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in §63.9(h). (40 CFR 63.3910(c)) (See Comment 6)

ii. *General Requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of §63.3920, and the information specified in paragraphs (a)(4) through (7) and (c)(1)

of section §63.3920 that is applicable to your affected source as follows: (40 CFR 63.3920(a)(3))

1) Company name and address. (40 CFR 63.3920(a)(3)(i))

2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.3920(a)(3)(ii))

3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. (40 CFR 63.3920(a)(3)(iii))

4) Identification of the compliance option or options specified in 63.3891 that you used on each coating operation during the reporting period. If you switched compliance options during the reporting period, you must report the beginning and ending dates for each option you used. (40 CFR 63.3920(a)(3)(iv))

5) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (40 CFR 63.3891(b) or (c), the calculations results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. (40 CFR 63.3920(a)(3)(v))

iii. *No deviations.* If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. (40 CFR 63.3920(a)(4))

iv. *Deviations: Compliant material option.* If you used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semiannual compliance report must contain the following information: (40 CFR 63.3920(a)(5))

1) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. (40 CFR 63.3920(a)(5)(i))

2) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this

section. You do not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports). (40 CFR 63.3920(a)(5)(ii))

3) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports). (40 CFR 63.3920(a)(5)(iii))

4) A statement of the cause of each deviation. (40 CFR 63.3920(a)(5)(iv))

v. *Deviations: Emission rate without add-on controls option.* If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of section 63.3920 as follows: (40 CFR 63.3920(a)(6))

1) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890. (40 CFR 63.3920(a)(6)(i))

2) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports). (40 CFR 63.3920(a)(6)(ii))

3) A statement of the cause of each deviation. (40 CFR 63.3920(a)(6)(iii))

4) Deviation means any instance in which an affected source subject to Subpart MMMM, or an owner or operator of such a source: (40 CFR 63.3981)

(a) Fails to meet any requirement or obligation established by this Subpart MMMM including but not limited to, any emission limit or operating limit or work practice standard;

(b) Fails to meet any term or condition that is adopted to implement an applicable requirement in Subpart MMMM and that is included in the operating permit for any affected source required to obtain such a permit; or

(c) Fails to meet any emission limit, or operating limit, or work practice standard in Subpart MMMM during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by Subpart MMMM.

vi. *Inclusion with Title V report.* Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in 40 CFR Part 63, Subpart MMMM in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to §63.3920 along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in Subpart MMMM, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. (40 CFR 63.3920(a)(2)) (See Comment 5)

vii. *Dates.* Unless the District has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of §63.3920. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. (40 CFR 63.3920(a)(1)) (See Comment 5)

1) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.3940, §63.3950, or §63.3960 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period. (40 CFR 63.3920(a)(1)(i))

2) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. (40 CFR 63.3920(a)(1)(ii))

3) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. (40 CFR 63.3920(a)(1)(iii))

4) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section. (40 CFR 63.3920(a)(1)(iv))

e. **TAC**

i. Within 6 months of a change of a raw material as described in S2.c.ii, the owner or operator shall submit the re-evaluated EA demonstration to the District.

ii. The owner or operator shall report the Ethyl Benzene emissions during each 12 consecutive month period in order to demonstrate compliance with the standard in Specific Condition S1.e.2.

U2 Comments

1. Caldwell Tanks has performed a one-time compliance demonstration for PM in 2001 semi-annual compliance report and the controlled PM emissions from the paint booths cannot exceeded the hourly PM emission limit. Therefore, the requirements of utilizing the filters at all time and monitoring the pressure drop across the filters, as a surrogate of the requirement of monthly PM calculation, will ensure compliance with PM standard. Should a new coating be introduced to the process, with higher solids content, then it will be necessary to resubmit the demonstration.

2. The regulation applicable will be Regulation 6.31, application method will be HVLP spray gun application of solvent-based paint, and the substrate type will be metal. The owner or operator shall be allowed to maintain a one time record of the information and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.

3. All coatings used at this plant are classified as general use coatings. For existing general use coating affected sources, the organic HAP emission limit is 2.6 lb organic HAP per gallon coating solids used during each 12-month compliance period.

4. 40 CFR Part 63, Subpart MMMM - *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Parts and Products* establishes three options to demonstrate compliance with the organic HAP emission standards in accordance with 63.3891: Compliant Material Option, Emission Rate without Add-on Controls Option, and Emission Rate with Add-on Controls Option. Since the paint booths are not equipped with any add-on controls for HAP, Caldwell Tanks may choose to demonstrate compliance with either Compliant Material Option or Emission Rate without Add-on Controls Option.

5. In accordance with 40 CFR Part 63, Subpart MMMM, section 63.3920(a)(1) and 63.3920(a)(1)(iv), Caldwell Tanks may submit their Subpart MMMM semiannual compliance reports on the same schedule as the Title V operating permit reporting requirements.

6. According to the requirements of §63.3910, Caldwell Tanks is required to submit an initial notification no later than January 2, 2005 and an notification of compliance status for the initial compliance period no later than March 2, 2008. Caldwell Tanks submitted the initial notification and the initial compliance demonstration prior to the required due days and therefore has fulfilled this requirement.

7. Caldwell Tanks submitted a revised STAR EA Demonstration on 8/12/2011 and demonstrated the TAC emissions from this unit are in compliance with the STAR EA Goals except Ethyl Benzene. In a letter dated 8/11/2011, Caldwell Tanks accepted the 28,546 lb/yr emission limit for Ethyl Benzene in order to demonstrate compliance with the STAR program.

Emission Unit U3: Two (2) non-halogenated cold solvent parts washers

U3 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3, 4

U3 Equipment:

Emission Point	Description	Applicable Regulation	Control ID
E6	One (1) non-halogenated cold solvent metal parts washer with secondary reservoir, make Selig, rated capacity 30 gallon.	6.18	N/A
E7	One (1) non-halogenated cold solvent metal parts washer with secondary reservoir, make Selig, rated capacity 30 gallon.	6.18	N/A

U3 Control Devices: There are no control devices associated with Emission Unit U3

U3 Specific Conditions

S1. **Standards** (Regulation 2.16, section 4.1.1)

VOC

i. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)

1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)

2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)

3) A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.b. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)

4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)

5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)

6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)

ii. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)

1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)

2) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)

3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)

4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)

5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)

6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)

7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)

iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20 °C (68 °F). (Regulation 6.18, section 4.3.2)

S2. **Monitoring and Record Keeping** (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)

VOC

i. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)

1) The name and address of the solvent supplier,
2) The date of the purchase,
3) The type of the solvent, and
4) The vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

ii. All records shall be retained for 5 years and made available to the District upon request. (Regulation 6.18, section 4.4.3)

S3. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance reports:

VOC

i. Emission Unit ID number and emission point ID number;
ii. The beginning and ending date of the reporting period;
iii. Identification of applicable equipment standard or record;
iv. A declaration that if the equipment standard or record is being maintained.

Comments

1. This equipment is determined to be an insignificant activity per Regulation 2.16, section 1.23. An insignificant activity is de minimis per Regulation 5.21, section 2.3. Therefore there are no requirements for TAC.

Emission Unit U4: Six (6) plant make-up air units

U4 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
6.09	Standards of Performance for Existing Process Operations	1, 2, 3
6.10	Standards of Performance for Existing Process Gas Streams	1, 2, 3, 4, 5
7.08	Standards of Performance for New Process Operations	1, 2, 3
7.09	Standards of Performance for New Process Gas Streams	1, 2, 3, 4, 5

U4 Equipment:

Emission Point	Description	Applicable Regulation	Control ID
E8	One (1) direct-fired natural gas roof unit at North Paint Area, make Hartzell, model GR181, with a rated capacity of 1.95 MMBtu/hr.	6.09 and 6.10	N/A
E9	One (1) direct-fired natural gas roof unit at Balcony Area, make Hartzell, model GC402, with a rated capacity of 4.0 MMBtu/hr.	6.09 and 6.10	N/A
E10	Four (4) direct-fired natural gas ground units, model unknown, with a rated capacity of 3.5 MMBtu/hr for each	7.08 and 7.09	N/A

U4 Control Devices: There are no control devices associated with Emission Unit U4

U4 Specific Conditions

S1. **Standards** (Regulation 2.16, section 4.1.1)

a. **PM**

i. For emission point E8 and E9, the owner or operator shall not allow PM emissions to exceed 2.58 lb/hr. (Regulation 6.09, section 3.2) (See Comment 1)

ii. For emission point E10, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2) (See Comment 1)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1) (Regulation 7.08, section 3.1.1)

c. **NO_x**

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility or from any air pollution control equipment installed on any affected facility any NO_x fumes in excess of 300 ppm by volume expressed as NO_2. (Regulation 6.09, section 4) (Regulation 7.08, section 4) (See Comment 1)

d. **SO_2**

i. For emission point E8 and E9, no owner or operator subject to this regulation shall cause the emission of SO_2 in a process gas stream to exceed 2000 parts per million by volume at 0% oxygen. (Regulation 6.10, section 4) (See Comment 1)

ii. For emission point E10, the owner or operator shall not cause or allow at any affected facility the release of a process gas stream containing sulfur dioxide with a concentration greater than 28.63 grains per 100 dscf at 0% excess oxygen unless the resulting emission of sulfur dioxide is less than 40 tons per year. (Regulation 7.09, section 4) (See Comment 1)

e. **CO**

No owner or operator subject to this regulation shall cause the emission of carbon monoxide in a process gas stream unless the gases are burned at 1300 ^{0}F for 0.5 seconds. (Regulation 6.10, section 5) (Regulation 7.09, section 5.1) (See Comment 3)

S2. **Monitoring and Record Keeping** (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)

a. **PM**

There are no monitoring and record keeping requirements for this pollutant. (See Comment 1)

b. **Opacity**

There are no monitoring and record keeping requirements for this pollutant. (See Comment 2)

c. **NO_x**

There are no monitoring and record keeping requirements for this pollutant. (See Comment 1)

d. **SO_2**

There are no monitoring and record keeping requirements for this pollutant. (See Comment 1)

e. **CO**

There are no monitoring and record keeping requirements for this pollutant. (See Comment 3)

S3. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. **PM**

There are no reporting requirements for this pollutant. (See Comment 1)

b. **Opacity**

There are no reporting requirements for this pollutant. (See Comment 2)

c. **NO_x**

There are no reporting requirements for this pollutant. (See Comment 1)

d. **SO_2**

There are no reporting requirements for this pollutant. (See Comment 1)

e. **CO**

There are no reporting requirements for this pollutant. (See Comment 3)

U4 Comment

1. A one-time PM, NO_x and SO_2 compliance demonstration has been performed for the direct heat units, using AP-42 emission factors and combusting natural gas and propane, the emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for these direct heat units with respect to PM, NO_x and SO_2 emission limits.

2. 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.

3. The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000˚F exceeds the 1,300˚F temperature requirement of 7.09, section 5.1.

4. The small boilers or direct heat units that having a capacity of less than 1.0 MMBtu/hr are listed as insignificant activities.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-Permit Documents

There are no off permit documents associated with this Title V permit.

Alternative Operating Scenario

The company requested an alternative operating scenario for emission unit U1. Emission unit U1, consisting of emission point E1, E2, and E3, normally operates with the baghouses vented inside the building. Under the alternative operating scenario, the owner or operator is allowed to vent the baghouses to the outdoors and the emission points are designated as E1A, E2A, and E3A respectively. The additional conditions needed to demonstrate compliance with this alternative are listed with the emission unit.

Source-Wide HAP Speciation

HAP	CAS #	HAP	CAS #
Ethyl Benzene	100-41-4	Methyl Isobutyl Ketone	108-10-1
MDI	101-68-8	Xylene	1330-20-7

Insignificant Activities

Equipment	Quantity	Basis for Exemption
Used oil aboveground storage tank, 250 gal	1	Regulation 2.02, 2.3.9.2
Small space heaters and make-up air units, natural gas fired, capacity ranged 0.05- 0.395 MMBtu/hr	117	Regulation 2.02, 2.1.1
Research and development activities with potential emissions less than 5 tpy	1	Regulation 2.02, 2.3.27
Closed system solvent distillation unit, make Finish Thompson, model LS-15D	1	Closed-loop system with “zero emission”, capacity 1.9 gal/hr
VOC storage vessel, capacity 15 gal	1	Regulation 2.02,2.3.24

Equipment	Quantity	Basis for Exemption
Portable diesel and gasoline storage tanks, 250 gal for each	2	Regulation 2.02, 2.3.23
Internal combustion engines, fixed or mobile	5	Regulation 2.02, 2.2
Separate and mostly mobile stations for performing welding, cutting, and gouging	54	Regulation 2.02, 2.3.4
Wood-working operation	1	Regulation 2.02, 2.3.5
Nitrogen and Oxygen storage tanks	402	Regulation 2.02, 2.3.26
Paint and solvent storage containers	500	Regulation 2.02, 2.3.24
Portable cylinders of flammable gases	200	Regulation 2.02, 2.3.26
Waste storage containers, 55-gallon drums	20	Not regulated

1) Insignificant activities identified in District Regulation 2.02 Section 2, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.

2) Insignificant activities identified in District Regulation 2.02 Section 2 shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.

3) The District has determined pursuant to Regulation 2.16 section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed.

4) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.

5) The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16 section 4.3.5.3.6.

6) The owner or operator elected to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions to be reported on the annual emission inventory.