Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

Title V Operating Permit

Permit No.: O-1734-18-V

Plant ID: 1734

Effective Date: 6/28/2018

Expiration Date: 6/30/2023

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:

Source: Kentucky Trailer
7201 Logistics Drive
7070 International Drive
Louisville, KY 40258

Owner: R.C. Tway Company, LLC
7201 Logistics Drive
Louisville, KY 40258

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 six (6) months prior to the expiration date.

Application No.: See **Application and Related Documents** table.

Administratively Complete: 07/13/2017
Date of Public Notice: 04/28/2018
Date of Proposed Permit: 04/28/2018

Permit writer: Aaron DeWitt

Air Pollution Control Officer
6/28/2018

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Title V Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	28557-12-TV	10/30/2012	07/18/2012	Initial	Entire Permit	Initial Permit Issuance This permit incorporated the construction permits 29996-10-C, 29997-10-C, 50-10-C, and 51-10-C
N/A	O-1734-18-V	06/28/2018	04/28/2018	Renewal	Entire Permit	Permit Renewal. This renewal incorporates the following changes:

Permit Changes:

1. Updated to newest format.
2. Emission Units U2 Parts Washers and U3 Direct Gas Fired Heaters are now considered Insignificant Activities.
3. Added District Regulation 7.06 requirements for IA heat exchangers in U1
4. Added IA Emission Unit for Metal and Wood Cutting Equipment Subject to Regulation 7.08
5. Stack height proposal for stack reconfiguration and cumene limit.

Application Documents

Document Number	Date Received	Description
35527	1/31/2012	Application to incorporate Construction Permits into Title V permit
80136	10/24/2016	Notification to Company of Regulation 5.21 BAC Changes
80634	11/30/2016	STAR Environmental Acceptability Review – Response Required by April 10, 2017
81715	2/6/2017	STAR Questions from KY Trailer
83410	4/10/2017	EA Demo submitted by company
83745	4/20/2017	District Response to EA Demo Submitted by KY Trailer
84470	5/30/2017	Title V Permit Renewal Application
84512	6/1/2017	Request for additional applications for application to be complete
85019	6/28/2017	Requested Supplemental Title V Permit Renewal Applications
85231	7/13/2017	Certificate of Existence
85232	7/13/2017	Administratively Complete Checklist
85233	7/13/2017	Correspondence with company about Administrative Completeness

Document Number	Date Received	Description
85922	8/15/2017	District request for any (M)SDS that were changed since last permit revision
85949	8/15/2017	Response to District request for any (M)SDS that were changed since last permit revision
86677	8/31/2017	District request for Reichold floor coating (M)SDS
87155	9/12/2017	Response to District request for Reichold floor coating (M)SDS
87218	9/14/2017	District request for information: (1) material coated in paint booth E1 (2) progress report for stack reconfiguration
87497	9/22/2017	Response to District request for information from 9/14/2017
87518	9/27/2017	District request for information: stack reconfiguration date clarification
87519	9/27/2017	Response to District request for information from 9/27/2017
87592	9/28/2017	District request for site visit
89108	11/9/2017	Company correspondence of stack configuration and modeling details
89107	11/16/2017	District review of stack configuration modeling background information. Informed company that an Agreed Board Order (ABO) may be required.
89168	11/20/2017	District clarification of reason for ABO
90021	11/21/2017	Company request to alter stack configuration
89195	11/21/2017	District response to request to alter stack
90023	11/29/2017	Company information on reconfigured stack cap
89399	12/5/2017	District letter requiring action before January 5, 2018 for new stack configuration modeling, updated EA Demo and updated stack height proposal
89957 & 90024	1/5/2018	Company response to District letter from 12/5/2017
90143	1/22/2018	District request for Initial Notice and Notification of Compliance Status with 40 CFR 63, Subpart MMMM
90229	1/29/2018	Company response to request for Initial Notice and Notification of Compliance Status with 40 CFR 63, Subpart MMMM
90280	1/31/2018	District request for Initial Notice and Notification of Compliance Status with 40 CFR 63, Subpart MMMM
90638	2/12/2018	Company response to request for Initial Notice and Notification of Compliance Status with 40 CFR 63, Subpart MMMM
90647	2/12/2018	District request for information of treatment, storage, and disposal facility
90655	2/12/2018	Company response to request for information of treatment, storage, and disposal facility usage
90683	2/14/2018	Company response to request for RO update
90684	2/14/2018	District request for RO updated 100a form
90701	2/14/2018	Company electronic submission of RO updated 100a form

Document Number	Date Received	Description
90892	2/28/2018	District request for diisocyanate emission factor used in company submitted application PTE
90895	2/28/2018	Meeting follow-up regarding incorporation of new stack reconfiguration for U1 E1 into new permit
90938	3/1/2018	Company questioned if work should continue on the new stack for U1 E1, or wait till new permit was complete. District instructed to continue work.
91080	3/8/2018	Company response to request for diisocyanate emission factor
91081	3/8/2018	Emission factor for isocyanates
91144	3/13/2018	District approved PTE

Abbreviations and Acronyms

AP-42	- AP-42, *Compilation of Air Pollutant Emission Factors*, published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO_x	- Nitrogen oxides
PM	- Particulate Matter
PM_{10}	- Particulate Matter less than 10 microns
$PM_{2.5}$	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO_2	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

Title V of the Clean Air Act Amendments of 1990 (the Act) 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 or APCD) 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 that 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 owner or operator's Title V permit may include a current table of "insignificant activities."

Insignificant activities are defined in District Regulation 2.16 section 1.23, as of the date the permit was proposed for review by U.S. EPA, Region 4.

Insignificant activities identified in District Regulation 1.02, section 1.38, and Appendix A 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 1.02, section 1.38, and Appendix A 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 (Form 9400-O) directly to the EPA and to the District, as set forth in Regulation 2.16, section 4.3.5.4, at the following addresses:

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

   Air Pollution Control District
   701 W. Ormsby Avenue, Suite 303
   Louisville, Kentucky 40203-3137

   This certification must be postmarked by 15 April of the year following the year for which the certification is being submitted, or other such due date as required by another applicable regulation.

3. **Compliance Schedule** - The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. 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, they 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 if the conditions in Regulation 2.16 are met. 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; and

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, section 12.3. 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 12.2.4]

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 at the address shown in General Condition 35.b. [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: [Regulation 2.16, section 4.3.2]

    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.

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. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month. 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 1 January through 30 June and 1 July through 31 December of each calendar year. All reports shall be sent to the District at the address shown in paragraph 2 of these General Conditions and must be postmarked by the 60th day following the end of each reporting period, unless specified elsewhere in this permit. 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 or a declaration that there were no such deviations. All semi-annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company.

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

Reporting Period	Report Due Date
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.

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, section 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 Termination and Revocation 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 through 5.11.6. For purposes of section 5.11.1, 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, 3.3, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.12 shall be submitted to:

    Air Pollution Control District
    701 West Ormsby Avenue, Suite 303
    Louisville, Kentucky 40203-3137

    b. Documents that 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:

    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 Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	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
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

District Only Enforceable Regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
5.00	Definitions
5.01	General Provisions
5.14	Hazardous Air Pollutants and Source Categories
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 that normally contains fifty 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 40 CFR 82 Subpart A, Production and Consumption Controls. [Regulation 2.16, section 4.1.5]

Plantwide Requirements

Facility Description:

This source manufactures large, open and closed trailers for over the road hauling.

Plantwide Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
2.16	Title V Operating Permits	1 through 6

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.00	Definitions	1, 2
5.01	General Provisions	1 through 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
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

Plantwide Specific Conditions

S1. **Standards**
[Regulation 2.16 Section 4.1.1]

a. **TAC**

i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*.
[Regulations 5.00 and 5.21] (See Comment 1)

ii. When submitting an application for construction of any new or modified process/process equipment, the owner or operator shall also submit a STAR EA Demonstration for all Category 1 through Category 4 TACs emitted. [Regulation 5.21, section 4.22.1]

iii. For any conditions outside the environmental acceptability analysis, including if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis*, the owner or operator shall verify and document the environmental acceptability of the revised emissions, at the time of the change. Prior approval by the District is not required for a change pursuant to Regulation 5.21 section 4.22.3 if the requirements of 4.23.1 through 4.23.4 are met. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. [Regulation 5.21, Section 4]

1) This includes, but is not limited to, control device upset conditions.

iv. If the TAC does not have an established BAC or *de minimis* value, the owner or operator shall calculate and report these values. The form, located in Attachment C - Determination of Benchmark Ambient Concentration (BAC), may be used for determining BAC and *de minimis* values. [Regulation 5.20, Sections 3 and 4]

b. **VOC**

i. The owner or operator shall not allow plantwide VOC emissions to equal or exceed 250 tons in a consecutive 12 month period from all emission points.[1] [Regulation 2.05]

[1] The 12-month rolling total VOC emission limit is to preclude applicability of District Regulation 2.05 *Prevention of Significant Deterioration of Air Quality.*

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 following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS/SDS, analysis of emissions, and/or modeling results.

ii. If there is a change in a process or process equipment, including a new TAC being emitted or the content of a TAC in a raw material increases above *de minimis*, the owner or operator shall verify and document the environmental acceptability of the revised emissions, at the time of the change.

b. **VOC**

i. The owner or operator shall maintain daily records of usage and the monthly and consecutive 12 month total VOC emission from all emission points to demonstrate compliance with Regulation 2.05 avoidance limit.

S3. **Reporting**
[Regulation 2.16 Section 4.1.1]

The owner or operator shall report the following information, as required by General Condition 14:

a. **TAC**

i. Any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

ii. If there is a change in a process or process equipment, including a new TAC being emitted or the content of a TAC in a raw material increases above *de minimis*, the re-evaluated EA demonstration shall be submitted to the District within 6 months after the change of a raw material.

b. **VOC**

i. For the 250 ton per 12 consecutive month period plantwide VOC limit:

1) The monthly and 12-consecutive month plantwide VOC emissions;

2) Identification of all periods of exceedance of the plantwide VOC limit including the quantity of excess emissions;

3) Reason for excess emissions; and

4) Description of corrective action taken to prevent future exceedances.

Comments for Plantwide Requirements

1. Kentucky Trailer submitted the TAC Environmental Acceptability Demonstration to the District on April 10, 2017 and January 5, 2018. Screen3 dispersion modeling was performed for each emission unit that has the potential to emit non-*de minimis* TAC emissions. In order to achieve compliance, the current horizontal discharge stacks will be reconfigured to a new vertical discharge configuration. The company submitted a stack height proposal with the April 2017 application. The District reviewed the EA Demonstrations submitted by the source. The following table demonstrates that the carcinogen risk and non-carcinogen risk values comply with the STAR EA goals required in Regulation 5.21.

Table 1 Plantwide Risk Summary

Plantwide Sum	All new P/PE		All new P/PE	
Industrial Total R_C	**2.00**	< 75	**2.00**	< 38
Non-Ind. Total R_C	**2.00**	< 7.5	**2.00**	< 3.8
Industrial Total R_{NC} (max)	**0.0004**	< 3.0		
Non-Ind. Total R_{NC} (max)	**0.0004**	< 1.0		

Table 2 Individual Industrial Risk

Individual Industrial				
TAC	CAS	Total	U1	
		HQ < 3	Risk < 10	HQ < 3
Ethlybenzene	100-41-4	0.00	1.00	0.0004
Cumene	98-82-8	0.00	1.00	0.0003

Table 3 Individual Non-Industrial Risk

Individual Non-Industrial (Risk < 1.0, HQ < 1.0)				
TAC	CAS	Total	U1	
		HQ < 1	Risk <1	HQ <1
Ethlybenzene	100-41-4	0.00	1.00	0.0004
Cumene	98-82-8	0.00	1.00	0.0003

Emission Unit U1: Coating Operations

U1 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
7.06	Standards of Performance for New Indirect Heat Exchangers	
7.08	Standards of Performance for New Process Operations	1, 2, 3, 5
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1 through 7
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	All
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**
5.00	Definitions	1, 2
5.01	General Provisions	1 through 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
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

U1 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Installation Date
E1	One (1) miscellaneous metal parts spray-applied surface coating operation (Interior Paint Booth) Location: 7070 International Drive	STAR, 7.08, 7.25, 7.59, 40 CFR 63 Subpart MMMM	C1	S101, S102	1/2011
E2a	Natural Gas Indirect Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr Location: 7070 International Drive	STAR, 7.06, 7.59, 40 CFR 63 Subpart MMMM[2]	N/A	S201	1/2011
E2b	Natural Gas Indirect Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr Location: 7070 International Drive	STAR, 7.06, 7.59, 40 CFR 63 Subpart MMMM[2]	N/A	S202	2/2011
E2c	Natural Gas Indirect Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr Location: 7070 International Drive	STAR, 7.06, 7.59, 40 CFR 63 Subpart MMMM[2]	N/A	S203	1/2011
E2d	Natural Gas Indirect Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr Location: 7070 International Drive	STAR, 7.06, 7.59, 40 CFR 63 Subpart MMMM[2]	N/A	S204	1/2011
E3	One (1) miscellaneous metal parts spray-applied surface coating operation (Undercoat Paint Booth) Location: 7201 Logistics Drive	STAR, 7.08, 7.25, 7.59, 40 CFR 63 Subpart MMMM[2]	C2	S301, S302	1/2011
E4	Adhesive application operation Location: 7201 Logistics Drive	STAR, 7.25, 40 CFR 63 Subpart MMMM[2]	N/A	F401, F402	1/2011

[2] These process heaters are not subject to 40 CFR 63, subpart DDDDD because the heaters are part of the "coating operation" as defined in 40 CFR 63, Subpart MMMM, section 63.3981 Definitions

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Installation Date
E5	Floor coating operation Location: 7070 International Drive & 7201 Logistics Drive	STAR, 7.25	N/A	F501, F502	1/2011

U1 Control Devices:

Control ID	Description	Control Efficiency	Performance Indicator	Stack ID
C1	One (1) American Paint Booth, Omega Series Custom Particulate Filter	90%	Filter Inspection	S101, S102
C2	One (1) Global Finishing Systems, CDF1616PDT-60 Particulate Filter	90%	Filter Inspection	S301, S302

U1 Specific Conditions

S1. **Standards**
[Regulation 2.16, section 4.1.1]

a. **HAP** [Subpart MMMM and Regulation 5.02, section 3.72]

i. For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.[3]
[40 CFR 63.3890(b)(1)] [See Comment 1]

ii. You 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 0.31 kg (2.6 lb) organic HAP per liter (gallon) of coating solids used. 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 require by §63.3930(c), and you must report it in the next semiannual compliance report required in §63.3920. [40 CFR 63.3891]

1) *Emission rate without add-on controls option.* The owner or operator shall 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 0.31 kg (2.6 lb) organic HAP per liter (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)]

[3] 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 Options, Emission Rate Without Add-on Controls Option, and Emission Rate with Add-on Controls Option. 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 0.31 kg (2.6 lb) organic HAP per liter (gallon) coating solids used during each 12-month compliance period.

iii. Any coating operation(s) for which the owner or operator uses the "compliant material option" or the "emission rate without add-on controls option," 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)]

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

v. If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period that must be reported as specified in §63.3910(c)(6) and 63.3920(a)(7).
[40 CFR 63.3963(b)]

b. **Opacity**

i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity.[4]
[Regulation 7.08, section 3.1.1; Regulation 7.06, section 5.1.1]

c. **$PM/PM_{10}/PM_{2.5}$**

i. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per piece of equipment (E1 and E3) based on actual operating hours in a calendar day.[5] [Regulation 7.08, section 3.1.2]

ii. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.56 pounds per million BTU actual total heat input for each heater (E2a-d).[6]
[Regulation 7.06, section 4.1.4]

d. **SO_2**

i. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur

[4] A determination has been made that natural gas combustion should inherently meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring of emission points E2a-E2d to demonstrate compliance with this standard.

[5] Using the minimum spray gun transfer efficiency of 35%, the percent solids of material (45.9%), and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booth cannot be exceeded.

[6] A one-time PM and SO_2 compliance demonstration has been performed for the heaters, using AP-42 emission factors and combusting natural gas, and the pounds per million BTU emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for these heaters with respect to PM and SO_2 emission limits.

dioxide in excess of 1.0 pound per million BTU actual total heat input for the combustion of gaseous fuels for each heater (E2a-E2d).[6]
[Regulation 7.06, section 5.1.1]

e. **TAC**

i. See Plantwide emission unit.

ii. The owner or operator shall not allow cumene emissions to exceed 103 lbs per 12 consecutive month period with current downturned gooseneck rain guards installed at emission point E1.[7] [Regulation 5.21, section 4.3]

iii. A Compliance Schedule for the U1, E1 stack reconstruction, submitted January 5, 2018, must be completed according to the following schedule: [7]
[TV application, received May 30, 2017] [Regulation 5.21, section 4.3]

1) Structural Design of New Stacks – 8/1/2017
2) RFQ for Stack Install – 9/15/2017
3) Review Quotes – 11/30/2017
4) Resubmit stack height proposal – 1/5/2018
5) Award Stack Installation – 2/15/2018
6) Schedule Installation for Paint Shutdown in October – 2/30/2018

(Previous milestones complete before permit effective date)

7) Stack Install Begins – 9/15/2018
8) Stacks Installation Complete – 10/30/2018

iv. Once the Stack Height Proposal to install vertical rain caps on E1 is completed, the owner or operator shall not allow cumene emissions to exceed 635 lbs per 12 consecutive month period.[7] [Regulation 5.21, section 4.3]

v. The owner or operator shall not allow ethylbenzene emissions to exceed 2,538 lbs per 12 consecutive month period at emission point E1.[7]
[Regulation 5.21, section 4.3]

vi. The owner or operator shall not allow TAC emissions for each E1, E3, E4 & E5, while operating, to exceed the TAC emission standards listed in the table "Unit 1 TAC Emission Standards". [8]
[Regulation 5.21, section 4.2 and section 4.3]

[7] Compliance schedule submitted initially with TV application, May 30, 2017. EA Demo and updated 100l submitted January 5, 2018. Limits determined from EA Demo, January 5, 2018.

[8] The paint booths have TAC emission standards for Category 1, 2, and 4 chemical TACs since its EA Demonstration was based on limited PTE. If the limited PTE for the TAC is less than de minimis level, *De Minimis* is listed as the limit. If the limited PTE for the TAC is greater than the *de minimis* level, modeling results were used to calculate risk value to compare to the EA Goals and limited PTE is used as limit.

Table 4: Unit 1 *De Minimis* TAC Emission Standards

***De Minimis* TACs**	**E1**	**E3**	**E4**	**E5**
Xylene (1330-20-7)	*		*	*
Methanol (67-56-1)	*			
Methyl isobutyl ketone, MIBK (108-10-1)	*	*		
Methylene chloride (75-09-2)	*			
Methyl methacrylate (80-62-6)	*			
Isophorone diisocyanate (4098-71-9)	*			
1,6-Hexamethylene-diisocyanate (822-06-0)	*			
1,2,4-Trimethylbenzene (95-63-6)	*			
Styrene (100-42-5)	*			
Toluene (108-88-3)		*		
Toluene Diisocyanate (TDI) (26471-62-5)				*

**The company has accepted de minimis as a STAR limit for these TACs from this equipment. (See Comment 2)*

f. **VOC**

i. See Plantwide emission unit.

ii. For each Emission Point E1 and E3: The owner or operator shall not coat more than 34 vehicles or trailers per day.
[Regulation 7.59, section 5.1.3]

iii. For Emission Points E1, E3, and E4 combined: The owner or operator shall not exceed 5 tons in any 12 consecutive month period for all process subject to Regulation 7.25 that have not undergone a BACT review.
[Regulation 7.25, section 3.1]

iv. The owner or operator shall not exceed 36.06 tons during any 12 consecutive month period from the floor coating operation (E5) according to the BACT analysis submitted on October 24, 1997.
[Regulation 7.25, section 3.1]

S2. **Monitoring and Record Keeping**
[Regulation 2.16, sections 4.1.9.1 and 4.1.9.2]

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

a. **HAP**

i. You 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]

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

2) 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)]

3) 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)]

4) 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)]

5) 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)]

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

7) 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)]

8) 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)]

9) You must keep records of the date, time, and duration of each deviation. [40 CFR 63.3930(j)]

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

1) Your records must be 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) You 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)]

iii. Compliance requirements for the *emission rate without add-on controls option*

1) You 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]

2) *Monitoring to Demonstrate Initial Compliance with Emission Limitation.* 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 the "emission rate without add-on controls" 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) D*etermine the mass fraction of organic HAP for each material.* 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.* 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.* 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.
[40 CFR 63.3951(c)]

(d) *Determine the volume of each material used.* 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 §63.3951. [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:

H_e = 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.

R_w = 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)]

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

(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.

$W_{t,j}$ = 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 (treatment, storage, and disposal facility) 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)]

a. You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater. [63.3951(e)(4)(i)]

b. You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month. [63.3951(e)(4)(ii)]

c. Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section. [63.3951(e)(4)(iii)]

d. You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in 63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them. [40 CFR 63.3951(e)(4)(iv)]

(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)]

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

(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 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)]

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}} \quad \text{(Equation 3)}$$

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) *Monitoring to Demonstrate Continuous Compliance with Emission Limitation.* 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 (2.6 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 (2.6 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 semi-annual 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. [40 CFR 63.3952(d)]

iv. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS/SDS) for each HAP-containing material used at this plant.

b. **Opacity**

i. For emission points E1 and E3, the owner or operator shall maintain records that include, but not be limited to, the following:

1) 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.

2) Keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

c. **PM/PM_{10}/$PM_{2.5}$**

i. For emission points E1 and E3, if there is any time that the control device is bypassed or not in operation when the process is 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 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) Measure implemented to prevent reoccurrence of the situation that resulted in the bypass event.

ii. There are no monitoring and record keeping requirements for emission points E2a, E2b, E2c, and E2d, related to Regulation 7.06.

d. **SO_2**

i. There are no monitoring and record keeping requirements for emission points E2a, E2b, E2c, and E2d, related to Regulation 7.06.

e. **TAC**

i. See Plantwide Monitoring and Recordkeeping.

ii. The owner or operator shall maintain records of the dates each of the milestones are completed to demonstrate compliance with the Stack Height Proposal submitted in the Title V renewal application.

iii. The owner or operator shall monthly calculate and record the monthly and 12 consecutive month period emissions of ethylbenzene and cumene for emission point E1.
(See Attachment A for Calculation Methodology)

iv. The owner or operator shall monthly calculate and record in lb/hr and lb/averaging period for each TAC marked in the table "Unit 1 *De Minimis* TAC Emission Standards".
(See Attachment A for Calculation Methodology)

f. **VOC**

i. See Plantwide Monitoring and Recordkeeping.

ii. For emission points E1, E3, and E4:

1) The owner or operator shall maintain the following records:

(a) The type of substrate coating is applied to (i.e. metal or non-metal component) per job,

(b) What regulation is applicable (i.e. Regulation 7.25 or 7.59),

(c) The start and stop time of job,

(d) The amount and type of coating applied per job.

2) For demonstrating compliance with Regulation 7.59:

(a) The owner or operator shall, daily, maintain trailer production records to demonstrate compliance with the number of trailers that can be coated each day.

3) For demonstrating compliance with Regulation 7.25 Non-BACT VOC emission limit:

(a) The owner or operator shall, monthly, calculate the monthly and consecutive 12 month combined total VOC emissions.

iii. For emission point E5, the owner or operator shall maintain records that include, but not be limited to, the following:

1) Daily records of VOC raw material usage; and

2) Monthly calculations of the consecutive 12 month total VOC emissions from the floor coating.

S3. **Reporting**
[Regulation 2.16, section 4.1.9.3]

The owner or operator shall report the following information, as required by General Condition 14:

a. **HAP**

i. *Initial Notification.* You must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. For an existing affected source, you must submit the initial notification no later than 1 year after January 2, 2004. If you are using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) as provided for under §63.3881(d) to constitute compliance with this subpart for any or all of your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no notifications are required under this subpart in regard to those metal parts coating operations. If you are complying with another NESHAP that constitutes the predominant activity at your facility under §63.3881(e)(2) to constitute compliance with this subpart for your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. [9]
[40 CFR 63.3910(b)]

ii. *Notification of Compliance.* 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).[9] [40 CFR 63.3910(c)]

1) Company name and address. [40 CFR 63.3910(c)(1)]

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 63.3910(c)(2)]

3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.3940, 63.3950, or 63.3960 that applies to your affected source. [40 CFR 63.3910(c)(3)]

4) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation in the affected source during the initial compliance period.
[40 CFR 63.3910(c)(4)]

5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
[40 CFR 63.3910(c)(5)]

[9] The Initial Notification and Notification of Compliance Status were submitted on February 12, 2018. Kentucky Trailer Manufacturing will use the Emission Rate without Add-on Controls option.

6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section. [40 CFR 63.3910(c)(6)]

(a) A description and statement of the cause of the deviation. [40 CFR 63.3910(c)(6)(i)]

(b) If you failed to meet the applicable emission limit in §63.3890, include all the calculations you used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports. [40 CFR 63.3910(c)(6)(ii)]

7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to the §63.3941(a), (b), or (c). You do not need to submit copies of any test reports. [40 CFR 63.3910(c)(7)]

(a) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material. [40 CFR 63.3910(c)(7)(i)]

(b) Volume fraction of coating solids for one coating. [40 CFR 63.3910(c)(7)(ii)]

(c) Density for one coating, one thinner and/or other additive, and one leaning material, except that if you use the compliant material option, only the example coating density is required. [40 CFR 63.3910(c)(7)(iii)]

(d) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.3951. [40 CFR 63.3910(c)(7)(iv)]

8) The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section. [40 CFR 63.3910(c)(8)]

(a) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.3951. [40 CFR 63.3910(c)(8)(ii)]

9) If you are complying with a single emission limit representing the predominant activity under §63.3890(c)(1), include the calculations and supporting information used to demonstrate that this emission limit represents the predominant activity as specified in §63.3890(c)(1). [40 CFR 63.3910(c)(10)]

10) If you are complying with a facility-specific emission limit under §63.3890(c)(2), include the calculation of the facility-specific emission limit and any supporting information as specified in §63.3890(c)(2). [40 CFR 63.3910(c)(11)]

iii. *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 semi-annual 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 semi-annual compliance report pursuant to §63.3920 along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semi-annual 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 semi-annual monitoring report. However, submission of a semi-annual 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)]

iv. *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 semi-annual 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.[10] [40 CFR 63.3920(a)(1)]

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

[10] In accordance with 40 CFR 63, Subpart MMMM, section 63.3920(a)(1) and 63.3920(a)(1)(iv), Kentucky Trailer Manufacturing, Inc. may submit their Subpart MMMM semi-annual compliance reports on the same schedule as the Title V operation permit reporting requirements.

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)]

v. *General Requirements.* The semi-annual 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, 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 (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)]

vi. *No deviations.* If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to you, the semi-annual 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)]

vii. *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 semi-annual 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.

b. **Opacity**

i. Report any deviation from the requirement to perform the monthly inspection of the filters during a reporting period. The report shall include the following:

1) Emission Unit ID and Emission Point ID numbers;

2) The date of each missed filter inspection.

c. **$PM/PM_{10}/PM_{2.5}$**

i. For emission points E1 and E3:

1) Description of equipment;

2) Identification of all periods of exceedances of the PM limit including the quantity of excess emissions;

3) Reason for excess emissions; and

4) Description of corrective action taken to prevent future exceedances.

ii. There are no routine compliance reporting requirements for emission points E2-a, E2b, E2c, E2d, related to Regulation 7.06.

d. **SO_2**

i. There are no routine compliance reporting requirements emission points E2-a, E2b, E2c, E2d, related to Regulation 7.06.

e. **TAC**

i. See Plantwide Reporting.

ii. Progress reports on the schedule of compliance required in section 4.3.3 shall be submitted at least semiannually, or at a more frequent period if specified in an applicable requirement or by the District. Progress reports shall contain: [Regulation 2.16, section 4.3.4]

1) Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved, and
[Regulation 2.16, section 4.3.4.1]

2) An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted. [Regulation 2.16, section 4.3.4.2]

iii. The owner or operator shall report the following information regarding the 12 consecutive month standards for U1- E1 ethylbenzene and cumene:

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

2) Calculated 12 month total TAC emissions for each month in the reporting period and identification of any exceedance of the standards; and

3) Description of any corrective action taken for each exceedance.

iv. The owner or operator shall report the following information regarding each exceedance of *de minimis* limits listed in the table "Unit 1 *De Minimis* TAC Emission Standards":

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

2) Actual emissions of the TAC in lb/hr and lb/averaging period for each exceedance; and

3) Description of any corrective action taken for each exceedance.

f. **VOC**

i. See Plantwide Reporting.

ii. For Emission Points E1, E3, and E4 the following shall be reported:

1) Identification of failure to maintain records of what substrate the coating was applied to; and

2) Exceedance of 34 trailers per day limit; and

3) Exceedance of non-BACT 5 tpy limit; and

4) Reason for excess emissions; and

5) Description of corrective action taken to prevent future exceedances.

iii. For emission point E5:

1) Exceedance of the 36.06 tons during any 12 consecutive month period BACT limit; and

2) Reason for excess emissions; and

3) Description of corrective action taken to prevent future exceedances.

Comments for U1 Requirements

1. 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)]
   a. All coating operations as defined in §3.3981;
   b. All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
   c. All manual and automated equipment and containers used for conveying coatings, thinners and/or additives, and cleaning materials; and
   d. All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
2. The TAC emission limits determined by de minimis values shall be updated each time when the District revises the BAC/de minimis values for these TACs. The current de minimis values per TAC list revised on 11/9/2017 are as follows:

Table 5: Unit 1 TAC *De Minimis* Values

TAC Name	CAS#	De minimis values		
		lb/hr	lb/averaging period	Averaging period
Xylene	1330-20-7	54	48,000	annual
Methanol	67-56-1	10,800	9,600,000	annual
Methyl isobutyl ketone, MIBK	108-10-1	0.70	624	annual
Methylene chloride	75-09-2	54.00	48,000	annual
Methyl methacrylate	80-62-6	378.00	336,000	annual
Isophorone diisocyanate	4098-71-9	0.0090	0.0090	8hr
1,6-Hexamethylene-diisocyanate	822-06-0	0.0054	4.80	annual
1,2,4-Trimethylbenzene	95-63-6	27.00	24,000	annual
Styrene	100-42-5	0.92	816	annual
Toluene Diisocyanate (TDI)	26471-62-5	0.049	43.64	annual

Emission Unit U2: Parts Washer (Insignificant Activity)

U2 Applicable Regulations:

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

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.00	Definitions	1, 2
5.01	General Provisions	1 through 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
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

U2 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Installation Date
E6	One (1) 20-gallon parts washer that has a drain opening diameter of 4 inches to the secondary reservoir (Make: Safety Kleen, Model:16)	STAR[11], 6.18	N/A	F601	4/2010

U2 Control Devices:

There are no control devices associated with this emission unit.

[11] Insignificant activities are *de minimis* by definition. (Regulation 5.21, section 2.3)

U2 Specific Conditions

S1. **Standards**
[Regulation 2.16, section 4.1.1]

a. **TAC**

i. See Plantwide TAC Standards.

b. **VOC**

i. See Plantwide VOC Standards.

ii. 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 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]

iii. 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]

iv. 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, sections 4.1.9.1 and 4.1.9.2]

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

a. **TAC**

i. See Plantwide Monitoring and Recordkeeping.

b. **VOC**

i. See Plantwide Monitoring and Recordkeeping.

ii. The owner or operator shall maintain records that include the following for each purchase: [Regulation 6.18, section 4.4.2]

(a) The name and address of the solvent supplier,

(b) The date of the purchase,

(c) The type of the solvent, and

(d) The vapor pressure of the solvent measure in mm Hg at 20°C (68°F).

iii. All records required by Regulation 6.18, section 4.4.2 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 report the following information, as required by General Condition 14:

a. **TAC**

i. See Plantwide Reporting.

b. **VOC**

i. See Plantwide Reporting.

ii. There are no routine compliance reporting requirements for Regulation 6.18.

Emission Unit U3: Direct Gas-Fired Heaters (Insignificant Activities)

U3 Applicable Regulations:

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.00	Definitions	1, 2
5.01	General Provisions	1 through 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
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

U3 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Installation Date
E7	One (1) Direct gas-fired heater (Make: Cambridge, Model: S1850, Rated Capacity: 1.85 MMBtu/hr)[12]	STAR[13]	N/A	F0701	4/2010
E8	One (1) Direct gas-fired heater (Make: Cambridge, Model: S1850, Rated Capacity: 1.85 MMBtu/hr)[12]		N/A	F0801	4/2010
E9	One (1) Direct gas-fired heater (Make: Cambridge, Model: S1850, Rated Capacity: 1.85 MMBtu/hr)[12]		N/A	F0901	4/2010
E10	One (1) Direct gas-fired heater (Make: Cambridge, Model: S1850, Rated Capacity: 1.85 MMBtu/hr)[12]		N/A	F1001	4/2010

U3 Control Devices:

There are no control devices associated with this emission unit.

[12] The heaters are direct fired units and not subject to 40 CFR 60 Subpart Dc. The heaters are direct fired process heater and not subject to 40 CFR 63 Subpart DDDDD.

[13] Insignificant activities are *de minimis* by definition. (Regulation 5.21, section 2.3)

U3 Specific Conditions

S1. **Standards**
[Regulation 2.16, section 4.1.1]

a. **TAC**

i. See Plantwide TAC Standards.

S2. **Monitoring and Record Keeping**
[Regulation 2.16, sections 4.1.9.1 and 4.1.9.2]

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

a. **TAC**

i. See Plantwide Monitoring and Record Keeping.

S3. **Reporting**
[Regulation 2.16, section 4.1.9.3]

The owner or operator shall report the following information, as required by General Condition 14:

a. **TAC**

i. See Plantwide Reporting.

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 no alternative operating scenario in its Title V application.

Insignificant Activities

Equipment	Quan.	PTE (tpy)	Regulation Basis
Parts Washer (Emission Unit U2)	1	0.01 VOC	Regulation 2.16, section 1.23
Direct Gas-Fired Heat Exchangers (Emission Unit U3)	4	3.18 NOx total	Regulation 2.16, section 1.23
Table Saw and Radial Saws (Wood Cutting) (Emission Unit IA1)	4	5.04 PM total	Regulation 2.16, section 1.23
Welders, Electric Arc, Mig & Stick (Emission Unit IA1)	72	0.34 PM total	Regulation 2.16, section 1.23
Hand Held Plasma Cutters (Metal Cutting) (Emission Unit IA1)	10	0.92 PM total	Regulation 2.16, section 1.23
Double Head Chop Saw (Metal Cutting) (Emission Unit IA1)	1	0.25 PM	Regulation 2.16, section 1.23
Abrasive Chop Saw (Metal Cutting) (Emission Unit IA1)	2	0.25 PM each	Regulation 2.16, section 1.23
Milter Saw Cold Cut (Metal Cutting) (Emission Unit IA1)	2	0.25 PM each	Regulation 2.16, section 1.23
Band Saw (Metal Cutting) (Emission Unit IA1)	2	0.25 PM each	Regulation 2.16, section 1.23
Laser Cutting (Metal Cutting) (Emission Unit IA1)	1	0.01 PM 0.02	Regulation 2.16, section 1.23

1) Insignificant activities identified in District Regulation 1.02, Appendix A, 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 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.

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

4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

5) 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 may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) to be reported on the annual emission inventory.

7) 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, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Emission Unit IA1: Metal and Wood Cutting Equipment

IA1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
7.08	Standards of Performance for New Process Operations	1, 2, 3

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.00	Definitions	1, 2
5.01	General Provisions	1 through 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
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

IA1 Equipment:

Emission Point	Description	Applicable Regulation [14]	Control ID	Stack ID	Installation Date
E-IA1	Four (4) Table Saws and Radial Saws (Wood Cutting)	STAR[15], 7.08	N/A	N/A	2010
E-IA2	Seventy-Two (72) Welders, Electric Arc, MIG & Stick		N/A	N/A	2010
E-IA3	Ten (10) Hand Held Plasma Cutters (Metal Cutting)		N/A	N/A	2010
E-IA4	One (1) Double Head Chop Saw (Metal Cutting)		N/A	N/A	2010
E-IA5	Two (2) Abrasive Chop Saw (Metal Cutting)		N/A	N/A	2010
E-IA6	Two (2) Milter Saw Cold Cut (Metal Cutting)		N/A	N/A	2010
E-IA7	Two (2) Band Saw (Metal Cutting)		N/A	N/A	2010

[14] This equipment is not subject to Federal Regulation 40 CFR 63, Subpart XXXXXX because the source is major for HAPs.

[15] Insignificant activities are *de minimis* by definition. (Regulation 5.21, section 2.3)

Emission Point	Description	Applicable Regulation [14]	Control ID	Stack ID	Installation Date
E-IA8	One (1) Laser Cutting (Metal Cutting) with Integral Dust Collector		N/A	N/A	2010

IA1 Control Devices:

There are no control devices associated with this emission unit.

IA1 Specific Conditions

S1. **Standards**
[Regulation 2.16, section 4.1.1]

a. **Opacity**

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

b. **$PM/PM_{10}/PM_{2.5}$**

i. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per piece of equipment based on actual operating hours in a calendar day.[16] [Regulation 7.08, section 3.1.2]

c. **TAC**

i. See Plantwide Standards Section.

S2. **Monitoring and Record Keeping**
[Regulation 2.16, sections 4.1.9.1 and 4.1.9.2]

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

a. **Opacity**

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

ii. At emission 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.

iii. The owner or operator shall, monthly, maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were

[16] A one-time PM compliance demonstration was performed for this equipment and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to the PM lb/hr emission limits.

observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

b. **PM/PM_{10}/$PM_{2.5}$**

i. There are no monitoring and record keeping requirements.

S3. **Reporting**
[Regulation 2.16, section 4.1.9.3]

The owner or operator shall report the following information, as required by General Condition 14:

a. **Opacity**

i. Any deviation from the requirement to perform monthly visible emission surveys or Method 9 determinations;

ii. Any deviation from the requirement to record the results of each VE survey and Method 9 determination performed;

iii. The number, date, and time of each VE survey where visible emissions were observed, and the results of the Method 9 determination 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.

b. **PM/PM_{10}/$PM_{2.5}$**

i. There are no reporting requirements.

Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests
Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc.) or hours of operation of the equipment by the appropriate emission factor and accounting for any control devices unless another method is approved in writing by the District.

Table 1 - U1 Coating Operation

Emission Point ID	Description	Control Device	Acceptable Emission Factor Sources and Calculation Methodology
E1	Miscellaneous metal parts spray-applied surface coating operation (Interior Paint Booth)	Particulate Filter (C1)	Mass Balance Method based on coating material usage and pollutant contents per MSDS of the coating material
E2a	Natural Gas-Fired Heater Capacity: 1.26 MMBtu/hr (Insignificant Activity)	N/A	Emission Factors from AP-42, Chapter 1.4-1, 1.4-2 and 1.4-3
E2b	Natural Gas-Fired Heater Capacity: 1.26 MMBtu/hr (Insignificant Activity)	N/A	
E2c	Natural Gas-Fired Heater Capacity: 1.26 MMBtu/hr (Insignificant Activity)	N/A	
E2d	Natural Gas-Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr (Insignificant Activity)	N/A	
E3	Miscellaneous metal parts spray-applied surface coating operation (Undercoat Paint Booth)	Particulate Filter (C2)	Mass Balance Method based on coating material usage and pollutant contents per MSDS of the coating material
E4	Adhesive application operation	N/A	Mass Balance Method based on coating material usage and pollutant contents per MSDS of the coating material
E5	Floor coating operation	N/A	Mass Balance Method based on coating material usage and pollutant contents per MSDS of the coating material

Table 2 - U2 Parts Washer			
Emission Point ID	**Description**	**Control Device**	**Acceptable Emission Factor Sources and Calculation Methodology**
E6	20-gallon parts washer that has a drain opening diameter of 4 inches to the secondary reservoir	N/A	VOC Emissions (tpy) = amount of solvent used (gallons) × VOC Content (6.8 lb/gal) × (1 ton/2000 lb)

Table 3 - U3 Direct-Fired Heat Exchangers			
Emission Point ID	**Description**	**Control Device**	**Acceptable Emission Factor Sources and Calculation Methodology**
E7	Direct gas-fired heater (Rated Capacity: 1.85 MMBtu/hr)	N/A	Emission Factors from AP-42, Chapter 1.4-1, 1.4-2 and 1.4-3
E8	Direct gas-fired heater (Rated Capacity: 1.85 MMBtu/hr)		
E9	Direct gas-fired heater (Rated Capacity: 1.85 MMBtu/hr)		
E10	Direct gas-fired heater (Rated Capacity: 1.85 MMBtu/hr)		

Table 4 - IA1 Metal and Wood Cutting Equipment			
Emission Point ID	**Description**	**Control Device**	**Acceptable Emission Factor Sources and Calculation Methodology**
E-IA1	Four (4) Table Saws and Radial Saws (Wood Cutting)	N/A	PM Emission Factor = 0.35 lbs PM/ton wood processed (from Minnesota Pollution Control Agency, Dec 2008)
E-IA2	Seventy-Two (72)Welders, Electric Arc, Mig & Stick		Various Emission Factors for various types of wire used, from either AP-42 or SDAPCD
E-IA3	Ten (10) Hand Held Plasma Cutters (Metal Cutting)		PM Emissions (tpy) = Material Removed (lb/hr) × × (8760 hr/year) × × Building Drop Out (1 – 0.7) HAP Emissions (tpy) = PM Emissions (tpy) × HAP Content (%) (Emission of fume, nitrogren oxide, and noise in plasma cutting of stainless and mild steel, Bernt von Bromssen et al. 1994)

Table 4 - IA1 Metal and Wood Cutting Equipment			
Emission Point ID	**Description**	**Control Device**	**Acceptable Emission Factor Sources and Calculation Methodology**
E-IA4	One (1) Double Head Chop Saw (Metal Cutting)		PM Emission Factor = 0.007 lbs PM/ton metal chips[17] PM Emissions (tpy) = total lbs chips/year × (1ton/2000 lbs) × PM Emission Factor (0.007 lbs/ton metal chips) × (1ton/2000lbs) HAP Emissions = PM Emissions (tpy) × HAP Content (%)
E-IA5	Two (2) Abrasive Chop Saw (Metal Cutting)		
E-IA6	Two (2) Milter Saw Cold Cut (Metal Cutting)		
E-IA7	Two (2) Band Saw (Metal Cutting)		
E-IA8	One (1) Laser Cutting (Metal Cutting) with Integral Dust Collector		PM Emissions (tpy) = Material Removed (lb/hr) × Material Removed that become fumes (7%) × (8760 hr/year) × Integral Dust Collector Control (1 – 0.995) × Building Drop Out (1 – 0.7) HAP Emissions (tpy) = PM Emissions (tpy) × HAP Content (%) (Emission of fume, nitrogren oxide, and noise in plasma cutting of stainless and mild steel, Bernt von Bromssen et al. 1994)

[17] Emission factor from Indiana Department of Environmental Management (IDEM), permit Alcoa / T157-17676-00001, February 6, 2007 (http://www.in.gov/apps/idem/caats/permitDetail.xhtml).

Attachment B – Protocol Checklist for a Performance Test

A complete protocol must include the following information

1. Facility name, location, and Plant ID number.
2. Responsible Official and environmental contact names.
3. Permit numbers that are requiring the test to be conducted.
4. Test methods to be used (*i.e.* EPA Method 1, 2, 3, 4, and 5).
5. Alternative test methods or description of modifications to the test methods to be used.
6. Purpose of the test including equipment and pollutant to be tested. (The purpose may be described in the permit that requires the test to be conducted or it may be to show compliance with a federal regulation or emission standard.)
7. Tentative test dates. (These may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation.)
8. Maximum rated production capacity of the system.
9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate, based on limits) and justification of the planned production rate, if less than the maximum rate.
10. Method to be used for determining rate of production during the performance test;
11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance.
12. Description of normal operation cycles, if applicable.
13. Discussion of operating conditions that tend to cause worse case emissions. This is especially important to clarify if worst case emissions do not result from the maximum production rate.
14. Process flow diagram.
15. The type and manufacturer of the control equipment, if any.
16. The control equipment parameter to be monitored and recorded during the performance test. These parameters may include pressure drops, flow rates, pH, temperature, *etc.* The values achieved during the test may be required during subsequent operations to describe the operating parameters that are indicative of good operating performance.
17. How quality assurance and accuracy of the data will be maintained, including sample identification and chain-of-custody procedures, audit sample provider, and number of audit samples to be used, if applicable.
18. Diameter of the pipe, duct, stack, or flue to be tested.
19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet.
20. The number of traverse points to be tested for the outlet and the inlet if required, using Appendix A-1 to 40 CFR Part 60.

The Stack Test Review fee must be submitted with each stack test protocol.

The current fee is listed on the APCD website (louisvilleky.gov/APCD)

Attachment C - Determination of Benchmark Ambient Concentration (BAC)

Category _____ Number _____

Compound name _____ CAS No. _____

Molecular weight _____

BAC_C = _____ µg/m^3, annual BAC_{NC} = _____ µg/m^3, _____ (avg period)

de minimis _____ lb/hr; _____ lb/_____; _____ lb/year

I. Carcinogen Risk - BAC_C (annual averaging period) Carcinogen ☐ YES ☐ NO

1. ☐ IRIS 10^{-6} risk = _____ µg/m^3 URE = _____ (µg/m^3)$^{-1}$ Date _____
2. ☐ Cal 10^{-6} risk = _____ µg/m^3 IUR = _____ (µg/m^3)$^{-1}$ Date _____
3. ☐ Mich 10^{-6} risk = _____ µg/m^3 Date _____
4. ☐ NTP Part A ☐ YES ☐ NO Part B ☐ YES ☐ NO
5. ☐ IARC Group 1 ☐ YES ☐ NO Group 2A ☐ YES ☐ NO Group 2B ☐ YES ☐ NO
6. ☐ ATSDR
7. ☐ Sec. 3.3.4 Method # _____ 10^{-6} risk = _____ µg/m^3 Date _____
8. ☐ Default 0.0004 µg/m^3

II. Chronic Noncancer Risk - BAC_{NC} (averaging period as specified)

1. ☐ IRIS RfC = _____ µg/m^3, annual Date _____
2. ☐ Cal REL = _____ µg/m^3, annual Date _____
3. ☐ IRIS [1] RfD = _____ µg/kg/day × (70/20) = _____ µg/m^3, annual Date _____
4. ☐ Mich ITSL = _____ µg/m^3, _____ averaging period Date _____
5. ☐ TLV NIOSH = _____ µg/m^3 × 0.01 = _____ µg/m^3, 8-hour Date _____
6. ☐ RTECS [1] _____ = _____ µg/m^3, annual Date _____
   (describe calculation from Reg 5.20, sections 4.6 - 4.10)
7. ☐ Default 0.004 µg/m^3

[1] To use data based upon an oral route of exposure, the District must make an affirmative determination that data are not available to indicate that oral-route to inhalation-route extrapolation is inappropriate.

III. *De minimis calculations*

1. ☐ Carcinogen BAC_C _____ µg/m^3 × 0.54 = _____ lb/hour
   BAC_C _____ µg/m^3 × 480 = _____ lb/year

2. ☐ Chronic Noncancer Risk _____ (averaging period)
   BAC_{NC} _____ µg/m^3 × F factor = _____ lb/(avg period)

BAC averaging period	F factor for avg period			
	Annual	24 hour	8 hour	1 hour
Annual	480			0.54
24 hours		0.12		0.05
8 hours			0.02	0.02
1 hour				0.001

[Regulation 5.22, table 1]

Prepared by _____ Date _____