

**Louisville Metro Air Pollution Control District**  
**850 Barret Ave., Louisville, Kentucky 40204**  
**21 December 2014**

**Construction Statement of Basis**

**Company:** GE Appliances

**Plant Location:** 4000 Buechel Bank Rd, Louisville, Kentucky 40255

**Date Application Received:** 25 November 2014    **Application Number:** 68194

**Date of Draft Permit:** 21 December 2014

**District Engineer:** Emily Tyler

**Permit No:** C-0870-1004-14

**Plant ID:** 0870

**SIC Code:** 3639

**NAICS:** 33552

**AFS:** 0870

**Introduction:**

This permit will be issued pursuant to District Regulation 2.03, Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits. Its purpose is to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), and particulate matter less than 10 microns (PM<sub>10</sub>); and is a non-attainment area for particulate matter less than 2.5 microns (PM<sub>2.5</sub>). A portion of the county is non-attainment for sulfur dioxide (SO<sub>2</sub>).

**Application Type/Permit Activity:**

- Initial Issuance
- Permit Revision
  - Administrative
  - Minor
  - Significant
- Permit Renewal
- Construction

**Compliance Summary:**

- Compliance certification signed
- Source is out of compliance
- Compliance schedule included
- Source is operating in compliance

**I. Source Information**

1. **Product/Process Description:** The source manufactures home laundry appliances, dishwashers and refrigerators.
2. **Project Description:** The source is installing one (1) JBI Inc IDB-128-S spray booth with filters in AP-5.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

Construction No.	Equipment Description
C-0870-1004-14	One (1) JBI Inc IDB-128-S spray booth with filters in AP-5.

**5. Permit Revisions**

Revision No.	Date of Issuance	Public Notice Date	Type	Emission Unit/Page No.	Description
Initial	X/X/2014	12/21/2014	Initial	Entire Permit	Initial Permit Issuance

6. **Fugitive Sources:** There are no fugitive emissions for this project.
7. **Plantwide Emission Summary:**

Pollutant	District Calculated Actual Emissions 2013 Data (tpy)	Major Source Status (based on PTE)
CO	24.18	Yes
NO <sub>x</sub>	30.25	Yes <sup>1</sup>
SO <sub>2</sub>	0.17	No
PM/PM <sub>10</sub>	9.38/7.76	Yes
VOC	24.43	Yes <sup>2</sup>
<b>Single HAP &gt; 1 tpy</b>		
Hydrogen Fluoride	0.00	Yes
<b>Total HAPs</b>	1.96	Yes

Note<sup>1</sup>: Limit taken to not be major for pollutant.

Note<sup>2</sup>: Major for Title V, limit taken to not be major for pollutant for PSD.

**8. Applicable Requirements:**

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

**9. MACT Requirements:**

40 CFR 63 Subpart NNNN

**10. Referenced Federal Regulations in Permit:**

40 CFR 63 Subpart NNNN

**II. Regulatory Analysis**

**1. Acid Rain Requirements:** The source is not subject to the Acid Rain Program.

**2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment, and commercial refrigerators. Additionally, in 1995, the source voluntarily substituted a high ozone depleting with a low ozone depleting compound in its refrigerator foaming operation under a "pollution control project" which received formal EPA approval on May 1, 1995.

**3. Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount. If the source becomes subject to 40 CFR 68 and Regulation 5.15, the source shall comply with the Risk Management Program and Regulation 5.15 and submit a Risk Management Plan to:

RMP Reporting Center  
 P.O. Box 3346  
 Merrifield, VA 22116-3346

**4. Basis of Regulation Applicability**

**a. Applicable Regulations:**

<b>Regulation</b>	<b>Title</b>	<b>Type</b>
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements	SIP
2.05	Prevention of Significant Deterioration of Air Quality	PSD
2.16	Title V Operating Permits	SIP
5.00	Definitions	Local
5.01	General Provisions	Local
5.21	Environmental Acceptability for Toxic Air Contaminants	Local
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	SIP
40 CFR 63 Subpart NNNN	National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	Federal

**b. Basis for Applicability**

<b>Regulation</b>	<b>Basis for Applicability</b>
5.00, 5.01, 5.21	Establishes the requirements for Environmental Acceptability for TACs. The source is a Group I company with TAC emissions.
7.25	Each new affected facility which commenced after December 16, 1987.
40 CFR 63 Subpart NNNN	Applies to a facility that applied coatings to large appliance parts or products located at a major source of HAPs.

**c. Plant-wide**

GE Appliances is a potential PSD (Prevention of Significant Deterioration) source for the pollutant VOC. Regulation 2.05 – *Prevention of Significant Deterioration of Air Quality* establishes requirements to limit the plant-wide potential emission rates to below PSD source threshold levels and to provide methods of determining continued compliance with all applicable requirements. Per Regulation 2.05 plant-wide VOC emissions are limited to 250 tons during any consecutive 12-month period.

Regulation 2.03 – *Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements*, section 6.1 requires monitoring, record keeping, and reporting assuring ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the District upon request.

d. **Permit C-0870-1004-14**

i. **Equipment:**

Description Make/Model	Maximum Capacity	Control Device Description
Spray Booth JBI Inc/IDB-128-S	N/A	Filters

ii. **Standards/Operating Limits**

a. **VOC**

- i. Plantwide VOC emissions are limited to less than 250 tons per 12 consecutive month period in order to avoid PSD/Non-attainment NSR per Regulation 2.05.
- ii. For plantwide equipment subject to Regulation 7.25 the VOC emissions are limited to less than 5 tons per 12 consecutive month period.

b. **HAPs**

Per Regulation 5.02, section 3.74, the source is subject to 40 CFR 63, Subpart NNNN.

c. **TACs**

Regulations 5.01 and 5.21 require that TAC emissions do not exceed environmentally acceptable levels, whether specifically established by modeling or determined by the District to be de minimis.

**III. Other Requirements**

- 1. **Temporary Sources:** The source did not request to operate any temporary facilities.
- 2. **Short Term Activities:** The source did not report any short term activities.
- 3. **Emissions Trading:** N/A
- 4. **Operational Flexibility:** The source did not request any operational flexibility for this equipment.

**5. Compliance History:**

<b>Incident Date(s)</b>	<b>Regulation Violated</b>	<b>Result</b>
12/23/1989	6.16, Section 3 Appliance Coatings	Board Order 5-90
11/21/1990	5.04, Section 6 Standard for Demolition and Renovation; 5.13, Section 4(1), 6, 11, 14, 15 Work Practice	Agreement A-2-92
1/7/1991	2.03, Section 1.a Permit Requirements; 7.25, Section 1.b Performance Standards of Performance For New Sources Using Volatile Organic Compounds	Board Order 2-91
10/31/1991	6.16, Section 5.1 Excess VOC Emissions	Agreement A-14-92
10/30/1992	1.09 Prohibition of Air Pollution	Agreement A-79-92
4/1/1999	1.09 Prohibition of Air Pollution	Settled

**6. Calculation Methodology:** The emission calculations for VOCs are based upon the material usage rate and a percentage of VOC content in the material emitted during application.

**7. Permit Fee:** The construction permit fee of \$3,050.88 is based on the Schedule of Fees table in Regulation 2.08, section 12. The following table is a breakdown of the applicable fees.

<b>Fee Type</b>	<b>Amount</b>
Permit Actions: Significant Permit Revision New Construction	\$2,542.40
STAR Program: De Minimis Determination (\$101.70 Per TAC, up to 5 TACs)	\$508.48

**8. Insignificant Activities:** There are no Insignificant Activities associated with this project.