

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
xx xx 2015

Statement of Basis

Company: Clifford Inc.

Plant Location: 4432 Poplar Level Road, Louisville, Kentucky 40216

Date Application Received: 02/21/2014
08/31/2006

Application Number: 62597
30148

Date of Draft Permit: 01/14/2015

Date of Public Comment: 01/14/2015

District Engineer: Shannon Hosey

Permit No: O-0434-14-F

Plant ID: 0434

SIC Code: 7532

NAICS: 811121

Introduction:

This permit will be issued pursuant to District Regulation 2.17- *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}) and partial non-attainment area for sulfur dioxide (SO₂).

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. **Plant-wide Product/Process Description:** Clifford Inc. specializes in the painting and collision repair of automobiles and boats.
2. **Process Description:** Group I and Group II refinishing operations, fiberglass work and surface coating of miscellaneous metal parts.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent to this facility.
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	Five (5) spray paint booths and one (1) prep area and paint spray guns and chopper guns. Equipment is used for Group I and Group II refinishing operations, fiberglass work and surface coating of miscellaneous metal parts.

5. **Fugitive Sources:** There are no fugitive source emissions at this facility.
6. **Permit Revisions:**

Permit No.	Revision No.	Issue Date	Public Notice Date	Type	Page No.	Description
0108-01-F	NA	11/05/2001	-	Initial	Entire Permit	Initial Permit Issuance
O-0434-14-F	1	xx/xx/20xx	01/14/2015	Renewal	Entire Permit	Permit Renewal

7. **Plant-wide Emission Summary:**

Pollutant	District calculated Actual Emissions 2009 Data (tpy)	Major Source Status (based on PTE)
CO	0	No
NO _x	0	No
SO ₂	0	No
PM/PM ₁₀	0	No
VOC	0.86	Yes
Single HAP Xylene	0.15	Yes
Total HAPs	0.40	Yes

8. **Applicable Requirements:**

- | | | |
|------------------------------|---|---|
| <input type="checkbox"/> PSD | <input type="checkbox"/> 40 CFR 60 | <input checked="" type="checkbox"/> SIP |
| <input type="checkbox"/> NSR | <input type="checkbox"/> 40 CFR 61 | <input checked="" type="checkbox"/> District-Origin |
| | <input checked="" type="checkbox"/> 40 CFR 63 | <input type="checkbox"/> Other |

9. MACT Requirements: The source has no future MACT requirements.

10. Referenced Federal Regulations in Permit:

40 CFR 60 Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

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.

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.

4. Basis of Regulation Applicability

a. Plant-wide:

The source is a potential major source. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

As defined by Regulation 5.00, section 1.13.5, in order to be an exempt stationary source in regards to STAR, the source has applied for an operating permit in accordance with Regulation 2.17 with emission limits that do not exceed the following:

Pollutant	Emissions (tpy)
VOC	25
Single HAP	5
Total HAP	12.5

Regulation 2.17, section 5.2 requires monitoring and record keeping to assure 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. Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an annual compliance certification by April 15. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an annual compliance report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

b. Applicable Regulations:

Regulation	Title	Type
2.17	Federally Enforceable District Origin Operating Permits	SIP
6.44	Standards of Performance for Existing Commercial Motor Vehicle and Mobile Equipment Refinishing Operations	SIP
7.08	Standards of Performance for New Process Operations	SIP
7.25	Standards of Performance for Existing Process Operations	SIP
7.59	Standards of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	SIP
7.79	Standards of Performance for New Commercial Motor Vehicle and Mobile Equipment Refinishing Operations	SIP
40 CFR 63, Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	Federal

c. Basis for Regulation Applicability:

Regulation	Basis for Applicability
2.17	Applies to any stationary source, or one or more processes or process equipment at a stationary source, for which the owner or operator voluntarily applies for a federally enforceable District origin operating permit.
6.44	Applies to existing commercial motor vehicle and mobile equipment refinishing operations.
7.08	Establishes the requirements for PM emissions from new processes that commenced construction after September 1, 1976.
7.25	Establishes the requirements for VOC emissions, for processes not elsewhere regulated in District Regulation 7, commenced after June 13, 1979.
7.59	Establishes the requirements for VOC emissions from new processes that coat metal substrates that commence construction after May 20, 1981.
7.79	Establishes the requirements for VOC emissions for new commercial facilities making spot repairs, panel repairs, refinishing of parts and/or the refinishing of the entire motor vehicle or mobile equipment which were constructed after February 1994.

Regulation	Basis for Applicability
40 CFR 63, Subpart HHHHH	Establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in paint stripping and miscellaneous surface coating operations.

d. **Emission Unit U1 – Spray Booths**

i. **Equipment:**

Emission Process	Description Make/Model	Applicable Regulation	Control Device
E1	Garmat Paint Booth, Model 99300	6.44, 7.08, 7.25, 7.59 and 40 CFR 63, Subpart HHHHHH	C1
E2	Brewco, heated Paint Booth, Model SDF 50A	7.08, 7.25, 7.59, 7.79 and 40 CFR 63, Subpart HHHHHH	C2
E3	Brewco Paint Booth		C3
E4	M & C Paint Booth		C4
E5	M & C Paint Booth		C5

ii. **Control Devices**

Control Device ID	Description Make/Model	Pollutant Controlled
C1	Dry Filters	PM
C2		
C3		
C4		
C5		

iii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 2.17, section 5.1, allows the source to request a synthetic limit below the major source threshold. The source has requested a synthetic limit of less than 25 tons per year of the pollutant VOC to be exempt from STAR.
- (b) Regulation 6.44 and 7.79, section 4.1 and 4.3 specifies VOC content limits for all coatings used in the paint booths.

- (c) VOC emissions from equipment subject to Regulation 7.25 cannot exceed five (5) tons during any consecutive 12-month period unless a BACT is submitted and approved.
- (d) Regulation 7.59, section 3.1 exempts facilities with emissions less than or equal to 5 tons per year.

2) **PM**

For equipment subject to Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2. Using the minimum spray gun transfer efficiency of 65%, the percent solids of the material 45.9%, and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booths cannot be exceeded.

3) **Opacity**

Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

4) **HAP**

- (a) Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. The source has requested synthetic limits of less than 5 tons per year of any individual HAP and less than 12.5 tons per year of total HAPs to be exempt from STAR.
- (b) Per Regulation 5.02, section 4.116, the source is subject to 40 CFR 63, Subpart HHHHHH and is required to comply with section 63.11173.

iv. **Monitoring and Recordkeeping**

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.

1) **VOC**

- (a) Source shall maintain records as required in Regulation 644 and 7.79, section 8.0.
- (b) Source shall maintain records as required in Regulation 7.59, section 6.0.

2) **HAP**

40 CFR 63, Subpart HHHHHH requires that records be kept of the training each painter has completed, documentation of the filter efficiency, and documentation from the spray gun manufacturer of each spray gun that does not meet the definition of a HVLP spray gun that it achieves a similar transfer efficiency.

v. **Reporting**

HAP

40 CFR 63, Subpart HHHHHH requires the owner or operator to submit an annual notification of changes report.

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 these emission points.
5. **Compliance Status:**

Incid. #	Date	Regulation Violated	Result
05238	09/30/09	The source failed to maintain records of filter checks and hours of operation of paint booths.	Letter

6. **Calculation Methodology or Other Approved Method:**

The VOC emission calculations are based upon the amount of coating used and the VOC content of the materials. HAP emissions shall be determined based on the MSDS and amount used of the coating materials used in the paint booth.

7. **Permit Fee:** The permit fee of \$508.48 is based on the *Schedule of Fees* table for Fiscal Year 2015, pursuant to Regulation 2.08. (NESHAP Review)

8. **Insignificant Activities:**

Description	Quantity	Basis
Natural Gas Space Heaters < 10 MMBTU/hr	3	Regulation 1.02, Appendix A, section 1.1
Brazing, Soldering or Welding Equipment	3	Regulation 1.02, Appendix A, section 3.4

Description	Quantity	Basis
Self-Contained Shot Blast Cabinet	1	Regulation 1.02, Appendix A, section 3.21

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A, shall comply with generally applicable requirements.
- 3) Activities identified in Regulation 1.02, Appendix A, may not require a permit and be insignificant with regard to application disclosure requirement but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE) quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.