



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0434-14-F

Plant ID: 0434

Effective Date: xx/xx/2015

Expiration Date: xx/xx/2020

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Clifford Inc.
 4432 Poplar Level Road
 Louisville, KY 40213

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	Single HAP	Total HAP
Tons/year:	<25 tpy	<5 tpy	<12.5 tpy

Permit Writer: Shannon Hosey

Public Notice Date: 01/14/2015

{manager1}
 Air Pollution Control Officer
 {date1}

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FEDOOP Permit Revisions/Changes

Permit	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

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _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
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

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District [Form 9440-0](#).
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM10, PM2.5, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gases whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.01	General Provisions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745***

Emission Unit U1

U1 Unit Description: 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.

U1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
6.44	Standards of Performance for Existing Commercial Motor Vehicle and Mobile Equipment Refinishing Operations	1 through 8
7.08	Standards of Performance for New Process Operations	1 through 3
7.25	Standards of Performance for Existing Process Operations	1 through 3
7.59	Standards of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 7
7.79	Standards of Performance for New Commercial Motor Vehicle and Mobile Equipment Refinishing Operations	1 through 8
40 CFR 63 Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	§ 63.11169 – § 63.11180

U1 Equipment¹:

Emission Process ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
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

¹ All booths are equipped with heating capability.

U1 Control Devices:

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

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.2)

a. VOC

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 25 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1)
- ii. When coating metal substrates, excluding motor vehicles or mobile equipment, the owner or operator shall not allow or cause VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners to exceed 5 tons during any 12 consecutive month period. (Regulation 7.59, section 5.2)
- iii. The owner or operator shall not allow or cause VOC emissions, from all coatings, additives, catalysts, solvents, thinners, and cleaners used when not coating metal substrates, motor vehicles or mobile equipment, to equal or exceed 5 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1)
- iv. When coating motor vehicles or mobile equipment, the owner or operator shall limit the VOC content in the coating materials as the following:
 - 1) No coating shall be used with a VOC content, as applied, in excess of the following limits, unless the conditions of Specific Condition S1.a.iv.2) are met: (Regulation 6.44 and 7.79, section 4.1)

Group I

Coating	VOC lb/gal	VOC kg/l
Pretreatment wash primer	6.5	0.78
Precoat	5.5	0.66
Primer/primer surfacer	4.8	0.58
Primer sealer	4.6	0.55
Topcoat	5.2	0.62
Metallic/iridescent topcoat	5.2	0.62
Extreme performance	6.2	0.74

Group II

Coating	VOC lb/gal	VOC kg/l
Pretreatment wash primer	6.5	0.78
Precoat	5.5	0.66
Primer/primer surfacer	2.8	0.34
Primer sealer	3.5	0.42
Topcoat	3.5	0.42
Metallic/iridescent topcoat	3.5	0.42
Extreme performance	6.2	0.74

- 2) Specialty coatings shall not be applied unless: (Regulation 6.44 and 7.79, section 4.4)
 - a) The VOC content is equal to or less than 7.0 pounds of VOC per gallon of coating, as applied, and
 - b) The application of all such coatings, except safety related coatings, shall not exceed 10% of all coatings applied, on a weekly basis.

- 3) Surface cleaners, consisting of general wiping cleaners, solvents, wax removers, grease removers, road-tar removers, mold-release agent removers, and other similar materials, must meet the following requirements: (Regulation 6.44, section 4.5 and 7.79, section 4.1.2)
 - a) General purpose surface cleaners shall have a VOC content that does not exceed 1.7 pounds per gallon, and
 - b) For Emission Process E1, any cleaner, solvent, or remover material may be used for specific, hard to clean surfaces provided that: (Regulation 6.44, section 4.5)
 - 1) Material is dispensed from a hand-held spray bottle, and
 - 2) Usage of the solvent or cleaner does not exceed 35% of the total monthly usage of all surface cleaners.

- v. Spray gun cleanup shall be accomplished in an apparatus specifically designed to minimize evaporation of VOC materials to the atmosphere. (Regulation 6.44, section 7.5 and 7.79, section 5.4)

- vi. Spraying solvent through guns with no reasonable attempt to reclaim the used solvent is prohibited. (Regulation 6.44, section 7.5 and 7.79, section 6.3)

vii. Good housekeeping practices shall be employed to minimize evaporation of solvent to the atmosphere. (Regulation 6.44 and 7.79 section 7)

b. **PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2)²

c. **Opacity**

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

d. **HAP**

i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period.³ (Regulation 5.00, section 1.13.5.2)

ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period.² (Regulation 5.00, section 1.13.5.3)

40 CFR 63, Subpart HHHHHH

i. The owner or operator shall comply with [40 CFR 63, Subpart HHHHHH](#).

ii. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. (40 CFR 63.11173 (e)(1))

iii. The owner or operator must ensure and certify that all new and existing personnel, including contract personnel, are trained in the proper application of surface coatings. The training program must include, at a minimum, the items listed below: (40 CFR 63.11173 (f))

1) A list of all current personnel by name and job description who are required to be trained; (40 CFR 63.11173 (f)(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 On 02/21/2014, the source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

- 2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed below: (40 CFR 63.11173 (f)(2))
 - a) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. (40 CFR 63.11173 (f)(2)(i))
 - b) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. (40 CFR 63.11173 (f)(2)(ii))
 - c) Routine spray booth and filter maintenance, including filter selection and installation. (40 CFR 63.11173 (f)(2)(iii))
 - d) Environmental compliance with the requirements of this subpart. (40 CFR 63.11173 (f)(2)(iv))
 - 3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Specific Condition S1.d.v.2) are not required to provide the initial training required by that paragraph to these painters. (40 CFR 63.11173 (f)(3))
- iv. All new and existing personnel, including contract personnel, must be trained by the dates specified below:
- 1) All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. (40 CFR 63.11173 (g)(2))
 - 2) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years. (40 CFR 63.11173 (g)(3))

- v. All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the following requirements: (40 CFR 63.11173 (e)(2))
 - 1) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of paint overspray⁴. (40 CFR 63.11173 (e)(2)(i))
 - 2) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. (40 CFR 63.11173 (e)(2)(iii))
- vi. All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the District⁵. (40 CFR 63.11173 (e)(3))
- vii. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a

4 The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see 40 CFR 63.14). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non- HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

5 The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see 40 CFR 63.14). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

container that collects used gun cleaning solvent⁶.
(40 CFR 63.11173 (e)(4))

- viii. The owner or operator may petition the District for an exemption from [40 CFR Part 63, Subpart HHHHHH](#) if the owner or operator can demonstrate, to the satisfaction of the District, that the owner or operator spray applies no coatings that contain the target HAP, as defined in 40 CFR 63.11180. Petitions must include a description of the coatings that the owner or operator spray applies and an owner or operator certification that the owner or operator does not spray apply any coatings containing the target HAP. If circumstances change such that the owner or operator intends to spray apply coatings containing the target HAP, the owner or operator must submit the initial notification required by 40 CFR 63.11175 and comply with the requirements of 40 CFR Part 63, Subpart HHHHHH. (40 CFR 63.11170(a)(2))

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

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

a. VOC

- i. For Equipment subject to Regulation 6.44, 7.25, 7.59, and 7.79:
- 1) The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate and record the amount of VOC emissions during the 12 consecutive month period.
 - 2) The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.
- ii. For Equipment subject to Regulation 7.59:

The owner or operator shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)

- 1) The regulation and section number applicable to the affected facility for which the records are being maintained,
- 2) The application method and substrate type (metal, plastic, etc.),

⁶ Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

- 3) The amount (in gallons) and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during each month,
- 4) The VOC content as applied in each coating and solvent,
- 5) The date, or usage record period, for each application of coating and solvent,
- 6) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during each month.

iii. For Equipment subject to Regulation 6.44 and 7.79:

The owner or operator shall maintain: (Regulation 6.44 and 7.79, section 8)

- 1) A current list of all coatings, solvents, reducers, additives, and any other VOC containing material in use at the facility. This list shall include, but is not limited to, the following information:
 - a) Name and appropriate identification of coating, catalyst, hardener, reducer, etc. used;
 - b) Mix ratio of components used, and
 - c) VOC content of coating, as applied, less water and excluded solvents, in pounds per gallon.
- 2) Daily records that shall include:
 - a) Identification of applied coatings, and
 - b) Quantity of each coating applied (in gallons).
- 3) Monthly records that shall include:
 - a) Type of solvent used for cleanup or surface preparation, and
 - b) Quantity of each solvent, cleaner, etc. used (in gallons).
- 4) MSDS or other data sheets provided by the material manufacturer or its agent for each item listed in Specific Condition S2.a.i.1)a) and shall include as a minimum:
 - a) Designation of VOC content as supplied, expressed in lbs/gal, less water and excluded solvents,
 - b) Designation of all hazardous and/or toxic components. Designation shall include, as a minimum: the CAS registration number of the component; the weight percent of the component; and the weight of the product, expressed in lbs/gal, or alternately, the specific gravity of the product, and

- c) Other pertinent physical and chemical data necessary to determine compliance with District regulations.

b. **PM**

- i. The owner or operator shall inspect the filters in the spray booth at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

c. **Opacity**

See Specific Condition S2.b.

d. **HAP**

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

40 CFR 63, Subpart HHHHHH

- i. Certification that each painter has completed the training specified in Specific Condition S1.d.iv. with the date the initial training and the most recent refresher training was completed. (40 CFR 63.11177 (a))
- ii. Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in Footnote 4. (40 CFR 63.11177 (b))
- iii. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in Footnote 5. (40 CFR 63.11177 (c))
- iv. Copies of any notification submitted as required by Specific Condition S3.d. (40 CFR 63.11177 (d))
- v. Records of any deviation from the requirements in Specific Condition S1.d and Specific Condition S3.d. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. (40 CFR 63.11177 (g))

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified in accordance with General Condition 12.

a. VOC

- i. The emission unit ID numbers and emission process ID numbers;
- ii. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- iii. Identification of all periods of exceedance of the VOC emissions limits; and
- iv. A description of corrective actions taken for each exceedance.

b. PM

- i. Any deviation from the requirement to perform the monthly visible inspections of each paint booth filter system;
- ii. Any deviation from the requirement to record the results of each monthly paint booth PM filter system inspection;
- iii. If there are no deviations from the opacity monitoring and record keeping requirements, the owner or operator shall submit a negative declaration.

c. Opacity

See Specific Condition S2.b.

d. HAP

The plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

40 CFR 63, Subpart HHHHHH

- i. Annual Notification of Changes Report⁷:

The owner or operator is required to submit a report in each calendar year in which information previously submitted in either the initial notification, Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in Specific Condition S1.d. on the date of the report will be deemed to be a change. The annual notification of changes report

⁷ The Initial Notification was received 12/22/2009 and the Notification of Compliance Status was received 01/07/2010 by the District. Therefore, the requirement to submit the Initial Notification and the Notification of Compliance Status has been met.

must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information: (40 CFR 63.11176 (a))

- 1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different. (40 CFR 63.11176 (a)(1))
- 2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. (40 CFR 63.11176 (a)(2))

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
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 may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE), as the annual emission for each piece of equipment, since the emissions from the source’s Insignificant Activities are very minor in comparison to the plant wide emissions.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.