



**LOUISVILLE METRO
AIR POLLUTION CONTROL DISTRICT
850 Barret Ave., Louisville, Kentucky 40204**



xx xx 2015

FEDOOP Statement of Basis

Company: Vanegas Enterprises, Inc., Vanaire and Industrial Fiberglass System Divisions

Plant Location: 10090 Bunsen Way, Louisville, KY 40299

Date Application Received: 05-04-2007

Date Admin Complete: 07-03-2007

Date of Draft Permit: xx/xx/2015

Date of Public Notice: xx/xx/2015

District Engineer: Karen Thorne

Permit No: 158-01-F(R2)

Plant ID: 0377

SIC Code: 3564

NAICS: 333411

AFS: 0377

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

Compliance Summary:

Compliance certification signed

Compliance schedule included

Source is out of compliance

Source is operating in compliance

I. Source Information

1. **Source Description:** Vanegas Enterprises manufactures fiberglass reinforced plastic air pollution control equipment.
2. **Emission Unit Summary:** Vanegas Enterprises operates the following emission units.

| Emission Unit | Equipment Description |
|---------------|--|
| U-1 | Fiberglass/Polyester Resin Layup Operation |

3. **Fugitive Sources:** NA
4. **FEDDOOP Permit 158-01-F(R1) Revisions:**

| Revision | Issue Date | Public Notice Date | Type | Description |
|----------|------------|--------------------|----------|---|
| Revised | Xx/xx/2015 | Xx/xx/2015 | Revision | Removal of repealed Toxic Air Pollutant limit |
| Renewal | 06/19/2014 | 05/16/2014 | Renewal | Permit renewal |
| Initial | 11/05/2001 | 06/03/2001 | Initial | Initial issuance |

5. **Applicable Requirements:**
 PSD 40 CFR 60 SIP 40 CFR 63
 NSR 40 CFR 61 District-Origin Other
6. **Future MACT Requirements:** NA
7. **Referenced Federal Regulations in Permit:** NA
8. **Emission Summary:**

| Pollutant | Actual Emissions (tpy) 2013 Data* | Pollutant that triggered major source status |
|--|-----------------------------------|--|
| CO | NA | No |
| NO _x | NA | No |
| SO ₂ | NA | No |
| PM/PM ₁₀ /PM _{2.5} | NA | No |
| VOC | 3.88 | Yes |
| Total HAPs | 3.88 | Yes |

* Emissions data provided from quarterly reports.

II. Regulatory Analysis

1. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
2. **Stratospheric Ozone Protection Requirements:** This source does not manufacture, sell, or distribute any of the chemicals listed in Title VI of the CAAA. 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. 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):** This 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**

| Regulation | Basis for Applicability |
|------------|--|
| 7.08 | Establishes emission standards for processes that emit PM which were constructed after September 1, 1976 |
| 7.25 | Establishes VOC standards for affected facilities constructed after June 13, 1979. |

a. Plant-wide major source limits

Vanegas is a major source for VOC and HAP. 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.

Vanegas has requested to be exempt from the requirements of STAR by accepting the following limits: 5 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

b. Equipment:

| EU | EP ID | Description | Applicable Regulations |
|-----|-------|---|------------------------|
| U-1 | E-1a | Filament Winder, Dura-Wound Model 20 | 7.08, 7.25 |
| | E-1b | Filament Winder, Dura-Wound Model 10C | |
| | E-1c | Chopper Guns, non-atomized (low pressure) | |
| | E-1d | Hand lay up | |

| EU | EP ID | Description | Applicable Regulations |
|----|-------|------------------------------------|------------------------|
| | E-1e | Gel coat application, non-atomized | |

c. Standards/Operating Limits

i. VOC

Per Regulations 2.17 section 5.1, 5.00 section 1.13.5, and 7.25 section 2.1, the source has accepted plant-wide emission limits for VOC. Plant-wide VOC emissions are limited to 5 tons during any consecutive 12-month period. The source has requested to be exempt from the requirements of STAR by accepting the following limits: 5 tons per year of a VOC, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs. The source has also accepted a limit of 5 tons per year of VOC to preclude the requirements of Regulation 7.25.

ii. PM

Pursuant to Regulation 7.08 section 3.1.2, for processing rates less than or equal to 1000 pounds per hour, the PM emission standard is 2.34 pounds per hour.

iii. Opacity

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

iv. HAP

- 1) Per Regulation 2.17, section 5.1, individual HAP emissions are limited to 5 tons during any consecutive 12-month period. (The source has requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.)
- 2) Per Regulation 2.17, section 5.1, combined HAP emissions are limited to 12.5 tons during any consecutive 12-month period. (The source has requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.)

e. Monitoring and Record Keeping**i. VOC**

Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to monitor and maintain records of the throughput and VOC emissions during each consecutive 12-month period.

ii. PM and Opacity

Regulation 7.08 does not require any specific reporting requirements for PM. However, Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions, including maintaining good housekeeping practices.

iii. HAP

Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit. The source must calculate and record the 12 consecutive month single and total HAP emissions in order to demonstrate compliance with the plant-wide HAP limits.

f. Reporting

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued shall 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.

i. VOC

Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report the total *plant-wide* consecutive 12-month VOC emissions for each month in the reporting period in order to demonstrate compliance with the plant-wide VOC limit.

ii. PM and Opacity

There are no routine compliance reporting requirements.

iii. HAP

Regulation 2.17, section 5.2 establishes requirements to assure ongoing compliance with the terms and conditions of the permit. The source must report the 12 consecutive month single and combined HAP emissions in order to demonstrate compliance with the plant-wide HAP limits.

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:** NA
4. **Alternative Operating Scenarios:** The source did not request to operate under any alternative operating scenarios.
5. **Compliance Status:** Vanegas is currently in compliance.
6. **Emissions Calculation Methodology:** The calculated emissions are based on the Unified Emission Factors for Open Molding of Composites.
7. **Insignificant Activities**

| Description | Quantity | Basis (Regulation 1.02) |
|---|----------|----------------------------|
| Sawing/grinding | 1 | 1.38.1.2.1 |
| Equipment used for compression or injection molding of plastics | 2 | Appendix A, Section 3.8 |