



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: 158-01-F(R2)

Plant ID: 0377

Effective Date: [Click here to enter a date.](#)

Expiration Date: [Click here to enter a date.](#)

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:

Vanegas Enterprises, Inc., Vanaire and Industrial Fiberglass System Divisions
 10090 Bunsen Way
 Louisville, KY 40299

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:	5	5	12.5

Application No.: 12264

Application Received: 5/4/2007

Permit Writer: Karen Thorne

Public Notice Date:

{Manager1}
 Air Pollution Control Officer
 {date1}

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Permit Revisions/Changes

Revision No.	Issue Date	Type	Description
2	Xx/xx/15	Revision	Removal of repealed Toxic Air Pollutant limit
1	06/19/14	Renewal	Permit renewal
NA	11/05/01	Initial	Initial issuance

Acronyms and Abbreviations

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
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
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
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

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

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, PM_{2.5}, 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 gasses whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)). 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
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for 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 U-1**U-1: Fiberglass/Polyester Resin Layup Operation**

Application Rate: 70% spray-up, 30% hand layup, and winding

U-1 Applicable Regulations

Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2 and 3
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4 and 5

U-1 Equipment

EP ID	Description, Make/Model	Construction	Applicable Regulation(s)	Control ID	Stack ID
E-1a	Filament Winder, Dura-Wound Model 20	2000	7.08, 7.25	NA	F-1 & F-2
E-1b	Filament Winder, Dura-Wound Model 10C				F-1 & F-2
E-1c	Chopper Guns, non-atomized (low pressure)				F-1 & F-2
E-1d	Hand lay up				F-1 & F-3
E-1e	Gel coat application, non-atomized				F-1 & F-2

U-1 Controls

There are no control devices for EU U-1.

U-1 Specific Conditions**S1. Standards** (Regulation 2.17, section 5.1)**a. VOC**

For affected facilities subject to Regulation 7.25, the owner or operator shall not allow or cause the *plant-wide* VOC emissions to exceed 5 tons per year, unless modeling or a BACT analysis has been submitted to, and approved by, the District. (Regulation 7.25, section 3)

b. Opacity

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

c. PM

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

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. (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. (Regulation 5.00, section 1.13.5.3)

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

The owner or operator shall monthly calculate and record the monthly and consecutive 12-month total VOC emissions each calendar month.

b. Opacity

See S2.c.

c. PM

The owner or operator shall maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions, including maintaining good housekeeping practices.

d. HAP

i. The owner or operator shall keep a record of the MSDS for each raw material.

- ii. The owner or operator shall monthly calculate and record the monthly throughput of each HAP-containing raw material and the HAP content.
- iii. The owner or operator shall monthly calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each calendar month.

S3. **Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **VOC**

The owner or operator shall report the plant-wide 12-consecutive month VOC emissions for each month in the reporting period.

b. **Opacity**

There are no routine compliance reporting requirements for this equipment.

c. **PM**

There are no routine compliance reporting requirements for this equipment.

d. **HAP**

- i. The owner or operator shall report the monthly throughput of each HAP-containing raw material and the HAP content for each month in the reporting period.
- ii. The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

U-1 Comments

- 1. VOC emissions at this facility consist solely of styrene.
- 2. The source has requested to be exempt from the requirements of STAR by accepting the following limits: 5 tons per year of VOC, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

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

- 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.