



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0102-15-F

Plant ID: 0102

Effective Date: 2/4/2013

Expiration Date: 2/28/2018

Revision Date: xx/xx/2015

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:

Jellico Incorporated
829 S. 26th Street
Louisville, KY 40211

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

Permit Writer: Shannon Hosey

Public Notice Date: 06/12/2015

{manager1}
Air Pollution Control Officer
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FEDOOP Permit Revisions/Changes

Permit No.	Revision No.	Issue Date	Public Notice Date	Type	Page No.	Description
194-05-F	Initial	03/31/2006	12/04/2005	Initial	Entire Permit	Initial Permit Issuance
194-05-F (R1)	R1	02/04/2013	12/14/2012	Renewal	Entire Permit	Renew FEDOOP and Incorporate Construction Permit 137-05-C
O-0102-15-F	R2	xx/xx/2015	06/12/2015	Revision	Entire Permit	Revision to make STAR exempt

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

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, sulfur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, nitrogen oxides, lead, gaseous fluorides, or Volatile Organic Compounds (VOC) as listed in District Regulation 3.04; 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. 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

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: Eleven (11) solvent storage tanks having bottom fill.

U1 Applicable Regulations:

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5

U1 Equipment:

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E1	4000 Gallon Storage Tank	6.13	N/A
E2	3000 Gallon Storage Tank		
E3	3000 Gallon Storage Tank		
E4	2000 Gallon Storage Tank		
E5	1000 Gallon Storage Tank		
E6	1000 Gallon Storage Tank		
E7	1000 Gallon Storage Tank		
E8	1000 Gallon Storage Tank		
E9	1000 Gallon Storage Tank		
E10	1000 Gallon Storage Tank		
E11	1000 Gallon Storage Tank		

U1 Control Devices:

There are no control devices associated with Emission Unit U1.

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.¹ (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1)
- ii. The owner or operator shall not store VOC materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe. (Regulation 6.13, section 3.3)

b. 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.¹ (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.¹ (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

- i. The owner or operator shall monthly calculate and record the consecutive 12-month total plant-wide VOC emissions.
- ii. The owner or operator of the storage vessel(s) shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the new vapor pressure, and the date of the change in order to demonstrate compliance with Specific Condition S1.a.ii.
- iii. The owner or operator shall keep a record that shows if the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill

¹ On 3/3/14, 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.

pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.

b. **HAP**

- i. The owner or operator shall monthly calculate and record the calendar month and consecutive 12-month emissions of each individual HAP for each month in the reporting period; and
- ii. The owner or operator shall monthly calculate and record the calendar month and consecutive 12-month emissions of total HAP for each month in the reporting period.

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

The owner or operator shall include the following information in the annual compliance report.

a. **VOC**

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

b. **HAP**

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.

Emission Unit U2

U2 Unit Description:² Sixteen (16) custom-made lacquer mixing tanks, two (2) Patterson ball mills, one (1) Abby ball mill, one (1) high speed disperser, and one (1) Economy swirl mill.

U2 Applicable Regulations:

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
6.09	Standards of Performance for Existing Process Operations	1 through 3
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5

U2 Equipment:

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E12	Mix Tank, Bldg 2 #18, 1100 Gallons	6.09 and 6.24	N/A
E13	Mix Tank, Bldg 2 #16, 990 Gallons		
E14	Mix Tank, Bldg 2 #17, 990 Gallons		
E15	Mix Tank, Bldg 2 #15, 825 Gallons		
E16	Mix Tank, Bldg 1 #14, 770 Gallons		
E17	Mix Tank, Bldg 1 #8, 440 Gallons		
E18	Mix Tank, Bldg 1 #2, 385 Gallons		
E19	Mix Tank, Bldg 1 #3, 330 Gallons		
E20	Mix Tank, Bldg 1 #6, 330 Gallons		
E21	Mix Tank, Bldg 1 #1, 220 Gallons		
E22	Mix Tank, Bldg 1 #7, 220 Gallons		
E23	Mix Tank, Bldg 2 #19, 220 Gallons		
E24	Mix Tank, Bldg 1 #4, 165 Gallons		

² The two (2) Patterson ball mills, one (1) Abby ball mill, one (1) high speed disperser, and one (1) Economy swirl mill were previously permitted under Permit 137-05-C

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E25	Mix Tank, Bldg 1 #5, 110 Gallons		
E26	Mix Tank, Bldg 3 #9, 110 Gallons		
E27	Mix Tank, Bldg 3 #11, 110 Gallons		
E32	Ball Mill, Bldg 2, 200 Gallons		
E33	Ball Mill, Bldg 2, 40 Gallons		
E34	Ball Mill Bldg 2, 40 Gallons		
E35	High Speed Dispenser, Bldg 2, 40 Gallons		
E36	Swirl Mill, Bldg 2, 50 Gallons		

U2 Control Devices:

There are no control devices associated with Emission Unit U2.

U2 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.³ (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1)
- ii. The owner or operator shall not discharge into the atmosphere more than forty (40) pounds of VOC in any one day, nor more than eight (8) pounds in any one hour, from any existing affected facility in which any Class II solvent is used unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.2)
- iii. The owner or operator shall not discharge into the atmosphere more than three thousand (3,000) pounds of VOC in any one day, nor more than four hundred fifty (450) pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.3)

b. PM

The owner or operator shall not allow PM emissions to exceed to 2.58 lb/hr.⁴ (Regulation 6.09, section 3.2)

c. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1)

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)

³ On 3/3/14, 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.

⁴ The District has performed a one-time PM compliance demonstration for this equipment and the lb/hr standard cannot be exceeded uncontrolled.

- 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.⁵ (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

- i. The owner or operator shall monthly calculate and record the consecutive 12-month total plant-wide VOC emissions.
- ii. The owner or operator shall maintain the following records to demonstrate ongoing compliance with Regulation 6.24, Section 3:
 - 1) The hours of operation of the equipment or usage for each day;
 - 2) The daily amount used in gallons of each solvent, cleaner, etc; and
 - 3) Monthly calculations showing the average hourly and daily VOC emissions.

b. PM

See Specific Condition S3.c.

c. Opacity

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all

⁵ On 2/9/15, 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.

visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

d. **HAP**

- i. The owner or operator shall monthly calculate and record the calendar month and consecutive 12-month emissions of each individual HAP for each month in the reporting period; and
- ii. The owner or operator shall monthly calculate and record the calendar month and consecutive 12-month emissions of total HAP for each month in the reporting period.

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

The owner or operator shall include the following information in the annual compliance report.

a. **VOC**

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

b. **PM**

See Specific Condition S3.c.

c. **Opacity**

- i. Emission Unit number and Emission Point number for each exceedance;
- ii. The beginning and ending date of the reporting period;
- iii. The number of surveys where visible emissions were observed;
- iv. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- v. Description of any corrective action taken for each exceedance.

d. **HAP**

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. HAP compounds shall be reported in terms of the HAP compound.

Emission Unit U3

U3 Unit Description: Four (4) custom-made drum blenders and associated packaging equipment for the production of surface coatings.

U3 Applicable Regulations:

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
7.08	Standards of Performance for New Process Operations	1 through 3
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1 through 5

U3 Equipment:

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E28	Twin Mix Head Mixers, Bldg 1, 2 @ 90 Gallons	7.08 and 7.25	N/A
E29	Twin Mix Head Mixers, Bldg 1,2 @ 90 Gallons		
E30	Twin Mix Head Mixers, Bldg 1, 2 @ 90 Gallons		
E31	Twin Mix Head Mixers, Bldg 1, 2 @ 90 Gallons		

U3 Control Devices:

There are no control devices associated with Emission Unit U3.

U3 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.⁶ (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1)
- ii. The owner or operator shall not allow or cause VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 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)

b. PM

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per each piece of equipment.⁷ (Regulation 7.08, section 3.1.2)

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.⁶ (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.⁶ (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.

⁶ On 3/3/14, 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.

⁷ The District performed a one-time compliance demonstration for PM for this equipment and the standard cannot be exceeded uncontrolled.

a. **VOC**

- i. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- ii. The owner or operator can demonstrate compliance with Specific Condition S1 by demonstrating that the VOC containing material is less than 1,250 gallons during the 12 consecutive month period. If the usage rate of VOC containing materials exceeds 1,250 gallons per 12-month period, the owner or operator shall calculate the VOC emissions during the 12 consecutive month period to demonstrate compliance with Specific Condition S1.a.ii.⁸
- iii. The owner or operator shall monthly calculate and record the consecutive 12-month total plant-wide VOC emissions.

b. **PM**

See Specific Condition S2.c.

c. **Opacity**

The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

d. **HAP**

- i. The owner or operator shall monthly calculate and record the calendar month and consecutive 12-month emissions of each individual HAP for each month in the reporting period; and
- ii. The owner or operator shall monthly calculate and record the calendar month and consecutive 12-month emissions of total HAP for each month in the reporting period.

⁸ The 1,250 gallons VOC containing material usage will ensure the VOC emissions less than 5 tons during the 12 consecutive month period. Therefore in lieu of calculating VOC emissions, the company can easily demonstrate compliance with Specific Condition S1 if the VOC containing material is less than 1,250 gallons during the 12 consecutive month period.

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall include the following information in the annual compliance report.

a. VOC

- i. The owner or operator shall report the Regulation 7.25 12-consecutive month VOC emissions for each month in the report period.
- ii. The emission unit ID numbers and emission point ID numbers;
- iii. The beginning and ending date of the reporting period;
- vi. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- vii. Identification of all periods of exceedance of the VOC emissions limits; and
- viii. A description of corrective actions taken for each exceedance.

b. PM

See Specific Condition S3.c.

c. Opacity

- i. Emission Unit number and Emission Point number for each exceedance;
- ii. The beginning and ending date of the reporting period;
- iii. The number of surveys where visible emissions were observed;
- iv. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- v. Description of any corrective action taken for each exceedance.

d. HAP

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. HAP compounds shall be reported in terms of the HAP compound.

Insignificant Activities

Description	Quantity	Basis
Pressurized VOC storage vessels	2	Regulation 1.02, Appendix A, section 2.3.26.
Internal combustion engines, fixed or mobile	1	Regulation 1.02, Appendix A, section 2
Combustion sources < 10 MMBtu/hr	2	Regulation 1.02, Appendix A, section 1.1
Research & Development (R&D) Activities, potential emissions less than 5 tpy of a regulated pollutant or 1000 lbs/year of a HAP	2	Regulation 1.02, Appendix A, section 3.27
Brazing, Soldering, or Welding Equipment, potential emissions less than 5 tpy of a regulated pollutant or 1000 lbs/year of a HAP	2	Regulation 1.02, Appendix A, section 3.4
Lab Ventilating & Exhausting Systems Non-Radioactive Materials, potential emissions less than 5 tpy of a regulated pollutant or 1000 lbs/year of a HAP	1	Regulation 1.02, Appendix A, section 3.11
A cold solvent metal parts cleaner manufactured by Just-Rite Model RB-9873	1	Regulation 1.02, Appendix A, section 3.22

- 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.