



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



**Federally Enforceable District Origin Operating Permit (FEDOOP)**

Permit No.: O-0460-15-F

Plant ID: 0460

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:

Cardinal Kitchens LLC  
 203 Hiawatha Avenue  
 Louisville, Kentucky 40209

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:	PM	VOC	HAPs	Single HAP
Tons/year:	<25	<25	<12.5 total	5

Application No.: See table.

Application Received: 02/07/2008  
 (See table)

Permit Writer: Kimberly Loechle

Date of Public Notice: 06/17/2015

{Manager1}  
 Air Pollution Control Officer  
 {date1}

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**APPLICATIONS**

<b>Application #</b>	<b>Date Rec'd</b>	<b>Type</b>
12823	02/07/2008	FEDOOP Renewal Application
12824	09/30/2008	Insignificant Activities application
11009	06/06/2008	Application for 539-08-C, 538-08-C
51524	11/08/2012	Application for wet cutting operation
62629	02/25/2014	STAR Exemption Application

**FEDOOP Permit Revisions/Changes**

<b>Revision No.</b>	<b>Permit No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Change Type</b>	<b>Change Scope</b>	<b>Description</b>
N/A	0060-97-F	04/22/1997	07/16/1997	Initial	Entire Permit	Initial Permit Issuance
R1	0060-97-F	05/30/2000	03/05/2000	Minor	General Conditions Pages 2-4	Incorporate revisions to General Conditions #4, #11, #12, and #13; New General Conditions #13 and #14
R2	0060-97-F	11/05/2001	09/20/2001	Major	94-00	Conversion of Construction Permit, 94-00-C to attachment
R3	0060-97-F	05/30/2003	04/13/2003	Renewal	Entire Permit	Permit Renewal
R4	O-0460-15-F	Xx/xx/15	06/17/15	Renewal	Entire Permit	Permit Renewal; Incorporation of STAR Exemption, and Construction Permits, 538-08-C and 539-08-C

### Abbreviations and Acronyms

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 <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- 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 <sub>2</sub>	- 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-O.
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 existing 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 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, PM<sub>10</sub>, PM<sub>2.5</sub>, 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 CO<sub>2</sub>-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:

<b>Regulation</b>	<b>Title</b>
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

<b>Regulation</b>	<b>Title</b>
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
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions

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

<b>Regulation</b>	<b>Title</b>
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
5.14	Hazardous Air Pollutants and Source Categories
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: Dust Collection System****U1 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1 through 4

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1, 2

**U1 Equipment:**

<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation</b>	<b>Control ID</b>	<b>Stack ID</b>	<b>Installation Date</b>
E1 <sup>1</sup>	Saws for various woodworking processes. Particleboard contains less than one one-hundredth percent (0.01%) formaldehyde.	7.08	C1	S1	1985
E2 <sup>2</sup>	Two (2) sanders, one (1) gang saw, four (4) table saws, and one (1) sliding table saw	7.08	C2	S2	2000
E3 <sup>3</sup>	One (1) wood chipper, make North Fab Sys, model F-3911342-64	7.08	C3	S3	2000

**U1 Control Devices:**

<b>Control ID</b>	<b>Description</b>	<b>Control Efficiency</b>	<b>Stack ID</b>
C1	One (1) Torit dust collection system. Collector is a cyclone with bag filters, Model 36FB, and vented into the building	99%	S1
C2	Eight (8) dust collectors (see table below)	95-99%	S2
C3	North Tech Industrial Dust Collector, Serial #000126	95%	S3

<sup>1</sup> Permitted under 0060-97-F (R3), originally under 484-93-O

<sup>2</sup> Permitted under 0538-08-C

<sup>3</sup> Permitted under 0539-08-C

<b>No.</b>	<b>Make</b>	<b>Model</b>	<b>Control Efficiency</b>	<b>Processes controlled</b>
1	Dayton	6K197A	95%	Sander, model SCMI Sandya
2	Central Machinery	45378	95%	Sander, model Mattison Machine Works
3	Arrestall Dust Collector	AR Unimount 125	99%	Gang Saw in core fabricate room
4	JET	DC 650	95%	Table Saw in saw buildup
5	JET	DC 650	95%	Table Saw in corian dept.
6	JET	DC 650	95%	Table Saw in stock room
7	DCE Vokes	UMA-7461, 81-1505	95%	Table Saw, model Powermatic 66
8	DEC Unimaster	UMA154G5AD, 96-1541	95%	Sliding Table Saw, model Altendorf F45

## U1 Specific Conditions

### S1. Standards (Regulation 2.17, Section 5.1)

#### a. PM/PM<sub>10</sub>

- i. For E1, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, Section 3.1.2)<sup>4</sup>
- ii. For E2, the owner or operator shall not allow PM emissions to exceed 6.84 lb/hr from all the listed wood working equipment. (Regulation 7.08, Section 3.1.2)<sup>5</sup>
- iii. For E3, the owner or operator shall not allow PM emissions to exceed 2.77 lb/hr. (Regulation 7.08, Section 3.1.2)<sup>6</sup>
- iv. The owner or operator shall operate and maintain the control device at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice.
- v. The owner or operator shall not allow or cause the plant-wide PM/PM<sub>10</sub> emissions to equal or exceed 25 tons during any consecutive 12-month period.

#### b. Opacity

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

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

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

#### a. PM/PM<sub>10</sub>

- i. For E1 & E2, the owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the dust collection systems for signs of damage, air leakage, corrosion, etc. and repair as

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

<sup>5</sup> The District has performed a one-time compliance demonstration for PM and the PM lb/hr standard cannot be exceeded uncontrolled.

<sup>6</sup> The District has performed a one-time compliance demonstration for PM on 9/4/2008 and the PM lb/hr standard cannot be exceeded uncontrolled.

needed. The owner or operator shall maintain monthly records of the results.

- ii. For E1, E2, and E3, the owner or operator shall maintain records, monthly, of the type and amount of products transferred.
- iii. For E1, E2, and E3, the owner or operator shall monthly calculate and record the monthly and 12 consecutive month plant-wide PM/PM<sub>10</sub> emissions.
- iv. The PM emissions shall be calculated using the following methodology based on a 0.024 lb PM/ton of material processed unless another methodology has been approved in writing by the district:

$$\text{PM emissions} = (\text{Material processed, ton}) (0.024 \text{ lb/ton}) / (1-0.99)$$

- v. If there is any time that the control device E1 or E2 is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event, or a negative declaration if the control device was operating at all times the process was operating during the reporting period:
  - 1) Date;
  - 2) Start time and stop time;
  - 3) Identification of the control device and process equipment;
  - 4) PM emissions for each hour during the bypass in lb/hr;
  - 5) Summary of the cause or reason for each bypass event;
  - 6) Corrective action taken to minimize the extent or duration of the bypass event; and
  - 7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.
- vi. For E3, there are no record keeping requirements for this equipment to meet the lb/hr standard.

**b. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the facility. 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 (8) 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. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practical steps to eliminate the exceedance.

- iii. 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.

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

The owner or operator shall submit annual compliance reports that include the information in this section, as specified in General Condition 12. The compliance reports shall clearly identify any deviation from a permit requirement.

**a. PM/PM<sub>10</sub>**

- i. For E1, E2 & E3, the owner or operator shall report the monthly and 12 consecutive month plant-wide PM/PM<sub>10</sub> emissions for each month in the report period.
- ii. The owner or operator shall report the following information regarding PM bypass activity in the semi-annual reports.
  - 1) Number of times the PM vent stream bypasses the control device and is vented to the atmosphere;
  - 2) Duration of each bypass to the atmosphere; and
  - 3) Calculated quantity of PM emitted for each bypass in lb/hr.
  - 4) A negative declaration if the control device was not bypassed.

**b. Opacity**

For E1, E2, & E3, the owner or operator shall include, at a minimum, the following information in the annual compliance monitoring reports for opacity:

- i. Identification of the Emission Unit;
- ii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

- iii. The date, time and results of each Method 9 conducted. If no Method 9 tests were conducted during the reporting period, the owner or operator may submit a negative declaration; and
- iv. Description of any corrective action taken.

**Emission Unit U2: Post Form Operation**

**U2 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1 through 5

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1, 2

**U2 Equipment:**

<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation</b>	<b>Control ID</b>	<b>Stack ID</b>	<b>Installation Date</b>
E4 <sup>7</sup>	Laminate gluing equipment for producing laminate boards (spreader, core spreader, belt conveyor, drying tunnel, edge spray, and index conveyor)	7.25	N/A	S4	2000

**U2 Control Devices:**

<b>Control ID</b>	<b>Description</b>	<b>Control Efficiency</b>	<b>Performance Indicator</b>	<b>Stack ID</b>
	No Controls			

<sup>7</sup> Permitted under 0060-97-F (R3), originally under 94-00

## U2 Specific Conditions

### S1. Standards (Regulation 2.17, section 5.1)

#### a. VOC

- i. The owner or operator shall not cause or allow plant-wide VOC emissions to exceed 25 tons per 12 consecutive months in order to maintain STAR exemption status.<sup>8</sup> (Regulation 2.17, Section 5.1)
- ii. The owner or operator shall not cause or allow VOC emissions to exceed 5 tons per 12 consecutive months for the laminating equipment. (Regulation 7.25, Section 3.1)

#### b. HAP

- i. The owner or operator shall not cause or allow, plant-wide any single HAP emission to equal or exceed 5.0 tons per 12 consecutive months. (Regulation 2.17, Section 5.1)
- ii. The owner or operator shall not cause or allow, plant-wide total HAPs emissions to exceed or equal 12.5 tons per 12 consecutive months. (Regulation 2.17, Section 5.1)

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

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

#### a. VOC

- i. The owner or operator shall keep a monthly monitor and record the VOC materials used each month. The owner or operator shall determine monthly the VOC material usage for each 12 consecutive month period.
- ii. The owner or operator shall monthly calculate and record the total VOC emissions from this usage on a monthly and 12 consecutive month basis.
- iii. The owner or operator shall maintain the following records (Regulation 6.24, Section 3):
  - 1) The hours of operation of the equipment or usage for each day;

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<sup>8</sup> The original permit had a VOC limit of 60.82 tons per year established in order to limit single HAP emissions to less than 10 tons per year and total HAP emissions to less than 25 tons per year. For STAR exemption, single HAP emissions will be limited to less than 5.0 tons per year and total HAP emissions to less than 12.5 tons per year, while VOC emissions will be limited to 25 tons per year.

- 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. HAP**

- i. The owner or operator shall keep a record of the single HAP materials used each month. The owner or operator shall determine monthly the single HAP material usage for each 12 consecutive month period.
- ii. The owner or operator shall monthly calculate and record the total HAP emissions from this usage on a monthly and 12 consecutive month basis.

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

The owner or operator shall submit annual compliance reports that include the information in this section, as specified in General Condition 12. The compliance reports shall clearly identify any deviation from a permit requirement.

**a. VOC**

- i. The owner or operator shall report VOC material usage for each month and the 12 consecutive month period from U2 Specific Condition S2.a.i.
- ii. The owner or operator shall report VOC emissions for each month and the 12 consecutive month period from U2 Specific Condition S2.a.ii.

**b. HAP**

- i. The owner or operator shall report single HAP material usage for each month and the 12 consecutive month period from U2 Specific Condition S2.b.i.
- ii. The owner or operator shall report HAP emissions for each month and the 12 consecutive month period from U2 Specific Condition S2.b.ii.

**Emission Unit U3: Self Edge Operation****U3 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.09	Standards of Performance for Existing Process Operations	1 through 5
6.24	Standards of Performance for Existing Sources Using Organic Materials	1 through 7

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1, 2

**U3 Equipment:**

<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation</b>	<b>Control ID</b>	<b>Stack ID</b>	<b>Installation Date</b>
E5 <sup>9</sup>	Four (4) spray booths for spraying adhesives, lacquer, and other coatings	6.09 and 6.24	C5	S5	1985

**U3 Control Devices:**

<b>Control ID</b>	<b>Description</b>	<b>Control Efficiency</b>	<b>Stack ID</b>
C5	Filters	95%	S5

<sup>9</sup> Permitted under 0060-97-F (R3), originally under 94-94 and with eight (8) spray booths; four (4) were removed when installed wet cutting equipment. Currently have three (3) Selfedge spray booths, make Devilbiss, model JG-SO2 for adhesives and one (1) Post Form spray booth with dryer, make Devilbiss, model ASB-466 for water-based adhesives.

### U3 Specific Conditions

#### S1. Standards (Regulation 2.17, section 5.1)

##### a. VOC

- i. The owner or operator shall not cause or allow plant-wide VOC emissions to exceed 25 tons per 12 consecutive months in order to maintain STAR exemption status.<sup>10</sup> (Regulation 2.17, Section 5.1)
- ii. The owner or operator shall not cause or allow to be discharged into the atmosphere more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, from any existing facility in which any Class III solvent or any material containing such solvent is employed or applied unless the discharge has been reduced by at least 85% by weight. (Regulation 6.24, Section 3.3)

##### b. HAP

- i. The owner or operator shall not cause or allow, plant-wide any single HAP emission to equal or exceed 5.0 tons per 12 consecutive months. (Regulation 2.17, Section 5.1)
- ii. The owner or operator shall not cause or allow, plant-wide total HAPS emissions to exceed or equal 12.5 tons per 12 consecutive months. (Regulation 2.17, Section 5.1)

##### c. PM/PM<sub>10</sub>

- i. The owner or operator shall not cause or allow the plant-wide PM/PM<sub>10</sub> emissions to equal or exceed 25 tons during any consecutive 12-month period.
- ii. The owner or operator shall not cause to be discharged into the atmosphere from each spray booth particulate matter in excess of 2.58 lb/hr. (Regulation 6.09, Section 3.2)<sup>11</sup>

##### d. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, Section 3.3.1 and Regulation 7.08, Section 3.1.1)

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<sup>10</sup> The original permit had a VOC limit of 60.82 tons per year established in order to limit single HAP emissions to less than 10 tons per year and total HAP emissions to less than 25 tons per year. For STAR exemption, single HAP emissions will be limited to less than 5.0 tons per year and total HAP emissions to less than 12.5 tons per year, while VOC emissions will be limited to 25 tons per year.

<sup>11</sup> The PM emission limit of 2.58 lb/hr for the spray booths cannot be exceeded with the use of filters.

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

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

- i. The owner or operator shall keep a monthly monitor and record the VOC materials used each month. The owner or operator shall determine monthly the VOC material usage for each 12 consecutive month period.
- ii. The owner or operator shall monthly calculate and record the total VOC emissions from this usage on a monthly and 12 consecutive month.
- iii. The owner or operator shall maintain the following records (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. 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.

**c. PM/PM<sub>10</sub>**

- i. The owner or operator shall, monthly, perform a visual inspection of the filters for signs of damage, air leakage, etc. and repair as needed. The owner or operator shall maintain monthly records of the results.
- ii. The owner or operator shall maintain records, monthly, of the type and amount of products transferred.
- iii. The owner or operator shall monthly calculate and record the monthly and 12 consecutive month plant-wide PM/PM<sub>10</sub> emissions.
- iv. The PM emissions shall be calculate using the following methodology based on a 0.024 lb PM/ton of material processed unless another methodology is approved in writing by the district:

$$\text{PM emissions} = (\text{Material processed, ton}) (0.024 \text{ lb/ton}) / (1-0.99)$$

- v. If there is any time that the filters are bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event, or a negative declaration if the control device was operating at all times the process was operating during the reporting period:
  - 1) Date;
  - 2) Start time and stop time;
  - 3) Identification of the control device and process equipment;
  - 4) PM emissions for each hour during the bypass in lb/hr;
  - 5) Summary of the cause or reason for each bypass event;
  - 6) Corrective action taken to minimize the extent or duration of the bypass event; and
  - 7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

**d. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the facility. No more than four emission points shall be observed simultaneously.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight (8) 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. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practical steps to eliminate the exceedance.
- iii. 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.
- iv. The owner or operator shall inspect the filters in the spray booth(s) at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.

- v. The owner or operator shall keep a record that shows date and the name of the person who inspected the filters and if the filters were replaced.

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

The owner or operator shall submit annual compliance reports that include the information in this section, as specified in General Condition 12. The compliance reports shall clearly identify any deviation from a permit requirement

a. **VOC**

The owner or operator shall report VOC material usage and emissions for each month and the 12 consecutive month period.

b. **HAP**

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

c. **PM/PM<sub>10</sub>**

i. The owner or operator shall report the monthly and 12 consecutive month plant-wide PM/PM<sub>10</sub> emissions for each month in the report period in order to demonstrate compliance with the 25 ton limit.

ii. The owner or operator shall report the following information regarding PM bypass activity in the semi-annual reports:

- 1) Number of times the PM vent stream bypasses the control device and is vented to the atmosphere;
- 2) Duration of each bypass to the atmosphere; and
- 3) Calculated quantity of PM emitted for each bypass in lb/hr.
- 4) A negative declaration if the control device was not bypassed.

d. **Opacity**

There are no compliance reporting requirements for this pollutant.

**Insignificant Activities**

<b>Equipment</b>	<b>Quan.</b>	<b>PTE (tpy)</b>	<b>Regulation Basis</b>
Granite Cutting CNC Machines—wet/water cutting, uses water only to cut stone countertops	2	N/A	Regulation 1.02, Appendix A
Natural Gas heaters used to heat the building	12	N/A	Regulation 1.02, Appendix A

- 1) Indirect heat exchangers, except furnaces that combust waster oil regardless of size, of the following types:
  - a) Those less than 10 million BTU/hr capacity using distillate oil, propane, butane, LPG, or natural gas as fuel, or
  - b) Those used solely for heating residential buildings not exceeding four dwelling units.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 3) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
- 4) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.
- 5) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 6) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
- 7) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.