



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



August 18 2015

Federally Enforceable District Origin Operating Permit Statement of Basis

Company: Coit Drapery

Plant Location: 2730 Crittenden Drive, Louisville, Kentucky 40209

Date Application Received: 13 March 2009

Date of Draft Permit: 08/18/2015

District Engineer: Kim Loechle

Permit No: O-0912-15-F

Plant ID: 0912 **SIC Code:** 7218

NAICS: 812332

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 the 1997 standard for particulate matter less than 2.5 microns (PM_{2.5}), unclassifiable for the 2012 standard for particulate matter less than 2.5 micron (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. **Product Description:** Coit Drapery is a dry cleaning facility.
2. **Process Description:** Dry cleaning of drapery using petroleum solvent.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent to this facility.
4. **Emission Unit Summary:**

Emission Unit/ Emission Point	Equipment Description
U1/E1	One (1) Washex machine, model 6002, 60 lb capacity, using Quick-Dry petroleum solvent.
U1/E2	One (1) Cissell dryer, model D36A30S, serial #37656, 50 lb capacity
U1/E3	One (1) Cissell dryer, model D3630, serial #717, 50 lb capacity
U2/E4	One (1) wet/dry cleaning machine, rated at 50 lb/load, using Stoddard solvent or soap/water as cleaning agents

5. **Fugitive Sources:** Fugitive VOC emissions from dry cleaning equipment.
6. **Permit Revisions:**

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	259-03-F	01/01/04	11/09/2003	Initial	Entire Permit	Initial Permit Issuance
N/A	O-0912-15-F	Xx/xx/15	08/18/2015	Renewal	Entire Permit	Permit renewal; Incorporation of construction permit 97-07-C for One (1) wet/dry cleaning machine

7. Construction Permit History:

Permit No.	Issue Date	Description
97-07-C	04/30/2008	One (1) wet/dry cleaning machine, rated at 50 lb/load, using Stoddard solvent or soap/water as cleaning agents.

8. Emission Summary:

Pollutant	District Calculated Actual Emissions (tn/yr) 2009 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	N/A	No
NO _x	N/A	No
SO ₂	N/A	No
PM ₁₀	N/A	No
VOC	2.89	Yes
Total HAPs	N/A	No
Single HAP	N/A	No

9. Applicable Requirements:

PSD 40 CFR 60 SIP 40 CFR 63
 NSR 40 CFR 61 District-Origin Other

10. MACT Requirements: N/A

11. Referenced Federal Regulations in Permit: None

II. Regulatory Analysis

- Acid Rain Requirements:** Coit Drapery is not subject to the Acid Rain Program.
- Stratospheric Ozone Protection Requirements:** 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. Coit Drapery does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
- Prevention of Accidental Releases 112(r):** Coit Drapery 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. **40 CFR Part 64 Applicability Determination:** Coit Drapery is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*.
5. **Basis of Regulation Applicability**

- a. **Plant-wide**

Coit Drapery is a potential major source for the pollutant VOC. 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. The source is not major for Greenhouse Gases. Coit Drapery has requested a VOC limit of <100 tpy.

40 CFR Part 60, Subpart JJJ (Standards of Performance for Petroleum Dry Cleaners) does not apply to this equipment since the method of cleaning does not meet the definition of “washer” in section 60.621 and there is no dryer associated with the wet/dry cleaning machine.

Regulation 5.00, section 1.13.4 exempts dry cleaners from being subject to the District Toxic Regulations.

Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an Annual Compliance Certification by April 15, of the following calendar year. 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.

a. **Applicable Regulations**

Regulation	Title	Type
2.17	Federally Enforceable District Origin Operating Permits	SIP
6.24	Standard of Performance for Existing Sources Using Organic Materials	SIP
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	SIP

b. **Emission Unit U1 – Dry Cleaning Operation**

i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E1: Washex machine	60 lb	1968	6.24	Regulation 6.24 establishes the requirements for existing sources using organic materials.
E2: Cissell Dryer	50 lb	1968		
E3: Cissell Dryer	50 lb	1972		

ii. **Standards/Operating Limits**

VOC

Regulation 6.24, Section 3.3, establishes a VOC emission limit of 450 pounds per hour and 3,000 pounds per day.

c. **Emission Unit U2 – Wet/Dry Cleaning Machine**

i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E4: Wet/Dry cleaning machine	50 lb/load	2008	7.25	Regulation 7.25 establishes the requirements for new sources using volatile organic compounds.

ii. **Standards/Operating Limits**

VOC

Regulation 7.25, Section 3.3, establishes that the source shall not allow or cause the VOC emissions to exceed 5 tons during any consecutive 12-month period unless a BACT is submitted and approved by the District.

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:** N/A
4. **Operational Flexibility:** The source did not request any operation flexibility.
5. **Compliance History:**

Incid.	Date	Regulation Violated	Settlement
06575	10/22/13	Reg. 2.03, Section 5.02. Failure to submit reports on time.	Paid fine.
06382	10/29/12	Reg. 2.03, Section 5.02. Failure to submit reports on time.	Paid fine.
05366	11/06/09	Reg. 2.03, Section 5.02. Failure to submit reports on time.	Paid fine.

6. Calculation Methodology or Other Approved Method:

Dry Cleaning (U1 & U2): Emission factors from AP-42, Chapter 4: Evaporation Loss Sources, Section 4.1 Dry Cleaning, Table 4.1-1, were used to determine Potential To Emit and confirm limits requested by the source.

- a. For U1: The owner or operator shall calculate the VOC emissions using the following methodology unless another method is approved in writing by the District.
 - i. Emissions of VOC per month = amount of petroleum solvent used (in gallons) during each calendar month * density in pound per gallon of solvent * percent VOC content of solvent

OR

 - ii. Emissions of VOC per month = amount of petroleum solvent used (in gallons) during each calendar month * VOC density in pounds of VOC per gallon of solvent
- b. For U2: The owner or operator shall calculate the VOC emission using the following methodology unless another method is approved in writing by the District.
 - i. If no flow meter is installed and number of calendar days used are recorded as described in S2.a.i:
 - 1) VOC Emissions wet/dry machine per month = Number of Calendar days used * Number of loads per calendar day * 1 gallon * VOC density in pounds of VOC per gallon of solvent * (1 ton/2000 lb) OR

2) VOC Emissions wet/dry machine per month = Number of Calendar days used * Number of loads per calendar day * 1 gallon * density in pounds per gallon of solvent * percent VOC content of solvent *(1 ton/2000 lb)

ii. If no flow meter is installed and surface area is recorded:

1) VOC Emissions wet/dry machine per month = Estimated surface area of material cleaned (in square feet) during each calendar month * 0.178 lb VOC emitted/ft² material cleaned emission factor * (1 ton/2000 lb)

OR

iii. If a flow meter is installed:

1) VOC Emissions wet/dry machine per month = quantity of petroleum solvent used (in gallons) during each calendar month * VOC density in pounds of VOC per gallon of solvent * (1 on/2000 lb)

OR

2) VOC Emissions wet/dry machine per month = quantity of petroleum solvent used (in gallons) during each calendar month * density in pounds per gallon of solvent * percent VOC content of solvent *(1 ton/2000 lb)

7. Insignificant Activities:

Equipment	Quantity	PTE (tpy)	Basis for Exemption
Boiler, 1.25 MMBtu/hr	1	NOx = 0.53	Reg. 1.02, Appendix A, section 1.1
Boiler, 2.45 MMBtu/hr, but disabled	1	NOx = 1.05	

- a. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- b. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
- c. 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 15th.
- d. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- e. 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.
- f. 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.