



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0912-15-F

Plant ID: 0912

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:

Coit Drapery
2730 Crittenden Drive
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: VOC
Tons/year: <100

Application No.: 30230

Application Received: 03/13/2009

Permit Writer: Kimberly Loechle

Date of Public Notice: 08/18/2015

{Manager1}
Air Pollution Control Officer
{date1}

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FEDOOP Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	259-03-F	01/01/2004	11/9/2003	Initial	Entire Permit	Initial Permit Issuance
N/A	O-0912-15-F	Xx/xx/2015	08/18/2015	Renewal	Entire Permit	Permit renewal; Incorporation of construction permit 97-07-C for One (1) wet/dry cleaning machine

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 _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-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, 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. 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 following per Regulation 2.17, section 3.5.
 - A certification 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

Regulation	Title
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
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:

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
5.14	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: Dry Cleaning Operation**U1 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 7

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00 ¹	Definitions	1, 2

U1 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Installation Date
E1	One (1) Washex machine, model 6002, 60 lb capacity, using Ashland Kwik Dri 66 or equivalent (a type of Stoddard solvent)	6.24	N/A	N/A	1968
E2	One (1) Cissell dryer, model D36A30S, serial #37656, 50 lb capacity	6.24	N/A	N/A	1968
E3	One (1) Cissell dryer, model D3630, serial #717, 50 lb capacity	6.24	N/A	N/A	1972

U1 Control Devices:

There are no control devices.

¹ In accordance with Regulation 5.00, section 1.13.4, Coit Drapery is an exempt stationary source and the District Toxic Regulations do not apply

U1 Specific Conditions

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

VOC

- a. The owner or operator shall not allow or cause *plant wide* VOC emissions to equal or exceed 100 tons during any consecutive 12-month period. (Regulation 2.17, Section 5.1)
- b. The owner or operator shall not allow or cause the VOC emissions to exceed 450 pounds per hour and 3,000 pounds per day. (Regulation 6.24, Section 3.3)²

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.

VOC

- a. The owner or operator shall, on a monthly basis, record the total amount of petroleum solvent used (in gallons) during each calendar month and consecutive 12-month period.
- b. If the usage rate of VOC containing materials exceeds 30,000 gallons during any consecutive 12-month period, the owner or operator shall calculate the VOC emissions for the calendar month in which the consecutive 12-month 30,000 gallons usage rate was exceeded. The owner or operator shall then calculate the total VOC emissions for the preceding 11 months and determine if the 12 consecutive month period VOC limit of less than 100 tons has been exceeded. The owner or operator shall continue to calculate the monthly and consecutive 12-month plant-wide VOC emissions each month until such time the consecutive 12-month usage of petroleum solvent is 30,000 gallons or less. (Regulation 2.17, Section 5.2)³
 - i. The owner or operator shall monthly calculate the VOC emissions by using the following methodology unless another method is approved in writing by the District.

² The potential uncontrolled hourly and daily VOC emissions are less than the emission standard (450 lbs/hr and 3,000 lbs/day) in District Regulation 6.24, Section 3.3 (Class III solvent); therefore, no additional monitoring, record keeping, and reporting is required. Based on a maximum processing rate of 105 pounds of material per hour and AP-42 emission factor of 28 lbs VOC/100 lbs material processed, the uncontrolled hourly and daily VOC emissions are 29.4 lbs/hr and 706 lbs/day, respectively.

³ The 30,000 gallons per year usage rate specified in Specific Condition 2.b. will assure ongoing compliance with the annual emission limit of less than 100 tpy. The petroleum solvent density is 6.50 pounds per gallon.

1) 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

2) 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

S3. Reporting (Regulation 2.17, section 5.2)

VOC

The owner or operator shall include the following information in the annual compliance monitoring reports for VOC in accordance with General Condition 12.

- a. Company name;
- b. The beginning and ending date of the reporting period;
- c. The total gallons of petroleum solvent used during each calendar month and each consecutive 12-month period for each month in the reporting period; and
- d. If the consecutive 12-month quantity of petroleum solvent used exceeds the limit of 30,000 gallons during a reporting period, the annual compliance report shall also include the total VOC emissions for each calendar month in the reporting period and the consecutive 12-month VOC emissions for each month in the reporting period.

Emission Unit U2: Wet/Dry Cleaning Machine

U2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00 ⁴	Definitions	1, 2

U2 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Installation Date
E4	One (1) wet/dry cleaning machine, rated at 50 lb/load, using Ashland Kwik Dri 66 or equivalent (a type of Stoddard solvent) or soap/water as cleaning agents	7.25	N/A	N/A	2008

U2 Control Devices:

There are no control devices.

⁴ In accordance with Regulation 5.00, section 1.13.4, Coit Drapery is an exempt stationary source and the District Toxic Regulations do not apply

U2 Specific Conditions

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

VOC

- a. For Emission Point E4 the owner or operator shall not allow or cause the VOC emissions to equal or exceed 5 tons during any consecutive 12-month period from the wet/dry clean machine. (Regulation 7.25, Section 3.3)⁵
- b. The owner or operator shall not allow or cause the *plant-wide* VOC emissions to equal or exceed 100 tons during any consecutive 12-month period. (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.

VOC

- a. For Emission Point E4 follow the requirements of either S2.a.i, S2.a.ii, or S2.a.iii below:
 - i. Make a record of each calendar day during which the E4 cleaning machine is used and the number of loads in that machine per calendar day;
 or,
 - ii. Estimate and record the surface area of the material being cleaned, for each cleaning job,
 or
 - iii. Install a flow meter on Emission Point and maintain monthly records that show the quantity (in gallons) of Ashland Kwik Dri 66 solvent or equivalent used during each calendar month and consecutive 12-month period.

⁵ The potential uncontrolled VOC emissions are 35.15 tons per year based on a maximum of 36 ft²/hr material cleaned, 0.178 lb VOC emitted/ft² cleaned, and operating 8760 hr/yr. The emissions of VOC are limited to 5 tons per year in accordance with Regulation 7.25, unless a Best Available Control Technology (BACT) analysis is submitted to, and approved by the LMAPCD. The company is required to maintain monthly records of the quantity of Ashland Kwik Dri 66 solvent used during each calendar month and consecutive 12-month period

b. If the usage rate of Ashland Kwik Dri 66 solvent or other VOC containing materials exceeds 1,525 gallons during any consecutive 12-month period for Emission Point E4 then the owner or operator shall calculate the VOC emissions for the calendar month in which the consecutive 12-month usage rate was exceeded. The owner or operator shall then calculate the total VOC emissions for the preceding 11 months and determine if the total consecutive 12-month VOC emissions exceeded 5 tons. The owner or operator shall continue to calculate the monthly and consecutive 12-month VOC emissions each month until such time the consecutive 12-month usage rate of VOC containing materials is 1,525 gallons or less. (Regulation 2.03, Section 5.1)

i. The owner or operator shall monthly calculate the VOC emissions by using the following methodology unless another method is approved in writing by the District.⁶

1) If no flow meter is installed and number of calendar days used are recorded as described in S2.a.i:

(a) $\text{VOC Emissions wet/dry machine per month} = \text{Number of Calendar days used} * \text{Number of loads per calendar day} * 1 \text{ gallon} * \text{VOC density in pounds of VOC per gallon of solvent} * (1 \text{ ton}/2000 \text{ lb})$

OR

(b) $\text{VOC Emissions wet/dry machine per month} = \text{Number of Calendar days used} * 4 \text{ gallons} * \text{density in pounds per gallon of solvent} * \text{percent VOC content of solvent} * (1 \text{ ton}/2000 \text{ lb})$

or

2) If no flow meter is installed and surface area is recorded as described in S2.a.ii:

(a) $\text{VOC Emissions wet/dry machine per month} = \text{Estimated surface area of material cleaned (in square feet) during each calendar month} * 0.178 \text{ lb VOC emitted/ft}^2 \text{ material cleaned emission factor} * (1 \text{ ton}/2000 \text{ lb})$

or

3) If a flow meter is installed as in S2.a.iii:

(a) $\text{VOC Emissions wet/dry machine per month} = \text{quantity of petroleum solvent used (in gallons) during each calendar month} * \text{VOC density in pounds of VOC per gallon of solvent} * (1 \text{ ton}/2000 \text{ lb})$

OR

⁶ E4 emission calculations are based on either the surface area of the material being cleaned, number of calendar days the machine is used, or the actual amount of cleaning solvent used each month in this machine.

- (b) $\text{VOC Emissions wet/dry machine per month} = \text{quantity of petroleum solvent used (in gallons) during each calendar month} * \text{density in pounds per gallon of solvent} * \text{percent VOC content of solvent} * (1 \text{ ton}/2000 \text{ lb})$

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

VOC

The owner or operator shall include the following information in the annual compliance monitoring reports for VOC in accordance with General Condition 12.

- a. The total quantity (in gal) of Ashland Kwik Dri 66 solvent or equivalent used during each calendar month of the reporting period;
- b. The consecutive 12-month quantity (in gal) of Ashland Kwik Dri 66 solvent or equivalent used for each month in the reporting period;
- c. If the consecutive 12-month quantity of Ashland Kwik Dri 66 solvent or equivalent used exceeds the limit of 1,525 gallons during a reporting period, the annual compliance report shall also include the total VOC emissions for each calendar month in the reporting period and the consecutive 12-month VOC emissions for each month in the reporting period.
- d. Additionally see Emission Unit 1 for plant wide VOC emission reporting requirements.

U2 Comment

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.

Insignificant Activities

Equipment	Quan.	PTE (tpy)	Regulation Basis
Boiler, 1.25 MMBtu/hr,	1	NO _x = 0.53	Regulation 1.02, Appendix A
Boiler, 2.45 MMBtu/hr, but disabled	1	NO _x = 1.05	Regulation 1.02, Appendix A

- 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) 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.
- 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) 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.
- 6) 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.