



Louisville Metro Air Pollution Control District  
701 West Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137



**Xx xx, 2016**  
**FEDOOP Statement of Basis**

**Owner:** The Valspar Corporation  
**Source:** Color Corporation of America

**Plant Location:** 1630 West Hill Street, Louisville, Kentucky 40210

**Date Application Received:** 04/22/2016

**Date of Draft Permit:** xx/xx/2016

**Date of Public Notice:** xx/xx/2016

**District Engineer:** Shannon Hosey

**Permit No:** O-0152-16-F

**Plant ID:** 0152

**SIC Code:** 2851

**NAICS:** 32551

**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 (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), and particulate matter less than 10 microns (PM<sub>10</sub>); and is a non-attainment area for particulate matter less than 2.5 microns (PM<sub>2.5</sub>). Part of the county is non-attainment for sulfur dioxide (SO<sub>2</sub>).

**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. Source Description:** Color Corporation manufactures coatings.

**2. Emission Unit Summary:**

<b>Emission Unit</b>	<b>Equipment Description</b>
U1	Paint Mixing Operation – 4 <sup>th</sup> Floor Equipment
U2	1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> Floor Equipment, Distillation Building and Storage Tank Farm
IA1	Natural Gas Boiler
IA2	Spray Booth with Filters – R&D Lab

**3. Fugitive Sources:** The source has fugitive emissions from mixing, milling, equipment leaks, and solvent reclamation.

**4. FEDOOP Permit O-0152-16-F Revisions/Changes:**

<b>Revision No.</b>	<b>Permit No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Change Type</b>	<b>Description</b>
Initial	57-97-F	04/22/1997	03/16/1997	Initial	Initial Permit Issuance
R1	57-97-F (R1)	04/04/2000	03/05/2000	Minor	Incorporate revisions to General Conditions #4, #11, #12 and #13; New General Conditions #13 and #14
R2	57-97-F (R2)	04/16/2002	02/17/2002	Significant	Permit Renewal; Incorporate Construction Permit 37-00-C
R3	57-97-F (R3)	07/08/2014	06/03/2014	Renewal	Permit Renewal: Incorporate Construction Permits 357-06-C, 240-06-C, 695-08-C and 37364-13-C
NA	O-0152-16-F	xx/xx/2016	xx/xx/2016	Significant	Revise Permit to Restructure the Layout, Fix Discrepancies in Capacities and Resolution of Inconsistencies in Control Device

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Description
					Applicability; Incorporate New Control Device that is Replacing the Existing One; Update Permit Number*

\*This permit is being reissued with the following changes:

Emission Unit U5 became U2 and Emission Unit U8 became U3. Regulation 6.09 was erroneously applied to Emission Points E4, E5, E6, E7, E8A, E8B, E9A, E9B, E9A, E9B, E10, E53 and E54. The permit was restructured to follow the facility's operations, fix discrepancies in capacities, and remove Emission Points E15 and E46. Inconsistencies in control device applicability were resolved and the permit number was updated.

**5. Emission Summary:**

Pollutant	Actual Emissions (tpy) 2009 Data	Pollutant that triggered major source status
CO	1.624	No
NO <sub>x</sub>	1.934	No
SO <sub>2</sub>	0.012	No
PM/PM <sub>10</sub>	1.053	No
VOC	21.15	Yes
Single HAP	All individual HAPs < 1 tpy	Yes
Total HAPs	2.616	Yes

**6. Applicable Requirements:**

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

**7. Referenced Federal Regulations:**

40 CFR 63 Subpart CCCCCC      National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing

**8. Non-Applicable Regulations:**

40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, does not apply to Emission Points E22 and E23 since the capacities are less than 19,812 gallons.

Regulation 7.12 does not apply to Emission Point E26 since it has a storage capacity of less than 250 gallons.

**II. Regulatory Analysis**

1. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
2. **Stratospheric Ozone Protection Requirements:** This source does not manufacture, sell, or distribute any of the chemicals listed in title VI of the CAAA. 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. The source’s use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
3. **Prevention of Accidental Releases 112(r):** The source 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. **Basis of Regulation Applicability**

<b>Regulation</b>	<b>Basis for Applicability</b>
2.17	Establishes procedures for issuing Federally Enforceable District Origin Operating Permits
6.09	Establishes emission standards for processes that emit PM which were constructed before September 1, 1976
6.13	Applicable to each VOC storage vessel that commences construction or modification before April 19, 1972, and has a storage capacity greater than 250 gallons
6.24	Applies to any affected facility using any organic materials which was in being prior to June 13, 1979.
7.06	Applies to equipment installed after April 9, 1972, and subject to the PM, Opacity, and SO2 standards.
7.08	Establishes emission standards for processes that emit PM which were constructed after September 1, 1976
7.12	Applies to storage tanks with a capacity greater than 250 gallons constructed after April 19, 1972
7.25	Establishes the requirements for VOC emissions, apply to a process not elsewhere regulated in District Regulation 7, and apply to new processes commenced after June 13, 1979
40 CFR 63 CCCCCC	Applies if you own or operate a facility that performs paints and allied products manufacturing that is an area source of hazardous air pollutant (HAP) emissions and processes, uses, or generates materials containing HAP

a. **Plant-wide major source limits**

Color Corporation of America is a potential major source for the pollutants VOC and HAP. 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.

As defined by Regulation 5.00, section 1.13.5, in order to be an exempt stationary source with respect to STAR, the source has applied for an operating permit in accordance with Regulation 2.17 with emission limits that do not exceed the following:

Pollutant	Emissions (tpy)
VOC	25
Single HAP	5
Total HAP	12.5

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.

b. **Equipment:**

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
U1	E1	1000 Gallon Premix Tank with 125 HP Mixer	6.09, 6.24 and 40 CFR 63 Subpart CCCCCC	C1
	E2	1000 Gallon Premix Tank with 125 HP Mixer		
	E3	1000 Gallon Premix Tank with 100 HP Mixer		

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
U1	E51	50-64 Liter Mill (Topas 2)	6.09, 7.25 and 40 CFR Subpart CCCCCC	C1
	E52	1800 Gallon Premix Tank with 200 HP Mixer (Topas 2)		
U2	E16	Quart and Gallon Filling Line – 1 <sup>st</sup> Floor	6.24 and 40 CFR Subpart CCCCCC	N/A
	E17	Five Gallon Can Filling Line – 1 <sup>st</sup> Floor		
	E55	10 HP Mixer - Fill Line – 1 <sup>st</sup> Floor	7.25 and 40 CFR Subpart CCCCCC	
	E11	(Topas 1 Letdown) 1,100 Gallon Letdown Tank with 80 HP Mixer – 2 <sup>nd</sup> Floor	6.24 and 40 CFR Subpart CCCCCC	
	E12	(150 L Mill) 1,400 Gallon Letdown Tank with 100 HP Mixer – 2 <sup>nd</sup> Floor	6.24 and 40 CFR Subpart CCCCCC	
	E13	(100 L Mill) 2,400 Gallon Letdown Tank with 100 HP Mixer – 2 <sup>nd</sup> Floor		
	E14	50 HP Portable Mixer – 2 <sup>nd</sup> Floor	7.25 and 40 CFR Subpart CCCCCC	
	E43	(100L Letdown) 2,400 Gallon Letdown Tank with 100 HP Mixer – 2 <sup>nd</sup> Floor		
	E44	(Topas 2 Letdown) 2,400 Gallon Letdown Tank with 150 HP Mixer – 2 <sup>nd</sup> Floor		
	E50	(Topas 2 Letdown) 2,400 Gallon Letdown Tank with 150 HP Mixer – 2 <sup>nd</sup> Floor	6.24 and 40 CFR Subpart CCCCCC	
	E4	300 Gallon Portable Dispenser with 50 HP Mixer (Mixer D) – 3 <sup>rd</sup> Floor		
	E5	300 Gallon Portable Dispenser with 50 HP Mixer (Mixer C) – 3 <sup>rd</sup> Floor	7.25 and 40 CFR Subpart CCCCCC	
	E6	150 Liter Mill – 3 <sup>rd</sup> Floor		
	E7	100 Liter Mill – 3 <sup>rd</sup> Floor	7.25 and 40 CFR Subpart CCCCCC	
	E8A	Topas 2 - 115 Liter Mill – 3 <sup>rd</sup> Floor		
	E8B	45 Liter Mill #1 – 3 <sup>rd</sup> Floor		
E9A	N BOA 10 Liter Mill – 3 <sup>rd</sup> Floor			
E9B	S BOA 10 Liter Mill – 3 <sup>rd</sup> Floor			
E10	45 Liter Mill #2 – 3 <sup>rd</sup> Floor	7.12 and 40 CFR Subpart CCCCCC		
E22	Storage Tank 206 - 2,495 Gallon AST (n-butyl acetate) – 3 <sup>rd</sup> Floor			

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
U2	E23	Storage Tank 207 - 2,495 Gallon AST (propylene glycol monomethyl ether acetate) – 3 <sup>rd</sup> Floor	7.12 and 40 CFR Subpart CCCCCC	N/A
	E27	Hockmeyer CMX-100 Automatic Washing System – 3 <sup>rd</sup> Floor	7.25 and 40 CFR Subpart CCCCCC	
	E28	320 Gallon Solvent Recycle Tank – 3 <sup>rd</sup> Floor		
	E29	2000 lb/hr Capacity Basket Mill BM2 - Hockmeyer Model HCP-20 – 3 <sup>rd</sup> Floor	7.25 and 40 CFR Subpart CCCCCC	N/A
	E30	2000 lb/hr Capacity Basket Mill BM3 - Hockmeyer Model HCP-20 – 3 <sup>rd</sup> Floor		
	E31	2000 lb/hr Capacity Basket Mill BM4 - Hockmeyer Model HCP-20 – 3 <sup>rd</sup> Floor		
	E53	(1) 50 HP Basket Mill 2,000 lb/hr Capacity – 3 <sup>rd</sup> Floor		
	E54	(2) 30 HP Mixers (Mixers A and B) – 3 <sup>rd</sup> Floor		
	E24	Solvent Distillation Unit – Distillation Building		
	E25	300 Gallon "Dirty" Solvent Storage Tank – Distillation Building	7.12 and 40 CFR Subpart CCCCCC	N/A
	E26	200 Gallon Reclaimed (Clean) Solvent Storage Tank – Distillation Building	40 CFR Subpart CCCCCC	
	E18	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm	6.13 and 40 CFR Subpart CCCCCC	
	E19	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		
	E20	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		
	E21	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		
	E56	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		
	E57	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		
	E58	Storage Tank 209 - 16,900 Gallon AST – Storage Tank Farm		

EU	Emission Point	Description Make/Model	Applicable Regulation	Control Device
IA1	IA1	Natural Gas Boiler 4.2 MMBtu/hr	7.06	N/A
IA2	E45	Spray Booth with Filters – R&D Lab	6.09 and 6.24	
	E47	QC Spray Booth	7.08 and 7.25	

**c. Standards/Operating Limits**

**i. VOC**

- 1) Regulation 6.24 limits the pound per hour and pound per day emissions of Class II and Class III Solvents.
- 2) Regulation 7.25 establishes a plant-wide VOC limit of 10 tons per year for all affected facilities, unless Best Available Control Technology (BACT) level of control is utilized to reduce the VOC emissions.
- 3) Regulations 6.13 and 7.12, section 3 establishes the requirements to install, maintain, and operate the applicable storage tanks.

**ii. Opacity**

- 1) Regulation 6.09, section 3.3.1 and Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.
- 2) Regulation 7.06, section 4.2 establishes opacity standards for boilers.

**iii. PM**

- 1) Regulation 6.09, section 3.2 establishes PM standards. The PM standard is calculated using the following equation:  

$$E = 4.10 (\text{Process Weight Rate tons/hr})^{0.67}$$
- 2) Regulation 7.08, section 3.1.2 establishes PM standards. The PM standard is calculated using the following equation:  

$$E = 3.59 (\text{Process Weight Rate tons/hr})^{0.62}$$
- 3) Regulation 7.06, section 5 establishes PM standard for boilers.

iv. **SO<sub>2</sub>**

Regulation 7.06, section 5 establishes SO<sub>2</sub> standard for boilers.

v. **HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart CCCCCC and is required to comply with section 63.11601.

**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. **Alternative Operating Scenarios:** The source did not request to operate under any alternative operating scenarios.
5. **Compliance Status:** Color Corporation of America is currently in compliance.
6. **Calculation Methodology:**

**VOC**

The emission calculations are based upon VOC content of the material used and EIIP Volume II, Chapter 8 Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities. The VOC storage tanks emissions are based upon the VOC content of the stored material and the amount of material in the tank and AP-42 Chapter 7.2 for Storage Tanks.

**HAP**

The emission calculations are based upon the throughput of HAP containing material used and weight percent of the HAP.

**PM**

The PM emission calculations are also based on the EIIP Volume II, Chapter 8 Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities.

7. **Compliance History:** The source submitted a signed FEDOOP compliance certification on March 13, 2015.

Incident Date(s)	Regulations Violated	Result
12/06/2010	2.17	Settled

8. **Insignificant Activities**

Description	Quantity	Basis
Natural Gas 4.2 MMBTU/hr Boiler	1	Regulation 1.02, Appendix A
R&D paint booth	1	Regulation 1.02, Appendix A
QC Spray Booth	1	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) 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 15<sup>th</sup>.