



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0152-16-F

Plant ID: 0152

Effective Date: 7/8/2014

Expiration Date: 7/31/2019

Revision Date: xx/xx/2016

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:

Owner: The Valspar Corporation
 Source: Color Corporation of America
 1630 West Hill Street
 Louisville, Kentucky 40210

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

Application No.: 76838

Application Received: 04/22/2016

Permit Writer: Shannon Hosey

Date of Public Notice: xx/xx/2016

{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	57-97-F	04/22/1997	03/16/1997	Initial	Entire Permit	Initial Permit Issuance
R1	57-97-F (R1)	04/04/2000	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	57-97-F (R2)	04/16/2002	02/17/2002	Significant	Entire Permit	Permit Renewal; Incorporate Construction Permit 37-00-C
R3	57-97-F (R3)	07/08/2014	06/03/2014	Renewal	Entire Permit	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	Entire Permit	Revise Permit to Restructure the Layout, Fix Discrepancies in Capacities and Resolution of Inconsistencies in Control Device Applicability; Incorporate New Control Device that is Replacing the Existing One; Update Permit Number

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
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.
 1. 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
 2. 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

Regulation	Title
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
701 W. Ormsby Avenue, Third Floor
Louisville, Kentucky 40203-3137***

Emission Unit: Plant-Wide Requirements**Plant-wide Specific Conditions****S1. Standards** (Regulation 2.17, section 5.1)**a. VOC**

- i. The owner or operator shall not allow or cause total plant-wide VOC emissions 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)

b. HAP

- i. The owner or operator shall not allow the plant-wide emissions of total HAPs to equal or exceed 12.5 tons per consecutive 12-month period.¹ (Regulation 2.17, section 5.1, Regulation 5.00, section 1.13.5.2)
- ii. The owner or operator shall not allow the plant-wide emissions of any single HAP to equal or exceed 5 tons per consecutive 12-month period.¹ (Regulation 2.17, section 5.1, Regulation 5.00, section 1.13.5.3)

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/HAP

The owner or operator shall monthly calculate and record the plant-wide total emissions for VOC, single HAP and total HAP for the previous 12-month period. (See Attachment A)

S3. Reporting (Regulation 2.17, section 5.2)

The following information shall be included in the annual compliance report required by General Condition #12.

VOC/HAP

The owner or operator shall report the plant-wide total emissions for VOC, Single HAP and Total HAP for each month in the consecutive 12-month period.

¹ On 5/21/2014, 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 5.00, section 1.13.5.

Emission Unit U1: Paint Mixing Operation – 4th Floor Equipment

U1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1 through 3
6.24	Standards of Performance for Existing Sources Using Organic Material	1 through 5
7.25	Standard of Performance for New Source Using Volatile Organic Compounds	1 through 5
40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing	63.11599, 63.11600, 63.11601, 63.11602, 63.11603, 63.11605, 63.11606 and 63.11607

U1 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID
4th Floor Equipment				
E1	1000 Gallon Premix Tank with 125 HP Mixer (150L Mill)	6.09, 6.24 and 40 CFR Subpart CCCCCC	C1	S1
E2	1000 Gallon Premix Tank with 125 HP Mixer (100L Mill)	6.09, 6.24 and 40 CFR Subpart CCCCCC	C1	S1
E3	1000 Gallon Premix Tank with 100 HP Mixer (Topas 1)	6.09, 6.24 and 40 CFR Subpart CCCCCC	C1	S1
E51	50-64 Liter Mill (Topas 2)	6.09, 7.25 and 40 CFR Subpart CCCCCC	C1	S1
E52	1800 Gallon Premix Tank with 200 HP Mixer (Topas 2)	6.09, 7.25 and 40 CFR Subpart CCCCCC	C1	S1

U1 Control Device:

Control ID	Description	Control Efficiency	Stack ID
C1	Baghouse	95%	S1

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

- i. [See Plant-wide Specific Condition S1.a.i.](#)
- ii. For Emission Points E1, E2 and E3:
 - 1) 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. (Regulation 6.24, section 3.2)
 - 2) 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. (Regulation 6.24, section 3.3)
- iii. For Emission Points E51 and E52, the owner or operator shall not allow or cause plant-wide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to equal or exceed 10 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District.² (Regulation 7.25, section 2.1 and 3.1)

b. Opacity

- i. For Emission Points E1, E2, E3, E51 and E52, the owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1)
- ii. See U1 Specific Condition S1.d.v.

c. PM

For Emission Points E1, E2, E3, E51 and E52, the owner or operator shall not allow PM emissions to exceed 2.58 lb/hr per piece of equipment of equipment based on actual operating hours in a calendar day.³ (Regulation 6.09, section 3.2)

² As stated in Regulation 7.25, section 3.2, affected facilities permitted prior to December 16, 1987, that emit no more emissions than that permitted at such date shall be deemed to be in compliance. The source was permitted for less than 5 tons/year for each attachment (#396-85 and #192-94), that were combined into a plant-wide allowable emission limit of less than 10 tons/year in the operating permit. The source is not required to submit a BACT analysis unless they request a change in the plant-wide Regulation 7.25 VOC limit of 10 tons/year. The source did not request a change to the plant-wide Regulation 7.25 VOC limit; therefore, no BACT analysis was required and the plant-wide limit remains at 10 tons/year.

³ The District has performed a one-time PM compliance demonstration for this equipment and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no emissions monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

d. HAP

- i. [See Plant-wide Specific Condition S1.b.](#)
- ii. The owner or operator must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process. (40 CFR 63.11601(a)(1))
- iii. The owner or operator must capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form. (40 CFR 63.11601(a)(2))
- iv. The owner or operator must:
 - 1) Capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or (40 CFR 63.11601(a)(3)(i))
 - 2) Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form. (40 CFR 63.11601(a)(3)(ii))
- v. The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere. (40 CFR 63.11601(a)(5))
- vi. The owner or operator must:
 - 1) Capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(5) during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or (40 CFR 63.11601(a)(4)(i))
 - 2) Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or (40 CFR 63.11601(a)(4)(ii))
 - 3) Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel. (40 CFR 63.11601(a)(4)(iii))

- vii. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the requirements of §63.11601(b)(1)(i) through §63.11601(b)(1)(iii). (40 CFR 63.11601(b)(1))
 - 1) The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process. (40 CFR 63.11601(b)(1)(i))
 - 2) The covers or lids must maintain contact along at least 90- percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent. (40 CFR 63.11601(b)(1)(ii))
 - 3) The covers or lids must be maintained in good condition. (40 CFR 63.11601(b)(1)(iii))
- viii. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft. (40 CFR 63.11601(b)(2))
- ix. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if: (40 CFR 63.11601(b)(3))
 - 1) All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and (40 CFR 63.11601(b)(3)(i))
 - 2) No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel. (40 CFR 63.11601(b)(3)(ii))
- x. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection. (40 CFR 63.11601(b)(4))
- xi. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (40 CFR 63.11601(b)(5))

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. [See Plant-wide Specific Condition S2.](#)
- ii. For Emission Points E1, E2 and E3, subject to Regulation 6.24, the owner or operator shall maintain the following records:
 - 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.
- iii. For Emission Points E51 and E52, subject to Regulation 7.25:
 - 1) 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 each 12 consecutive month period.
- iv. The owner or operator shall calculate the VOC emissions during each 12 consecutive month period. (See Attachment A)

b. Opacity

See U1 Specific Condition S2.d.ii.1) b)

c. PM

See U1 Specific Condition S2.d.ii.1)

d. HAP

- i. [See Plant-wide Specific Condition S2.](#)
- ii. For each new and existing affected source, you must demonstrate ongoing compliance by conducting the inspection and testing activities in §63.11602(a)(2). (40 CFR 63.11602(a))
 - 1) Ongoing particulate control device inspections and tests. Following the initial inspections, you must perform periodic inspections of each PM control device according to the requirements in §63.11602(a)(2)(ii). You must record the results of each inspection according to §63.11602(b) and perform corrective action where necessary. You must also conduct tests according to the requirements in §63.11602(a)(2)(iii) and record the results according to §63.11602(b). (40 CFR 63.11602(a)(2))
 - a) You must inspect and maintain each dry particulate control unit according to the requirements in §§63.11602(a)(2)(ii)(A) and (B). (40 CFR 63.11602(a)(2)(ii))
 - i. You must conduct weekly visual inspections of any flexible ductwork for leaks. (40 CFR 63.11602(a)(2)(ii)(A))

- ii. You must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months. (40 CFR 63.11602(a)(2)(ii)(B))
- b) For each particulate control device, you must conduct a 5-minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, you must conduct a Method 203C (40 CFR part 51, appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in §63.11601(a)(5), you must comply with the requirements in §§63.11602(a)(2)(iii)(A) through (C). (40 CFR 63.11602(a)(2)(iii))
- i. You must take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. You must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in §63.11601(a)(5). (40 CFR 63.11602(a)(2)(iii)(A))
 - ii. You must prepare a deviation report in accordance with §63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in §63.11601(a)(5). (40 CFR 63.11602(a)(2)(iii)(B))
 - iii. You must resume the visible determinations of emissions from the particulate control device in accordance with of §63.11602(a)(2)(iii) 3 months

after the previous visible determination. (40 CFR 63.11602(a)(2)(iii)(C))

- iii. You must record the information specified in §§63.11602(b)(1) through (6) for each inspection and testing activity. (40 CFR 63.11602(b))
 - 1) The date, place, and time; (40 CFR 63.11602)(b)(1))
 - 2) Person conducting the activity; (40 CFR 63.11602)(b)(2))
 - 3) Technique or method used; (40 CFR 63.11602)(b)(3))
 - 4) Operating conditions during the activity; (40 CFR 63.11602)(b)(4))
 - 5) Results; and (40 CFR 63.11602)(b)(5))
 - 6) Description of correction actions taken. (40 CFR 63.11602)(b)(6))
- iv. The owner or operator must maintain the records specified in §63.11603(c)(1) through §63.11603(c)(4) in accordance with §63.11603(c)(5) through §63.11603(c)(6), for five years after the date of each recorded action. (40 CFR 63.11603(c))
 - 1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted in accordance with §63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted.⁴ (40 CFR 63.11603(c)(1))
 - 2) You must keep a copy of each Annual Compliance Certification Report prepared in accordance with §63.11603(b). (40 CFR 63.11603(c)(2))
 - 3) You must keep records of all inspections and tests as required by §63.11602(b). (40 CFR 63.11603(c)(3))
 - 4) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). (40 CFR 63.11603(c)(4))
 - 5) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each recorded action. (40 CFR 63.11603(c)(5))
 - 6) You must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). You may keep the records offsite for the remaining 3 years. (40 CFR 63.11603(c)(6))

⁴ Color Corporation submitted an initial notification on June 2, 2010.

S3. Reporting (Regulation 2.17, section 5.2)

The following information shall be included in the annual compliance report required by General Condition #12.

a. VOC

- i. [See Plant-wide Specific Condition S3.](#)
- ii. Identification of all periods of exceedance of the VOC emissions limits; and
- iii. A description of corrective actions taken for each exceedance.

b. Opacity

See U1 Specific Condition S3.d.ii.

c. PM

There are no routine compliance reporting requirements for this equipment.

d. HAP

- i. [See Plant-wide Specific Condition S3.](#)
- ii. You must prepare an annual compliance certification report according to the requirements in §63.11603(b)(1) through §63.11603(b)(3). This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report. (40 CFR 63.11603(b)
 - 1) You must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in §63.11603(b)(1)(i) through §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(1)
 - (a) Each annual compliance certification report must cover the annual reporting period from January 1 through December 31. (40 CFR 63.11603(b)(1)(ii))
 - (b) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15. (40 CFR 63.11603(b)(1)(iii))
 - 2) The annual compliance certification report must contain the information specified in §63.11603(b)(2)(i) through §63.11603(b)(2)(iii). (40 CFR 63.11603(b)(2))
 - (a) Company name and address; (40 CFR 63.11603(b)(2)(i))
 - (b) A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that

official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and (40 CFR 63.11603(b)(2)(ii))

- (c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31. (40 CFR 63.11603(b)(2)(iii))
- 3) If a deviation has occurred during the reporting period, you must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(3))

Emission Unit U2: 1st, 2nd, 3rd Floor Equipment, Distillation Building and Storage Tank Farm**U2 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 7 & 8
6.24	Standards of Performance for Existing Sources Using Organic Material	1 through 5
7.25	Standard of Performance for New Source Using Volatile Organic Compounds	1 through 5
40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing	63.11599, 63.11600, 63.11601, 63.11602, 63.11603, 63.11605, 63.11606 and 63.11607

U2 Equipment:

Emission Point	Description	Applicable Regulations	Control ID	Stack ID
1st Floor Equipment				
E16	Quart and Gallon Filling Line – 1 st Floor	6.24 and 40 CFR Subpart CCCCCC	N/A	N/A
E17	Five Gallon Can Filling Line – 1 st Floor		N/A	N/A
E55	10 HP Mixer - Fill Line – 1 st Floor	7.25 and 40 CFR Subpart CCCCCC	N/A	N/A
2nd Floor Equipment				
E11	(Topas 1 Letdown) 1,100 Gallon Letdown Tank with 80 HP Mixer – 2 nd Floor	6.24 and 40 CFR Subpart CCCCCC	N/A	N/A
E12	(150 L Mill) 1,400 Gallon Letdown Tank with 100 HP Mixer – 2 nd Floor		N/A	N/A
E13	(100 L Mill) 2,400 Gallon Letdown Tank with 100 HP Mixer – 2 nd Floor		N/A	N/A
E14	50 HP Portable Mixer – 2 nd Floor		N/A	N/A
E43	(100L Letdown) 2,400 Gallon Letdown Tank with 100 HP Mixer – 2 nd Floor	7.25 and 40 CFR Subpart CCCCCC	N/A	N/A
E44	(Topas 2 Letdown) 2,400 Gallon Letdown Tank with 150 HP Mixer – 2 nd Floor		N/A	N/A
E50	(Topas 2 Letdown) 2,400 Gallon Letdown Tank with 150 HP Mixer – 2 nd Floor		N/A	N/A

3rd Floor Equipment				
E4	300 Gallon Portable Dispenser with 50 HP Mixer (Mixer D) – 3 rd Floor	6.24 and 40 CFR Subpart CCCCCC	N/A	N/A
E5	300 Gallon Portable Dispenser with 50 HP Mixer (Mixer C) – 3 rd Floor		N/A	N/A
E6	150 Liter Mill – 3 rd Floor	7.25 and 40 CFR Subpart CCCCCC	N/A	N/A
E7	100 Liter Mill – 3 rd Floor		N/A	N/A
E8A	Topas 2 - 115 Liter Mill – 3 rd Floor		N/A	N/A
E8B	45 Liter Mill #1 – 3 rd Floor		N/A	N/A
E9A	N BOA 10 Liter Mill – 3 rd Floor		N/A	N/A
E9B	S BOA 10 Liter Mill – 3 rd Floor		N/A	N/A
E10	45 Liter Mill #2 – 3 rd Floor		N/A	N/A
E22	Storage Tank 206 - 2,495 Gallon AST (n-butyl acetate) – 3 rd Floor	7.12 and 40 CFR Subpart CCCCCC	N/A	N/A
E23	Storage Tank 207 - 2,495 Gallon AST (propylene glycol monomethyl ether acetate) – 3 rd Floor		N/A	N/A
E27	Hockmeyer CMX-100 Automatic Washing System – 3 rd Floor	7.25 and 40 CFR Subpart CCCCCC	N/A	N/A
E28	320 Gallon Solvent Recycle Tank – 3 rd Floor		N/A	N/A
E29	2000 lb/hr Capacity Basket Mill BM2 - Hockmeyer Model HCP-20 – 3 rd Floor		N/A	N/A
E30	2000 lb/hr Capacity Basket Mill BM3 - Hockmeyer Model HCP-20 – 3 rd Floor		N/A	N/A
E31	2000 lb/hr Capacity Basket Mill BM4 - Hockmeyer Model HCP-20 – 3 rd Floor		N/A	N/A
E53	(1) 50 HP Basket Mill 2,000 lb/hr Capacity – 3 rd Floor		N/A	N/A
E54	(2) 30 HP Mixers (Mixers A and B) – 3 rd Floor		N/A	N/A
Distillation Building Equipment				
E24	Solvent Distillation Unit – Distillation Building	7.25 and 40 CFR Subpart CCCCCC	N/A	N/A
E25	300 Gallon "Dirty" Solvent Storage Tank – Distillation Building	7.12 and 40 CFR Subpart CCCCCC	N/A	N/A
E26	200 Gallon Reclaimed (Clean) Solvent Storage Tank – Distillation Building	40 CFR Subpart CCCCCC	N/A	N/A
Storage Tank Farm				
E18	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm	6.13 and 40 CFR Subpart CCCCCC	N/A	N/A
E19	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		N/A	N/A

Storage Tank Farm				
E20	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm	6.13 and 40 CFR Subpart CCCCCC	N/A	N/A
E21	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		N/A	N/A
E56	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		N/A	N/A
E57	8000 Gallon Bottom Fill Storage Tank – Storage Tank Farm		N/A	N/A
E58	Storage Tank 209 - 16,900 Gallon AST – Storage Tank Farm		N/A	N/A

U2 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

- i. [See Plant-wide Specific Condition S1.a.](#)
- ii. For Emission Points E4, E5, E11, E12, E13, E14, E16 and E17:
 - 1) 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. (Regulation 6.24, section 3.2)
 - 2) 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. (Regulation 6.24, section 3.3)
- iii. For Emission Points E6, E7, E8A, E8B, E9A, E9B, E10, E24, E27, E28, E29, E30, E31, E43, E44, E50, E53, E54 and E55, the owner or operator shall not allow or cause plant-wide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to equal or exceed 10 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District.⁵ (Regulation 7.25, section 2.1 and 3.1)
- iv. For Emission Points E18, E19, E20, E21, E22, E23, E25, E56, E57 and E58, 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.⁶ (Regulation 6.13 and 7.12, section 3.3)

b. HAP

- i. [See Plant-wide Specific Condition S1.b.](#)
- ii. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are

⁵ As stated in Regulation 7.25, section 3.2, affected facilities permitted prior to December 16, 1987, that emit no more emissions than that permitted at such date shall be deemed to be in compliance. The source was permitted for less than 5 tons/year for each attachment (#396-85 and #192-94), that were combined into a plant-wide allowable emission limit of less than 10 tons/year in the operating permit. The source is not required to submit a BACT analysis unless they request a change in the plant-wide Regulation 7.25 VOC limit of 10 tons/year. The source did not request a change to the plant-wide Regulation 7.25 VOC limit; therefore, no BACT analysis was required and the plant-wide limit remains at 10 tons/year.

⁶ For storage vessel E25, Regulation 7.12 applies due to the size of the tank, but since the vapor pressure as stored is less than 1.5 psia submerged fill is not required.

mixing vessels, must be equipped with covers or lids meeting the requirements of §63.11601(b)(1)(i) through §63.11601(b)(1)(iii). (40 CFR 63.11601(b)(1))

- 1) The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process. (40 CFR 63.11601(b)(1)(i))
 - 2) The covers or lids must maintain contact along at least 90- percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent. (40 CFR 63.11601(b)(1)(ii))
 - 3) The covers or lids must be maintained in good condition. (40 CFR 63.11601(b)(1)(iii))
- iii. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft. (40 CFR 63.11601(b)(2))
- iv. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if: (40 CFR 63.11601(b)(3))
- 1) All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and (40 CFR 63.11601(b)(3)(i))
 - 2) No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel. (40 CFR 63.11601(b)(3)(ii))
- v. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection. (40 CFR 63.11601(b)(4))
- vi. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (40 CFR 63.11601(b)(5))

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. [See Plant-wide Specific Condition S2.](#)
- ii. For Emission Points E4, E5, E11, E12, E13, E14, E16 and E17, subject to Regulation 6.24, the owner or operator shall maintain the following records:
 - 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) Calculations, performed each month, showing the average hourly and daily VOC emissions.
- iii. For Emission Points E6, E7, E8A, E8B, E9A, E9B, E10, E24, E27, E28, E29, E30, E31, E43, E44, E50, E53, E54 and E55, subject to Regulation 7.25:
 - 1) 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 each 12 consecutive month period.
 - 2) The owner or operator shall calculate the VOC emissions during each 12 consecutive month period.
- iv. For Emission Points E18, E19, E20, E21, E22, E23, E25, E56, E57 and E58, subject to Regulation 6.13 and 7.12:
 - 1) The owner or operator 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.
 - 2) 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 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. [See Plant-wide Specific Condition S2.](#)
- ii. The owner or operator must maintain the records specified in §63.11603(c)(1) through §63.11603(c)(4) in accordance with

§63.11603(c)(5) through §63.11603(c)(6), for five years after the date of each recorded action. (40 CFR 63.11603(c))

- 1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted in accordance with §63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted.⁷ (40 CFR 63.11603(c)(1))
- 2) You must keep a copy of each Annual Compliance Certification Report prepared in accordance with §63.11603(b). (40 CFR 63.11603(c)(2))
- 3) You must keep records of all inspections and tests as required by §63.11602(b). (40 CFR 63.11603(c)(3))
- 4) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). (40 CFR 63.11603(c)(4))
- 5) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each recorded action. (40 CFR 63.11603(c)(5))
- 6) You must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). You may keep the records offsite for the remaining 3 years. (40 CFR 63.11603(c)(6))

S3. Reporting (Regulation 2.17, section 5.2)

The following information shall be included in the annual compliance report required by General Condition #12.

- a. **VOC**
 - i. [See Plant-wide Specific Condition S3.](#)
 - ii. Identification of all periods of exceedance of the VOC emissions limits; and
 - iii. A description of corrective actions taken for each exceedance.
- b. **HAP**
 - i. [See Plant-wide Specific Condition S3.](#)
 - ii. You must prepare an annual compliance certification report according to the requirements in §63.11603(b)(1) through §63.11603(b)(3). This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report. (40 CFR 63.11603(b))

⁷ Color Corporation submitted an initial notification on June 2, 2010.

- 1) You must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in §63.11603(b)(1)(i) through §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(1))
 - (a) Each annual compliance certification report must cover the annual reporting period from January 1 through December 31. (40 CFR 63.11603(b)(1)(ii))
 - (b) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15. (40 CFR 63.11603(b)(1)(iii))
- 2) The annual compliance certification report must contain the information specified in §63.11603(b)(2)(i) through §63.11603(b)(2)(iii). (40 CFR 63.11603(b)(2))
 - (a) Company name and address; (40 CFR 63.11603(b)(2)(i))
 - (b) A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and (40 CFR 63.11603(b)(2)(ii))
 - (c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31. (40 CFR 63.11603(b)(2)(iii))
- 3) If a deviation has occurred during the reporting period, you must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(3))

Insignificant Activities

Equipment	Quantity	Regulation Basis
Natural Gas Combustion	1	Regulation 1.02, Appendix A
R&D Spray Booth with Filters	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) 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.

Emission Unit IA1: Natural Gas Combustion**IA1 Applicable Regulations:**

Regulation	Title	Applicable Sections
7.06	Standards of Performance for New Indirect Heat Exchangers	All (1 – 5)

IA1 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID
IA1	Natural Gas Boiler 4.2 MMBtu/hr	7.06	N/A	N/A

IA1 Specific Conditions**S1. Standards** (Regulation 2.17, section 5.2)**a. PM/PM₁₀**

The owner or operator shall not cause to be discharged into the atmosphere from each boiler particulate matter in excess of 0.56 pounds per million BTU actual total heat input. (Regulation 7.06, section 4.1.4)⁸

b. Opacity

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity. (Regulation 7.06, section 4.2)⁹

c. SO₂

The owner or operator shall not cause to be discharged into the atmosphere from each boiler any gases which contain sulfur dioxide in excess of 1.0 pounds per million BTU actual total heat input for combustion of gaseous fuels. (Regulation 7.06, section 5.1.1)⁸

d. VOC/HAP

[See Plant-wide Specific Condition.S1.a](#)

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

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

a. PM/PM₁₀

There are no monitoring or record keeping requirements for PM compliance.⁸

b. Opacity

There are no monitoring or record keeping requirements for Opacity compliance.⁹

c. SO₂

There are no monitoring or record keeping requirements for SO₂ compliance.⁸

d. VOC/HAP

[See Plant-wide Specific Condition S2.](#)

S3. Reporting (Regulation 2.17, section 5.2)**a. PM/PM₁₀**

There are no routine compliance reporting requirements for this equipment.

⁸ A one-time compliance demonstration has been performed for PM and SO₂ for the boiler using AP-42 emission factors and combusting natural gas, and the pound per million BTU emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, or reporting requirements for this boiler with respect to the PM or SO₂ emission limits.

⁹ The District has determined that using a natural gas fired boiler will inherently meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.

- b. **Opacity**
There are no routine compliance reporting requirements for this equipment.
- c. **SO₂**
There are no routine compliance reporting requirements for this equipment.
- d. **VOC/HAP**
[See Plant-wide Specific Condition S3.](#)

Emission Unit IA2: Spray Booths

IA2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
6.24	Standards of Performance for Existing Sources Using Organic Material	1 through 5

IA2 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID
E45	Spray Booth with Filters – R&D Lab (IA)	6.09 and 6.24	Filters	S2
E47	QC Spray Booth	7.08 and 7.25	N/A	N/A

IA2 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

i. [See Plant-wide Specific Condition S1.a.](#)

ii. For Emission Point E45:

1) 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. (Regulation 6.24, section 3.2)

2) 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. (Regulation 6.24, section 3.3)

iii. For Emission Point E47, the owner or operator shall not allow or cause plant-wide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to equal or exceed 10 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District.¹⁰ (Regulation 7.25, section 2.1 and 3.1)

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1 and Regulation 7.08, section 3.1.1)

c. PM/PM₁₀

i. For Emission Point E45, the owner or operator shall not allow PM emissions to exceed 2.58 lb/hr based on actual operating hours in a calendar day.¹¹ (Regulation 6.09, section 3.2)

¹⁰ As stated in Regulation 7.25, section 3.2, affected facilities permitted prior to December 16, 1987, that emit no more emissions than that permitted at such date shall be deemed to be in compliance. The source was permitted for less than 5 tons/year for each attachment (#396-85 and #192-94), that were combined into a plant-wide allowable emission limit of less than 10 tons/year in the operating permit. The source is not required to submit a BACT analysis unless they request a change in the plant-wide Regulation 7.25 VOC limit of 10 tons/year. The source did not request a change to the plant-wide Regulation 7.25 VOC limit; therefore, no BACT analysis was required and the plant-wide limit remains at 10 tons/year.

¹¹ The District has performed a one-time PM compliance demonstration for this equipment and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no emissions monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

- ii. For Emission Point E47, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per piece of equipment.¹¹ (Regulation 7.08, section 3.1.2)

d. **HAP**¹²

[See Plant-wide Specific Condition S1.b.](#)

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. [See Plant-wide Specific Condition S2.](#)

- ii. For Emission Point E45, Regulation 6.24, the owner or operator shall maintain the following records:

- 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.

- iii. For Emission Point E47 subject to Regulation 7.25:

- 1) 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 each 12 consecutive month period.
- 2) The owner or operator shall calculate the VOC emissions during each 12 consecutive month period.

b. **Opacity**

- i. The owner or operator shall inspect the filters in the spray booth monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

c. **PM/PM₁₀**

See Specific Conditions S2.b.

d. **HAP**

[See Plant-wide Specific Condition S2.](#)

¹² Emission Points E45 and E47 are not currently subject to the standards of the NESHAP, 40 CFR 63 subpart HHHHHH, due to this coating operation being a quality control activity, as defined in §63.11180.

S3. Reporting (Regulation 2.17, section 5.2)

The following information shall be included in the annual compliance report required by General Condition #12.

a. VOC

- i. [See Plant-wide Specific Condition S3.](#)
- ii. Identification of all periods of exceedance of the VOC emissions limits; and
- iii. A description of corrective actions taken for each exceedance.

b. Opacity

There are no routine compliance reporting requirements for this equipment.

c. PM/PM₁₀

There are no routine compliance reporting requirements for this equipment.

d. HAP

[See Plant-wide Specific Condition S3.](#)

Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests
 Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc) or hours of operation of the equipment by the appropriate emission factor and accounting for any control devices unless otherwise approved in writing by the District.

Table 1 – U1: Paint Mixing Operation		
Emission Point	Description	Acceptable Emission Factor Sources
4th Floor Equipment		
E1	1000 Gallon Premix Tank with 125 HP Mixer (150L Mill)	EIIP Volume II, Chapter 8 Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities
E2	1000 Gallon Premix Tank with 125 HP Mixer (100L Mill)	
E3	1000 Gallon Premix Tank with 100 HP Mixer (Topas 1)	
E51	50-64 Liter Mill (Topas 2)	
E52	1800 Gallon Premix Tank with 200 HP Mixer (Topas 2)	

Table 2 - U2: 1st, 2nd, 3rd Floor Equipment, Distillation Building and Storage Tank Farm		
Emission Point	Description	Acceptable Emission Factor Sources
1st Floor Equipment		
E16	Quart and Gallon Filling Line – 1 st Floor	EIIP Volume II, Chapter 8 Preferred and Alternative Methods For Estimating Air Emissions From Paint and Ink Manufacturing Facilities
E17	Five Gallon Can Filling Line – 1 st Floor	
E55	10 HP Mixer - Fill Line – 1 st Floor	
2nd Floor Equipment		
E11	(Topas 1 Letdown) 1,100 Gallon Letdown Tank with 80 HP Mixer – 2 nd Floor	EIIP Volume II, Chapter 8 Preferred and Alternative Methods For Estimating Air Emissions From Paint and Ink Manufacturing Facilities
E12	(150 L Mill) 1,400 Gallon Letdown Tank with 100 HP Mixer – 2 nd Floor	
E13	(100 L Mill) 2,400 Gallon Letdown Tank with 100 HP Mixer – 2 nd Floor	
E14	50 HP Portable Mixer – 2 nd Floor	
E43	(100L Letdown) 2,400 Gallon Letdown Tank with 100 HP Mixer – 2 nd Floor	
E44	(Topas 2 Letdown) 2,400 Gallon Letdown Tank with 150 HP Mixer – 2 nd Floor	
E50	(Topas 2 Letdown) 2,400 Gallon Letdown Tank with 150 HP Mixer – 2 nd Floor	

Table 2 - U2: 1st, 2nd, 3rd Floor Equipment, Distillation Building and Storage Tank Farm		
Emission Point	Description	Acceptable Emission Factor Sources
3rd Floor Equipment		
E4	300 Gallon Portable Dispenser with 50 HP Mixer (Mixer D) – 3 rd Floor	EIIP Volume II, Chapter 8 Preferred and Alternative Methods For Estimating Air Emissions From Paint and Ink Manufacturing Facilities
E5	300 Gallon Portable Dispenser with 50 HP Mixer (Mixer C) – 3 rd Floor	
E6	150 Liter Mill – 3 rd Floor	
E7	100 Liter Mill – 3 rd Floor	
E8A	Topas 2 - 115 Liter Mill – 3 rd Floor	
E8B	45 Liter Mill #1 – 3 rd Floor	
E9A	N BOA 10 Liter Mill – 3 rd Floor	
E9B	S BOA 10 Liter Mill – 3 rd Floor	
E10	45 Liter Mill #2 – 3 rd Floor	
E22	Storage Tank 206 - 2,495 Gallon AST (n-butyl acetate) – 3 rd Floor	
E23	Storage Tank 207 - 2,495 Gallon AST (propylene glycol monomethyl ether acetate) – 3 rd Floor	
E27	Hockmeyer CMX-100 Automatic Washing System – 3 rd Floor	EIIP Volume II, Chapter 8 Preferred and Alternative Methods For Estimating Air Emissions From Paint and Ink Manufacturing Facilities
E28	320 Gallon Solvent Recycle Tank – 3 rd Floor	
E29	2000 lb/hr Capacity Basket Mill BM2 - Hockmeyer Model HCP-20 – 3 rd Floor	
E30	2000 lb/hr Capacity Basket Mill BM3 - Hockmeyer Model HCP-20 – 3 rd Floor	
E31	2000 lb/hr Capacity Basket Mill BM4 - Hockmeyer Model HCP-20 – 3 rd Floor	
E53	(1) 50 HP Basket Mill 2,000 lb/hr Capacity – 3 rd Floor	
E54	(2) 30 HP Mixers (Mixers A and B) – 3 rd Floor	
Distillation Building Equipment		
E24	Solvent Distillation Unit – Distillation Building	EIIP Volume II, Chapter 8 Preferred and Alternative Methods For Estimating Air Emissions From Paint and Ink Manufacturing Facilities
E25	300 Gallon "Dirty" Solvent Storage Tank – Distillation Building	AP-42 Chapter 7.1
E26	200 Gallon Reclaimed (Clean) Solvent Storage Tank – Distillation Building	

Table 2 - U2: 1st, 2nd, 3rd Floor Equipment, Distillation Building and Storage Tank Farm		
Emission Point	Description	Acceptable Emission Factor Sources
Storage Tank Farm		
E18	8000 Gallon Bottom Fill Storage Tank	AP-42 Chapter 7.1
E19	8000 Gallon Bottom Fill Storage Tank	
E20	8000 Gallon Bottom Fill Storage Tank	
E21	8000 Gallon Bottom Fill Storage Tank	
E56	8000 Gallon Bottom Fill Storage Tank	
E57	8000 Gallon Bottom Fill Storage Tank	
E58	Storage Tank 209 - 16,900 Gallon AST	

Table 3 – Natural Gas Combustion		
Emission Point	Description	Acceptable Emission Factor Sources
IA1	Natural Gas Boiler 4.2 MMBtu/hr	Natural Gas Combustion AP-42, Chapter 1.4

Table 4 – IA2 Spray Booths		
Emission Point	Description	Acceptable Emission Factor Sources
E45	Spray Booth with Filters – R&D Lab	Material Balance
E47	QC Spray Booth	