



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1847-16-F

Plant ID: 1847

Effective Date: TBD

Expiration Date: TBD

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/Source: Koroseal Interior Products, LLC
 7929 National Turnpike
 Louisville, KY 40214

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.:	65423	Application Received:	6/6/2014
	66037		7/14/2014
	68559		12/22/2014
	69395		2/17/2015
	72338		7/2/2015

Permit Writer: Lana R. Stilger

Date of Public Notice: 06/28/2016

{Manager1}
 Air Pollution Control Officer
 {date1}

TABLE OF CONTENTS

FEDDOOP Permit Revisions/Changes.....	3
Construction Permit History:	3
Abbreviations and Acronyms	4
Preamble	5
General Conditions	6
Emission Unit: Plant-Wide Requirements	10
Plant-wide Applicable Regulations:	10
Plant-wide Specific Conditions.....	11
Comments for Plant-wide Requirements	13
Emission Unit U1: Printing and Laminating	14
U1 Applicable Regulations	14
U1 Equipment:	15
U1 Control Devices:	17
U1 Specific Conditions	18
Emission Unit U2: Mixing.....	28
U2 Applicable Regulations:.....	28
U2 Equipment:	28
U2 Control Devices:	28
U2 Specific Conditions	29
Insignificant Activity	33
IA-1 Emission Unit: Boilers	34
IA-1 Applicable Regulations:	34
IA-1 Equipment:	34
IA-1 Control Devices:.....	34
IA-1 Specific Conditions	35
Fee Comment	37
Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests	38
Attachment B - Determination of Benchmark Ambient Concentration (BAC)	39

FEDOOP Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial ¹	O-1847-16-F	xx-xx-2016	06-28-2016	Initial	Entire Permit	Initial Permit Issuance

Construction Permit History:

Permit No.	Issue Date	Description
F-14-1013-C	7/30/2014	Initial Construction Permit Issuance for a wallpaper printing facility with equipment that includes rotogravure printers, laminators, ovens, and an adhesive mixer.
C-1847-1000-15-F	7/30/2015	Construction Permit Renewal; construction not completed.
C-1847-1001-15-F	2/23/2015	Construction Permit for three nickel plating tanks with a tank cover in an enclosed room controlled by a baghouse.
C-1847-1001-15-F(R1)	4/08/2015	Construction Permit Revision to update the cover page process equipment description to include the baghouse control device.

¹ Koroseal Interior Products was previously permitted at another location under Plant ID 1173 (RJF International Corporation).

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
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
Suite 303
701 W. Ormsby Ave
Louisville, KY 40203-3137*

Emission Unit: Plant-Wide Requirements**Plant-wide Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	1 through 9

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 7
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

Plant-wide Specific Conditions**S1. Standards** (Regulation 2.17, section 5.1)**a. VOC**

The owner or operator shall not allow or cause total plant-wide VOC emissions to equal or exceed 100 tons during any consecutive 12-month period.² (Regulation 2.17, section 5.1)

b. TAC

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21) (See Comment 1)
- ii. The owner or operator shall submit with the notification of construction for any new emission unit the STAR EA Demonstration for all Category 1 through Category 4 TACs emitted from that emission unit.
- iii. The owner or operator shall submit a *plant-wide* emissions-based EA Demonstration to the District showing compliance with the *plant-wide* EA goals of 7.5 for new and existing, 3.8 for all new combined, and 1.0 for each TAC from each process when a change occurs that increases emissions above *de minimis* or previously modeled values.
- iv. If the TAC does not have an established BAC or *de minimis* value, the owner or operator shall calculate and report these values. The form located in Attachment B – Determination of Benchmark Ambient Concentration (BAC), may be used for determining BAC and *de minimis* values.

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

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

a. VOC

- i. The owner or operator shall, monthly, calculate and record the plant-wide total emissions for VOC for the previous 12-month period.
- ii. The owner or operator shall account for the minor VOC emissions from Insignificant Activities when totaling the monthly plant-wide emissions. Since the emissions are minor the owner or operator may use the potential VOC emissions as the monthly emissions. District approved VOC

² The source is potentially major for VOC. The source accepted less than 100 tpy for VOC as FEDOOP limits.

potential to emit for the Natural Gas Boilers and Silver Coating Spray Booth is 167.62 lb/month combined.

- iii. The owner or operator shall monitor and maintain records of the quantity used and VOC content of each VOC containing material during each calendar month and consecutive 12-month period.
- iv. The owner or operator shall maintain monthly records, including calculations, which show the total VOC emissions during each consecutive 12-month period in order to demonstrate ongoing compliance with the 100 tons per year plant-wide emission limit.

b. TAC

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis* at the time of the change.

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

The owner or operator shall report the plant-wide total emissions for VOC for each month in the reporting period.

b. TAC

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material.

Comments for Plant-wide Requirements

Natural gas combustion is *de minimis* by definition. The TAC emissions for the blasting booth (E47) are *de minimus* uncontrolled. The TAC emissions for the nickel plating equipment (E46, E48, E49) has been determined by the District to be *de minimus* controlled. Therefore, the plating equipment has TAC emission limits and operating hour limits established under Unit U1.

Emission Unit U1: Printing and Laminating**U1 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
6.29	Standard of Performance for Graphic Arts Facilities Using Rotogravure or Flexographic Printing	All
7.08	Standards of Performance for New Process Operations	All
40 CFR 60 Subpart FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	60.580, 60.581, 60.582(a)(1), 60.583(b)
40 CFR 63 Subpart WWWW	Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations	63.11507, 63.11508, 63.11509, 63.11511

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1 and 4
5.14	Hazardous Air Pollutants and Source Categories	1, 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
7.02	Adoption of Federal New Source Performance Standards	All

U1 Equipment:

Emission Point	Description Make/Model	Applicable Regulation	Control ID	Stack ID	Installation Date ³
E1	Oven Custom	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	TBD
E2	#1 Laminator Liberty Machine	6.29, 40 CFR 60 Subpart FFF	C1	S1	TBD
E3	Top Dress Station Custom	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	TBD
E5	Electric Oven	6.29	N/A	S5	10/14/2016
E6	#1 Printer Custom	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	10/14/2014
E7	#2 Printer DCI	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	6/6/2014
E8/E9	Maxon/Radiant Energy/456OP2	6.29	N/A	S8	TBD
E10	#4 Printer W&H/6425	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	TBD
E11	#4 Laminator Custom	6.29, 40 CFR 60 Subpart FFF	N/A	S9	TBD
E12	Oven #1 Pyradia/SAU	6.29	N/A	S12	TBD
E13	Oven #2 Pyradia/SAU	6.29	N/A	S13	TBD
E14	Oven #3 Pyradia/SAU	6.29	N/A	S14	TBD
E15	Oven #4 Pyradia/SAU	6.29	N/A	S15	TBD
E15A	Laminator TBD	6.29, 40 CFR 60 Subpart FFF	N/A	S15A	TBD
E16	#5 Printer Romotec/1625	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	TBD
E16A	Top Dress Applicator/TBD	6.29, 40 CFR 60 Subpart FFF	N/A	NA	TBD
E21	Top Dress Electric Oven	6.29, 40 CFR 60 Subpart FFF	N/A	S21	12/14/2014

³ Equipment with Installation Date TBD is still at another Louisville location as of March 1, 2016, and is planned to be moved to this location.

Emission Point	Description Make/Model	Applicable Regulation	Control ID	Stack ID	Installation Date ³
E22	#5 Laminator Custom	6.29, 40 CFR 60 Subpart FFF	N/A	S22	10/14/2014
E23	Top Dress Station Custom	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	12/14/2014
E24	Electric Oven	6.29	N/A	S24	TBD
E25	Electric Oven	6.29	N/A	S25	TBD
E26	Oven #3 Pyradia/SAU	6.29	N/A	S26	TBD
E27	Oven #4 Pyradia/SAU	6.29	N/A	S27	TBD
E28	#6 Printer Romotec	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	3/29/2015
E29	#6 Laminator Lembo/1988	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	3/29/2015
E29A	Laminator Oven Pyradia/SAU	6.29, 40 CFR 60 Subpart FFF	N/A	S29A	3/29/2015
E30	Oven #1 Pyradia/SAU	6.29	N/A	S30	11/25/2014
E31	Oven #2 Pyradia/SAU	6.29	N/A	S31	11/25/2014
E32	Oven #3 Pyradia/SAU	6.29	N/A	S32	11/25/2014
E33	Oven #4 Pyradia/SAU	6.29	N/A	S33	11/25/2014
E34	Oven #5 Pyradia/SAU	6.29	N/A	S34	11/25/2014
E35	#7 Printer Cerutti/1693 1979	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	11/25/2014
E36	#7 Laminator Custom	6.29, 40 CFR 60 Subpart FFF	N/A	N/A	12/14/2014
E39	#7 Laminator Electric Oven	6.29, 40 CFR 60 Subpart FFF	N/A	S39, S39A	12/14/2014
E45 (IA) ⁴	Silver Coating Spray Booth	STAR,7.08	C3	N/A	2015
E46 ⁴	Nickel Plating – Tank 1 Custom	STAR, 40 CFR 63 Subpart WWWWW	C3	N/A	2015
E47 (IA) ⁴	Abrasive Blasting - Custom	STAR,7.08	C1	S1	2015

⁴ STAR regulations only apply to equipment with TAC emission. Only equipment E46, E47, E48, and E49 have nickel emissions. E45 and E47 are Insignificant Activities, therefore De Minimis by definition. The STAR Regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.

Emission Point	Description Make/Model	Applicable Regulation	Control ID	Stack ID	Installation Date ³
E48 ⁴	Nickel Plating – Tank 2 Custom	STAR, 40 CFR 63 Subpart WWWWW	C3	N/A	2015
E49 ⁴	Nickel Plating – Tank 3 Custom	STAR, 40 CFR 63 Subpart WWWWW	C3	N/A	2015

U1 Control Devices:

Control ID	Description	Control Efficiency ⁵	Performance Indicator	Stack ID
C1	Doyle custom made Dust Collector	95%	N/A	S1
C3	Donaldson Baghouse	95%	N/A	N/A ⁶

⁵ This is the District pre-approved control efficiency.

⁶ There is no stack associated with this baghouse, the emissions are recycled indoors.

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

i. A person shall not cause or allow the emission of VOC from any affected facility (E1, E2, E3, E5, E6, E7, E8/E9, E10, E11, E12, E13, E14, E15, E15A, E16, E16A, E21, E22, E23, E24, E25, E26, E27, E28, E29, E29A, E30, E31, E32, E33, E34, E35, E36, E39) unless at least one of the following requirements is met: (Regulation 6.29, section 3.1)

- 1) The volatile fraction of all inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 25% VOC by volume, (Regulation 6.29, section 3.1.1)
- 2) The non-volatile fraction, minus water and exempt solvents, of all inks and coatings, as applied to the substrate, used on the affected facility shall be at least 60% by volume, (Regulation 6.29, section 3.1.2)
- 3) All inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 0.5 pound of VOC per pound of solids, or (Regulation 6.29, section 3.1.3)
- 4) The VOC emissions shall not exceed the following limit:
 - (a) For packaging rotogravure printing or specialty rotogravure printing, 35% by weight of the VOC net input into the affected facility. (Regulation 6.29 section 3.1.4.2)

Compliance with the requirements shall be based upon the inks and coatings, as applied, used by the affected facility during a calendar-day averaging period. If more than one requirement would be applicable for a specific affected facility, then the least stringent requirement shall apply. (Regulation 6.29, section 3.2 and 3.3)

- ii. The owner or operator shall use inks with a weighted average VOC content less than 1 kilogram VOC per kilogram ink solids for E1, E2, E3, E6, E7, E10, E11, E15A, E16, E16A, E21, E22, E23, E28, E29, E29A, E35, E36, E39. (40 CFR 60.582(a)(1))⁷
- iii. See the Plant-wide emission unit.

⁷ 40 CFR 60 Subpart FFF applies to any affected facility constructed after January 18, 1983 and applies to each rotogravure printing line used to print or coat flexible vinyl or urethane products.

b. **HAP**

- i. The owner or operator of a new affected source (E46, E48, E49) for which the initial startup date is after July 1, 2008, you must achieve compliance with the provisions of 40 CFR 63 WWWWWW upon initial startup of your affected source. (40 CFR 63.11506(c))
- ii. The owner or operator of an affected new or existing “flash” or short-term electroplating tank (E46, E48, E49), as defined in 40 CFR 63.11411, that uses or emits one or more of the plating and polishing metal HAP, you must use a tank cover, as defined in 40 CFR 63.11511, for at least 95 percent of the plating time. (40 CFR 63.11507(b)(2))

c. **TAC**

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21)⁸
- ii. The owner or operator shall not allow nickel emissions to exceed 1.82 lb/12 consecutive month period per each nickel plating tank (E46, E48, E49). (Regulation 5.21, section 3.1.1)
- iii. The owner or operator shall not allow nickel emissions to exceed 0.0021 lb/hr per each nickel plating tank (E46, E48, E49).⁹ (Regulation 5.21, section 3.1.1)
- iv. The owner or operator shall limit the hours of operation per each nickel plating tank (E46, E48, E49) to 6,650 hours per year.¹⁰ (Regulation 5.21, section 4.3)
- v. The owner or operator shall operate and maintain the control device (C3) at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards.¹⁰ (Regulation 5.21, section 3.1.1)
- vi. See the Plant-wide emission unit.

⁸ The TACs from natural gas combustion are *de minimis* by definition, Regulation 5.21, section 2.7, TAC emissions for the blasting booth are *de minimis* uncontrolled.

⁹ The controlled Category 1 TAC Nickel emissions from the nickel plating tank are *de minimis* for the lb/hr standard.

¹⁰ The uncontrolled Category 1 TAC Nickel emissions from the nickel plating tank are not *de minimis* for the lb/hr or lb/12 consecutive month period. Therefore, the source is required to use the control device and limit hours of operation to keep the emissions under the *de minimis* level.

d. **PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr based on actual operating hours on a calendar day for E45 and E47 each. (Regulation 7.08, section 3.1.2)¹¹

e. **Opacity**

The owner or operator shall not allow or cause visible emissions to exceed 20% opacity for E45 and E47. (Regulation 7.08, section 3.1.1)

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

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

a. **VOC** (Regulation 6.29, section 6)

i. An owner or operator of an affected facility (E1, E2, E3, E5, E6, E7, E8/E9, E10, E11, E12, E13, E14, E15, E15A, E16, E16A, E21, E22, E23, E24, E25, E26, E27, E28, E29, E29A, E30, E31, E32, E33, E34, E35, E36, E39) subject to this regulation shall maintain daily records of operations and shall include, but not be limited to, the following: (Regulation 6.29, section 6)

- 1) The regulation and section number applicable to the affected facility for which the records are being maintained,
- 2) The application method and substrate type (metal, plastic, etc.),
- 3) The amount and type of each ink, coating, and solvent used at each point of application, including exempt compounds, during the averaging period.
- 4) The VOC content as applied in each ink, coating and solvent,
- 5) The date for each application of each ink, coating, and solvent.

ii. The owner or operator shall monthly maintain records, including calculations, which show the total VOC emissions during each consecutive 12-month period in order to demonstrate ongoing compliance with the 100 tons per year plant-wide emission limit.

iii. Uncontrolled VOC emissions from the laminator and printing presses shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{VOC (lb)} = \text{coating used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)}$$

Or

$$\text{VOC (lb)} = \text{coating used (gal)} \times \text{VOC content (lb/gal)}$$

¹¹ A one-time PM compliance demonstration for this equipment was performed on 1/12/2015 and the 2.34 lb/hr standard could not be exceeded uncontrolled. Therefore there is not monitoring/record keeping or reporting required to show compliance with the lb/hr PM emission standard.

- iv. The owner or operator shall calculate the weighted average mass of VOC per mass of coating solids applied using the following methodology, unless the District approves an alternative method that more accurately quantifies the VOC emission rate:(40 CFR 60.582(b))

$$G = \frac{\sum W_{oi}M_{ci}}{\sum W_{ci}M_{si}}$$

Where:

G the calculated weighted average mass (lb) of VOC per mass (lb) of coating solids applied during a calendar month

M_{ci} the total mass (lb) of each ink and coating (i) applied during a calendar month as determined from the coating manufacturer's formulation data

W_{oi} the weight fraction of VOC of each ink and coating (i) applied during the calendar month as determined from the coating manufacturer's formulation data

W_{si} the weight fraction of solids of each ink and coating (i) applied during the calendar month as determined from the coating manufacturer's formulation data

- v. See the Plant-wide emission unit.

b. TAC

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to, MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis* at the time of the change.
- iii. The owner or operator shall maintain records of the monthly and calendar year-to-date lb/12 consecutive month nickel emissions of the nickel plating tanks (E46, E48, E49).
- iv. The owner or operator shall document the hours of operation daily of the nickel plating tanks (E46, E48, E49).
- v. The owner or operator shall maintain 12-month rolling totals of the hours of operation of the nickel plating tanks (E46, E48, E49).

- vi. The owner or operator shall maintain daily records that identify all periods of bypassing the control device (C3) while the nickel plating tanks (E46, E48, E49) are in operation or a declaration entered into the records that the control device operated at all times the nickel plating was in operation for a given day. The record shall include the following:
 - 1) The date, duration (including start and stop time) of each bypass event;
 - 2) Identification of the control device and process equipment in operation;
 - 3) The total lb/hr of nickel during each bypass event;
 - 4) Summary information on the cause or reason for each control device bypass event;
 - 5) Corrective action taken to minimize the extent and duration of each bypass event; and
 - 6) Measures implemented to prevent reoccurrence of the situation that resulted in bypassing the control device.

- vii. See the Plant-wide emission unit.

c. **HAP**

- i. The owner or operator of an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in 40 CFR 63.11507(b) and you comply with 40 CFR 63.11507(a), (b), or (c) of this subpart by operating the affected tank with a cover, you must demonstrate initial compliance with the following: (40 CFR 63.11508(c)(6))
 - 1) The owner or operator shall install a tank cover on the affected tank. (40 CFR 63.11508(c)(6)(i))
 - 2) The owner or operator shall state in the Notification of Compliance Status that you operate the tank with the cover in place of at least 95 percent of the plating time. (40 CFR 63.11508(c)(6)(ii))
 - 3) The owner or operator shall implement the applicable management practices specified in 40 CFR 63.11507(g), as practicable. (40 CFR 63.11508(c)(6)(iii))
 - 4) The owner or operator shall state in the Notification of Compliance Status that they have implemented the applicable management practices specified in 40 CFR 63.11507(g), as practicable. (40 CFR 63.11508(c)(6)(iv))

- ii. The owner or operator must keep the following record: (40 CFR 63.11509(e))

- 1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications. (40 CFR 63.11509(e)(1))
 - 2) The records specified in 40 CFR 63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part. (40 CFR 63.11509(e)(2))
 - 3) The records required showing continuous compliance with each management practice and equipment standard that applies to you, as specified in 40 CFR 63.11508(d). (40 CFR 63.11509(e)(3))
- iii. The owner or operator must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the dated of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years. (40 CFR 63.11509(f))

d. **PM**

There are no monitoring or record keeping requirements for this equipment.

e. **Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points (E45 and E47). No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

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

a. **VOC**

- i. See the Plant-wide emission unit.
 - ii. Identification of all periods of exceeding a VOC standard or limit specified in this permit. The report shall include the following:
 - 1) Date and time;
 - 2) Quantity of excess VOC emissions;
 - 3) Description of any corrective action taken for each exceedance including measures taken to minimize the extent and duration of excess emissions; and
 - 4) Measures implemented to prevent reoccurrence of the situation that resulted in excess emissions.
 - 5) If there are no periods of exceeding a VOC standard or limit specified in this permit during a reporting period, the owner or operator shall submit a negative declaration stating that no excess VOC emissions occurred during the reporting period.
- b. TAC**
- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
 - ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
 - iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material.
 - iv. The owner or operator shall report the 12-consecutive month totals of the hours of operation of the nickel plating tanks (E46, E48, E49) for each month in the reporting period.
 - v. The owner or operator shall identify all periods of exceeding the lb/hr and lb/12 consecutive month period Nickel emission standards during a reporting period for E46, E48, and E49. The report shall include the following:
 - 1) The date, duration (including start and stop time) during which a deviation occurred;
 - 2) The quantity of excess emissions in lb/hr or lb/12 consecutive month period of Nickel;
 - 3) Summary information on the cause or reason for excess emissions;

- 4) Corrective action taken to minimize the extent and duration of each excess emission event; and
- 5) Measures implemented to prevent reoccurrence of the situation that resulted in excess Nickel emissions,
- 6) If no deviations occur during an annual reporting period, the report shall contain a negative declaration.

vi. See the Plant-wide emission unit.

c. **HAP**

- i. The owner or operator of an affected source (E46, E48, E49), as defined in 40 CFR 63.11505(a), you must submit an Initial Notification in accordance with the following: (40 CFR 63.11509(a))¹²
 - 1) The Initial Notification must include the information specified in 40 CFR 63.11509(b)(2)(i) through (iv). (40 CFR 63.11509(a)(1))
 - 2) The Initial Notification must include a description of the compliance method for each affected source. (40 CFR 63.11509(a)(2))
 - 3) If you startup your new affected source after July 1, 2008, you must submit an Initial Notification when you become subject to this subpart. (40 CFR 63.11509(a)(4)).
- ii. The owner or operator of an affected source must submit a Notification of Compliance Status in accordance with the following: (40 CFR 63.11509(b))
 - 1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in 40 CFR 63.11506. (40 CFR 63.11509(b)(1))¹³
 - 2) The Notification of Compliance Status must include the following items: (40 CFR 63.11509(b)(2))
 - (a) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources. (40 CFR 63.11509(b)(2)(i))
 - (b) Methods used to comply with the applicable management practices and equipment standards. (40 CFR 63.11509(b)(2)(ii))

¹² An Initial Notification was submitted by Koroseal on March 3, 2016.

¹³ The Notification of Compliance Status was submitted by Koroseal on March 3, 2016.

- (c) Description of the capture and emission control systems used to comply with the applicable equipment standards. (40 CFR 63.11509(b)(2)(iii))
 - (d) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements. (40 CFR 63.11509(b)(2)(iv))
 - 3) If a facility makes a change to any items in 40 CFR 63.11509(b)(2)(i), (iii), and (iv) of this section that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change. (40 CFR 63.11509(b)(3))
 - iii. The owner or operator of an affected source must prepare an annual certification of compliance report according to the following: (40 CFR 63.11509(c))
 - 1) The owner or operator of an affected “flash” or short-term electroplating tank that is subject to the requirements in 40 CFR 63.11507(b) and you comply with this subpart by operating the affected tank with a cover, you must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time. (40 CFR 63.11509(c)(4))
 - 2) The owner or operator of an affected tank or other affected plating and polishing operation that is subject to the management practices specified in 40 CFR 63.11507(g) you must state in your annual compliance certification that you have implemented the applicable management practices, as practicable. (40 CFR 63.11509(c)(6))
 - 3) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period. (40 CFR 63.11509(c)(7))
 - iv. The owner or operator of an affected source with any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority. (40 CFR 63.11509(d))
 - d. **PM**

There are no compliance reporting requirements for this equipment.

e. **Opacity**

The owner or operator shall identify all periods of exceeding an opacity standard during a reporting period for E45 and E47. The report shall include the following:

- i. Any deviation from the requirement to perform monthly visible emission surveys or Method 9 tests;
- ii. Any deviation from the requirement to record the results of each VE survey and Method 9 test performed;
- iii. The date and time of each VE Survey where visible emissions were observed and the results of any Method 9 test performed;
- iv. The date, time and results of follow-up VE survey;
- v. The date, time, and results of any Method 9 test performed;
- vi. Identification of all periods of exceeding an opacity standard; and
- vii. If no deviations occur during an annual reporting period, the report shall contain a negative declaration.

Emission Unit U2: Mixing**U2 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
7.08	Standards of Performance for New Process Operations	All
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	All

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.14	Hazardous Air Pollutants and Source Categories	1, 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U2 Equipment:

Emission Point	Description Make/Model	Applicable Regulation	Control ID	Stack ID	Installation Date
E20	Mixer; Littleford Daymax; capacity: 200 gallons	, 7.08, 7.25	C2	S40	TBD

U2 Control Devices:

Control ID	Description	Make/Model	Control Efficiency	Performance Indicator	Stack ID
C2	Baghouse Dust Collector	American Air Filter/ Arrestall AV1200	95% ¹⁴	N/A	S40

¹⁴ This is the District pre-approved control efficiency.

U2 Specific Conditions**S1. Standards** (Regulation 2.17, section 5.2)**a. VOC**

- i. The owner or operator shall not allow VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 (E20 and E45) equal or exceed 5 tons during any 12 consecutive month period, unless BACT is submitted and approved by the District.¹⁵ (Regulation 7.25, section 2.1 and 3.1)
- ii. See the Plant-wide emission unit.

b. PM

- i. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr based on actual operating hours on a calendar day, for the adhesive mixer. (Regulation 7.08, section 3.1.2)¹⁶
- ii. The owner or operator shall utilize the control devices at all times the adhesive mixer is in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 2.03, section 6.1)

c. Opacity

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

d. TAC

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulation 5.01 and 5.21)¹⁷
- ii. See the Plant-wide emission unit.

¹⁵ The potential to emit for this equipment (E20 and E45) is 1.64 tons per year. Therefore monitoring, record keeping, and reporting are not required to demonstrate compliance with the <5 tpy limit from Regulation 7.25. But, the company will need to calculate the emissions to show compliance with the less than 100 tpy plant wide limit.

¹⁶ A one-time PM compliance demonstration for this equipment was performed on 6/9/2014 and the lb/hr standard can be exceeded uncontrolled. Therefore, controls must be run to meet the PM lb/hr emission limits.

¹⁷ There are no TACs associated with this equipment, therefore the TAC generic language is used to account for any raw material changes that contain TACs.

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. **VOC**

- i. Uncontrolled VOC emissions from the mixer shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{VOC (lb)} = \text{raw material used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)}$$

or

$$\text{VOC (lb)} = \text{raw material used (gal)} \times \text{VOC content (lb/gal)}$$

- ii. See the Plant-wide emission unit.

b. **PM**

- i. The owner or operator shall, monthly, perform and keep records of a visual inspection of the structural and mechanical integrity of the control device for signs of damage, air leakage, corrosion, etc. and repair as needed.
- ii. The owner or operator shall maintain daily records that identify all periods of bypassing the control device while the mixer is in operation or a declaration entered into the records that the control device operated at all times the mixer was in operation for a given day. The record shall include the following:
- 1) The date, duration (including start and stop time) of each bypass event;
 - 2) Identification of the control device and process equipment in operation;
 - 3) The total lb/hr of PM emissions during the bypass event;
 - 4) Summary information on the cause or reason for each control device bypass event;
 - 5) Corrective action taken to minimize the extent and duration of each bypass event; and
 - 6) Measures implemented to prevent reoccurrence of the situation that resulted in bypassing the control device.
- iii. Uncontrolled PM/PM₁₀ emission from the mixer shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{PM (lb)} = \text{solids per batch (770 lb/batch)} \times \text{emission factor (20 lb PM/ton)} \\ / (2000 \text{ lb/ton}) \times \text{number of batches (\#batches)}$$

- iv. Controlled PM/PM₁₀ emission from the mixer shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{PM (lb)} = \text{solids per batch (770 lb/batch)} \times \text{emission factor (20 lb PM/ton)} \\ / (2000 \text{ lb/ton}) \times \text{number of batches (\#batches)} \times \text{control efficiency (1 - 0.95)}^{18}$$

c. **Opacity**

- i. The owner or operator shall perform a monthly visual inspection of the mixer and baghouse to check the structural and mechanical integrity of the system for signs of damage, air leakage, corrosion, or other equipment defects and repair as needed.¹⁹
- ii. The owner or operator shall maintain records, monthly, of the results of all visual inspections. Records of the results of any visual inspection shall include the date of the survey, the name of the person conducting the survey, whether or not damage was observed, and what, if any, corrective action was performed.

d. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to, MSDS/SDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis*.
- iii. See the Plant-wide emission unit.

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

a. **VOC**

- i. There are no VOC Reporting requirements for this equipment related to Regulation 7.25 emission standards.
- ii. See the Plant-wide emission unit.

¹⁸ This methodology is used to calculate PM/PM10 emissions for Emissions Inventory.

¹⁹ The visual inspection of the mechanical and structural integrity of the mixer and baghouse will ensure the opacity standard is not exceeded.

b. PM

- i. The owner or operator shall identify all periods of exceeding PM lb/hr emission standards during a reporting period. The report shall include the following:
 - 1) Emission point ID number;
 - 2) The date and duration (including the start and stop time) during which a deviation occurred;
 - 3) The quantity of excess emissions;
 - 4) Summary information on the cause or reason for excess emissions;
 - 5) Corrective action taken to minimize the extent and duration of each excess emissions event;
 - 6) Measures implemented to prevent reoccurrence of the situation that resulted in excess PM emissions;
 - 7) If no deviations occur during an annual reporting period, the report shall contain a negative declaration
- ii. The owner or operator shall report any deviation from the requirement of performing a monthly visual inspection of the structural and mechanical integrity of the control device.

c. Opacity

- i. Any deviation from the requirement to perform and record the results of each monthly visual inspection; and
- ii. The date of each visual inspection where damage was observed and the corrective action was taken.

d. TAC

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material.
- iv. See the Plant-wide emission unit.

Insignificant Activity

Equipment	Quantity	PTE (tpy)	Regulation Basis
Natural Gas Boiler #1 Capacity: 1.7 MMBtu/hr	1	0.730 (NO _x) 0.9872 (VOC) for all combustion sources –boilers and ovens	Regulation 1.02, A.1.1
Natural Gas Boiler #2 Capacity: 1.7 MMBtu/hr	1	0.730 (NO _x)	Regulation 1.02, A.1.1
Silver Coating Spray Booth (E45)	1	0.0185 (VOC) 0.0827 (HAP)	Regulation 1.02
Custom Abrasive Blasting Unit Usage: 268 lb/hr (E47)	1	1.53 (PM ₁₀)	Regulation 1.02
Woodworking equipment	1	0.122 (PM)	Regulation 1.02, A.3.5
Woodworking operation in thermoforming	1	0.172 (PM)	Regulation 1.02

- 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.
- 7) The Source has one Storage Tank (Non-VOC), Capacity: 5000 gallons and one Solder Melting Pot, Capacity: 4 gallons located on site that does not emit air pollutants.

IA-1 Emission Unit: Boilers**IA-1 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.06	Standards of Performance for New Indirect Heat Exchangers	All

IA-1 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Installation Date
IA-1-E1	Natural Gas Boiler #1	7.06	N/A	N/A	2014
IA-1-E2	Natural Gas Boiler #2	7.06	N/A	N/A	2014

IA-1 Control Devices:

There are no control devices associated with this equipment.

IA-1 Specific Conditions**S1. Standards** (Regulation 2.03, section 6.1)**a. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.06, Section 4.2)

b. PM

The owner or operator shall not cause or allow PM emissions to exceed 0.56 lb/MMBtu actual heat input for each IA-E1 and IA-E2 (Regulation 7.06, section 4.1.4)

c. SO₂

The owner or operator of the affected facility shall not allow SO₂ emissions to exceed 1.0 lb/MMBtu actual heat input for combustion of liquid and gaseous fuels for each IA-E1 and IA-E2 (Regulation 7.06, section 5.1.1)

S2. Monitoring and Record Keeping (Regulation 2.03, section 6.1)

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. Opacity²⁰

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

b. PM

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

c. SO₂

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

S3. Reporting (Regulation 2.03, section 6.1)

The owner or operator shall submit an annual report as described in the General Condition G9.

²⁰ The District has determined that small natural gas boilers should inherently meet the opacity standard.

a. **Opacity**

There are no routine compliance reporting requirements for this equipment.

b. **PM**

There are no routine compliance reporting requirements for this equipment.

c. **SO₂**

There are no routine compliance reporting requirements for this equipment.

Fee Comment

1. On May 15, 2013, the Board approved revisions to Regulation 2.08, which implemented a new fee structure. As a result, Koroseal Interior Products, LLC will be required to pay the initial issuance fee as well as annual fees.
2. The initial issuance fee for a FEDOOP is \$2,594.24 in accordance with the Schedule of Fees table, Regulation 2.08, section 12.9.6. This fee shall be paid to the District prior to the issuance of the permit.

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.

Unit ID	Emission Point ID	Emission Point Description	Pollutants	Emission Factors Unit	Uncontrolled Emission Factors	Controlled Emission Factors	Emission Factor Sources
U1	All	Printing	VOC	lb/gal	10.2	n/a	MSDS
		Laminating	VOC	lb/gal	0.032	n/a	MSDS
		Top Dress	VOC	lb/gal	0.83	n/a	MSDS
		Combustion	NO _x	lb/mmcf	100	n/a	AP-42 Table 1.4-1 and AP-42 Table 1.4-2
			CO	lb/mmcf	84	n/a	
			CO ₂	lb/mmcf	120,000	n/a	
			Lead	lb/mmcf	0.0005	n/a	
			N ₂ O	lb/mmcf	2.2	n/a	
			PM	lb/mmcf	7.6	n/a	
			PM ₁₀	lb/mmcf	7.6	n/a	
			SO ₂	lb/mmcf	0.6	n/a	
			Methane	lb/mmcf	2.3	n/a	
	VOC		lb/mmcf	5.5	n/a		
	NH ₃	lb/mmcf	3.2	n/a			
	IA-2 – Silver Coating Spray Booth		VOC/HAP/PM	Mass Balance Method			Data from site equipment moving from in Application scaled up to three shifts.
E46/48/49 – Nickel Plating	all 3 units	HAP	lb/hr	0.0163	0.000815	June 16, 2005; Bay Area Air Quality Management District; San Francisco, CA	
		PM/PM ₁₀	lb/hr	0.0163	0.000815		
		TACs	lb/hr	0.0163	0.000815		
IA-2 – Abrasive Blasting		PM	lb/1000 lb abrasive	2.7	n/a	AP-42 Chapter 13.2.6 Abrasive Blasting: Table 13.2.6-1	
		PM ₁₀		1.3			
		PM _{2.5}		0.13			
U2	E20 - Mixer		PM/PM ₁₀	lb/ton	20	0.211	AP-42 Chapter 6.4 Table 6.4-1: Uncontrolled Emission Factors for Pain and Varnish Manufacturing

Attachment B - Determination of Benchmark Ambient Concentration (BAC)

Determination of Benchmark Ambient Concentration (BAC)

Category _____ No. _____

TAC _____ CAS No. _____ - _____ - _____ Mol. Wt. _____

BAC_C = _____ µg/m³ Annual BAC_NC = _____ µg/m³ _____ Averaging Period

De Minimis _____ lb/hour; _____ lb/_____ ; _____ lb/year

I. Carcinogen Risk - BAC_C [Annual Averaging Period] Carcinogen yes no

- 1. IRIS no 10^-6 risk = _____ µg/m³ URE _____ (µg/m³)^-1 _____ - _____ - _____
2. Cal no 10^-6 risk = _____ µg/m³ IUR _____ (µg/m³)^-1 _____ - _____ - _____
3. MI no 10^-6 risk = _____ µg/m³ _____ - _____ - _____
4. NTP Part A yes no Part B yes no
5. IARC Group 1 yes no Group 2A yes no Group 2B yes no
6. ATSDR no
7. Sec. 3.3.4 method _____ no 10^-6 risk = _____ µg/m³ _____ - _____ - _____
8. Default 0.0004 µg/m³

II. Chronic Noncancer Risk - BAC_NC [Averaging Period as Specified]

- 1. IRIS no RfC = _____ µg/m³ Annual _____ - _____ - _____
2. Cal no REL = _____ µg/m³ Annual _____ - _____ - _____
3. IRIS^1 no RfD = _____ µg/kg/day x 70/20 = _____ µg/m³ Annual _____ - _____ - _____
4. MI no ITSL = _____ µg/m³ _____ Averaging Period _____ - _____ - _____
5. TLV NIOSH _____ µg/m³ x 0.01 = _____ µg/m³ 8-Hr _____ - _____ - _____
6. RTECS^1 _____ = _____ µg/m³ Annual
7. Default 0.04 µg/m³ Annual

III. De Minimis

- 1. Carcinogen (BAC_C) _____ µg/m³ x 0.54 = _____ lb/hour
(BAC_C) _____ µg/m³ x 480 = _____ lb/year
2. Chronic Noncancer Risk _____ Averaging Period
(BAC_NC) _____ µg/m³ x _____ = _____ lb/hour
(BAC_NC) _____ µg/m³ x _____ = _____ lb/_____
_____ lb/_____ x _____ = _____ lb/year

1 To use data based upon an oral route of exposure, the District must make an affirmative determination that data are not available to indicate that oral-route to inhalation-route extrapolation is inappropriate.

Prepared by _____ - _____ - _____