

**Air Pollution Control District  
Jefferson County, Ky  
01 December 2000**

**TITLE V PERMIT SUMMARY**

**Company:** Allied Drum Services Inc.

**Plant Location:** 401 Colorado Avenue

**Date App. Received:** 2 May 1997 & 24 Aug 2000      **Date Admin. Complete:** 19 May 1997 &  
31 Aug 2000

**Date of Draft Permit:** 10 September 2000      **Date of Proposed Permit:** 01 December 2000

**District Engineer:** Michael W. Carter      **Permit No.:** 139-97-TV

**Plant ID:** 0002      **SIC Code:** 7699      **NAICS:** 81131      **AFS:** 00002

**Introduction:**

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter (PM), particulate matter less than 10 microns (PM<sub>10</sub>), and lead (Pb); unclassifiable for particulate matter less than 2.5 microns (PM<sub>2.5</sub>); and is a moderate non-attainment area for ozone (O<sub>3</sub>).

**Application Type/Permit Activity:**

- Initial Issuance
- Permit Revision
  - Administrative
  - Minor
  - Significant
- Permit Renewal

**Compliance Summary:**

- Compliance certification signed
- Compliance schedule included
- Source is out of compliance

**I. Source Description**

1. **Class I Area Impacts:** This source is not located in or near a Class I area.
2. **Product Description:** Metal drum reconditioning and refinishing.
3. **Overall Process Description:** The company receives empty 16 gallon to 55 gallon drums for reconditioning. Reconditioning entails removal of the residue from the inside of the drum, Removing the internal and external coatings by passing the drums through a reclamation furnace. Removal of scale and ash from the drum is performed by shot blast booths. Lastly, the drums are refinished internally and externally.
4. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**
  - a. U1 - Drum Reclamation Furnace
  - b. U2 - Paint booths for surface coating of 55 and 30 gallon steel drums
  - c. U3 - Paint booth for surface coating 16 gallon steel drums.
  - d. U4 - One 25.2 MMBtu/hr Boiler
  - e. U5 - Five Shot Blast Booths: Sheet steel blasted by shot to remove rust, coating residue and mill scale.
  - f. U6 - Acid Flushing Operation: Drums are flushed with acid to remove rust, acid fumes are captured and removed by packed bed scrubber.
6. **Fugitive Sources:** None
7. **Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy)1999 Data	Major Source Status (based on PTE)
CO	1.4	No
NO <sub>x</sub>	4.525	No
SO <sub>2</sub>	nil	No
PM	12.49	No
VOCs	29.524	Yes
<b>Single HAP (&gt; 1 tpy)</b>		
methyl ethyl ketone	2.211	No
glycol ethers	9.471	Yes
toluene	1.221	No
triethylamine	4.395	Yes

Pollutant	Actual Emissions (tpy)1999 Data	Major Source Status (based on PTE)
<b>Total HAPs</b> (VOC and Non-VOC)	18.147	Yes

### 8. Applicable Requirements:

PSD     NSPS     SIP     NSR     NESHAPS  
 District-Origin     MACT     Other

### 10. Referenced Federal Regulations in Permit:

None

## II. Regulatory Analysis

1. **Emission and Operating Caps:** The source is not subject to any plant-wide emission or operating caps.
2. **Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.
3. **Operational Flexibility:** The source did not request to operate under alternative operating scenarios in its Title V Permit Application.
4. **Testing Requirements:** Twice during the permit cycle, the owner or operator shall conduct source testing on Drum Reclamation Furnace. Test methods 1 through 5, 7 and 25A shall be utilized to demonstrate compliance with the PM standard, the NO<sub>x</sub> standard and the continued DRE of the unit.
5. **Monitoring, Record Keeping and Reporting Requirements:** The source is required to monitor, maintain records of, and report on various operating parameters to demonstrate ongoing compliance with all applicable requirements. Record keeping requirements are specified for each pollutant, for each emission unit. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting. The following is a summary of the compliance monitoring requirements:
  - a. PM - Facility testing for PM is required twice per permit cycle for the drum reconditioning furnace. The coating operations shall not be operated unless the dry filter systems are in place. The company has demonstrated that the PM standards can not be exceeded by the boiler and that the control devices for the shot blasters are not needed for compliance. Therefore, no periodic monitoring is necessary for PM.

- b. Opacity - The source is required to perform scheduled visual emissions surveys for all emission units on site. Should any visible emissions be observed, a Method 9 shall be performed within a specified time frame.
- c. VOC - The source is required to monitor temperature in the secondary combustion zone to demonstrate compliance with the destruction of VOC in the reconditioning furnace. The source shall test for DRE of the reconditioning furnace twice during the permit cycle. The source is required to maintain records of coating usage, as applied to demonstrate compliance with the VOC standard. The source is also required to demonstrate the destruction of VOC's in recirculation of VOC containing air through the combustion chamber of the paint ovens when not using compliant coatings.
- d. NO<sub>x</sub> - The source is required to monitor temperature in the reconditioning furnace, monitor the drum residue for nitrogen containing materials, and perform a source test twice during the permit cycle to demonstrate ongoing compliance with the standard.
- e. TAPs - The source will keep a computerized system of checking TAP contents in the drum residue and control the drum flow input into the reconditioning furnace, to assure compliance with TAP emissions. The source shall monitor the bag houses for the shot blasters, for proper operation to assure compliance with TAP emission requirements.

**6. Off-Permit Documents:** None

The District considers an "off-permit document" as a document on which a source's compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source's Title V Operating Permit. The designation "off-permit document" shall be made at the District's discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, PMPs, MOCS; or other documents which are too voluminous to be included in a source's Title V Operating Permit, as determined by the District.

### III. Other Requirements

- 1. **Temporary Facilities:** The source did not request to operate any temporary facilities.
- 2. **Short Term Activities:** The source did not report any short term activities.
- 3. **Compliance Schedule/Progress Reports:** The source has certified compliance with all applicable requirements; therefore, no compliance schedule or progress reports are necessary.
- 4. **Emissions Trading:** None.
- 5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
- 6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source did not report the use any of the listed chemicals.

- 7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR 68 Subpart F and Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
- 8. **Insignificant Activities:** The following activities, as referenced in the source’s Title V Permit Application, have been determined by the District to be insignificant.

<b>INSIGNIFICANT ACTIVITIES</b>		
<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
Internal Combustion Engines	8 tractors, 2 forklifts	Reg. 2.02, sec.2.1.1
Heat Treating	3 ovens	Reg. 2.02, sec.2.3.14
Brazing, Soldering, or Welding	Various	Reg. 2.02, sec.2.3.4
Soil/Groundwater remediation (future)	Future Remediation Schedule	Reg. 2.02; Sec.2.3.20
Closed Head Drum Caustic Washing Operation	170 Closed head drums/hr	Negligible emissions
Fly Ash Hopper in a water bath	1	No regulated emissions
Emergency Generator (IC engine)	1	Reg 2.02, sec 2.2
Above ground Diesel Fuel Storage Tank (550 gallons)	1	Reg. 2.02, sec 2.3.9.2

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- B. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.

- i. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
- ii. No periodic monitoring shall be required for facilities designated as insignificant activities.