

**Air Pollution Control District
Jefferson County, Ky
8 January 2001**

TITLE V PERMIT SUMMARY

Company: Caldwell Tanks, Incorporated

Plant Location: 4000 Tower Road, Louisville, KY 40219

Date App. Received: 20 February 1997 **Date Admin. Complete:** 20 April 1997

Date of Draft Permit: 14 January 2001 **Date of Proposed Permit:** 29 March 2001

District Engineer: John McCarthy **Permit No.:** 134-97-TV

Plant ID: 0034 **SIC Code:** 3443 **NAICS:** 332313 **AFS:** 00034

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 (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), particulate matter less than 10 microns (PM₁₀), and lead (Pb); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}); and is a moderate non-attainment area for ozone (O₃).

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:** Fabricated steel plate work
3. **Overall Process Description:** Steel plates are taken from storage and sent through shot blast systems to remove rust and scale. The plates are then cut to desired dimensions and formed into various parts. The parts are then sent through the paint booth for coating purposes. The steel parts are assembled at the consumer's desired location.
4. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**
 - a. U1 - Three shot blast booths
 - b. U2 - Two paint booths
 - c. U3 - Separate and mostly mobile welding/cutting/gouging stations (considered insignificant activities and listed as such)
 - d. U4 - Two cold solvent metal parts cleaners
6. **Fugitive Sources:** When the shot blast booths' (U1) collectors are vented indoors, these can be a source of fugitive emissions.
7. **Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy) 1998 Data	Major Source Status (based on PTE)
CO	Negligible	No
NO _x	Negligible	No
SO ₂	Negligible	No
PM	1.9	No
VOCs	30.8	Yes
Single HAP (> 1 tpy)		
Ethyl Benzene	2.3	No
Methyl Ethyl Ketone	1.9	No
Methyl Isobutyl Ketone	6.9	Yes

Isomers of Xylene	14.4	Yes
Total HAPs (VOC and Non-VOC)	27.5	Yes

Note: The HAP emissions, listed in table above, is informational, only. The source may emit any or all of the 188 listed HAPs.

8. Applicable Requirements:

PSD NSPS SIP NSR NESHAPS
 District-Origin MACT Other

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 request to operate under alternative operating scenarios in its Title V Permit Application. Emission Unit U1 shall be allowed to vent from the bag houses to the ambient air rather than directly into the building. In so doing, the company shall be required to perform additional opacity surveys and maintain required records and log.
4. **Testing Requirements:** None at this time.
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. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting.
 - A. PM Compliance - The owner or operator will monitor and record pressure drop, daily, for all control devices. This is to ensure proper operation of that device and the corresponding control efficiencies, which will be used in conjunction with daily product throughput to demonstrate ongoing compliance with the hourly PM limit. This is applicable, only when the source is operating under the "Alternative Scenario", when the baghouses for the shot blasters are vented to the atmosphere.

When operating under the primary scenario (venting indoors), Emission Unit U1, shall monitor and record the pressure drop on a weekly basis.

The basis for determination of PM allowables is section 3.3.1 of Regulation 7.08 for each of emission point E-5 and E-6. The product weight is based on the weight of the shot, dirt, rust and scale going through the shot blast booths and ultimately to the collector. This equates to less than a 1000 pounds per hour, combined, thus an allowable of 2.34 pounds per hour, combined. Emission point E-1 is subject to Regulation 6.09, thus the basis for the allowable emissions is self explanatory. For Emission Points E-2 and E-3, the basis for the allowable is the weight of the coating being applied and the combine weight will not exceed 1000 pounds per hour.

- B. Opacity - The owner or operator will conduct a one (1) minute visible emission survey monthly to ensure ongoing compliance with opacity standards. These records shall be maintained monthly and be made available to the District upon request.
- C. VOC Compliance - owner or operator will monitor and record the average daily VOC content of their coatings to ensure compliance with the pounds per gallon VOC content limit.

The owner or operator, by performing the daily record keeping, as defined in Regulation 6.31 and specified above, thus complies with the requirements of Regulation 1.05, section 4.1.1.

- D. Reporting - the owner or operator will, on a semi-annual basis, submit ongoing compliance reports which shall cover: opacity readings, PM hourly limit verification calculations, and VOC content limit verification calculations. These reports shall also include any excursions and corrective action taken to prevent further excursions.

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 identify any of the listed chemicals in its Title V permit application.
- 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.

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Used Oil Aboveground Storage Tank (250 gal)	1	Reg 2.02 sec 2.3.9.2
Small Space Heaters (Natural Gas)	128	Reg 2.02, sec 2.1.1
Research and Development Activities with potential emissions less than 5 tons per year.	1	Reg 2.02, sec 2.3.27
Closed system solvent distillation unit	1	Closed-loop system with "zero emissions" (Capacity: 1.9 gal/hr)
VOC Storage Vessel (55 gal)	1	Reg 2.02, sec 2.3.24
Portable diesel and gasoline storage tanks (250 gal)	2	Reg 2.02, sec 2.3.23
Internal combustion engines fixed or mobile.	5	Reg 2.02, sec 2.2
Separate and mostly mobile stations for performing welding, cutting, and gouging (U3).	73	Reg 2.02, sec 2.3.4

- 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.