



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY
TITLE V OPERATING PERMIT

Permit No.: 134-97-TV

Plant ID: 0034

Effective Date: 28 September 2001

Expiration Date: 28 September 2006

UTM Northing: 4222.9

UTM Easting: 614.8

SIC: 3443

NAICS: 332313

AFS: 00034

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

Caldwell Tanks, Incorporated
4000 Tower Road
Louisville, Kentucky 40219

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. 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 eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Caldwell Tanks, Incorporated

Responsible Official: Mike Marrs

Title of Responsible Official: Vice President; Environmental, Health, and Safety

Date Application Received: 20 February 1997

Date Application Administratively Complete: 20 April 1997

Date Public Notice Given: 14 January 2001

Reviewing Engineer (03)

Air Pollution Control Officer

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Abbreviations and Acronyms

AC	- Additional Condition
AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
EC	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
EF	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO _x	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM ₁₀	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
VOC	- Volatile Organic Compound
UTM	- Universal Transverse Mercator

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are 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. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

*US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960*

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

- 6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
- 7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
- 8. **Enforceability Requirements** - Except for the conditions that are specifically designated as “District Only Enforceable Conditions”, all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.

(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.
15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.

23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
 - a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.

- 32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
- 33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
- 34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
- 35. **Submittal of Reports, Data, Notifications, and Applications**
 - a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745*
 - b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104*
- 36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE 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 Emission Standards and Maintenance Requirements

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i>)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i>)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

Emission Unit U1 Description: Three (3) Shot Blast Booths

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standard of Performance for Existing Process Operations	1, 2, 3.1, 3.2 & 5
7.08	Standards of Performance for New Process Operations	Sections 1, 2, 3.1.1, 3.1.2, and 3.3

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 5
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	Sections 1, 2, 3, 4, 5 & 6
5.14	Hazardous Air Pollutants and Source Categories	Sections 1 and 2

Components:

- E1 - Shot blast booth
- E5 - Shot blast booth
- E6 - Shot blast booth

Allowable Emissions:

Emission Points	Limit / Standard
E1	PM - 2.58 lb/hr each (Regulation 6.09, section 3.1)
	Opacity - < 20 % (Regulation 6.09, section 3.2)
	TAPs - < ASL (Regulation 5.11)
E5 and E6	PM - 2.34 lb/hr, combined (Regulation 7.08, section 3.1.2)
	Opacity - < 20 % (Regulation 7.08, section 3.1.1)

TAPs - < ASL (Regulation 5.12)

Control Devices:

ID	Stack ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C1	vents indoors	Baghouse (E1)	Pressure drop	2" - 6" W.C.	Record keeping Weekly	Semi-annual
C5	vents indoors	Baghouse (E5)	Pressure drop	3" - 5" W.C.	Record keeping Weekly	Semi-annual
C6	vents indoors	Baghouse (E6)	Pressure drop	2" - 8" W.C.	Record keeping Weekly	Semi-annual

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. **PM**
 - i. The owner or operator shall, for the one booth subject to 6.09 (section 3.2), not cause or permit the discharge of emissions in excess of 2.58 lb/hr.
 - ii. The owner or operator shall, for each booth subject to 7.08 (section 3.1), not cause or permit the combined discharge of emissions in excess of 2.34 lb/hr.
 - b. **Opacity**
 - i. The owner or operator shall, for each particulate matter (PM) Emission Point subject to 6.09 (section 3.1), not cause or permit the discharge of emissions equal to or in excess of 20% opacity.
 - ii. The owner or operator shall, for each particulate matter (PM) Emission Point subject to 7.08 (section 3.1.1), not cause or permit the discharge of emissions equal to or in excess of 20% opacity.
 - c. **TAPs**

The owner or operator shall limit Toxic Air Pollutant (TAP) emissions from this source to below the calculated ASL specified in Regulation 5.11 or 5.12, unless modeling, RACT or a BACT determination has been performed and approved by the District.
2. **Monitoring** (Reg 2.16, section 4.1.9.1.2)
 - a. **PM**

The owner or operator shall maintain the pressure drop across the control device with the range of 2" to 6" for C1, 3" to 5" for C5 and 2" to 8" for C6, water column.

b. **Opacity**

There are no compliance monitoring requirements for opacity, as long as the emission unit and each of the control devices vent indoors.

c. **TAPs**

Compliance monitoring shall be accomplished by additional condition 2.a.

3. Record Keeping (Reg 2.16, Section 4.1.9.2)

a. **PM**

The owner or operator shall record the pressure drop across the control device weekly, when the unit is in use. The records shall contain:

- i. Date and time of the recording
- ii. The pressure drop, in inches of water
- iii. Name of the person who performed the recording
- iv. If parameter was outside the normal operating bounds, what was done to correct the problem.

b. **Opacity**

There are no recordkeeping requirements.

c. **TAPs**

The owner or operator shall maintain the following records to monitor ongoing compliance with Regulations 5.11 and 5.12:

- i. See additional condition 2.a
- ii. See additional condition 3.a.

4. Reporting (Reg 2.16, Section 4.1.9.3)

a. **PM**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit/Point ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Description of any corrective action taken pursuant to Additional Condition 3.a.iv.
- iv. A negative declaration, if no corrective action taken.

b. Opacity

There are no compliance reporting requirements.

c. TAPs

There is no compliance reporting required, see additional condition 4.a.

Alternative Operating Scenario

The owner or operator has requested the option to vent baghouses E1, E5 and E6 to the outside air, in so doing the owner or operator shall abide with the following additional conditions:

1. Monitoring (Reg 2.16, section 4.1.9.1.2)

Opacity

- a. The owner or operator shall, to demonstrate compliance with the opacity standard, conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stack S1, S2 and S3) in U1.
- b. For an Emission Point without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No survey needs to be conducted if the emission points are not in operation at the time of the survey.
- c. At an Emission Point 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 for stack emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent

visible emission surveys shall be conducted as indicated in Additional Condition 1.a.

2. Record Keeping (Reg 2.16, Section 4.1.9.2)

a. Opacity

- i. The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from Additional Condition 1.c above shall be documented and records made available to the District upon request. The records shall also indicate when no survey is conducted and the reason why.
- ii. The owner or operator shall maintain a log, specifying when the emission unit was operating under which scenario.

b. PM

The owner or operator shall record the pressure drop across the control device daily when the unit is in use. The records shall contain:

- i. Date and time of the recording
- ii. The pressure drop, in inches of water
- iii. Name of the person who performed the recording
- iv. If parameter was outside the normal operating bounds, what was done to correct the problem.

3. Reporting

a. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit/Point ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each Method 9 conducted. If no Method 9 tests were conducted during the reporting period, the owner or operator may submit a negative declaration;
- iv. Description of any corrective action taken pursuant to Additional Condition 1.c.

b. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit/Point ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Description of any corrective action taken pursuant to Additional Condition 2.b.iv.
- iv. A negative declaration, if no corrective action taken.

Comment

All other Additional Conditions for Emission Unit U1 apply, whether operating under the primary scenario or alternative scenario.

Emission Unit U2 Description: Two Paint Booths

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.05	Compliance With Emission Standards and Maintenance Requirements	1.1, 4.1, 4.1.1
6.09	Standard of Performance for Existing Process Operations	1, 2, 3.1, 3.2 & 5
6.31	Standard of Performance for Existing Miscellaneous Metal Parts and Products Surface Coating Operations	1, 2, 3, 4, 5, 6 & 7

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Components:

- E2 - Paint Booth No. 1
- E3 - Paint Booth No. 2

Allowable Emissions:

Emission Pt	Limit/Standard
E2 & E3	Opacity - <20% (Regulation 6.09, section 3.1)
	PM - 2.58 lbs/hr combined (Regulation 6.09, section 3.2)
	VOC - See Additional Condition 1.c. (Regulation 6.31, Section 3)
	TAPs - < ASL (Regulation 5.11)

Control Devices:

ID	Stack ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C2	S2	Fiberglass Filters (E2)	Pressure drop	0" - 2" W.C.	Record keeping Weekly	Semi-annual
C3	S3	Fiberglass Filters (E3)	Pressure drop	0" - 2" W.C.	Record keeping Weekly	Semi-annual

Additional Conditions

1. Standards (Regulation 2.16, section 4.1.1)

a. Opacity

The owner or operator shall, for each particulate matter (PM) Emission Point subject to 6.09 (section 3.1), not cause or permit the discharge of emissions equal to or in excess of 20% opacity.

b. PM

The owner or operator shall, for the booths subject to 6.09 (section 3.2), not cause or permit the combined discharge of emissions in excess of 2.58 lb/hr.

c. VOC (Regulation 6.31, section 3)

The owner or operator shall not allow or cause the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of the following:

- i. 4.3 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for clear coatings
- ii. 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for air-dried coatings
- iii. 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings
- iv. 3.0 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for all other coatings

Compliance with these emission limits shall be based upon coatings used for the affected facility during a calendar-day averaging period.

d. TAPs

The owner or operator shall limit Toxic Air Pollutant (TAP) emissions from this source to the emission rate(s) below the calculated ASL specified in Regulation 5.11, unless modeling or a RACT determination has been performed and approved by the District.

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)

a. Opacity

- i. The owner or operator shall, to demonstrate compliance with the opacity standard, conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks S2 and S3) in U2.
 - ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No survey needs to be conducted if the emission points are not in operation at the time of the survey.
 - iii. 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 for stack emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in Additional Condition 2.a.i.
- b. **PM**
- i. The owner or operator shall operate the Dry Filter System whenever the emission unit is in operation.
 - ii. The owner or operator shall monitor the pressure drop across the filter and maintain within the range of 0" to 2" water column.
 - iii. The owner or operator shall calculate the average hourly PM emissions on a monthly basis. These emissions shall be based on: the amount and solids content of each coating used each day; over spray per AP 40; daily hours of operation; and the collection efficiency of the filtration devices used to control emissions.
 - iv. As an alternative, the owner or operator may demonstrate compliance with the PM standard by a one time calculation. The calculation shall be based on the highest solid content coating used, the maximum coating application rate of the spray guns and the collection efficiency of the filters. Then as a surrogate, perform 2.b.ii. Should a new coating be introduced to the process, with a higher solids content, then it will be necessary to resubmit the demonstration.
 - v. The owner or operator may, as an alternative to this additional condition, submit a one time compliance demonstration that the uncontrolled PTE of PM is below the allowable limit, thus negating 2.b.iii.

- v. See Record keeping Additional Condition 3.b.

- c. **VOC**

For each coating line that applies multiple coatings, all of which are subject to the same numerical emission limitation in section 3.1, during the same averaging period, e.g., all coatings used on the line are subject to 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, the daily weighted VOC content, calculated in accordance with the procedure in 3.c, shall not exceed the coating VOC content limit corresponding to the category of coating used.

- d. **TAPs**

The owner or operator shall review the TAP constituents in all coatings used. The owner or operator shall calculate TAP emissions, based on these constituents and hours of operation.

As an alternative, the owner or operator may calculate TAP emissions, based on the maximum hourly rate of coating usage, worse case scenario PTE, and submit a one time demonstration that TAP emissions from the coatings are below the calculated ASL.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. **Opacity**

Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

- b. **PM**

The owner or operator shall record the pressure drop across the control device weekly, when the unit is in use. The records shall contain:

- i. Date and time of the recording
- ii. The pressure drop, in inches of water
- iii. Name of the person who performed the recording
- iv. If parameter was outside the normal operating bounds, what was done to correct the problem.

c. **VOC**

The averaging period weighted average VOC content, which means the VOC content of two or more coatings as applied on a coating line during any averaging period and weighted according to the fraction of the total coating volume that each coating represents, shall be calculated using the following equation:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{VT}$$

where:

VOC_w	=	The average VOC content of two or more coatings as applied each averaging period on a coating line, in kg VOC/l (lb of VOC/gal) of coating, excluding water and exempt solvents.
V_i	=	The volume of each coating as applied each averaging period on a coating line in units of liters (gallons), excluding water and exempt solvents.
C_i	=	The VOC content of each coating as applied each averaging period on a coating line in units of kg of VOC/l (lb of VOC/gal) of coating, excluding water and exempt solvents.
VT	=	The total volume of all coatings as applied each averaging period on a coating line in units of liters (gallons), excluding water and exempt solvents.
n	=	The number of different coatings as applied each averaging period on a coating line.

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. **TAPs**

The owner or operator shall maintain monthly records of TAP emissions based on the hours of operation and material usages to demonstrate hourly compliance with Regulation 5.11. As an alternative, see 2.d.

4. Reporting (Regulation 2.16, section 4.1.9.3)

a. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time, and results of each Method 9 conducted (or a negative declaration if none)
- iv. Description of any corrective action taken pursuant to Additional Condition 2.a.iii.

b. **PM**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID Number
- ii. The beginning and ending date of the reporting period
- iii. The monthly and year to date total particulate emissions
- iv. Identification of all periods of exceedances of the standards including the quantity of excess emissions
- v. Description of any corrective action taken pursuant to Additional Condition 3.b.iv.
- vi. Identification of all periods when the Dry Filter System was not in service when the emission unit was in operation.

c. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC

- i. Emission Unit ID Number
- ii. The beginning and ending date of the reporting period
- iii. Identification of all periods of exceedances of the coating VOC limit including the quantity of excess emissions
- iv. Description of any corrective action taken pursuant to Additional Condition 4.c.iii.

d. **TAPs**

There is no compliance reporting required.

Emission Unit U4 Description: Non-halogenated Cold Solvent Metal Cleaners

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.05	Compliance With Emission Standards and Maintenance Requirements	1.1, 4.1, 4.1.1
7.18	Standards of Performance for New Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, 4
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, 6

Allowable Emissions:

Pollutant	Limit/Standard
TAPs	See Additional Condition # 3
VOC	See Additional Condition #1

Components:

Non-halogenated cold solvent metal cleaning tank, rated capacity of 30 gallon each. Fugitive emission point.

Additional Conditions

1. Standards Regulation 2.16, section 4.1.1)

a. VOC

- i. The cleaner shall be equipped with a cover. If the VOC volatility is greater than 15 mm Hg measured at 100EF or if the VOC is agitated or heated, then the cover shall be designed so that it can be easily operated with one hand.
- ii. The cleaner shall be equipped with a drainage facility such that VOC that drains off parts removed from the cleaner will return to the cleaner. If the VOC volatility is greater than 32 mm Hg measured at 100EF, then the drainage facility shall be internal so that parts are enclosed under the cover while draining. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system.
- iii. A permanent, conspicuous label summarizing the operating requirements specified in 1.a.vi, vii, and viii shall be installed on or near the cleaner.
- iv. If used, the VOC spray shall be a fluid stream (not a fine, atomized, or shower type spray) at a pressure that does not cause excessive splashing.
- v. If the VOC volatility is greater than 32 mm Hg measured at 100EF or if the VOC is heated above 120EF, then one of the following control devices shall be used:
 - 1) Freeboard that gives a freeboard ratio equal to or greater than 0.7,
 - 2) Water cover (VOC must be insoluble in and heavier than water), or
 - 3) Other systems of equivalent control, such as a refrigerated chiller or carbon absorption.
- vi. Do not dispose of waste VOC or transfer it to another party in a manner that more than 20% by weight of the waste VOC can evaporate into the atmosphere. Store waste VOC only in covered containers,
- vii. Close degreaser cover whenever not handling a part in the cleaner, and
- viii. Drain cleaned parts until dripping ceases (15 seconds is usually necessary).
- ix. Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20EC (68EF).

b. **TAPs**

Limit Toxic Air Pollutant (TAP) emissions from this source to no more than the Adjusted Significance Level (ASL) specified in Regulations 5.11 and 5.12 for this emission unit, unless modeling or a BACT/RACT analysis has been performed to demonstrate compliance.

2. **Monitoring** , Regulation 2.16, section 4.1.9.1.2)

a. **VOC**

See additional condition 3.a

b. **TAPs**

The owner or operator shall calculate average hourly TAP emissions, based on records maintained for additional condition 3.a, to assure that the ASL has not been exceeded.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC**

i. The owner or operator shall keep monthly records of VOC usage for each emission point.

ii. The owner or operator shall:

- 1) The name and address of the solvent supplier,
- 2) The date of the purchase,
- 3) The type of the solvent, and
- 4) The vapor pressure of the solvent measured in mm Hg at 20EC (68EF).

iii. The owner or operator shall maintain records of employee training for the proper operation of this emission unit. These records shall contain:

- 1) The date of the training
- 2) The name of the person trained
- 3) Who performed the training

The owner or operator, by complying with the record keeping requirements above, is complying with the requirements of Regulation 1.05, section 4.1.1

b. TAPs

Based on 3.a, the owner or operator shall, on a monthly basis, calculate hourly TAP emissions to demonstrate compliance with additional condition 1.b.

4. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories.

a. VOC

The owner or operator shall report semi-annually the following for each emission point:

- i. Emission Unit ID number and Emission point ID number
- ii. The beginning and ending date of the reporting period
- iv. Identification of applicable equipment standard or record
- v. A declaration that the equipment standard or record is being maintained

b. TAPs

The owner or operator shall report any occurrence where the calculated ASL was exceeded

PERMIT SHIELD

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance per District Regulation 2.16, section 4.6.1.1.

OFF-PERMIT DOCUMENTS

There are no off-permit documents associated with this Title V permit.

ALTERNATIVE OPERATING SCENARIO

The company requested an alternative operating scenario for Emission Unit U1. The additional conditions needed to demonstrate compliance with this alternative are listed with the emission unit.

SOURCE-WIDE HAP SPECIATION	
HAP	CAS #
Methyl isobutyl ketone	108-10-1
Xylene	1330-20-7

Note: The company may emit any of the 188 regulated HAPs, as listed in Regulation 5.14.

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Used Oil Aboveground Storage Tank (250 gal)	1	Reg 2.02 sec 2.3.9.2

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
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 (15 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). *	54	Reg 2.02, sec 2.3.4

1. 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.
2. 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.
 - a. 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.
 - b. No periodic monitoring shall be required for facilities designated as insignificant activities.

* This insignificant activity was originally designated as emission unit U3.