

Rust-Oleum Corporation

7850 Ohio River Rd., Lesage, WV 25537



March 6, 2017

Ms. Beverly D. McKeone, P.E.
NSR Program Manager
WV Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304-2345

RE: Lesage Facility – Facility ID: 011-00045
Application for Class II Administrative Update - NSR Permit and Title V Permit Revision
Current Permit No. R13-1512J

Dear Ms. McKeone:

Rust-Oleum (RO) is submitting this Class II Administrative Amendment to correct current permit administrative errors and to address the proposed installation of a new storage tank, a new ribbon blender, a new process line and a new dust collection system.

More specifically, the following updates to Table 1 and Attachment L in Permit R13-1512J are requested:

1. Correct ID No. TD-308 to "TK-308"
2. Correct ID No. TD-309 to "TK-309"
3. Correct TK-304 Design Capacity to "5,712 gal"
4. Correct S-1 Emission Point ID No. to "EFUG1", Emission Unit Description to "Filling Machine Line 1", Design Capacity to "60 gpm"
5. Correct S-2 Emission Point ID No. to "EFUG1", Emission Unit Description to "Filling Machine Line 2", Design Capacity to "45 gpm"
6. Correct S-3 Emission Point ID No. to "EFUG1", Emission Unit Description to "Filling Machine Line 3", Design Capacity to "28 gpm"
7. Add a row, ID No. "S-4", Emission Point ID No. "EFUG1", Emission Unit Description "Filling Machine Line 4", Year Installed "2017", Design Capacity "28 gpm", Control Device "None"
8. Correct ID No. MS-10 to "S-5", Emission Point ID No. to "EFUG1", Emission Unit Description to "Filling Machine Line 5 (5-Gal/O)", Design Capacity to "20 gpm"
9. Delete row RC-1 (Entire machine dismantled and removed from facility)
10. Delete row RC-2 (Entire machine dismantled and removed from facility)
11. Correct ID No. HF-1 to "S-9", Emission Point ID No. to "EFUG1", Emission Unit Description to "Filling Machine Line 9 (Handfill)", Design Capacity to "2 gpm"
12. Correct ID No. WP-1 to "S-6", Emission Point ID No. to "EFUG1", Emission Unit Description to "Filling Machine Line 6 (WP)", Design Capacity to "4 gpm"
13. Add a row, ID No. "S-7", Emission Point ID No. "EFUG1", Emission Unit Description "Filling Machine Line 7 (5-Gal/W)", Year Installed "2016", Design Capacity "20 gpm", Control Device "None"
14. Add a row, ID No. "S-8", Emission Point ID No. "EFUG1", Emission Unit Description "Filling Machine Line 8 (Mezz)", Year Installed "2016", Design Capacity "20/25 gpm", Control Device "None"
15. Add a row, ID No. "S-10", Emission Point ID No. "EFUG1", Emission Unit Description "Filling Machine Line 10 (1-3Gal)", Year Installed "2017", Design Capacity "16 gpm", Control Device "None"
16. See update to Note on Attachment L

Rust-Oleum Corporation



7850 Ohio River Rd., Lesage, WV 25537

New sources associated with this permit application:

1. 1 – 8,800 gallon HDPE storage tank to be designated ID No. TK-310. This tank will contain various latex bases, vapor pressures <0.3 psia, for use in the new process line. It should be considered a De Minimis source per 45CSR13 2.6 Table 45-13B No. 58. It is included in this application for completeness.
2. 1 – 3,000 gallon Ribbon Blender to be designated ID No. RB-1. The ribbon blender is used to facilitate the mixing of sand and other solids into the base latex. It will be controlled by the new baghouse, EDC-2.
3. 1 – 1-gallon pail filling line to be designated ID No. S-10. This new filling line will fill 1-gallon pails for subsequent packaging and shipment. Maximum filling rate is 16 gallons per minute and operates on average 40 hrs/week. Emissions from this line are building fugitives, EFUG1.
4. 1 – Donaldson Torit Downflo Oval 3-18 dust collection system with cartridge style filters and a REMBE non-return valve. Designated ID No. DC-2 and emission point ID No. EDC-2. The system is designed to handle a St = 1 combustible dust hazard classification as is generated by the raw materials for the new process line.

RO is not requesting an increase in the currently permitted potential-to-emit VOC limit of 22.6 tpy. The operation of the new line is expected to increase actual VOCs by 3.8 tpy. This is expected to increase the facility's annual actual VOC emissions to approximately 7 tpy, based on the average of the last 2 years.

We look forward to your review, and please do not hesitate to call if you need additional information or have any questions or concerns.

Sincerely,



Michael J. Newell
Lesage Environmental Health & Safety Manager
304-762-1421

Enclosures



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

**APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):

- CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office):
Rust-Oleum Corporation

2. Federal Employer ID No. (FEIN):
13-1497940

3. Name of facility (if different from above):
Lesage

4. The applicant is the:
 OWNER OPERATOR BOTH

5A. Applicant's mailing address:
**7850 Ohio River Road
Lesage, WV 25537**

5B. Facility's present physical address:
**7850 Ohio River Road
Lesage, WV 25537**

6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? YES NO
– If YES, provide a copy of the **Certificate of Incorporation/Organization/Limited Partnership** (one page) including any name change amendments or other Business Registration Certificate as **Attachment A**.
– If NO, provide a copy of the **Certificate of Authority/Authority of L.L.C./Registration** (one page) including any name change amendments or other Business Certificate as **Attachment A**.

7. If applicant is a subsidiary corporation, please provide the name of parent corporation:

8. Does the applicant own, lease, have an option to buy or otherwise have control of the proposed site? YES NO
– If YES, please explain: **Rust-Oleum owns the property and buildings located at the physical address above.**
If NO, you are not eligible for a permit for this source.

9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.):
Paint product blending and packaging facility.

10. North American Industry Classification System (NAICS) code for the facility:
325510

11A. DAQ Plant ID No. (for existing facilities only):
011 – 00045

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):
R13-1512J

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP** as **Attachment B**.

From Charleston travel west on I-64W towards Huntington. Take CR-19 exit and travel north to SR-2. Turn right on SR-2. The plant main entrance is approximately 7 miles on the left, near Green Bottoms.

12.B. New site address (if applicable):

Same as 5B above.

12C. Nearest city or town:

Lesage

12D. County:

Cabell

12.E. UTM Northing (KM): 4,268.4

12F. UTM Easting (KM): 388.1

12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:

Installation of a latex storage tank, 1 ribbon blender, 1-gallon filling line and a larger dust collection system.

14A. Provide the date of anticipated installation or change: 05/30/2017

- If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: / /

14B. Date of anticipated Start-Up if a permit is granted:

06/15/2017

14C. Provide a **Schedule** of the planned **Installation of/Change to** and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:

Hours Per Day 8 Days Per Week 5 Weeks Per Year 52

16. Is demolition or physical renovation at an existing facility involved? YES NO

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (*if known*). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (*if known*). Provide this information as **Attachment D**.

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as **Attachment E** (Refer to **Plot Plan Guidance**).

- Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F**.

23. Provide a **Process Description** as **Attachment G**.

- Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.

– For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

- | | | |
|--|--|--|
| <input type="checkbox"/> Bulk Liquid Transfer Operations | <input type="checkbox"/> Haul Road Emissions | <input type="checkbox"/> Quarry |
| <input checked="" type="checkbox"/> Chemical Processes | <input type="checkbox"/> Hot Mix Asphalt Plant | <input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities |
| <input type="checkbox"/> Concrete Batch Plant | <input type="checkbox"/> Incinerator | <input type="checkbox"/> Storage Tanks |
| <input type="checkbox"/> Grey Iron and Steel Foundry | <input type="checkbox"/> Indirect Heat Exchanger | |
| <input type="checkbox"/> General Emission Unit, specify One form for RB-1 and S-10 which are both part of the same new paint filling line. | | |

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

- | | | |
|--|---|--|
| <input type="checkbox"/> Absorption Systems | <input checked="" type="checkbox"/> Baghouse | <input type="checkbox"/> Flare |
| <input type="checkbox"/> Adsorption Systems | <input type="checkbox"/> Condenser | <input type="checkbox"/> Mechanical Collector |
| <input type="checkbox"/> Afterburner | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |
| <input type="checkbox"/> Other Collectors, specify | | |

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES NO

➤ If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "**Precautionary Notice – Claims of Confidentiality**" guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Authority of Corporation or Other Business Entity | <input type="checkbox"/> Authority of Partnership |
| <input type="checkbox"/> Authority of Governmental Agency | <input type="checkbox"/> Authority of Limited Partnership |

Submit completed and signed **Authority Form** as **Attachment R**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned **Responsible Official** / **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE _____

(Please use blue ink)

DATE: _____

3/6/17

(Please use blue ink)

35B. Printed name of signee: **Michael J. Newell**

35C. Title: **EHS Manager**

35D. E-mail: **mnewell@rustoleum.com**

35E. Phone: **304.762.1421**

35F. FAX:

36A. Printed name of contact person (if different from above):

36B. Title:

36C. E-mail:

36D. Phone:

36E. FAX:

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate | <input checked="" type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet |
| <input type="checkbox"/> Attachment B: Map(s) | <input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s) |
| <input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input checked="" type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input checked="" type="checkbox"/> Attachment D: Regulatory Discussion | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan | <input checked="" type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s) | <input checked="" type="checkbox"/> Attachment P: Public Notice |
| <input checked="" type="checkbox"/> Attachment G: Process Description | <input type="checkbox"/> Attachment Q: Business Confidential Claims |
| <input checked="" type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input checked="" type="checkbox"/> Attachment R: Authority Forms |
| <input checked="" type="checkbox"/> Attachment I: Emission Units Table | <input type="checkbox"/> Attachment S: Title V Permit Revision Information |
| <input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee |

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

- Forward 1 copy of the application to the Title V Permitting Group and:
- For Title V Administrative Amendments:
 - NSR permit writer should notify Title V permit writer of draft permit,
- For Title V Minor Modifications:
 - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
 - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
 - NSR permit writer should notify a Title V permit writer of draft permit,
 - Public notice should reference both 45CSR13 and Title V permits,
 - EPA has 45 day review period of a draft permit.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Application for NSR Permit and Title V Permit Revision

Class II Administrative Amendment



**Lesage Facility
Cabell County
7850 Ohio River Road
Lesage, WV 25537**

March 6, 2017

Facility ID No.: 011-00045

Current Permit No.: R13-1512J

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Introduction

This NSR Application is for the installation and subsequent operation of a new paint filling line for a new line of product to be manufactured at this facility. The product name is RESTORE and will have 2 variants, 4X and 10X. Because the facility has an existing Air Operating Permit (R13-1512J) and the calculated potential-to-emit (PTE) for the new line is less than 6 pph and 10 tpy of any regulated pollutant, Rust-Oleum is submitting this permit modification application representing the permit level of a Class II Administrative Update.

The calculated PTE for this new installation is 3.8 tpy of VOC and 0.2 tpy of PM.

Attachment A

Certificate of Incorporation

**WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION
CERTIFICATE**

ISSUED TO:
**RUST OLEUM CORPORATION
11 E HAWTHORN PKWY
VERNON HILLS, IL 60061-1402**

BUSINESS REGISTRATION ACCOUNT NUMBER: 2187-4580

This certificate is issued on: 06/3/2011

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with Chapter 11, Article 12, of the West Virginia Code.*

*The person or organization identified on this certificate is registered
to conduct business in the State of West Virginia at the location above.*

This certificate is not transferrable and must be displayed at the location for which issued.

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

Attachment C

Installation and Start Up Schedule

Start of Construction and Start Up Schedule

Activity	Date
Start of Construction	April 01, 2017
Storage Tank Installation Complete	April 15, 2017
Ribbon Blender Installation Complete	April 20, 2017
1-gallon Pail Line Installation Complete	May 15, 2017
Dust Collector Installation Complete	May 30, 2017
Equipment Start Up	June 05, 2017
Production Start	June 15, 2017

Attachment D

Regulatory Discussion

Federal and State Regulatory Review

A regulatory review of both Federal (Clean Air Act – 40 CFR) and State of West Virginia (Title 45, Series 13) regulations were performed to determine any applicability of these regulations to this new installation.

New Source Review

The source is currently not a major source for VOC, PM or HAP emissions. The facility is located in an Attainment Area for all criteria pollutants, Cabell County; therefore, Non-Attainment New Source Review (NNSR) is not applicable or required.

The following table compares the estimated emission increases to the PSD significance thresholds for each criteria pollutant of concern. None of the estimated project-related emission increases for VOC, PM, PM₁₀, SO₂, NO_x, and CO exceed their respective PSD significance thresholds and therefore this project is not subject to PSD Review.

PSD Significance Threshold Comparison

Pollutant	PSD Significance Threshold (tpy)	Project Related Increase in Emissions (tpy)	PSD Review Required? (Yes/No)
PM/PM ₁₀	25/15	0.2/0.16	No
SO ₂	40	0	No
NO _x	40	0	No
CO	100	0	No
VOC	40	3.8	No

New Source Performance Standards (NSPS – 40 CFR 60)

None of the new emission sources have an applicable NSPS standard.

National Emission Standards for Hazardous Air Pollutants (NESHAP – 40 CFR 61)

None of the new emission sources have an applicable NESHAP standard under Part 61.

National Emission Standards for Hazardous Air Pollutants (NESHAP – 40 CFR 63)

Because HAP emissions associated with this modification are below 10 tpy for a single HAP and 25 tpy for all HAPs, no NESHAP, i.e., Maximum Achievable Control Standard (MACT) is applicable. In addition, 40 CFR 63 Subpart CCCCCC does not apply as none of the new raw materials associated with this installation contain any of the HAPs as defined in 40 CFR 63.11607.

West Virginia State Regulations (Title 45, Series – 13 Division of Air Quality)

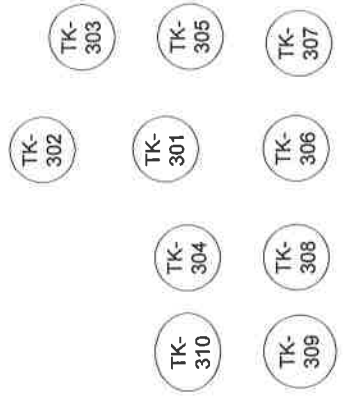
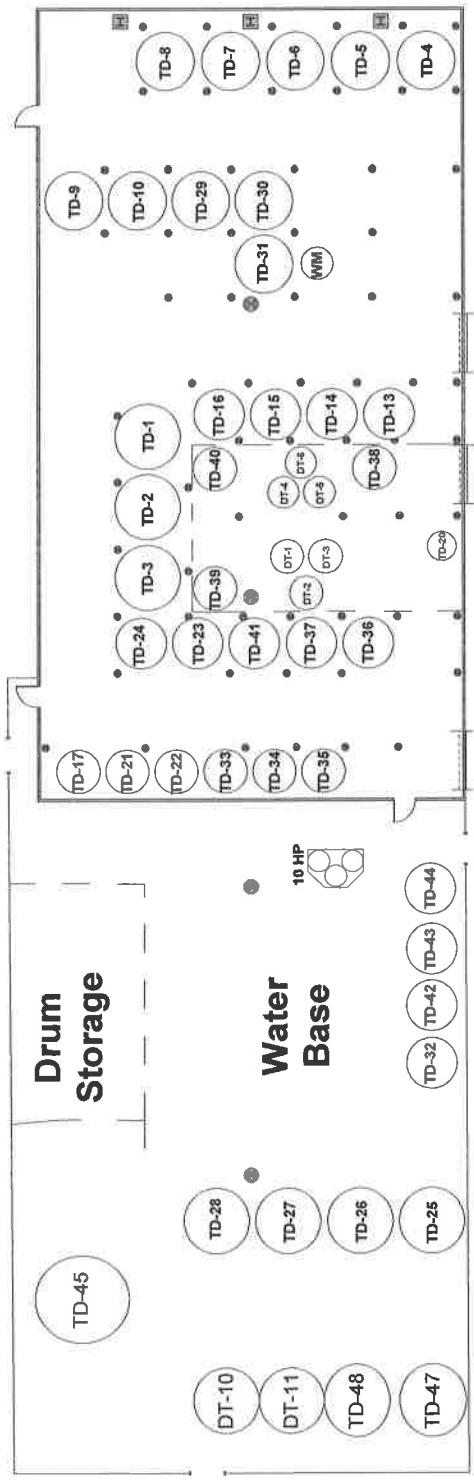
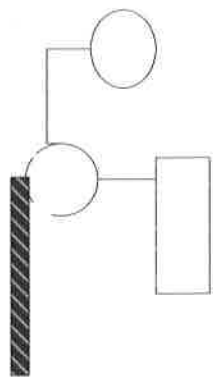
The following state requirements are applicable to this new source construction:

- **45-CSR-4 – TO PREVENT AND CONTROL THE DISCHARGE OF AIR POLLUTANTS INTO THE OPEN AIR WHICH CAUSES OR CONTRIBUTES TO AN OBJECTIONABLE ODOR OR ODORS**
 - 45-4-3 – Objectionable Odor Prohibited
 - 45-4-4 – Accidental and Other Infrequent Emissions, Reporting
 - 45-4-6 – Variance
- **45-CSR-7 – TO PREVENT AND CONTROL PARTICULATE MATTER AIR POLLUTION FROM MANUFACTURING PROCESSES AND ASSOCIATED OPERATIONS**
 - 45-7-3 – Emission of Smoke and/or Particulate Matter Prohibited and Standards of Measurement
 - 45-7-4 – Control and Prohibition of Particulate Emissions by Weight from Manufacturing Process Source Operations
 - 45-7-5 – Control of Fugitive Particulate Matter
- **45-CSR-13 – PERMITS FOR CONSTRUCTION, MODIFICATION, RELOCATION AND OPERATION OF STATIONARY SOURCES OF AIR POLLUTANTS, NOTIFICATION REQUIREMENTS, ADMINISTRATIVE UPDATES, TEMPORARY PERMITS, GENERAL PERMITS, PERMISSION TO COMMENCE CONSTRUCTION, AND PROCEDURES FOR EVALUATION**
 - 45-13-2 – Definitions
 - 45-13-4 – Administrative Updates to Existing Permits and General Permit Registrations
 - 45-13-6 – Determination of Compliance of Stationary Sources
 - 45-13-15 – Hazardous Air Pollutants

Attachment E

Plot Plan

S-10



RUST-OLEUM

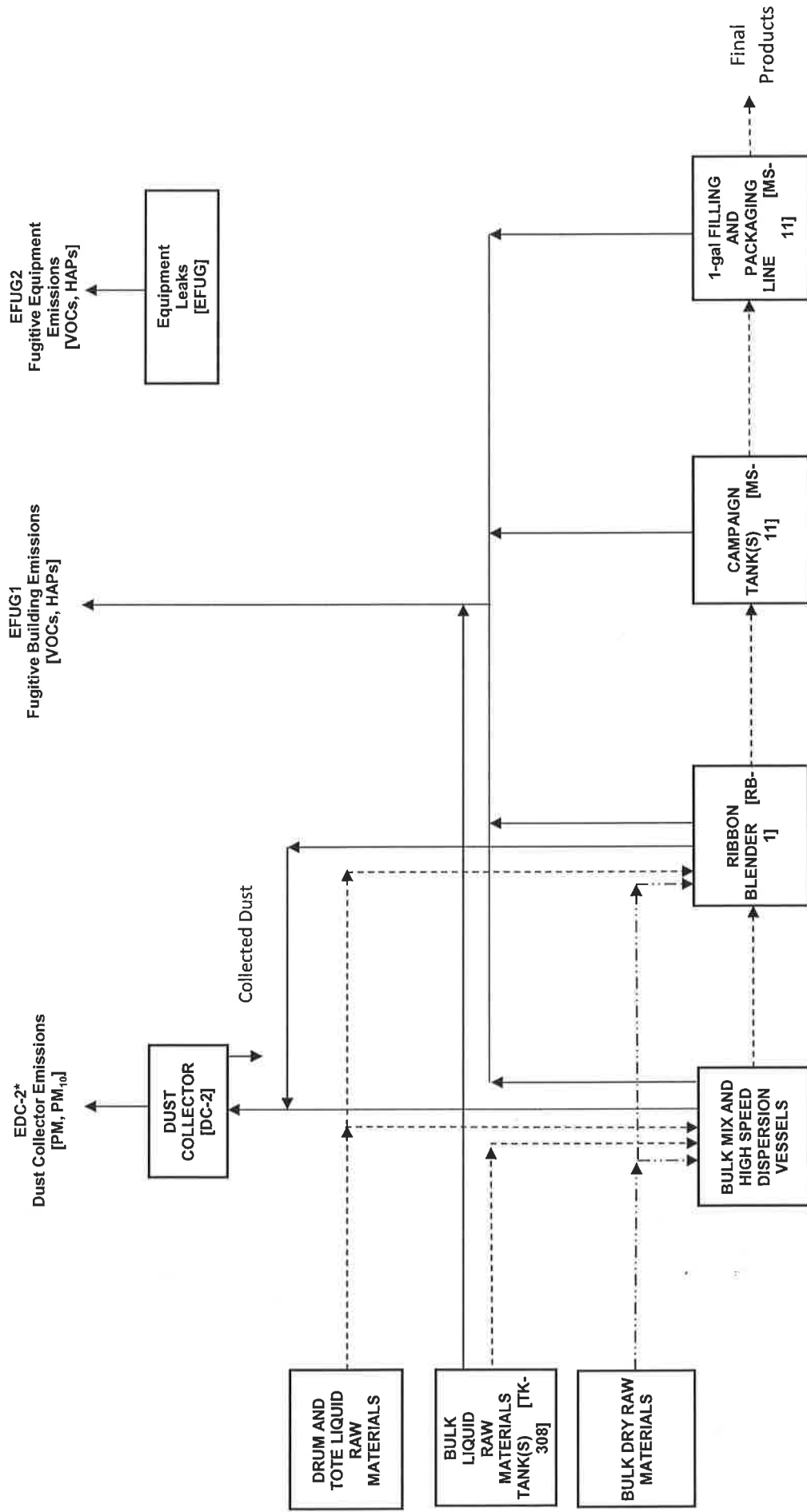
Blending Tanks

01-24-17	MJN	ROL-	Rev.
			0

Attachment F

Process Flow Diagram

Attachment F - Process Flow Diagram New 1-gallon Paint Filling Line



* Note that some VOCs and HAPs are expected to be emitted through the dust collector, these are accounted for in the building fugitives, EFUG1.

Attachment G

Process Description

Process Description for New RESTORE Paint Line

Water based paint raw materials for this new paint line will be delivered to the facility in bags, super sacks, drums, totes or by bulk truck or rail. The bulk materials will be offloaded into storage tanks (inside and out) via loading rack pumps. The remaining materials will be offloaded into the facility warehouse. These constituents consist of resins, sand, other powders, pigments, additives and solvents.

These constituents are combined in a specific sequence and volume according to a specified formula dependent upon the final product desired to form a paint batch. The process begins with mixing of latex, additives and solvents in a mixing vessel for a specified period of time to form the base mixture. The constituent materials are either pumped into the vessel or added by hand. Upon completion of the initial mixing, the base is pumped into a ribbon blender where sand and other powders are added and subsequently blended for another specified period of time. The product is then tested for quality while still in the blender and any adjustments to bring out of spec material into quality compliance are made. Once the material passes all quality tests, it is subsequently pumped to the filling line and dispensed into the appropriate consumer packaging, e.g., quart, gallon pail or 5-gallon buckets. The filled containers are then palleted and wrapped for shipment to a distribution center. A typical batch takes anywhere from 4 to 8 hours to go from initial mixing to final product depending upon the final product to be made.

Emissions from this new paint line are VOCs, HAPs and PM pollutants. PM is emitted as the powders are added by hand to the mixing vessels and when the sand is added to the ribbon blender. PM will be controlled by a dust collector system with pickup points located at the mixing vessels and ribbon blender. The PM is removed from the flu stream in the dust collector with fabric filters. It should be noted that the dust generated in this process has been tested for combustibility and rates a dust explosion classification of 1, $St = 1$. The dust collection system is designed accordingly with blow out panels and an explosion isolation, non-return valve.

The VOCs and HAPs are emitted during the storing, mixing and filling operations of this new paint line. Engineering controls installed will be hard piping, submerged filling, where appropriate, and lids/covers on all tanks and vessels. There is no air pollution control device to mitigate these type of emissions. The estimated emissions are minimal however due to low vapor pressure constituents and small volume production runs.

Attachment H

Safety Data Sheets

SAFETY DATA SHEET



NeoCryl A-1237 XP

Section 1. Identification

GHS product identifier	: NeoCryl A-1237 XP
Other means of identification	: Not available.
Chemical formula	: Not applicable.
Product type	: Liquid.
Material uses	: Resin used in the production of coatings, inks and/or adhesives
Supplier	: DSM Coating Resins, Inc. Telephone : +1 (978) 658-6600 730 Main Street Wilmington, MA 01887 USA
e-mail address of person responsible for this SDS	: DSMRESINS.SDS@dsm.com (Communication in English only please)
Emergency telephone number	: 800-424-9300 Medical Emergency For chemical emergency, spill, leak, fire, exposure or accident: call CHEMTREC day or night. DOMESTIC NORTH AMERICA 800-424-9300; INTERNATIONAL, CALL 703-527-3887 (collect calls accepted)

Section 2. Hazards identification

OSHA/HCS status : While this material is not considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200), this SDS contains valuable information critical to the safe handling and proper use of the product. This SDS should be retained and available for employees and other users of this product.

Classification of the substance or mixture : Not classified.

GHS label elements

Signal word : No signal word.
Hazard statements : No known significant effects or critical hazards.

Precautionary statements

Prevention : Not applicable.
Response : Not applicable.
Storage : Not applicable.
Disposal : Not applicable.
Hazards not otherwise classified : None known.

Hazardous Material Information System (U.S.A.)

Health	1
Flammability	1
Physical hazards	0
PERSONAL PROTECTION	

The PPE (Personal Protection Equipment) designation in the HMIS is provided for use by employees at supplier sites only. Other users of this product are encouraged to evaluate the hazards of the product and assign PPE that is applicable to their specific situations.

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on SDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

The customer is responsible for determining the PPE code for this material.

Section 3. Composition/information on ingredients

Substance/mixture : Mixture
Other means of identification : Not available.

CAS number : Not applicable.

There are no ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

Eye contact : Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Get medical attention if irritation occurs.

Inhalation : Remove victim to fresh air and keep at rest in a position comfortable for breathing. Get medical attention if symptoms occur.

Skin contact : Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Get medical attention if symptoms occur.

Ingestion : Wash out mouth with water. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Do not induce vomiting unless directed to do so by medical personnel. Get medical attention if symptoms occur.

Most important symptoms/effects, acute and delayed

Potential acute health effects

Eye contact : No known significant effects or critical hazards.
Inhalation : No known significant effects or critical hazards.
Skin contact : No known significant effects or critical hazards.
Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : No specific data.
Inhalation : No specific data.
Skin contact : No specific data.
Ingestion : No specific data.

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

Specific treatments : No specific treatment.

Protection of first-aiders : No action shall be taken involving any personal risk or without suitable training.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media : Use an extinguishing agent suitable for the surrounding fire.

Unsuitable extinguishing media : None known.

Specific hazards arising from the chemical : In a fire or if heated, a pressure increase will occur and the container may burst.

Hazardous thermal decomposition products : Decomposition products may include the following materials:
carbon monoxide
carbon dioxide
(dense) black smoke
aldehydes
organic acids

Section 5. Fire-fighting measures

- Special protective actions for fire-fighters** : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training.
- Special protective equipment for fire-fighters** : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.
- Remarks** : The material will not support combustion unless the water has evaporated.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

- For non-emergency personnel** : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Put on appropriate personal protective equipment.
- For emergency responders** : If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".
- Environmental precautions** : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

- Small spill** : Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.
- Large spill** : Stop leak if without risk. Move containers from spill area. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

- Protective measures** : Put on appropriate personal protective equipment (see Section 8). Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas.
- Advice on general occupational hygiene** : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.
- Conditions for safe storage, including any incompatibilities** : Store between the following temperatures: 5 to 40°C (41 to 104°F). Store in accordance with local regulations. Store in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10). Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination. Store in original container, protected from direct sunlight. Sensitive to frost.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

None.

- Appropriate engineering controls** : Good general ventilation should be sufficient to control worker exposure to airborne contaminants.

Section 8. Exposure controls/personal protection

Environmental exposure controls : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

- Hygiene measures** : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
- Eye/face protection** : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: safety glasses with side-shields.
- Hand protection** : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. 4 - 8 hours (breakthrough time): Nitril rubber (0.5 mm)
- Body protection** : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Other skin protection** : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Respiratory protection** : Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.
- Remarks** : If respiratory protection is needed, use a NIOSH certified respirator with an Assigned Protection Factor (APF) of at least 10.

Section 9. Physical and chemical properties

Appearance

- Physical state** : Liquid. [Milky emulsion.]
- Color** : Off-white.
- Odor** : Ammonia.
- Odor threshold** : Not available.
- pH** : 8.6 to 9
- Melting point** : Not available.
- Boiling point** : 100 °C
- Flash point** : Closed cup: >212°F (>100°C) [(estimate)] [Product does not sustain combustion.]
- Evaporation rate** : Not available.
- Flammability (solid, gas)** : Not available.
- Lower and upper explosive (flammable) limits** : Not available.
- Vapor pressure** : Not available.
- Vapor density** : Not available.
- Relative density** : 1.05 (Water = 1)
- Density (g/cm³)** : 1.05 g/cm³ (20°C)
- Bulk density** : Not available.
- Solubility** : Insoluble in the following materials: cold water, hot water, methanol, n-octanol and acetone.
- Solubility in water** : Not available.
- Partition coefficient: n-octanol/water** : Not available.
- Auto-ignition temperature** : Not applicable.
- Decomposition temperature** : Not available.
- Viscosity** : Kinematic (room temperature): 0.5 to 3 cm²/s (50 to 300 cSt)
- Remarks** : Miscible in water.

Section 10. Stability and reactivity

Reactivity	: No specific test data related to reactivity available for this product or its ingredients.
Chemical stability	: The product is stable.
Possibility of hazardous reactions	: Under normal conditions of storage and use, hazardous reactions will not occur.
Conditions to avoid	: No specific data.
Incompatible materials	: No specific data.
Hazardous decomposition products	: No specific data.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Not available.

Irritation/Corrosion

Not available.

Sensitization

Not available.

Mutagenicity

Not available.

Carcinogenicity

Not available.

Reproductive toxicity

Not available.

Teratogenicity

Not available.

Specific target organ toxicity (single exposure)

Not available.

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

Eye contact	: No known significant effects or critical hazards.
Inhalation	: No known significant effects or critical hazards.
Skin contact	: No known significant effects or critical hazards.
Ingestion	: No known significant effects or critical hazards.

Symptoms related to the physical, chemical and toxicological characteristics

Eye contact	: No specific data.
Inhalation	: No specific data.
Skin contact	: No specific data.
Ingestion	: No specific data.

Section 11. Toxicological information

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : Not available.

Potential delayed effects : Not available.

Long term exposure

Potential immediate effects : Not available.

Potential delayed effects : Not available.

Potential chronic health effects

General : No known significant effects or critical hazards.

Carcinogenicity : No known significant effects or critical hazards.

Mutagenicity : No known significant effects or critical hazards.

Teratogenicity : No known significant effects or critical hazards.

Developmental effects : No known significant effects or critical hazards.

Fertility effects : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Not available.

Section 12. Ecological information

Toxicity

Not available.

Persistence and degradability

Not available.

Bioaccumulative potential

Not available.

Mobility in soil

Soil/water partition coefficient (K_{oc}) : Not available.

Other adverse effects : No known significant effects or critical hazards.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Empty containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.



Section 14. Transport information

	DOT Classification	TDG Classification	Mexico Classification	ADR/RID	IMDG	IATA
UN number	Not regulated.	Not regulated.	Not regulated.	Not regulated.	Not regulated.	Not regulated.
UN proper shipping name	-	-	-	-	-	-
Transport hazard class(es)	-	-	-	-	-	-
Packing group	-	-	-	-	-	-
Environmental hazards	No.	No.	No.	No.	No.	No.
Additional information	-	-	-	-	-	-

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code : Not available.

Section 15. Regulatory information

U.S. Federal regulations : **United States inventory (TSCA 8b):** All components are listed or exempted.
Clean Water Act (CWA) 311: potassium hydroxide; Ammonia

	Product/ingredient name	CAS #	%

Clean Air Act Section 602 Class I Substances : Not listed

Clean Air Act Section 602 Class II Substances : Not listed

DEA List I Chemicals (Precursor Chemicals) : Not listed

DEA List II Chemicals (Essential Chemicals) : Not listed

State regulations

Massachusetts : None of the components are listed.

New York : None of the components are listed.

New Jersey : None of the components are listed.

Pennsylvania : None of the components are listed.

International regulations

Chemical Weapon Convention List Schedules I, II & III Chemicals

Ingredient name	List name	Status
Not listed.		

Montreal Protocol (Annexes A, B, C, E)

Ingredient name	List name	Status
Not listed.		

Stockholm Convention on Persistent Organic Pollutants

Section 15. Regulatory information

Ingredient name	List name	Status
Not listed.		

Rotterdam Convention on Prior Inform Consent (PIC)

Ingredient name	List name	Status
Not listed.		

UNECE Aarhus Protocol on POPs and Heavy Metals

Ingredient name	List name	Status
Not listed.		

International lists

Canada inventory : Not determined.

Section 16. Other information

History

Code : 033770WW58025
 Date of printing : 9/14/2015.
 Date of issue/Date of revision : 9/14/2015.
 Date of previous issue : No previous validation.
 Version : 1
 Key to abbreviations : ATE = Acute Toxicity Estimate
 BCF = Bioconcentration Factor
 GHS = Globally Harmonized System of Classification and Labelling of Chemicals
 IATA = International Air Transport Association
 IBC = Intermediate Bulk Container
 IMDG = International Maritime Dangerous Goods
 LogPow = logarithm of the octanol/water partition coefficient
 MARPOL 73/78 = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
 UN = United Nations

Procedure used to derive the classification

Classification	Justification
Not classified.	

References : Not available.

Indicates information that has changed from previously issued version.

Notice to reader

The information contained in the Material Safety Data Sheet is based on our data available on the date of publication. The information is intended to aid the user in controlling the handling risks; it is not to be construed as a warranty or specification of the product quality. The information may not be or may not altogether be applicable to combinations of the product with other substances or to particular applications.

The user is responsible for ensuring that appropriate precautions are taken and for satisfying themselves that the data are suitable and sufficient for the product's intended purpose. In case of any unclarity we advise consulting the supplier or an expert.

Attachment I

Emission Units Table

Attachment I
Emission Units Table
(includes all emission units and air pollution control devices
that will be part of this permit application review, regardless of permitting status)

Emission Unit ID ¹	Emission Point ID ²	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type ³ and Date of Change	Control Device ⁴
TK-310	EFUG1	HDPE Inside Latex Storage Tank (DeMinimis Source)	2017	8,800-gal	New, Mar-2017	None
RB-1	EDC-2	Ribbon Blender	2017	3,000-gal	New, Apr-2017	Fabric Filter
DC-2	EDC-2	Baghouse Control Device System	2017	8,000 cfm	New, May-2017	Fabric Filter
EFUG	EFUG2	Equipment Fugitives	2017	NA	New, May-2017	None
S-1	EFUG1	Filling Machine Line 1		60 gpm		None
S-2	EFUG1	Filling Machine Line 2		45 gpm		None
S-3	EFUG1	Filling Machine Line 3		28 gpm		None
S-4	EFUG1	Filling Machine Line 4		28 gpm		None
S-5	EFUG1	Filling Machine Line 5 (5-Gal/O)		20 gpm		None
S-6	EFUG1	Filling Machine Line 6 (WP)		4 gpm		None
S-7	EFUG1	Filling Machine Line 7 (5-Gal/W)	2016	20 gpm		None
S-8	EFUG1	Filling Machine Line 8 (Mezz)	2016	20/25 gpm	New Dec-2016	None
S-9	EFUG1	Filling Machine Line 9 (Hand-fill)		2 gpm		None
S-10	EFUG1	Filling Machine Line 10	2017	16 gpm	New, May-2017	None

¹ For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S,... or other appropriate designation.

² For Emission Points use the following numbering system: 1E, 2E, 3E, ... or other appropriate designation.

³ New, modification, removal

⁴ For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

Attachment J

Emission Points Data Summary Sheet

**Attachment J
EMISSION POINTS DATA SUMMARY SHEET**

Table 1: Emissions Data

Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type ¹	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (chemical processes only)		All Regulated Pollutants - Chemical Name/CAS ³ (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions ⁴		Maximum Potential Controlled Emissions ⁵		Emission Form or Phase (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used ⁶	Emission Concentration ⁷ (ppmw or mg/m ³)
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
EDC-2	Upward Stack	RB-1	Ribbon Blender	DC-2	Fabric Filter		2,080	PM PM10	19.3 15.4	20.0 16.0	0.19 0.15	0.20 0.16	Aerosol Aerosol	EE	0.5 ppmw 0.3 ppmw
EFUG1	Building Fugitives	S-10 & TK-310	Process and Inside Storage Tank	NA	NA		2,080	VOC HAP-Glycol Ethers	3.7 0.059	3.8 0.061	3.7 0.059	3.8 0.061	Gas/Vapor	EE	NA

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

- Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.
- Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).
- List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. DO NOT LIST H₂, H₂O, N₂, O₂, and Noble Gases.
- Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).
- Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, use units of ppmv (See 45CSR10).

EMISSION POINTS DATA SUMMARY SHEET

Table 2: Release Parameter Data

Emission Point ID No. <i>(Must match Emission Units Table)</i>	Inner Diameter (ft.)	Temp. (°F)	Exit Gas		Velocity (fps)	Emission Point Elevation (ft)		UTM Coordinates (km)	
			Temp. (°F)	Volumetric Flow ¹ (acfm) <i>at operating conditions</i>		Ground Level (Height above mean sea level)	Stack Height ² (Release height of emissions above ground level)	Northing	Easting
EDC-2	1.7	Ambient		<8,000	59	573	25	4,268.4	388.1

¹ Give at operating conditions. Include inerts.
² Release height of emissions above ground level.

Attachment K

Fugitive Emissions Data Summary Sheet

Attachment K

FUGITIVE EMISSIONS DATA SUMMARY SHEET

The FUGITIVE EMISSIONS SUMMARY SHEET provides a summation of fugitive emissions. Fugitive emissions are those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Note that uncaptured process emissions are not typically considered to be fugitive, and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET.

Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions).

APPLICATION FORMS CHECKLIST - FUGITIVE EMISSIONS
1.) Will there be haul road activities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, then complete the HAUL ROAD EMISSIONS UNIT DATA SHEET.
2.) Will there be Storage Piles? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete Table 1 of the NONMETALLIC MINERALS PROCESSING EMISSIONS UNIT DATA SHEET.
3.) Will there be Liquid Loading/Unloading Operations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the BULK LIQUID TRANSFER OPERATIONS EMISSIONS UNIT DATA SHEET.
4.) Will there be emissions of air pollutants from Wastewater Treatment Evaporation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
5.) Will there be Equipment Leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> If YES, complete the LEAK SOURCE DATA SHEET section of the CHEMICAL PROCESSES EMISSIONS UNIT DATA SHEET.
6.) Will there be General Clean-up VOC Operations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
7.) Will there be any other activities that generate fugitive emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET or the most appropriate form.
If you answered "NO" to all of the items above, it is not necessary to complete the following table, "Fugitive Emissions Summary."

FUGITIVE EMISSIONS SUMMARY		All Regulated Pollutants - Chemical Name/CAS ¹	Maximum Potential Uncontrolled Emissions ²		Maximum Potential Controlled Emissions ³		Est. Method Used ⁴
	lb/hr		ton/yr	lb/hr	ton/yr		
Haul Road/Road Dust Emissions Paved Haul Roads							
Unpaved Haul Roads							
Storage Pile Emissions							
Loading/Unloading Operations							
Wastewater Treatment Evaporation & Operations							
Equipment Leaks		VOCs HAP-Glycol Ether	Does not apply	0.06	Does not apply	0.06	EE
General Clean-up VOC Emissions							
Other		VOCs HAP-Glycol Ether	3.7	3.8	3.7	3.8	EE

¹ List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. DO NOT LIST H₂, H₂O, N₂, O₂, and Noble Gases.

² Give rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

³ Give rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

⁴ Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

Attachment L

Emission Unit Data Sheets

**Attachment L
EMISSIONS UNIT DATA SHEET
GENERAL**

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*): RB - 1 and MS - 10

1. Name or type and model of proposed affected source:

3,000-gallon ribbon blender from Marshall and Associates.
1 - gallon pail filling and packaging line. Filler on the line is from IdealPak, the rest is an agglomeration of various components from other lines.

2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.

3. Name(s) and maximum amount of proposed process material(s) charged per hour:

RB-1; 3,000-gallon/hr
S-10; 960 1-gallon pails/hr

4. Name(s) and maximum amount of proposed material(s) produced per hour:

Restore 4X and 10X products at 960 gallons/hr

5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:

None, only physical mixing.

* The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

6. Combustion Data (if applicable):

(a) Type and amount in appropriate units of fuel(s) to be burned:

NA

(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:

(c) Theoretical combustion air requirement (ACF/unit of fuel):

@

°F and

psia.

(d) Percent excess air:

(e) Type and BTU/hr of burners and all other firing equipment planned to be used:

(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:

(g) Proposed maximum design heat input:

× 10⁶ BTU/hr.

7. Projected operating schedule:

Hours/Day

8

Days/Week

5

Weeks/Year

52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@	ambient	°F and	atmospheric	psia
a. NO _x		lb/hr		grains/ACF
b. SO ₂		lb/hr		grains/ACF
c. CO		lb/hr		grains/ACF
d. PM ₁₀	15.4	lb/hr	0.22	grains/ACF
e. Hydrocarbons		lb/hr		grains/ACF
f. VOCs	3.8	lb/hr	NA	grains/ACF
g. Pb		lb/hr		grains/ACF
h. Specify other(s)		lb/hr		grains/ACF
		lb/hr		grains/ACF
		lb/hr		grains/ACF
		lb/hr		grains/ACF

NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.
 (2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING

RECORDKEEPING

REPORTING

TESTING

MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

RECORDKEEPING. PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

REPORTING. PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

TESTING. PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

Attachment L
EMISSIONS UNIT DATA SHEET
CHEMICAL PROCESS

For chemical processes please fill out this sheet and all supplementary forms (see below) that apply. Please check all supplementary forms that have been completed.

- Emergency Vent Summary Sheet*
- Leak Sources Data Sheet*
- Toxicology Data Sheet*
- Reactor Data Sheet*
- Distillation Column Data Sheet*

1. Chemical process area name and equipment ID number (as shown in *Equipment List Form*)

2. Standard Industrial Classification Codes (SICs) for process(es)

3. List raw materials and attach MSDSs

4. List Products and Maximum Production and attach MSDSs

Description and CAS Number	Maximum Hourly (lb/hr)	Maximum Annual (ton/year)

5. Complete the *Emergency Vent Summary Sheet* for all emergency relief devices.

6. Complete the *Leak Source Data Sheet* and describe below or attach to application the leak detection or maintenance program to minimize fugitive emissions. Include detection instruments, calibration gases or methods, planned inspection frequency, and record-keeping, and similar pertinent information. If subject to a rule requirement (e.g. 40CFR60, Subpart VV), please list those here.

7. Clearly describe below or attach to application Accident Procedures to be followed in the event of an accidental spill or release.

8A. Complete the *Toxicology Data Sheet* or attach to application a toxicology report (an up-to-date material safety data sheets (MSDS) may be used) outlining the currently known acute and chronic health effects of each compound or chemical entity emitted to the air. If these compounds have already been listed in Item 3, then a duplicate MSDS sheet is not required. Include data such as the OSHA time weighted average (TWA) or mutagenicity, teratogenicity, irritation, and other known or suspected effects should be addressed. Indicate where these are unknown, and provide references.

8B. Describe any health effects testing or epidemiological studies on these compounds that are being or may be conducted by the company or required under TSCA, RCRA or other federal regulations. Discuss the persistence in the environment of any emission (e.g. pesticides, etc.).

9. **Waste Products** - Waste products status: (If source is subject to RCRA or 45CSR25, please contact the Hazardous Waste Section of WVDEP, OAQ at (304) 926-3647.)

9A. Types and amounts of wastes to be disposed:

9B. Method of disposal and location of waste disposal facilities:

Carrier:

Phone:

9C. Check here if approved USEPA/State Hazardous Waste Landfill will be used

10. Maximum and Projected Typical Operating Schedule for process or project as a whole (circle appropriate units).

circle units:	(hrs/day) (hr/batch)	(days), (batches/day), (batches/week)	(days/yr), (weeks/year)
10A. Maximum			
10B. Typical			

11. Complete a *Reactor Data Sheet* for each reactor in this chemical process.

12. Complete a *Distillation Column Data Sheet* for each distillation column in this chemical process.

13. Proposed Monitoring, Recordkeeping, Reporting, and Testing

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING

RECORDKEEPING

REPORTING

TESTING

MONITORING. Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment operation or air pollution control device.

RECORDKEEPING. Please describe the proposed recordkeeping that will accompany the monitoring.

REPORTING. Please describe the proposed frequency of reporting of the recordkeeping.

TESTING. Please describe any proposed emissions testing for this process equipment or air pollution control device.

14. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

INFORMATION REQUIRED FOR CHEMICAL PROCESSES

The notes listed below for chemical processes are intended to help the applicant submit a complete application to the OAQ; these notes are not intended to be all inclusive. The requirements for a complete application for a permit issued under 45CSR13 are designed to provide enough information for a permit reviewer to begin a technical review. Additional information beyond that identified may be required to complete the technical review of any individual application.

Process Description

Please keep these points in mind when completing your process description as part of this permit application.

1. Provide a general process overview. This brief, but complete, process description should include chemical or registered trademark names of chemical products, intermediates, and/or raw materials to be produced or consumed, and the ultimate use(s) of the product(s). A list of the various chemical compounds is helpful.
2. Describe each process step. Include the process chemistry and stoichiometrically balanced reaction equation or material mass balance on all components.
3. Describe the methods and equipment used to receive, store, handle, and charge raw materials.
4. Describe the methods and equipment used to handle, store, or package final products and intermediates.
5. Provide process flow diagrams or equipment layout drawings which clearly show the process flow relationships among all pieces of process and control equipment. Identify all air emission discharge points. Discuss instrumentation and controls for the process.
6. Discuss the possibilities of process upsets, the duration and frequency of upsets, and consequences (including air emissions) of these upsets. Include a description of rupture discs, pressure relief valves, and secondary containment systems.
7. Discuss any fugitive emissions and the methods used to minimize them.
8. Include the following plans for the process if available:
 - a. preventative maintenance and malfunction abatement plan (recommended for all control equipment).
 - b. continuous emissions (in-stack) monitoring plan
 - c. ambient monitoring plan
 - d. emergency response plan

Regulatory Discussion

The following state and federal air pollution control regulations may be applicable to your chemical process. You should review these regulations carefully to determine if they apply to your process. Please summarize the results of your review in your permit application along with any other regulations you believe are applicable.

- Title 45 Legislative Rule Division of Environmental Protection, Office of Air Quality contains West Virginia's air pollution control regulations, including the following promulgated rules which may require emissions reductions or control technologies for your chemical process:
 - a. 45CSR27 - Best Available Technology (BAT) for Toxic Air Pollutants (TAPs)
 - b. 45CSR21 - VOC emissions controls for ozone maintenance in Kanawha, Cabell, Putnam, Wayne, and Wood counties.
 - c. 45CSR13 (Table 45-13A) - plantwide emission thresholds for permitting for certain pollutants.
- Federal Guidelines for case-by-case MACT determinations under section 112(g) of the 1990 CAAA for individual and total HAPs greater than 10 and 25 tons per year, respectively.
- There are also subparts of the federal Standards of Performance for New Stationary Sources (NSPS), 40CFR60 60, and the National Emission Standards for Hazardous Air Pollutants (NESHAP) at 40CFR61 and 40CFR63, which apply to various chemical and nonchemical processes. These subparts are too numerous to list here, but these areas of the federal regulations should be consulted carefully to determine applicability to your process.

Emissions Summary and Calculations

Please keep these points in mind when submitting your emissions calculations as part of this permit application.

1. For each pollutant, provide the basis for the emissions estimate and for all emission reduction(s) or control efficiency(ies) claimed.
2. For all batch processes provide the following
 - a. Emissions of each pollutant in pound(s) per batch, from each process step
 - b. Annual emissions based on number of batches requested per year
 - c. The total time for each process step and the duration of the emissions during the process step
 - d. Total batch time, total emissions per batch (or per day), and annual emissions based on the number of batches requested per year.

EMERGENCY VENT SUMMARY SHEET

List below all emergency relief devices, rupture disks, safety relief valves, and similar openings that will vent only under abnormal conditions.

Emission Point ID ¹	Equipment to Relief Vent (type, ID if available) ²	Relief Vents (type) & Set Pressure (psig)	Name of Chemical(s) or Pollutants Controlled	Worst Case Emission per Release Event (lbs)

All routine vents (non-emergency) should be listed on the *Emission Points Data Summary Sheet*.
¹ Indicate the emission point, if any, to which source equipment normally vents. Do not assign emission point ID numbers to each emergency relief vent or device.
² List all emergency relief devices next to the piece of equipment from which they control releases.

LEAK SOURCE DATA SHEET

Source Category	Pollutant	Number of Source Components ¹	Number of Components Monitored by Frequency ²	Average Time to Repair (days) ³	Estimated Annual Emission Rate (lb/yr) ⁴
Pumps ⁵	light liquid VOC ^{6,7}	4	Monthly	3	EPA - 77
	heavy liquid VOC ⁸				
	Non-VOC ⁹				
Valves ¹⁰	Gas VOC				
	Light Liquid VOC	20	0	3	EPA - 38
	Heavy Liquid VOC				
	Non-VOC				
Safety Relief Valves ¹¹	Gas VOC				
	Non VOC				
Open-ended Lines ¹²	VOC				
	Non-VOC				
Sampling Connections ¹³	VOC				
	Non-VOC				
Compressors	VOC				
	Non-VOC				
Flanges	VOC				
	Non-VOC				
Other	VOC	100	0	3	EPA - 7
	Non-VOC				

1 - 13 See notes on the following page.

Notes for Leak Source Data Sheet

1. For VOC sources include components on streams and equipment that contain greater than 10% w/w VOC, including feed streams, reaction/separation facilities, and product/by-product delivery lines. Do not include certain leakless equipment as defined below by category.
2. By monitoring frequency, give the number of sources routinely monitored for leaks, using a portable detection device that measures concentration in ppm. Do not include monitoring by visual or soap-bubble leak detection methods. "M/Q(M)/Q/SA/A/O" means the time period between inspections as follows:

Monthly/Quarterly, with Monthly follow-up of repaired leakers/Quarterly/Semi-annual/Annually/Other (specify time period)

If source category is not monitored, a single zero in the space will suffice. For example, if 50 gas-service valves are monitored quarterly, with monthly follow-up of those repaired, 75 are monitored semi-annually, and 50 are checked bimonthly (alternate months), with non checked at any other frequency, you would put in the category "valves, gas service:" 0/50/0/75/0/50 (bimonthly).
3. Give the average number of days, after a leak is discovered, that an attempt will be made to repair the leak.
4. Note the method used: MB - material balance; EE - engineering estimate; EPA - emission factors established by EPA (cite document used); O - other method, such as in-house emission factor (specify).
5. Do not include in the equipment count sealless pumps (canned motor or diaphragm) or those with enclosed venting to a control device. (Emissions from vented equipment should be included in the estimates given in the Emission Points Data Sheet.)
6. Volatile organic compounds (VOC) means the term as defined in 40 CFR §51.100 (s).
7. A light liquid is defined as a fluid with vapor pressure equal to or greater than 0.04 psi (0.3 Kpa) at 20°C. For mixtures, if 20% w/w or more of the stream is composed of fluids with vapor pressures greater than 0.04 psi (0.3 Kpa) at 20 °C, then the fluid is defined as a light liquid.
8. A heavy liquid is defined as a fluid with a vapor pressure less than 0.04 psi (0.3 Kpa) at 20°C. For mixtures, if less than 20% w/w of the stream is composed of fluids with vapor pressures greater than 0.04 psi (0.3 Kpa) at 20 °C, then the fluid is defined as a heavy liquid.
9. LIST CO, H₂S, mineral acids, NO, NO₂, SO₃, etc. DO NOT LIST CO₂, H₂, H₂O, N₂, O₂, and Noble Gases.
10. Include all process valves whether in-line or on an open-ended line such as sample, drain and purge valves. Do not include safety-relief valves, or leakless valves such as check, diaphragm, and bellows seal valves.
11. Do not include a safety-relief valve if there is a rupture disk in place upstream of the valve, or if the valve vents to a control device.
12. Open-ended lines include purge, drain and vent lines. Do not include sampling connections, or lines sealed by plugs, caps, blinds or second valves.
13. Do not include closed-purge sampling connections.

TOXICOLOGY DATA SHEET¹

Descriptor Name/CAS Number	OSHA Limits ²		Acute ³ TC _{LO} - Animal LC _{LO} - Animal LC ₅₀ - Animal	Chronic ⁴	Irritation ⁵	References
	TWA	CL				

¹ Indicate by "ND" where no data exists, in company's knowledge.
² Time Weighted Average, Ceiling Limit, or other, with units.
³ If inhalation data is not available, provide other data as available.
⁴ Relying on animal or human studies, indicate if any data suggests: C = carcinogenicity, M = mutagenicity, T = teratogenicity, O = oncogenicity.
⁵ Indicate if there are dermal or eye irritation effects and whether they are considered to be low, moderate, or severe.

REACTOR DATA SHEET

Provide the following information for each piece of equipment that is a potential or actual source of emissions as shown on the *Equipment List Form* and other parts of application.

Identification Number (as shown on <i>Equipment List Form</i>):							
1. Name and type of equipment (e.g. CSTR, plug flow, batch, etc.)							
2. Type of operation <input type="checkbox"/> Batch <input type="checkbox"/> Continuous <input type="checkbox"/> Semi-batch							
3. Projected Actual Equipment Operating Schedule (complete appropriate lines):							
hrs/day		days/week			weeks/year		
hrs/batch		batches/day, weeks (Circle one)			day, weeks/yr (Circle one)		
4. Feed Data Flow In = gal/hr, or gal/batch							
Material Name & CAS No.	Phase ^a	Specific Gravity	Vapor Pressure ^b	Charge Rate			Fill Time (min/batch, run) ^c
				Normal	Max	Units	
<p>a. S = Solid, L = Liquid, G = gas or vapor</p> <p>b. At feed conditions</p> <p>c. Total time that equipment is filling per batch or run (start-up), for tank or vessel-type equipment.</p>							
5. Provide all chemical reactions that will be involved (if applicable), including the residence time and any side reactions that may occur as well as gases that may be generated during these reactions. Indicate if the reaction(s) are exothermic or endothermic.							

6. Maximum Temperature	7A. Maximum Pressure 7B. Max. Set Pressure for venting
°C	mmHg
°F	psig

8. Output Data		Flow Out = gal/hr or gal/batch				
Material Name and CAS No.	Phase	Specific Gravity	Vapor Pressure	Hourly or Batch Output Rate		Units
				Normal	Maximum	

9. Complete the following emission data for equipment connected to a header exhaust system, giving emissions levels before entering header system (i.e. before control equipment).

Check here if not applicable

Emission Point ID (exhaust point of header system):

Material Name and CAS No.	Maximum Potential Emission Rate (lb/hr)	Method **

** MB - material balance; EE - Engineering Estimate; TM - Test Measurement (submit test data); O - other (Explain)

10. Provide the following information pertaining to each condenser that may be attached to this reactor. Attach additional pages as necessary if more than one condenser is used for this reactor. Complete the Condenser Air Pollution Control Device Sheet if necessary.

Check here if not applicable

10A. Cooling material

10B. Minimum and Maximum flowrate of cooling material (gal/hr)

10C. Inlet temperature of cooling material (°F)

10D. Outlet temperature of cooling material (°F)

10E. Pressure drop of gas to be condensed from inlet to outlet (psig)

10F. Inlet temperature of gas stream (°F)

10G. Outlet temperature of gas stream (°F)

10H. Number of passes

10I. Cooling surface area

11. Provide the following pertaining to auxiliary equipment that burns fuel (heaters, dryers, etc.):

Check here if not applicable

11A. Type of fuel and maximum fuel burn rate, per hour:

11B. Provide maximum percent sulfur (S), ash content of fuel, and the energy content using appropriate units:

%S

% Ash

BTU/lb, std. ft³/day, gal

(circle one)

11C. Theoretical combustion air requirement in SCFD per unit of fuel (circle appropriate unit) @ 70°F and 14.7 PSIA:

SCFD/lb, SCFD, gal (circle one)

11D. Percent excess air: %

11E. Type, amount, and BTU rating of burners and all other firing equipment that are planned to be used:

11F. Total maximum design heat input: ×10⁶ BTU/hr.

12. Proposed Monitoring, Recordkeeping, Reporting, and Testing

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING

RECORDKEEPING

REPORTING

TESTING

MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION OR AIR POLLUTION CONTROL DEVICE.

RECORDKEEPING. PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

REPORTING. PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

TESTING. PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT OR AIR POLLUTION CONTROL DEVICE.

13. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

NOTE: An *AIR POLLUTION CONTROL DEVICE SHEET* must be completed for any air pollution device(s) (except emergency relief devices) used to control emissions from this reactor.

DISTILLATION COLUMN DATA SHEET

Identification Number (as assigned on <i>Equipment List Form</i>):		
1. Name and type of equipment		
#. Projected actual equipment operating schedule (complete appropriate lines):		
hrs/day	days/week	weeks/year
hrs/batch	batches/day, batches/week (circle one)	days/yr, weeks/yr (circle one)
2. Number of stages (plates), excluding condenser		
3. Number of feed plates and stage location		
4. Specify details of any reheating, recycling, or stage conditioning along with the stage locations		
5. Specify reflux ratio, R (where R is defined as the ratio of the reflux to the overhead product, given symbolically as $R=L/D$, where L = liquid down column, D = distillation product)		
6. Specify the fraction of feed which is vaporized, f (where f is the molal fraction of the feed that leaves the feed plate continuously as vapor).		
7A. Type of condenser used: <input type="checkbox"/> total <input type="checkbox"/> partial <input type="checkbox"/> multiple <input type="checkbox"/> other		
7B. For each condenser provide process operating details including all inlet and outlet temperatures, pressures, and compositions.		
8. Feed Characteristics		
A. Molar composition		
B. Individual vapor pressure of each component		
C. Total feed stage pressure		
D. Total feed stage temperature		
E. Total mass flow rate of each stream into the system		
9. Overhead Product		
A. Molar composition of components		
B. Vapor pressure of components		
C. Total mass flow rate of all streams leaving the system as overhead products		
10. Bottom Product		
A. Molar composition of all components		
B. Total mass flow rate of all streams leaving the system as bottom products		

11. General Information

- A. Distillation column diameter
- B. Distillation column height
- C. Type of plates
- D. Plate spacing
- E. Murphree plate efficiency
- F. Any other information necessary to describe the operation of this distillation column.

12. **Proposed Monitoring, Recordkeeping, Reporting, and Testing**

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING

RECORDKEEPING

REPORTING

TESTING

MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION OR AIR POLLUTION CONTROL DEVICE.

RECORDKEEPING. PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

REPORTING. PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

TESTING. PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT OR AIR POLLUTION CONTROL DEVICE.

13. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

NOTE: An *AIR POLLUTION CONTROL DEVICE SHEET* must be completed for any air pollution device(s) (except emergency relief devices) used to control emissions from this distillation column.

Attachment M

Air Pollution Control Data Sheet

Attachment M
Air Pollution Control Device Sheet
 (BAGHOUSE)

Control Device ID No. (must match Emission Units Table): DC-2

Equipment Information and Filter Characteristics

1. Manufacturer: Donaldson Torit Model No. DFO 3-18		2. Total number of compartments: 9	
		3. Number of compartment online for normal operation: 9	
4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.			
5. Baghouse Configuration: <input checked="" type="checkbox"/> Open Pressure <input type="checkbox"/> Closed Pressure <input type="checkbox"/> Closed Suction (check one) <input type="checkbox"/> Electrostatically Enhanced Fabric <input type="checkbox"/> Other, Specify			
6. Filter Fabric Bag Material:		7. Bag Dimension:	
<input type="checkbox"/> Nomex nylon <input type="checkbox"/> Wool <input type="checkbox"/> Polyester <input type="checkbox"/> Polypropylene <input type="checkbox"/> Acrylics <input type="checkbox"/> Ceramics <input type="checkbox"/> Fiber Glass <input type="checkbox"/> Cotton Weight oz./sq.yd <input type="checkbox"/> Teflon Thickness in <input checked="" type="checkbox"/> Others, specify Nanofiber		Diameter 14.4 in. Length 2.2 ft.	
		8. Total cloth area: 3,420 ft ²	
		9. Number of bags: 18	
		10. Operating air to cloth ratio: 2.3 ft/min	
11. Baghouse Operation: <input type="checkbox"/> Continuous <input type="checkbox"/> Automatic <input checked="" type="checkbox"/> Intermittent			
12. Method used to clean bags:			
<input type="checkbox"/> Mechanical Shaker <input type="checkbox"/> Sonic Cleaning <input type="checkbox"/> Reverse Air Jet <input type="checkbox"/> Pneumatic Shaker <input type="checkbox"/> Reverse Air Flow <input type="checkbox"/> Other: <input type="checkbox"/> Bag Collapse <input checked="" type="checkbox"/> Pulse Jet <input type="checkbox"/> Manual Cleaning <input type="checkbox"/> Reverse Jet			
13. Cleaning initiated by:			
<input type="checkbox"/> Timer <input type="checkbox"/> Frequency if timer actuated <input checked="" type="checkbox"/> Expected pressure drop range 1 in. of water <input type="checkbox"/> Other			
14. Operation Hours: Max. per day: 8 Max. per yr: 2,080		15. Collection efficiency: Rating: 99 % Guaranteed minimum: 95 %	

Gas Stream Characteristics

16. Gas flow rate into the collector: 7,400 ACFM at 70 °F and 14.8 PSIA ACFM: Design: 8,000 PSIA Maximum: 14.8 PSIA Average Expected: 14.8 PSIA			
17. Water Vapor Content of Effluent Stream: Varies lb. Water/lb. Dry Air			
18. Gas Stream Temperature: Ambient °F		19. Fan Requirements: 50 hp OR ft ³ /min	
20. Stabilized static pressure loss across baghouse. Pressure Drop: High in. H ₂ O Low in. H ₂ O			
21. Particulate Loading: Inlet: grain/scf Outlet: grain/scf			

22. Type of Pollutant(s) to be collected (if particulate give specific type):
 PM and PM10 associated with sand and powders, and cellulosic materials.

23. Is there any SO₃ in the emission stream? No Yes SO₃ content: _____ ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

Pollutant	IN		OUT	
	lb/hr	grains/acf	lb/hr	grains/acf
PM	19.3	0.28	0.19	0.003
PM10	15.4	0.22	0.15	0.002

25. Complete the table:

Particulate Size Range (microns)	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
	Weight % for Size Range	Weight % for Size Range
0 – 2		
2 – 4		
4 – 6		
6 – 8		
8 – 10		
10 – 12	86	99
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50		
50 – 60		
60 – 70		
70 – 80	6.4	99
80 – 90		
90 – 100		
>100	7.6	99

26. How is filter monitored for indications of deterioration (e.g., broken bags)?

- Continuous Opacity
- Pressure Drop
- Alarms-Audible to Process Operator
- Visual opacity readings, Frequency: Daily
- Other, specify: _____

27. Describe any recording device and frequency of log entries:

Daily visual opacity check and panel review (pressure drop) recorded on log sheet.

28. Describe any filter seeding being performed:

None

29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):

None

30. Describe the collection material disposal system:

Filtered dust is collected in 55-gallon drums and disposed of via landfilling.

31. Have you included **Baghouse Control Device** in the Emissions Points Data Summary Sheet?

32. Proposed Monitoring, Recordkeeping, Reporting, and Testing

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING: Daily visual opacity and recordkeeping of the operating control panel indicators, i.e., pressure drop. For opacity, any degree would be considered an issue. A pressure drop increase of > 2.5 in w.c. triggers an inspection of the baghouse for filter clogging.

RECORDKEEPING: Monthly log sheets, with daily records, kept on file.

REPORTING: If daily monitoring of opacity or pressure drop indicate a problem, a report to Maintenance for filter bag repair or maintenance will be submitted that day.

TESTING: Source testing performed at the request of WV DEP.

MONITORING: Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.

RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.

REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant. None given.

34. Manufacturer's Guaranteed Control Efficiency for each air pollutant. None given.

35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty. None given.

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DO NOT INSTALL OR OPERATE THIS EQUIPMENT UNTIL YOU HAVE READ AND UNDERSTOOD ALL INSTRUCTIONS AND WARNINGS IN THE OPERATION MANUAL. THE OPERATOR SHALL BE RESPONSIBLE FOR CONSTRUCTION AND PURPOSES. THE DOCUMENT IS SUBJECT TO CHANGE WITHOUT NOTICE.

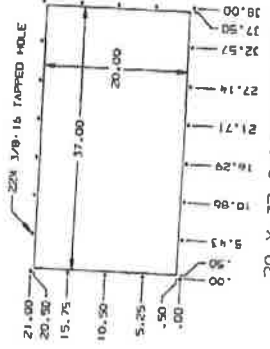
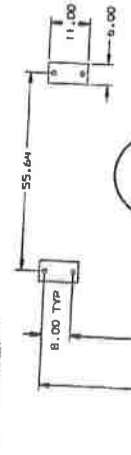
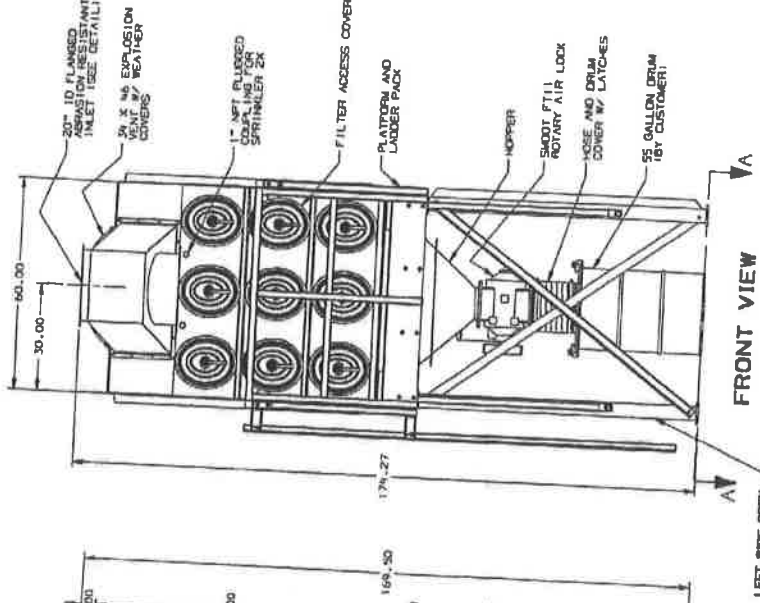
REV	DATE	DESCRIPTION	APPROVAL
1	09/15/2014	REVISED AIR INLET MANIFOLD TO ADD 20 X 37 COVERED ACCESS OUTLET (SEE DETAIL). CROSS BRANCH MANIFOLD FROM APPROVAL WITH CHANGES.	ISEE 10, 2014

SPECIFICATIONS DFO 3-18

- REMOTE TIMER ----- 110 VAC 50-60 HZ
- NUMBER OF FILTERS ----- 18 ULTRA-MED
- ACTUAL FILTER AREA ----- 3,420 SQ FT
- P-PED ----- 3,420 SQ FT
- HEATING TEMPERATURE ----- 180 DEGREE F MAXIMUM
- NUMBER OF VALVES ----- 9
- COMPRESSED AIR REQUIRED ----- 10 SCFM @ 90-100 PSIG
- HOUSING RATING ----- 20" WC
- FINISH ----- NATIONAL BLUE SAFETY YELLOW
- APPROXIMATE WEIGHT ----- 3,100 POUNDS

IBC 2009 SPECIFICATION
 OCCUPANCY CATEGORY 2
 BASIC # AND SPEED & EXPOSURE, 199 M/H, EXPOSURE C
 SITE CLASS SECTRAL ACCELERATION, 5, 11, 5 & 5, 0, 0, 6,
 ROOM AND SMOKE LOAD, 901 W0, P2P
 COLLECTOR TYPE LOAD, 11 20, 10, P2P
 COLLECTOR HOSE AT GRADE

NOTE
 1. THIS COLLECTOR INCLUDES GROUND TEST DOCUMENTATION.
 2. PLATFORM AND LADDER TO BE PAINTED SAFETY YELLOW.
 3. THIS COLLECTOR INCLUDES PLATFORM LADDER PACK WHICH CAN BE MOUNTED ON LEFT OR RIGHT SIDE OF PLATFORM.



FRONT OF COLLECTOR
 SECTION A-A
 1/8\"/>

ISSUE NO.	1
DATE	09/15/2014
REVISED BY	J. ALETTI
DATE REVISED	09/15/2014
REVISED BY	J. ALETTI
DATE REVISED	09/15/2014
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DATE REVISED	09/15/2014
REVISED BY	J. ALETTI
DATE REVISED	09/15/2014

FLUID ENGINEERING INC

THE DFO 3-18 DUST COLLECTOR

1610122886L001

DATE: 09/15/2014

SCALE: 1/2" = 1'-0"

DRAWN BY: J. ALETTI

CHECKED BY: J. ALETTI

APPROVED BY: J. ALETTI

FLUID ENGINEERING INC

Attachment N

Supporting Emission Calculations

Emission Calculations

VOC and PM emissions from these proposed sources (tanks, lines and mixers) are based on maximum production and standard emission factors for paint manufacturing from Emissions Inventory Improvement Program (EIIP) Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, Volume II, Chapter 8, February 2005. The PM emissions are based on maximum production rates and standard emission factors for solids handling in Paint Manufacturing, Table 6.4-1, AP-42, Fifth Edition, Volume I, May 1983. VOC emissions from the storage tank are estimated using the working loss equation (1-29) from Chapter 7 – Organic Liquid Storage Tanks, AP-42, Fifth Edition, Volume 1, November 2006.

The facility is not proposing any change to its currently permitted PTE limit for VOC and HAP emissions. With the installation of this new equipment, a reallocation of production and thus PTE emissions will occur under the existing limits.

The following table shows the increase in emissions associated with this modification:

Proposed PTE Emissions for Modification

Paint Manufacturing (tpy)				
	VOC	HAP	PM	PM10
New Paint/Adhesive Manufacturing	3.8	-	-	-
Solids Handling	-	-	0.20	0.16
Glycol Ethers	-	0.061	-	-

A summary table of the emission calculations and PTEs is included as part of this Attachment.

Attachment O

Monitoring, Recordkeeping, Reporting and Testing Plan

Monitoring, Recordkeeping, Reporting and Testing Plan

Monitoring

The production on the new filling line will be monitored on an hourly basis according to Lean Production techniques. The gallons/hr filled will be recorded.

For the dust collector and collection system, two parameters will be monitored: opacity and pressure drop. A daily visual observation of the stack for any opacity will be performed. In addition, a daily record of the operating pressure drop across the bag house filters as indicated on the bag house main control panel and as measured by the system pitot tube.

Recordkeeping

Both the production and dust collector data will be recorded on daily log sheets. The log sheets in turn are kept on file for a minimum of 5 years in both paper and electronic formats.

Reporting

For any deviations noted during the daily inspection of the dust collector and system, an internal report to Maintenance for immediate repair will be submitted. There is no creditable scenario associated with the dust collector and collection system operations that would warrant notification to WV DEP.

Testing

If requested by WV DEP, opacity testing, Method 9, would be performed on the dust collector stack.

Attachment P
Affidavit of Publication

AFFIDAVIT OF PUBLICATION

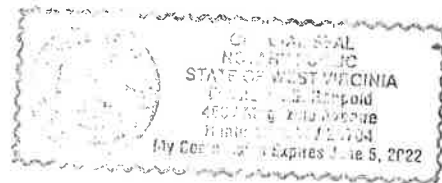
I, Linda Losey being duly sworn, depose and say that I am Legal Clerk for *The Herald-Dispatch*, HD Media Co., LLC, who publishes at Huntington, Cabell County, West Virginia, the newspaper *The Herald-Dispatch*, an Independent newspaper, the morning seven days each week, Monday through Sunday including New Year's Day, Memorial Day, the Fourth of July, Labor Day, Thanksgiving and Christmas; that I have been duly authorized by the Board of Directors of such corporation and the newspaper mentioned herein; that the legal advertisement attached in the left margin of this affidavit and made a part herof and bearing number 50844 was duly published in the *The Herald-Dispatch* once a week for 1 successive weeks, commencing with its issue of 03/02/2017 and ending with the issue of 03/02/2017, that said legal advertisement was published on the following dates: 03/02/2017 that the cost of publishing said annexed advertisement as aforesaid was \$ 47.48; that such newspaper in which such legal advertisement was published has been and is now published regularly, at least as frequently as once a week for at least fifty weeks during the calendar year as prescribed by its mailing permit and has been so published in the municipality of Huntington, Cabell County, West Virginia, for at least one year immediately preceding the date on which the legal advertisement set forth herein was delivered to such newspaper for publication; that such newspaper is a newspaper of "general circulation" as defined in article 3, chapter 59, of the West Virginia Code within the publication area or areas of the municipality of Huntington, Cabell, Putnam and Wayne Counties, West Virginia, and that such newspaper is circulated to the general public at a definite price or consideration; that such newspaper on each date published consists of not less than four pages without a cover; and that it is a newspaper to which the general public resorts for passing events of a political, religious, commercial and social nature, and for current happenings, announcements, miscellaneous reading matter, advertisements and other notices.

Taken, subscribed and sworn to before me in my said county this day: 03/02/2017

My commission expires January, 2022

Constance J. Rappold
 Notary Public
 Cabell County, West Virginia

Linda Losey



**AIR QUALITY
PERMIT NOTICE****Notice of
Application:**

Notice is given that the Rust-Oleum Corporation has applied to the West Virginia Department of Environmental Protection, Division of Air Quality for a Class II Administrative Update for paint product blending and repackaging facility located on Ohio River Road in Lesage, Cabell County, West Virginia. The latitude and longitude coordinates for the facility are: 38.557323N; -82.284319W.

The applicant is requesting the addition of an inside 8,800-gallon bulk material storage tank, a 3,000-gallon ribbon blender, a 1-gallon fill and packaging line and a 8,000 cfm baghouse. The operation of this equipment is estimated to increase volatile organic compounds (VOC) by 3.8 tpy and particulate matter (PM) by 0.20 tpy. The applicant is not requesting an increase in its current permitted potential-to-emit for VOCs.

Startup of operation of all components is planned to begin on or about the 15th of June, 2017. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours.

Dated this the 17th day of February, 2017.

By:
Rust-Oleum
Corporation
Michael J. Newell
EHS Manager
7850 Ohio River Rd
Lesage, WV 25537

LH-50844
3-2; 2017

Acc.Id: 9005718
Name: NEWELL, MICHAEL
Phone: 304-762-1421
Address: 7850 OHIO RIVER RD.
City: LESAGE
State: WV
Postcode: 25537
Class: 9010 Legal Notices
Edition: HD
Start: 03/02/2017
Stop: 03/02/2017
Issues: 1
Units: 83.00
Order ID: HC 50844
TFN: C
TFN cycle:
Rep: JREED
Status: OK
Source: EM
Paytype: BI
Rate: LG
Cost EXC
GST: 47.48
Tax: 0.00
Total Charge: 47.48
Printed on: 03/06/2017 08:26:47
Printed by: CRAPPOLD

Attachment R

Authority Form

Attachment R
AUTHORITY OF CORPORATION
OR OTHER BUSINESS ENTITY (DOMESTIC OR FOREIGN)

TO: The West Virginia Department of Environmental Protection,
Division of Air Quality

DATE: March 6, 2017

ATTN.: Director

Corporation's / other business entity's Federal Employer I.D. Number 13-1497940

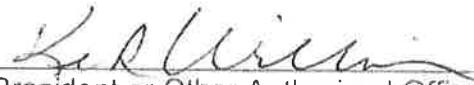
The undersigned hereby files with the West Virginia Department of Environmental Protection, Division of Air Quality, a permit application and hereby certifies that the said name is a trade name which is used in the conduct of an incorporated business or other business entity.

Further, the corporation or the business entity certifies as follows:

(1) Lesage Environmental Health and Safety (is/are) the authorized Manager representative(s) and in that capacity may represent the interest of the corporation or the business entity and may obligate and legally bind the corporation or the business entity.

(2) The corporation or the business entity is authorized to do business in the State of West Virginia.

(3) If the corporation or the business entity changes its authorized representative(s), the corporation or the business entity shall notify the Director of the West Virginia Department of Environmental Protection, Division of Air Quality, immediately upon such change.



President or Other Authorized Officer
(Vice President, Secretary, Treasurer or other
official in charge of a principal business function of
the corporation or the business entity)

(If not the President, then the corporation or the business entity must submit certified minutes or bylaws stating legal authority of other authorized officer to bind the corporation or the business entity).

Secretary

Rust-Oleum Corporation
Name of Corporation or business entity