

SPECIAL CONDITIONS

Permit Number S-18595

1. This permit authorizes specialty paint manufacturing facilities at 2803 Old Highway 75 North in Ennis, Ellis County. It does not cover a lab vent hood and a sample mixer both authorized by Title 30 Texas Administrative Code § 106.122 (30 TAC § 106.122).

EMISSION LIMITATIONS

2. Opacity of emissions from the baghouses and dust collectors shall be less than 5 percent averaged over a six-minute period, except for those periods described in 30 TAC § 111.111(a)(1)(E).
3. These facilities shall comply with all requirements of the U.S. Environmental Protection Agency regulations in Title 40 Code of Federal Regulations Part 60, Subparts A and Kb, on Standards of Performance for New Stationary Sources promulgated for Storage Tanks.

OPERATIONAL LIMITATIONS

4. Manufacturing operations shall not be conducted unless the ventilation systems which serve the mixing and blending areas are fully operational.
5. The mixing and blending tanks for solvent based products shall maintain a nitrogen blanket.
6. This permit allows the use of products containing volatile organic compounds and exempt solvents for paint manufacturing, other than those represented in the permit application dated December 30, 2002, which meet the following conditions:
 - A. The new or replacement product shall serve the same basic function and the emissions shall be emitted from the same location as the replaced product emissions.
 - B. The total ingredients of the replacement and replaced product are known (i.e., weight percent add to 100 percent);
 - C. The Effects Screening Level (ESL) of any air contaminant ingredient, in the

replaced or replacement product, must be listed on the current Texas Commission on Environmental Quality (TCEQ) ESL list or derived by the TCEQ Toxicology and Risk Assessment Section. The ESL of any air contaminant ingredient, in the replacement product, shall not be less than 2 $\mu\text{g}/\text{m}^3$ and its increase in hourly emission rate (ER) shall be less than 0.04 pound per hour (lb/hr).

Therefore:

$$\text{ESL} \geq 2 \mu\text{g}/\text{m}^3 \text{ and } [\text{ER}]_{\text{new}} < [\text{ER}]_{\text{approved}} + 0.04 \text{ lb/hr}$$

or

For those constituents not meeting the above requirement, the following conditions are met:

where: the replacement and replaced products have a single ingredient

$$(\text{ER}_2)/(\text{ESL}_2) < (\text{ER}_1)/(\text{ESL}_1)$$

where: ER1 is the ER as represented in the December 2002 application of the replaced ingredient

ER2 is the maximum proposed ER of the replacement ingredient

ESL1 is ESL for the replaced ingredient

ESL2 is the ESL for the replacement ingredient

where: the replacement and the replaced products have multiple ingredients

$$\begin{aligned} & (\text{ER}_{2a})/(\text{ESL}_{2a}) + (\text{ER}_{2b})/(\text{ESL}_{2b}) + \dots + (\text{ER}_{2n})/(\text{ESL}_{2n}) \\ & < (\text{ER}_{1a})/(\text{ESL}_{1a}) + (\text{ER}_{1b})/(\text{ESL}_{1b}) + \dots + (\text{ER}_{1n})/(\text{ESL}_{1n}) \end{aligned}$$

where: ER1a...n is the ER as represented in the December 2002 application of replaced (from a through n ingredients)

ER2a...n is the maximum proposed ER of the replacement (from a through n ingredients)

ESL1a...n is ESL for the replaced (from a through n ingredients)

ESL2a...n is the ESL for the replacement (from a through n ingredients)

- D. This condition allows for changes in formulations and does not allow for any increase in total annual emissions from any emission point.
- 7. All pigment and filler handling operations shall utilize particulate matter (PM) filter control capable of at least 99.99 percent PM removal. These filters shall be maintained in good condition at all times and changed as necessary. Documentation of particulate deposition originating from this facility beyond the property lines of this facility shall be considered as demonstrating that the filters are not being maintained in good condition.
- 8. Only Storage Tanks T004 and T007 shall utilize a heating system.

RECORDKEEPING

- 9. General Condition No. 7 regarding information and data to be maintained on file is supplemented as follows and shall be used to demonstrate compliance with Special Condition Nos. 3, 6, and 7 and the maximum allowable emissions rates table:
 - A. Material Safety Data Sheets (MSDS) or Air Quality Data Sheets (AQDS) for all products currently in use and those used during the previous two-years.
 - B. Data of daily solvent, pigment, and resin usage, the air contaminant content as contained in applicable MSDS/AQDS of each product, and actual daily hours of the mixing, blending, and filling operations. These data shall be used to produce a monthly report to be kept on file that represents:
 - (1) Hourly emissions from each emission point in lb/hr as a daily average.
 - (2) Annual emissions from each emission point in TPY over the previous 12 months.

This report shall include examples of the calculations performed and any assumptions and their basis.

- C. Records of substitution of products demonstrating how the requirements of Special Condition No. 6 are met and when the substitution occurred.

- D. Records of tank dimensions and storage capacities as required by Special Condition No. 3.
- E. Documentation of both baghouse and dust collector filter efficiencies.

POLLUTION PREVENTION

- 10. Particulates captured in the baghouses and dust collectors shall be contained such a way that when removed from the collectors or stored for reuse or awaiting disposal or upon disposal they shall not be allowed to escape into the atmosphere.
- 11. All waste paint, solvents and rags shall be stored in closed containers until removed from the site by a licensed disposal service.
- 12. All spills shall be cleaned up immediately.

Dated July 29, 2003