September 15, 2023

Division for Air Quality
SURFACE COATING SECTION
200 Fair Oaks Lane, 3rd Floor
Frankfort, KY 40601

Re: RENEWAL of Conditional Major Permit# F-18-055 R2 // AI # 4231

Ruggles Sign holds a Conditional Major Permit (F-18-055) issued March 2, 2019. The facility submitted a modification to their existing air quality permit on October 4, 2021, seeking an amendment for the following additions and modifications:

1. AI Name Change: Current AI Name is Ruggles Sign Co. We are requesting an AI Name change to match our legal name: John F. Ruggles, Jr. Inc. DBA Ruggles Sign.

2. Addition of New Emission Point: (1) paint booth with 2021 construction date to be listed as Emission Unit EP06. See updated DEP 7007K form.

3. Modification to Current Emission Points/Units: Separation of existing paint booth Emission Units into three (3) separate Emission Points/Units. See updated PTE.

4. Addition of New Insignificant Activity: Addition of (1) LTS 3020 Cutlite Penta Laser Cutter as #16 under Section C Insignificant Activities. This cutter exhausts waste acrylic/plastic into our external router silos/hoppers. See machine information provided.

5. New HAP: Addition of new product to Rolling Total Spreadsheet Report: Matthews Slow Catalyst (43-999SP) which includes a new HAP, naphthalene. See SDS for the new product.

These amendments were addressed and captured in (F-18-055 R2), which was issued on February 20, 2022. Since the issuance of the latest revision no new equipment or processes have been removed or added by the facility. However, the facility has added the following new reagents that contain additional HAPs not currently covered on the existing permit.

1. FP301Finish Etching Primer was added in May of 2022 and contains a new HAP (Dibutyl Phthalate) not previously covered under Paint Spray Booth (Colors and Coatings).

2. FT302 Finish Etching Primer Reducer was also added in May of 2022 and contains a new HAP (Methyl Isobutyl Ketone (MIBK) to emission point Paint Spray Booth (Reducers).

Updated DEP7007 Forms AI, N, K have been provided as part of this renewal application package along with SDS sheets for the above referenced reagents.

Review and let me know if additional information is needed.

Sincerely, Lisa G. Smith

Lisa G. Smith

DEP7007K

Surface Coating or Printing Operations

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

- ✓ Section K.1: Process Information
- ✓ Section K.2: Coating Operations
- ✓ Section K.3: Other Operations
- ✓ Section K.4: Coatings/Printing Materials as Applied
- ✓ Section K.5: HAP-containing Coatings/Printing Materials
- ✓ Section K.6: Notes, Comments, and Explanations

Additional Documentation

✓ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.

✓ Attach SDS or Technical Sheets for all Coating/Printing Materials

___ Attach a flow diagram

Source Name: **John F. Ruggles, Jr. Inc. DBA Ruggles Sign**

KY EIS (AFS) #: **21- 239-0012**

Permit #: **F-18-055 R2**

Agency Interest (AI) ID: **4231**

Date: **8-Sep-23**

Section K.1: Process Information

Emission Unit #: EP01A-C & EU01E-G

Emission Unit Name: Spray Paint Booth

Coating/Printing Line Name: Colors and Coatings and Reducers

Proposed/Actual Date of Construction: *(MM/YYYY)* Exisitng

List Applicable Regulations: 401 KAR 59:010 and 401 KAR 63:020

Describe Overall Process: Spray Painting Booth processes coating and colors and reducers

Describe Coatings/Printing Materials: Added new HAP Dibutyl Phthalate to Colors and Coatings and MIBK to Reducers as part of new reagenst introduced to processes in May of 2022.

Identify the Material ☑ Metal ☑ Vinyl ☑ Plastics ☐ Wood ☐ Foil ☐ Paper ☑ Other Substrate

that is Coated/Printed: ☑ Metal ☑ Vinyl ☑ Plastics ☐ Wood ☐ Foil ☐ Paper ☑ Other Substrate

Provide detailed description of material coated/printed:

Cut or formed (bent to shape) Aluminum, sheet metal, vinyl, acrylic, polycarbonate and pvc.

Provide approximate dimensions and range of sizes of parts being coated or printed:

Varies

Identify the Type of Operation: ☐ Continuous ☑ Batch ☐ Other:

Describe Surface Preparation/Pretreatment Steps:

Sanding, filling and cleaning

For Coating Operations: ☑ Spray ☐ Flow ☐ Dip tank ☐ Electrodeposition ☐ Brush ☐ Powder ☐ Roller Coat ☐ Other:

For Printing Operations: *(Select all that apply)* ☐ Web ☐ Rotogravure ☐ Heatset ☐ Lithographic ☐ Other: ☐ Sheetfed ☐ Letterpress ☐ Non-heatset ☐ Flexographic

Describe Final Product:

Painted letters, shapes, cabinets and panels

Check the category that most closely describes this unit:

☐ Large Appliance Coating	☑ Auto or Light-Duty Truck Coating	☐ Metal Furniture Coating	☐ Metal Coil Coating
☐ Beverage Can Coating	☐ Miscellaneious Metal Parts Coating	☐ Magnet Wire Insulation Coating	☐ Flat Wood Panel Coating
☐ Fabric, Vinyl, or Paper Coating	☐ Boat Manufacturing/ Ship Repair	☐ Pressure Sensitive Tape and Label Coating	☐ Magnet Tape Coating
☐ Publication Rotogravure Printing	☐ Coating of Plastic Parts for Business Machines	☐ Flexible Vinyl and Urethane Coating and Printing	
☐ Graphic Arts using Rotogravure and Flexographic Printing			☐ Other: _____

Section K.2: Coating Operations

K.2A: For Spray Coating

Gun/Booth ID	Describe Function	Type	Mode	Maximum Design Application Rate *(gal/hr or lb/hr)*		Describe how maximum rate was determined
EP01A-C & EU01E-G	Paint Spray Booth	☐ Conventional Air Gun ☑ Airless ☐ HVLP ☐ Electrostatic ☐ LVLP ☐ Aerosol Spray Can ☐ Other	☑ Manual ☐ Automatic	2.81		☑ Testing ☐ Equipment Specification Sheet ☐ Estimation
		☐ Conventional Air Gun ☐ Airless ☐ HVLP ☐ Electrostatic ☐ LVLP ☐ Aerosol Spray Can ☐ Other	☐ Manual ☐ Automatic			☐ Testing ☐ Equipment Specification Sheet ☐ Estimation
		☐ Conventional Air Gun ☐ Airless ☐ HVLP ☐ Electrostatic ☐ LVLP ☐ Aerosol Spray Can ☐ Other	☐ Manual ☐ Automatic			☐ Testing ☐ Equipment Specification Sheet ☐ Estimation

If spray guns are used simultaneously, describe:

K.2B: For Brush Coating

Describe Function:

Maximum Coating Application Rate: *(gal/hr)*

K.2C: For Roller Coating

Roller Coat ID	Describe Function	Maximum Coating Application Rate *(gal/hr)*	Describe how maximum rate was determined
			☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
			☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
			☐ Testing ☐ Estimation ☐ Equipment Specification Sheet

K.2D: For Powder Coating

Powder Coat ID	Describe Function	Maximum Coating Application Rate *(gal/hr or lb/hr)*		Describe how maximum rate was determined
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet

If powder coating material is recycled, describe:	

K.2E: For Flow Coating

Flow Coat ID	Describe Function	Maximum Coating Application Rate *(gal/hr or lb/hr)*		Describe how maximum rate was determined
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet

K.2F: For Dip Tank/Electrodeposition Coating

Tank ID	Describe Function	Maximum Make-up Rate *(gal/hr or lb/hr)*		Describe how maximum rate was determined
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet
				☐ Testing ☐ Estimation ☐ Equipment Specification Sheet

Section K.3: Other Operations

K.3A: For Finishing

Describe Finishing Processes: *Complete Form DEP7007B as applicable*	

K.3B: For Curing/Drying

Describe Curing/Drying Processes:	Description	Rated Capacity *(MMBtu/hr)*	Fuel	Control Device/Stack ID

K.3C: For Purge

Type: _____

Daily Usage: _____ gal/day

K.3D: For Clean-up

Type: ☐ Manual ☐ Automatic

Daily Usage: _____ hrs/day

Operating Hours: _____

K.3E: For Other Equipment

Describe Processes:	

Section K.4: Coatings/Printing Materials As Applied

Include SDS or Technical Sheets for all coating/printing materials used.

Trade Name of Material	Description *(Identify as coating, ink, fountain solution, blanket wash, cleaning solvent, thinning solvent, auto wash, manual wash, etc.)*	Emission Unit/Coating ID where material is used	SCC Code	SCC Code Units	Density *(lb/gal)*	Solid Content *(lb/gal)*	VOC Content *(lb/gal)*	Emission Factor for PM* *(lb/SCC)*	Transfer Efficiency *(%)*	Emission Factor for VOC *(lb/SCC)*	Capture Efficiency *(%)*	Control Device/ Stack ID
FP301 Finish Etching Primer	Coating	Spray Paint Booths Colors and Coatings	4-02-001-10	Gallons Coating Processed	9.20	3.77	5.43	3.77 lb/gal	60.00	5.43 lb/gal	0.00	Fabric Filter/Baghouse Stack 1
FT302 Finish Etching Primer Reducer	Reducer	Spray Paint Booths Reducer	4-02-001-10	Gallons Coating Processed	6.76	1.49E-01	6.61	1.49E-01 lb/gal	60.00	6.61 lb/gal	0.00	Fabric Filter/Baghouse Stack 1

**Emission factor for particulate matter (PM) should not include transfer efficiency.*

Section K.5: Hazardous Air Pollutant-containing Coatings/Printing Materials

List each individual hazardous air pollutant (HAP) contained in each material.

Trade Name of Material	HAP Name	HAP CAS #	Identify Solid (*S*) or Volatile (*V*)	HAP % by weight	HAP Emission Factor *(lb/SCC)*	Control Device/ Stack ID
Finish 1 Etching Primer	Toluene	108-88-3	V	2.00	1.84E-01	Fabric Filter/Baghouse Stack 1
	Ethylbenzene	100-41-4	V	1.00	9.20E-02	Fabric Filter/Baghouse Stack 1
	Xylene	1330-20-7	V	8.00	7.36E-01	Fabric Filter/Baghouse Stack 1
	MIBK	108-10-1	V	19.00	1.75	Fabric Filter/Baghouse Stack 1
	Dibutyl Phthalate	84-74-2	V	4.00	3.68E-01	Fabric Filter/Baghouse Stack 1
Finish 1 Etching Primer Reducer	Ethylbenzene	100-41-4	V	0.60	4.06E-02	Fabric Filter/Baghouse Stack 1
	Xylene	1330-20-7	V	4.00	2.70E-01	Fabric Filter/Baghouse Stack 1
	Glycol Ether	112-07-2	V	2.00	1.35E-01	Fabric Filter/Baghouse Stack 1
	MIBK	108-10-1	V	41.00	2.77	Fabric Filter/Baghouse Stack 1

Section K.6: Notes, Comments, and Explanations

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007AI

Administrative Information

- ✓ Section AI.1: Source Information
- ✓ Section AI.2: Applicant Information
- ✓ Section AI.3: Owner Information
- ✓ Section AI.4: Type of Application
- ✓ Section AI.5: Other Required Information
- ✓ Section AI.6: Signature Block
- ✓ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

✓ Additional Documentation attached

Source Name: **John F. Ruggles, Jr. Inc. DBA Ruggles Sign**

KY EIS (AFS) #: **21-239-00012**

Permit #: **F-18-055 R2**

Agency Interest (AI) ID: **4231**

Date: **7-Aug-23**

Section AI.1: Source Information

Physical Location Address:	**Street:**	93 Industry Drive				
	City:	Versailles	**County:**	Woodford	**Zip Code:**	40383
Mailing Address:	**Street or P.O. Box:**	PO Box 349				
	City:	Versailles	**State:**	KY	**Zip Code:**	40383

Standard Coordinates for Source Physical Location

Longitude: 38.06375954 (decimal degrees) **Latitude:** -84.72566601 (decimal degrees)

Primary (NAICS) Category: Sign Manufacturing **Primary NAICS #:** 399950

#

Classification (SIC) Category: Signs and Advertising Specialties **Primary SIC #:** 3993

Briefly discuss the type of business conducted at this site: Manufacture of illuminated (neon, LED and fluorscent) and non-illuminated signs

Description of Area Surrounding Source: ☐ Rural Area ☑ Industrial Park ☐ Residential Area ☐ Urban Area ☐ Industrial Area ☐ Commercial Area

Is any part of the source located on federal land? ☐ Yes ☑ No

Number of Employees: 116

Approximate distance to nearest residence or commercial property: *530 ft (residential)*

Property Area: **27.65 acres**

Is this source portable? ☐ Yes ☑ No

What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?

NPDES/KPDES:	☐ Currently Hold	☐ Need	☑ N/A
Solid Waste:	☑ Currently Hold	☐ Need	☐ N/A
RCRA:	☑ Currently Hold	☐ Need	☐ N/A
UST:	☐ Currently Hold	☐ Need	☑ N/A

Type of Regulated Waste Activity:

☑ Mixed Waste Generator ☐ Generator ☐ Recycler ☐ Other: _____

☐ U.S. Importer of Hazardous Waste ☐ Transporter ☐ Treatment/Storage/Disposal Facility ☐ N/A

Section AI.2: Applicant Information

Applicant Name: John F. Ruggles, Jr. Inc. DBA Ruggles Sign

Title: (if individual)

Mailing Address:
Street or P.O. Box: 93 Industry Drive
City: Versailles **State:** KY **Zip Code:** 40383

Email: (if individual)

Phone: 859-879-1199

Technical Contact

Name: Lisa G. Smith

Title: Office Manager

Mailing Address:
Street or P.O. Box: 93 Industry Drive
City: Versailles **State:** KY **Zip Code:** 40383

Email: lisa@rugglessign.com

Phone: 859-879-1199 Ext #105

Air Permit Contact for Source

Name: Lisa G. Smith

Title: Office Manager

Mailing Address:
Street or P.O. Box: 93 Industry Drive
City: Versailles **State:** KY **Zip Code:** 40383

Email: lisa@rugglessign.com

Phone: 859-879-1199 Ext# 105

Section AI.3: Owner Information

☐ **Owner same as applicant**

Name: Tim and Anna Cambron

Title: Owners, Ruggles Sign & Camco Properties

Mailing Address:
Street or P.O. Box: 93 Industry Drive
City: Versailles **State:** KY **Zip Code:** 40383

Email: tim@rugglessign.com or anna@rugglessign.com

Phone: 859-879-1199 Ext #104 or Ext #126

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name	Position
Anna Cambron	Majority Owner & CFO, Ruggles Sign
Tim Cambron	Owner & President, Ruggles Sign
Carly Cambron, Lauren Cambron and Seth Cambron	Minority Owners

Section AI.4: Type of Application

Current Status: ☐ Title V ☑ Conditional Major ☐ State-Origin ☐ General Permit ☐ Registration ☐ None

Requested Action: *(check all that apply)*

☐ Name Change	☐ Initial Registration	☐ Significant Revision	☐ Administrative Permit Amendment
☑ Renewal Permit	☐ Revised Registration	☐ Minor Revision	☐ Initial Source-wide OperatingPermit
☐ 502(b)(10)Change	☐ Extension Request	☐ Addition of New Facility	☐ Portable Plant Relocation Notice
☐ Revision	☐ Off Permit Change	☐ Landfill Alternate Compliance Submittal	☐ Modification of Existing Facilities
☐ Ownership Change	☐ Closure		

Requested Status: ☐ Title V ☑ Conditional Major ☐ State-Origin ☐ PSD ☐ NSR ☐ Other: _____

Is the source requesting a limitation of potential emissions? ☐ Yes ☑ No

Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☐ Particulate Matter		☐ Single HAP	
☐ Volatile Organic Compounds (VOC)		☐ Combined HAPs	
☐ Carbon Monoxide		☐ Air Toxics (40 CFR 68, Subpart F)	
☐ Nitrogen Oxides		☐ Carbon Dioxide	
☐ Sulfur Dioxide		☐ Greenhouse Gases (GHG)	
☐ Lead		☐ Other	

For New Construction:

Proposed Start Date of Construction: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

For Modifications:

Proposed Start Date of Modification: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

Applicant is seeking coverage under a permit shield. ☐ **Yes** ☑ **No** **Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.**

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- ☐ DEP7007A Indirect Heat Exchangers and Turbines
- ☐ DEP7007B Manufacturing or Processing Operations
- ☐ DEP7007C Incinerators and Waste Burners
- ☐ DEP7007F Episode Standby Plan
- ☐ DEP7007J Volatile Liquid Storage
- ☑ DEP7007K Surface Coating or Printing Operations
- ☐ DEP7007L Mineral Processes
- ☐ DEP7007M Metal Cleaning Degreasers
- ☑ DEP7007N Source Emissions Profile
- ☐ DEP7007P Perchloroethylene Dry Cleaning Systems
- ☐ DEP7007R Emission Offset Credit
- ☐ DEP7007S Service Stations
- ☐ DEP7007T Metal Plating and Surface Treatment Operations
- ☐ DEP7007V Applicable Requirements and Compliance Activities
- ☐ DEP7007Y Good Engineering Practice and Stack Height Determination
- ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units
- ☐ DEP7007BB Certified Progress Report
- ☐ DEP7007CC Compliance Certification
- ☐ DEP7007DD Insignificant Activities
- ☐ DEP7007EE Internal Combustion Engines
- ☐ DEP7007FF Secondary Aluminum Processing
- ☐ DEP7007GG Control Equipment
- ☐ DEP7007HH Haul Roads
- ☐ Confidentiality Claim
- ☐ Ownership Change Form
- ☐ Secretary of State Certificate
- ☐ Flowcharts or diagrams depicting process
- ☐ Digital Line Graphs (DLG) files of buldings, roads, etc.
- ☐ Site Map
- ☐ Map or drawing depicting location of facility
- ☐ Safety Data Sheet (SDS)
- ☐ Emergency Response Plan
- ☐ Other: _____

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

Lisa G. Smith	14-Sep-23
Authorized Signature	**Date**
Lisa G. Smith	Office Manager
Type or Printed Name of Signatory	**Title of Signatory**

*Responsible official as defined by 401 KAR 52:001.

Section AI.7: Notes, Comments, and Explanations

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007N

Source Emissions Profile

✓ Section N.1: Emission Summary

✓ Section N.2: Stack Information

✓ Section N.3: Fugitive Information

✓ Section N.4: Notes, Comments, and Explanations

Additional Documentation

✓ Complete DEP7007AI

Source Name: John F. Ruggles, Jr. Inc. DBA Ruggles Sign

KY EIS (AFS) #: 21- 239-0012

Permit #: F-18-055 R2

Agency Interest (AI) ID: 4231

Date: 8-Sep-23

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity *(SCC Units/hour)*	Pollutant	Uncontrolled Emission Factor *(lb/SCC Units)*	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency *(%)*	Control Efficiency *(%)*	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential *(lb/hr)*	Controlled Potential *(lb/hr)*	Uncontrolled Potential *(tons/yr)*	Controlled Potential *(tons/yr)*
EU01A-C & EU 01E-G	Paint Spray Booth 1	1	Colors and Coatings	Fabric Filter/Baghouse	1	1	2.81 gal/hr	Antimony, Total as Sb	5.30E-01 lb/gal	SDS Worst Case	0.00%	0.00%	1.49	1.49	6.52	6.52
								Ethylbenzene	3.00E-02 lb/gal	SDS Worst Case	0.00%	0.00%	8.43E-02	8.43E-02	3.69E-01	3.69E-01
								Glycol Ethers	1.70E-01 lb/gal	SDS Worst Case	0.00%	0.00%	4.78E-01	4.78E-01	2.09	2.09
								MIBK	2.38 lb/gal	SDS Worst Case	0.00%	0.00%	6.69	6.69	29.29	29.29
								PM	3.61 lb/gal	SDS Worst Case	100.00%	90.00%	10.14	1.01	44.43	4.44
								PM10	3.61 lb/gal	SDS Worst Case	100.00%	90.00%	10.14	1.01	44.43	4.44
								PM2.5	2.82 lb/gal	SDS Worst Case	100.00%	90.00%	7.92	7.92E-01	34.71	3.47
								Toluene	1.03 lb/gal	SDS Worst Case	0.00%	0.00%	2.89	2.89	12.68	12.68
								VOC	6.05 lb/gal	SDS Worst Case	0.00%	0.00%	17.00	17.00	74.46	74.46
								Xylenes (Total)	2.07 lb/gal	SDS Worst Case	0.00%	0.00%	5.82	5.82	25.48	25.48
								Dibutyl Phthalate	3.70E-01 lb/gal	SDS Worst Case	0.00%	0.00%	1.04	1.04	4.55	4.55

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity *(SCC Units/hour)*	Pollutant	Uncontrolled Emission Factor *(lb/SCC Units)*	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency *(%)*	Control Efficiency *(%)*	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential *(lb/hr)*	Controlled Potential *(lb/hr)*	Uncontrolled Potential *(tons/yr)*	Controlled Potential *(tons/yr)*
EU01A-C & EU 01E-G	Paint Spray Booth 1	3	Reducers	Fabric Filter/Baghouse	1	1	5.60E-01 gal/hr	Ethylbenzene	7.00E-02 lb/gal	SDS Worst Case	0.00%	0.00%	3.92E-02	3.92E-02	1.72E-01	1.72E-01
								Glycol Ethers	2.18 lb/gal	SDS Worst Case	0.00%	0.00%	1.22	1.22	5.35	5.35
								PM	6.00E-02 lb/gal	SDS Worst Case	100.00%	90.00%	3.36E-02	3.36E-03	1.47E-01	1.47E-02
								PM10	6.00E-02 lb/gal	SDS Worst Case	100.00%	90.00%	3.36E-02	3.36E-03	1.47E-01	1.47E-02
								PM2.5	4.68E-02 lb/gal	SDS Worst Case	100.00%	90.00%	2.62E-02	2.62E-03	1.15E-01	1.15E-02
								Toluene	1.59 lb/gal	SDS Worst Case	0.00%	0.00%	8.90E-01	8.90E-01	3.90	3.90
								VOC	7.93 lb/gal	SDS Worst Case	0.00%	0.00%	4.44	4.44	19.45	19.45
								Xylenes (Total)	7.10E-01 lb/gal	SDS Worst Case	0.00%	0.00%	3.98E-01	3.98E-01	1.74	1.74
								MIBK	2.77 lb/gal	SDS Worst Case	0.00%	0.00%	1.55	1.55	6.79	6.79

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter *(ft)*	Height *(ft)*	Base Elevation *(ft)*	Northing *(m)*	Easting *(m)*	Flowrate *(acfm)*	Temperature *(° F)*	Exit Velocity *(ft/sec)*
1	EP01A-C EU01E-G	3.00	30.00	912.00	4215287	699628	14000.00	120.00	33.00

Section N.3: Fugitive Information

UTM Zone:

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side *(ft)*	Length of the Y Side *(ft)*	Northing *(m)*	Easting *(m)*	Release Temperature *(°F)*	Release Height *(ft)*
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Section N.4: Notes, Comments, and Explanations

ENVIRONMENTAL DATA SHEET

(Certified Product Data Sheet)

Date of Preparation
Sep 16, 2020

17 00 [3537]

PRODUCT NUMBER

FP301

PRODUCT NAME

FINISH 1™ Etch Primer

MANUFACTURER'S NAME

ACME AUTOMOTIVE FINISHES
101 W. Prospect Avenue
Cleveland, OH 44115

This document includes all data required by 40 CFR 63.801(a) for a Certified Product Data Sheet under criteria specified in 40 CFR 63.805(a). All data given below are MAXIMUM THEORETICAL VALUES based on the product AS CURRENTLY FORMULATED. Variations may occur on individual batches due to adjustments made during production.

Hazard Category (for SARA 311.312)

FP301 = | Acute | Chronic | Fire |

Product Weight	Specific Gravity	FLASH POINT
9.20 lb/gal	1.11	48 °F PMCC

Volatile Ingredients

Chemical / Compound	SARA 302 EHS	CERCLA	SARA 313 TC	HAPS 112	% by Weight	% by Volume
Toluene 108-88-3	N	Y	Y	Y	2	3
Ethylbenzene 100-41-4	N	Y	Y	Y	1	2
Xylene 1330-20-7	N	Y	Y	Y	8	10
2-Propanol 67-63-0	N	N	N	N	14	19
2-Methyl-1-propanol 78-83-1	N	Y	N	N	4	5
2-Butoxyethanol 111-76-2	N	N	Y - Glycol Ethers (SARA)	N	6	8
Methyl Isobutyl Ketone 108-10-1	N	Y	Y	Y	19	26
Isopropyl Acetate 108-21-4	N	N	N	N	1	1

Non-Volatile Ingredients

Chemical / Compound	SARA 302 EHS	CERCLA	SARA 313 TC	HAPS 112	% by Weight	% by Volume
Dibutyl Phthalate 84-74-2	N	Y	Y	Y	4	4

Regulated Compounds

	SARA 302 EHS	CERCLA	SARA 313 TC	HAPS 112	% by Weight	% by Volume
Zinc (as Zn)	N	Y	Y	N	4	
Zinc Compound	N	N	Y	N	7	
Glycol Ethers (SARA)	N	N	Y	N	6	

Volatile Organic Compounds - U.S. EPA / Canada

	FP301	
	LB/Gal	**g/L**
Coating Density	9.20	1102
	By wt	**By vol**
Total Volatiles	54.9%	74.2%
Federally exempt solvents		
Water	0.0%	0.0%
Organic Volatiles	54.9%	74.2%
Percent Non-Volatile	45.1%	25.8%
VOC Content	**LB/Gal**	**g/L**
Total	5.05	605
Less exempt solvents	5.05	605
Of solids	19.58	2347
Of solids	1.21 lb/lb	1.21 kg/kg
	By wt	
By wt LVP-VOC	54.9%	

Maximum Incremental Reactivity (MIR) (per US EPA Aerosol Ctg Rule, MIR Values 2009) **1.87**

Volatile Organic Compounds - California

	FP301	
	LB/Gal	**g/L**
Coating Density	9.20	1102
	By wt	**By vol**
Total Volatiles	54.9%	74.2%
Exempt solvents		
Water	0.0%	0.0%
Organic Volatiles	54.9%	74.2%
Percent Non-Volatile	45.1%	25.8%
VOC Content	**LB/Gal**	**g/L**
Total	5.05	605
Less exempt solvents	5.05	605
Of solids	19.58	2347
Of solids	1.21 lb/lb	1.21 kg/kg
	By wt	
By wt LVP-VOC	54.9%	

Maximum Incremental Reactivity (MIR) (per California Air Resources Board Aerosol Products Regulation, MIR Values 2010) **1.79**

Volatile Organic Compounds - South Coast Air Quality Management District, California, US

	FP301	
	LB/Gal	**g/L**
Coating Density	9.20	1102
	By wt	**By vol**
Total Volatiles	54.9%	74.2%
Exempt solvents		
Water	0.0%	0.0%
Organic Volatiles	54.9%	74.2%
Percent Non-Volatile	45.1%	25.8%
VOC Content	**LB/Gal**	**g/L**
Total	5.05	605
Less exempt solvents	5.05	605
Of solids	19.58	2347
Of solids	1.21 lb/lb	1.21 kg/kg

Volatile Organic Compounds - EU Directive 2004/42/EC

	FP301	
	By wt	**By vol**
Total Volatiles	55.1%	74.4%
VOC Content	**LB/Gal**	**g/L**
Total	5.06	607

Volatile Organic Compounds - EU Directive 2010/75/EU

	FP301	
	By wt	**By vol**
Total Volatiles	54.9%	74.2%
VOC Content	**LB/Gal**	**g/L**
Total	5.05	605

Volatile Organic Compounds - Mexico

	FP301	
	LB/Gal	**g/L**
Coating Density	9.20	1102
	By wt	**By vol**
Total Volatiles	54.9%	74.2%
Exempt solvents		
Water	0.0%	0.0%
Organic Volatiles	54.9%	74.2%
Percent Non-Volatile	45.1%	25.8%
VOC Content	**LB/Gal**	**g/L**
Total	5.05	605
Less exempt solvents	5.05	605
Of solids	19.58	2347
Of solids	1.21 lb/lb	1.21 kg/kg

Hazardous Air Pollutants (Clean Air Act, Section 112(b))

	FP301	
	LB/Gal	kg/L
Volatile HAPS	2.70	0.324
Of solids	10.50	1.258
Of solids	0.65 lb/lb	0.65 kg/kg

Air Quality Data

Density of Organic Solvent Blend

6.81 lb/gal

Photochemically Reactive

Yes

Additional Regulatory Information

US EPA TSCA:

Not Applicable

Relevant identified uses of the substance or mixture and uses advised against:

Not Applicable

Waste Disposal

Waste from this product may be hazardous as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261.
Waste must be tested for ignitability to determine the applicable EPA hazardous waste numbers.

Addition of reducers or other additives to this product may substantially alter the above data. Since conditions of use are outside our control, we make no warranties, express or implied, and assume no liability in connection with any use of this information.

ENVIRONMENTAL DATA SHEET

(Certified Product Data Sheet)

Date of Preparation
May 13, 2020

19 00 [2607]

PRODUCT NUMBER

FT302

PRODUCT NAME

FINISH 1™ Etch Primer Reducer

MANUFACTURER'S NAME

ACME AUTOMOTIVE FINISHES
101 W. Prospect Avenue
Cleveland, OH 44115

This document includes all data required by 40 CFR 63.801(a) for a Certified Product Data Sheet under criteria specified in 40 CFR 63.805(a). All data given below are MAXIMUM THEORETICAL VALUES based on the product AS CURRENTLY FORMULATED. Variations may occur on individual batches due to adjustments made during production.

Hazard Category (for SARA 311.312)

FT302 = | Acute | Chronic | Fire | Pressure |

Product Weight	Specific Gravity	FLASH POINT
6.76 lb/gal	0.81	48 °F PMCC

Volatile Ingredients

Chemical / Compound	SARA 302 EHS	CERCLA	SARA 313 TC	HAPS 112	% by Weight	% by Volume
Ethylbenzene 100-41-4	N	Y	Y	Y	0.6	< 1
Xylene 1330-20-7	N	Y	Y	Y	4	3
2-Propanol 67-63-0	N	N	N	N	45	47
2-Butoxyethanol 111-76-2	N	N	Y - Glycol Ethers (SARA)	N	3	3
Methyl Isobutyl Ketone 108-10-1	N	Y	Y	Y	41	41
2-Butoxyethyl Acetate 112-07-2	N	N	Y - Glycol Ethers (SARA)	Y - Glycol Ethers (HAPS)	2	2
Water 7732-18-5	N	N	N	N	2	2

Non-Volatile Ingredients

Chemical / Compound	SARA 302 EHS	CERCLA	SARA 313 TC	HAPS 112	% by Weight	% by Volume
Phosphoric Acid 7664-38-2	N	Y	N	N	2	< 1

Regulated Compounds

	SARA 302 EHS	CERCLA	SARA 313 TC	HAPS 112	% by Weight	% by Volume
Glycol Ethers (SARA)	N	N	Y	N	6	
Glycol Ethers (HAPS)	N	N	N	Y	2	

Volatile Organic Compounds - U.S. EPA / Canada

	FT302	
	LB/Gal	g/L
Coating Density	6.76	810
	By wt	By vol
Total Volatiles	97.8%	99.1%
Federally exempt solvents		
Water	2.0%	1.6%
Organic Volatiles	95.9%	97.5%
Percent Non-Volatile	2.2%	0.9%
VOC Content	LB/Gal	g/L
Total	6.48	777
Less exempt solvents	6.59	789
Of solids	> 99.99	> 11,983
Of solids	> 99.99 lb/lb	> 11,983 kg/kg
	By wt	
By wt LVP-VOC	95.9%	

Maximum Incremental Reactivity (MIR) (per US EPA Aerosol Ctg Rule, MIR Values 2009) **2.50**

Volatile Organic Compounds - California

	FT302	
	LB/Gal	g/L
Coating Density	6.76	810
	By wt	By vol
Total Volatiles	97.8%	99.1%
Exempt solvents		
Water	2.0%	1.6%
Organic Volatiles	95.9%	97.5%
Percent Non-Volatile	2.2%	0.9%
VOC Content	LB/Gal	g/L
Total	6.48	777
Less exempt solvents	6.59	789
Of solids	> 99.99	> 11,983
Of solids	> 99.99 lb/lb	> 11,983 kg/kg
	By wt	
By wt LVP-VOC	95.9%	

Maximum Incremental Reactivity (MIR) (per California Air Resources Board Aerosol Products Regulation, MIR Values 2010) **2.28**

Volatile Organic Compounds - South Coast Air Quality Management District, California, US

	FT302	
	LB/Gal	g/L
Coating Density	6.76	810
	By wt	By vol
Total Volatiles	97.8%	99.1%
Exempt solvents		
Water	2.0%	1.6%
Organic Volatiles	95.9%	97.5%
Percent Non-Volatile	2.2%	0.9%
VOC Content	LB/Gal	g/L
Total	6.48	777
Less exempt solvents	6.59	789
Of solids	> 99.99	> 11,983
Of solids	> 99.99 lb/lb	> 11,983 kg/kg

Volatile Organic Compounds - EU Directive 2004/42/EC

	FT302	
	By wt	By vol
Total Volatiles	97.8%	99.1%
VOC Content	LB/Gal	g/L
Total	6.48	777

Volatile Organic Compounds - EU Directive 2010/75/EU

	FT302	
	By wt	By vol
Total Volatiles	97.8%	99.1%
VOC Content	LB/Gal	g/L
Total	6.48	777

Volatile Organic Compounds - Mexico

	FT302	
	LB/Gal	g/L
Coating Density	6.76	810
	By wt	By vol
Total Volatiles	97.8%	99.1%
Exempt solvents		
Water	2.0%	1.6%
Organic Volatiles	95.9%	97.5%
Percent Non-Volatile	2.2%	0.9%
VOC Content	LB/Gal	g/L
Total	6.48	777
Less exempt solvents	6.59	789
Of solids	> 99.99	> 11,983
Of solids	> 99.99 lb/lb	> 11,983 kg/kg

Hazardous Air Pollutants (Clean Air Act, Section 112(b))

	FT302	
	LB/Gal	kg/L
Volatile HAPS	3.19	0.383
Of solids	> 99.99	> 11.983
Of solids	21.94 lb/lb	21.94 kg/kg

Air Quality Data

Density of Organic Solvent Blend

6.65 lb/gal

Photochemically Reactive

Yes

Additional Regulatory Information

US EPA TSCA:

Not Applicable

Relevant identified uses of the substance or mixture and uses advised against:

Not Applicable

Waste Disposal

Waste from this product may be hazardous as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261.
Waste must be tested for ignitability and corrosivity to determine the applicable EPA hazardous waste numbers.