Commonwealth of Kentucky
Division for Air Quality

STATEMENT OF BASIS / SUMMARY

Conditional Major, Operating
Permit: F-26-005

Doric Products Inc.
386 Warren Chandler Drive
Corbin, KY 40701

July 6, 2026
Ibrahim Alburai, Reviewer

SOURCE ID:	21-125-00091
AGENCY INTEREST:	38878
ACTIVITY:	APE20250001

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 3995, Burial Caskets

Single Source Det. ☐ Yes ☒ No If Yes, Affiliated Source AI:

Source-wide Limit ☒ Yes ☐ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Laurel

Nonattainment Area ☒ N/A ☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ Ozone ☐ Lead
If yes, list Classification:

PTE* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☒ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☒ Yes ☐ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☒ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☐ Yes ☒ No
If yes, list which pollutant(s): Ethyl Benzene

PTE* greater than 25 tpy for combined HAP ☐ Yes ☒ No

*PTE does not include self-imposed emission limitations.

Description of Facility:
Doric Products Inc. operates a metal burial vaults manufacturing facility with the source name of Classic Metal Vaults.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: F-26-005 Activity: APE20250001

Application Received: October 29, 2025 Application Complete Date(s): December 24, 2025

Permit Action: ☐ Initial ☒ Renewal ☐ Significant Rev ☐ Minor Rev ☐ Administrative

Construction/Modification Requested? ☐Yes ☒No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐Yes ☒No

Description of Action:
Renewal permit with no requested construction.

F-26-005 Emission Summary		
Pollutant	2025 Actual (tpy)	PTE F-26-005 (tpy)
CO	0.032	0.85
NOx	0.038	1.01
PT	1.48	22.81
PM_{10}	1.48	22.81
$PM_{2.5}$	1.46	22.81
SO_2	0.0002	0.006
VOC	11.69	434.8*
Lead	0	0
Greenhouse Gases (GHGs)		
Carbon Dioxide	45.0	1,209
Methane	0.001	0.023
Nitrous Oxide	0.001	0.002
CO_2 Equivalent (CO_2e)	45.323	1,210
Hazardous Air Pollutants (HAPs)		
Ethyl Benzene	1.31	48.881**
Combined HAPs:	1.31	49.028*

*The permittee has requested federally enforceable emission limitations to preclude major source status under 401 KAR 52:020 and/or 401 KAR 51:017.

**Air toxic limit of 7.53 tpy to comply with 401 KAR 63:020.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Units 01, 02, 03 and 04 Coating Operations				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
VOC	Source wide 90 tpy	401 KAR 52:030	Material Balance & SDS	Recordkeeping, 12 month rolling total
HAP	Source wide 9/22.5 tpy single/combined	401 KAR 52:030	Material Balance & SDS	Recordkeeping, 12 month rolling total
Ethyl Benzene	Source wide 7.53 tpy	401 KAR 63:020	Material Balance & SDS	Monthly emission calculations and a new rolling 12-month total
PM	2.58 lbs/hr	401 KAR 61:020, Section 3(2)(a)	Material Balance & SDS with 70% Transfer Efficiency	Dry Filters, 90% C.E., Manufacturer's guarantee
	20% for Oven #1~4	401 KAR 52:030	N/ A	Weekly visual observation
	40% for Booth #1~4	401 KAR 61:020, Section 3(1)(a)	N/ A	Weekly visual observation

Initial Construction Date: January 1972

Process Description:

EP 01(B-1) Spray Booth #1
MP1: Spray Gun
Spray operation system: 5 High Volume Low Pressure & 1 airless applicators
Capacity: 15.5 gals/ hr; Transfer efficiency 70%
Estimated dry filter control efficiency 90%

MP2: Clean up
Solvent usage: 0.25 gallon /day

MP3: Natural Gas Drying Oven #1 (listed as IA03 process ID 1 in KYEIS)
Heat input capacity: 90,500 (Btu/hr)

EP 02(B-2) Spray Booth #2
MP1: Spray Gun
Spray operation system: 3 High Volume Low Pressure & 1 airless applicators
Capacity: 15.5 gals/ hr. Transfer efficiency 70%
Estimated dry filter control efficiency 90%

MP2: Clean up
Solvent usage: 0.25 gallon /day

MP3: Natural Gas Drying Oven #2 (listed as IA03 process ID 2 in KYEIS)

Emission Units 01, 02, 03 and 04 Coating Operations

Heat input capacity: 90,500 (Btu/hr)

EP 03(B-3) Powder Coating #3
Capacity: 3.34 lbs/ hr.
Estimated dry filter control efficiency 90%

MP3: Natural Gas Drying Oven #3 (listed as IA03 process ID 3 in KYEIS)
Heat input capacity: 90,500 (Btu/hr)

EP 04(B-4) Powder Coating #4
Capacity: 3.34 lbs/ hr.
Estimated dry filter control efficiency 90%

MP2: Natural Gas Drying Oven #4 (listed as IA03 process ID 4 in KYEIS)
Heat input capacity: 90,500 (Btu/hr)

Applicable Regulations:
401 KAR 61:020, Existing Process Operations, applicable to each affected facility associated with a process operation commenced before July 2, 1975. This regulation is applicable to Spray Booth #1 - #4 and corresponding ovens.

State-Origin Requirement:
401 KAR 63:020, *Potentially hazardous matter or toxic substances* applies to each affected facility which emits or may emit potentially hazardous matter or toxic substances, provided that such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division. This applies to the HAP/toxics emissions from the coating operations – Spray Booth #1 - #4 and corresponding ovens.

Comments:
- 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations, is not applicable because the source is not a major source nor located in a county designated as nonattainment for ozone.
- 40 CFR 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, is applicable to any area source that is involved in various surface coating operations that contain target hazardous air pollutants (HAP) compounds specific to each operation. Since the coatings does not contain any of the target HAPs (chromium, lead, manganese, nickel or cadmium), this subpart does not apply.
- 40 CFR 63, Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source categories, does not apply because the source is not in one of the nine metal fabrication and finishing source categories.
- The ovens were constructed prior to the applicability date of 401 KAR 59:010, however due to opacity issues in 2012, the Division then applied 401 KAR 59:010 opacity limit of 20% in permit F-11-057. The ovens vent through the same stack as the spray booths and so the source shall comply with the most stringent requirements among those units connected to the common stack. See statement of basis associated with F-16-050 for details.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit	Test Result	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
NA										

Footnotes:

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
90 tpy of VOC emissions	401 KAR 52:030, *Federally-enforceable permits for nonmajor sources*	Source-wide
9.0 tpy of individual HAP emissions	To preclude major source status for HAP	Source-wide
22.5 tpy of combined HAP emissions	To preclude major source status for HAP	Source-wide
7.53 tpy of Ethyl Benzene	To comply with 401 KAR 63:020	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 61:020, *Existing Process Operations.*	EU 01, 02, 03 & 04
401 KAR 63:020, *Potentially hazardous matter or toxic substances.*	EU 01, 02, 03 & 04

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 52:020, *Title V permits*	Source-wide
401 KAR 51:017, *Prevention of significant deterioration of air quality*	Source-wide

Table D - Summary of Non-Applicable Regulations:
N/A

Air Toxic Analysis
401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*
The Division for Air Quality (Division) has performed modeling using SCREEN View on February 5, 2026 of potentially hazardous matter or toxic substances (Ethyl benzene, Naphthalene, 2-Butoxy Ethanol and Methyl Ethyl Ketone) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Additionally refined model AERMOD was performed on June 29, 2026 on Ethyl Benzene. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020. See emission limits in Section 4 of this document and Section D of the operating permit.

Single Source Determination
N/A

SECTION 5 – PERMITTING HISTORY

Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
F-01-021	Initial	53827	5/27/2001	11/9/2001	Initial	NA
F-06-064	Renewal	APE20060001	10/31/2006	1/26/2007	Renewal	NA
F-11-057	Renewal	APE20110001	9/16/2011	12/22/2011	Renewal	NA
F-16-050	Renewal	APE20160001	810/2016	11/23/2016	Renewal	NA
F-21-050	Renewal	APE20210001	6/22/2021	11/21/2021	Renewal	NA

SECTION 6 – PERMIT APPLICATION HISTORY

None

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS – Ambient Air Quality Standards
BACT – Best Available Control Technology
Btu – British thermal unit
CAM – Compliance Assurance Monitoring
CO – Carbon Monoxide
Division – Kentucky Division for Air Quality
ESP – Electrostatic Precipitator
GHG – Greenhouse Gas
HAP – Hazardous Air Pollutant
HF – Hydrogen Fluoride (Gaseous)
MSDS – Material Safety Data Sheets
mmHg – Millimeter of mercury column height
NAAQS – National Ambient Air Quality Standards
NESHAP – National Emissions Standards for Hazardous Air Pollutants
NO_x – Nitrogen Oxides
NSR – New Source Review
PM – Particulate Matter
PM_{10} – Particulate Matter equal to or smaller than 10 micrometers
$PM_{2.5}$ – Particulate Matter equal to or smaller than 2.5 micrometers
PSD – Prevention of Significant Deterioration
PTE – Potential to Emit
SO_2 – Sulfur Dioxide
TF – Total Fluoride (Particulate & Gaseous)
VOC – Volatile Organic Compounds