

Commonwealth of Kentucky
Division for Air Quality
STATEMENT OF BASIS / SUMMARY

Conditional Major, Operating
Permit: F-26-025

Lexington Paint and Supply Company, Inc.
103 Park Central Court
Nicholasville, KY 40356

October 12, 2026
Ibrahim Alburai, Reviewer

SOURCE ID:	21-113-00027
AGENCY INTEREST:	38669
ACTIVITY:	APE20260001

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 2851, Paints, Varnishes, Lacquers, Enamels and Allied Products.

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: Jessamine

Nonattainment Area ☒ N/A ☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☐ Ozone ☐ Lead

If yes, list Classification:

PTE* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No

If yes, for what pollutant(s)?

☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☒ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☒ Yes ☐ No

If yes, for what pollutant(s)?

☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☒ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☒ Yes ☐ No

If yes, list which pollutant(s): Toluene and Xylenes (Total)

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

*PTE does not include self-imposed emission limitations.

Description of Facility:

Lexington Paint & Supply Company, Inc. (LP&S) operates a specialty paints manufacturing facility in Nicholasville, Kentucky.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: F-26-025

Activity: APE20260001

Application Received: March 10, 2026

Application Complete Date: May 4, 2026

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 new construction. The facility requested addition of Tank G, an insignificant activity, which was omitted from previous applications. In the renewal application, the facility also provided updated stack information for emission units 001, 002 and 003 (EP 03) which required remodeling for compliance with 401 KAR 63:020 and subsequent annual limits on Cobalt, Diethylene Monobutyl Ether and Ethyl benzene.

F-26-025 Emission Summary		
Pollutant	2025 Actual (tpy)	PTE F-26-025 (tpy)
CO	0	0
NO _x	0	0
PT	6.48	51.64
PM ₁₀	6.48	51.64
PM _{2.5}	5.06	40.28
SO ₂	0	0
VOC	37.75	420.08*
Lead	0	0
Greenhouse Gases (GHGs)		
Carbon Dioxide	0	0
Methane	0	0
Nitrous Oxide	0	0
CO ₂ Equivalent (CO ₂ e)	0	0
Hazardous Air Pollutants (HAPs)		
Toluene	2.22	17.91*
Xylenes	5.42	100.23*
Ethyl Benzene	0.23	1.44**
Cumene		4.48
Methyl Isobutyl Ketone		4.48
Cobalt	0.0132	0.00031**
Diethylene Glycol Monobutyl Ether	0	0.51**
Combined HAPs:	7.88	129.05*

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

**Subject to limits for compliance with 401 KAR 63:020.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Units #001, 002 & 003 (EP 03) Paint Manufacturing				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
VOC	Source wide 90 tpy	To Preclude 401 KAR 52:020	SDS & AP-42 Ch 6.4.1	Recordkeeping, 12 month rolling total
HAPs	Source wide 9 tpy individual, (except Cobalt, Diethylene Glycol Monobutyl Ether and Ethyl Benzene), and 22.5 tpy combined	To preclude 401 KAR 52:020	SDS & AP-42 Ch 6.4.1	Recordkeeping, 12 month rolling total
PM	$E = 3.59(P)^{0.62}$	401 KAR 59:010, Section 3(2)	SDS & AP-42 Ch 6.4.1	Dust collector, 90% C.E.
	< 20% opacity	401 KAR 59:010, Section 3(1)	N/A	Weekly Visual Observation
Cobalt	Source wide 8.08E-04 tpy	401 KAR 63:020	SDS & AP-42 Ch 6.4.1	Dust collector, 90 % C.E., Manufacturer's guarantee
Diethylene Glycol Monobutyl Ether	Source wide 0.262 tpy	401 KAR 63:020	SDS & AP-42 Ch 6.4.1	Recordkeeping, 12 month rolling total
Ethyl Benzene	Source wide 2.88 tpy	401 KAR 63:020	SDS & AP-42 Ch 6.4.1	Recordkeeping, 12 month rolling total
Initial Construction Date: 02/1986 Process Description: The manufacture of paint involves the dispersion of a colored oil or pigment in a vehicle. All three paints are mixed in 1,500 gallon tanks. Each paint is mixed with a high-speed disperser, a cylinder with a paddle on the bottom. Fencecoat Black undergoes an addition step in an enclosed 30 gallon milling tank that uses metal pellets to break up any clumps of carbon black which were added in the mixing tank.				
Emission Unit 001 Fencecoat Black Paint Manufacturing Two 1,500 gallon mixing tanks; One 30 gallon milling tank				

Emission Units #001, 002 & 003 (EP 03) Paint Manufacturing

Emission Unit 002 Oil Based Paint Manufacturing

One 1,500 gallon mixing tank

Emission Unit 003 (KYEIS: EP 03) Latex Paint Manufacturing

Three 1,500 gallon mixing tanks

Applicable Regulation:

401 KAR 59:010. New process operations. Applicable to each affected facility associated with a process operation, which is not subject to another emission standard with respect to particulates in this chapter, commenced on or after July 2, 1975.

401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

Non-applicable Regulation:

401 KAR 63:002, Section 2(4) (aaaaaa) 40 C.F.R. 63.11599 through 63.11607, Table 1 (Subpart CCCCCC), National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing, does not apply because the source does not process, use or generate materials that contain amounts that equal or exceed 0.1% by weight of the following substances: benzene, methylene chloride or compounds of cadmium, chromium, lead or nickel.

PRECLUDED REGULATIONS:

To avoid major source status and preclude applicability of the following regulations, LP&S has voluntarily accepted source wide limits on volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions:

401 KAR 51:017. Prevention of Significant Deterioration of Air Quality

401 KAR 52:020. Title V permits.

401 KAR 63:002, Section 2(4) (kkk) 40 C.F.R. 63.2330 through 63.2406, Tables 1 through 12 (Subpart EEEE), National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).

401 KAR 63:002, Section 2(4) (lll) 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.

401 KAR 63:002, Section 2(4) (mmmm) 40 C.F.R. 63.7980 through 63.8105, Tables 1 through 10 (Subpart HHHHH), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.

Comments:

401 KAR 59:050, *New Storage Vessels for Petroleum Liquids*, is not applicable to the storage tanks at this source since the stored materials are not a petroleum liquid, pursuant to 401 KAR 59:050 Section 2 (Definitions).

401 KAR 60:005, Sections 2(2)(r) 40 C.F.R. 60.110b through 60.117b (Subpart Kb), Standards of

Emission Units #001, 002 & 003 (EP 03) Paint Manufacturing

Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), does not apply.

This regulation applies to tanks with a capacity greater than or equal to 75 m³ but less than 150 m³, with a maximum true vapor pressure less than 15.0 kPa. One tank at this facility, tank C, has a capacity within this range, but the vapor pressure is 0.896 kPa; therefore, this regulation does not apply. The capacities of the remaining tanks are less than the minimum that is required for applicability of this regulation.

According to AP-42, Section 6.4, “The manufacture of paint involves the dispersion of a colored oil or pigment in a vehicle...Only the physical processes of weighing, mixing, grinding, tinting, thinning, and packaging take place.” Consequently, LP&S has various storage tanks, mixing vessels, and milling equipment that are all the regulated emission units for this facility.

The particulate and solvent potential emissions calculations are based on materials safety data sheets (SDS) and the Emission Factors from Section 6.4.1 of AP-42. The AP-42 estimates that at most 2% of solvent is emitted, while particulate emissions at most amount to 1.0% of pigments in the paint.

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 Operating Parameter Established During 7
N/A								

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 and to preclude 401 KAR 52:020 and 401 KAR 51:017	Source-wide
9.0 tpy of individual HAP emissions except Cobalt, Diethylene Glycol Monobutyl Ether & Ethyl Benzene	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
8.08E-04 tpy, of Cobalt	401 KAR 63:020, Potentially hazardous matter or toxic substances	Source-wide
0.262 tpy Diethylene Glycol Monobutyl Ether	401 KAR 63:020, Potentially hazardous matter or toxic substances	Source-wide
2.88 tpy Ethyl Benzene	401 KAR 63:020, Potentially hazardous matter or toxic substances	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:010, New process operations.	001, 002 & 003(EP 03)
401 KAR 63:020, Potentially hazardous matter or toxic substances	001, 002 & 003(EP 03)

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 51:017. Prevention of Significant Deterioration of Air Quality.	Source-wide
401 KAR 52:020. Title V permits	Source-wide
401 KAR 63:002, Section 2(4) (kkk) 40 C.F.R. 63.2330 through 63.2406, Tables 1 through 12 (Subpart EEEE), National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).	Source-wide
401 KAR 63:002, Section 2(4) (lll) 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.	Source-wide
401 KAR 63:002, Section 2(4) (mmmm) 40 C.F.R. 63.7980 through 63.8105, Tables 1 through 10 (Subpart HHHHH), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.	Source-wide

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Table D - Summary of Non-Applicable Regulations:

Non-Applicable Regulations	Emission Unit
401 KAR 63:002, Section 2(4) (aaaaaa) 40 C.F.R. 63.11599 through 63.11607, Table 1 (Subpart CCCCCC), National Emission Standards for Hazardous Air Pollutants for Area Sources.	Source-wide

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*

The Division for Air Quality (Division) has performed dispersion modeling using SCREEN View on May 4, 2026, of potentially hazardous matter or toxic substances (Cobalt, Diethylene Glycol Monobutyl Ether, Ethyl Benzene, Cumene, Methyl Isobutyl Ketone, Toluene and Xylenes that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant.

Additional refined model AERMOD was performed on May 8, 2026, on (Cobalt, Diethylene Glycol Monobutyl Ether and 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-05-008	Cond Mjr-Renewal	APE20020001	3/15/2005	10/20/2006	Permit Renewal	N/A
F-11-027	Renewal	APE20110001	4/25/2011	8/25/2011	Operating Permit Renewal	N/A
F-16-028	Synthetic Minor-Renewal	APE20160001	12/8/2007	8/26/2016	Renewal Operating Permit	Synthetic Minor
F-21-028	Renewal	APE20210001	4/16/2021	9/19/2021	Renewal Permit	N/A

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