

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

Conditional Major, Operating  
PERMIT ID: F-23-038  
R & S Godwin Truck Body, LLC  
5168 US Highway 23 South, Ivel, KY 41642  
August 24, 2023  
Nathan Cox, Reviewer

Source ID: 21-071-00157  
Agency Interest #: 38060  
Activity ID: APE20230001

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## SECTION 1 - SOURCE DESCRIPTION

SIC Code and description: 3713, Truck and Bus Bodies.

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: Floyd

Nonattainment Area  N/A  PM<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  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<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  VOC

PTE\* greater than 250 tpy for any criteria air pollutant  Yes  No  
If yes, for what pollutant(s)?  
 PM<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  VOC

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

PTE\* greater than 25 tpy for combined HAP  Yes  No

\*PTE does not include self-imposed emission limitations.

### Description of Facility:

R&S Godwin Truck Body Company, LLC manufactures steel and aluminum truck bodies used in coal, blacktop, and construction industries. The main sources of potential emissions are three (3) spray booths. The facility also has welding machines, plasma cutters, and an abrasive blasting machine. Potential emissions of Volatile Organic Compounds (VOC) is above major source thresholds; however the source has accepted Federally-enforceable limits to be classified as a non-major source.

**SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM**

Permit Number: F-23-038

Activity: APE20230001

Application Received: 6/14/2023

Application Complete: 8/17/2023

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:**

The facility has requested a renewal of its conditional major operating permit. The facility changed the formulation of their undercoating from a solvent-based coating to a powder coating. This lowered their potential to emit (PTE) of VOC and HAP emissions. Their combined HAP PTE is below the 25 tpy threshold requiring a limit, but the existing 12.5 tpy limit was left in the permit to provide operational flexibility for the source in case of future changes.

F-23-038 Emission Summary				
Pollutant	2022 Actual (tpy)	Previous PTE F-18-021 (tpy)	Change (tpy)	Revised PTE F-23-038 (tpy)
CO	0	0	0	0
NO <sub>x</sub>	0	0	0	0
PT	0.68	7.07	11.56	18.63
PM <sub>10</sub>	0.68	7.07	11.56	18.63
PM <sub>2.5</sub>	0.01	5.51	12.69	18.20
SO <sub>2</sub>	0	0	0	0
VOC	1.28	215.39	-74.95	140.44*
Lead	0	0	0	0
Greenhouse Gases (GHGs)				
Carbon Dioxide	0	0	0	0
Methane	0	0	0	0
Nitrous Oxide	0	0	0	0
CO <sub>2</sub> Equivalent (CO <sub>2</sub> e)	0	0	0	0
Hazardous Air Pollutants (HAPs)				
Cumene	0.002	0.55	0	0.055
Ethyl Benzene	0	2.43	-2.43	0
Methyl Ethyl Ketone	0.10	3.69	0	3.69
Toluene	0.0008	0.09	0	0.09
Xylenes (Total)	0.01	3.59	-2.44	1.15
Combined HAPs:	0.61	9.86	-4.86	5.00

\*Note: Emissions limited by federally-enforceable emission limitations to ensure the source remains below major source thresholds.

**SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS**

<b>EP 01 (Spray Booth 1&amp;2), EP 02 (SprayBooth #3)</b>				
<b>Pollutant</b>	<b>Emission Limit or Standard</b>	<b>Regulatory Basis for Emission Limit or Standard</b>	<b>Emission Factor Used and Basis</b>	<b>Compliance Method</b>
VOC	Source wide 50 tpy	To preclude 401 KAR 52:020	Material Balance & MSDS	Monitoring, recordkeeping and reporting
PM	2.34 lbs/hr	401 KAR 59:010, Section 3(2)	Material Balance & MSDS	Filters, 90% C.E., Manufacturer's guarantee
PM	20 percent opacity	401 KAR 59:010, Section 3(1)	N/A	Weekly monitoring and recordkeeping requirements
Single HAP	Source wide 5 tpy	To preclude 401 KAR 52:020	Material Balance & MSDS	Recordkeeping and reporting requirements
Combined HAPs	Source wide 12.5 tpy	To preclude 401 KAR 52:020	Material Balance & MSDS	Recordkeeping and reporting requirements

**Initial Construction Date :** 1/1998

**Process Description:**

Spray booths using air less spray guns with transfer efficiency estimated to be 45%.  
 Controls: Filter with control efficiency of 90%.

**Applicable Regulation:**

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

401 KAR 63:020, *Potentially hazardous matter or toxic substances* is applicable to because the facility may emit potentially hazardous matter or toxic substances which may be harmful to the health and welfare of humans, animals, and plants.

**Comments:**

Emission factors for the painting operation are derived from taking the worst case VOC and individual HAP content of multiple coatings. The following are the worst case scenario emission factors for each pollutant:

<b>EP 01 (Spray Booth 1&amp;2) MP 1: Undercoating</b>	
PM/PM10/PM2.5	5.555 lb/gal
VOC	0 lb/gal
Carbon Black	0.27775 lb/gal
<b>EP 01 (Spray Booth 1&amp;2) MP 2: Top Coat</b>	
PM/PM10/PM2.5	2.868 lb/gal
VOC	4.953 lb/gal
Methyl Ethyl Ketone	0.0719 lb/gal
Toluene	0.014 lb/gal

**EP 01 (Spray Booth 1&2), EP 02 (SprayBooth #3)**

Xylenes	0.1709 lb/gal
<b>EP 01 (Spray Booth 1&amp;2) MP 3: Reducer</b>	
VOC	7.55 lb/gal
Cumene	0.01294 lb/gal
Ethyl Acetate	3.775 lb/gal
Methyl Ethyl Ketone	0.755 lb/gal
<b>EP 02 (Spray Booth #3) MP 1: Undercoating</b>	
PM/PM10/PM2.5	5.555 lb/gal
VOC	0 lb/gal
Carbon Black	0.27775 lb/gal

401 KAR 63:002, Section 2(4)(rrr), 40 C.F.R. 63.3880 to 63.3981, Subpart MMMM - National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products is not applicable because the source is not part of a major source of emissions of HAP.

401 KAR 63:002, Section 2(4)(iiii), 40 C.F.R. 63.11169 to 63.11180, Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The spray coatings in use do not contain compounds of chromium (Cr), lead (Pb), manganese (Mn) and nickel (Ni), collectively referred to as the target HAP in such quantities as to be subject to this regulation.

**Insignificant Activities: Welding, Abrasive Blasting and Plasma Cutters**

**Initial Construction Date:** 1/1998 (Welders), 1/2007 (Abrasive Blaster), 1/2007 (Plasma Cutters)

**Process Description:**

1. Seventy three (73) welders using 0.035 Steel Wire at 14.4 lbs/hr and 3-64 Aluminum Wire at 4.64 lbs/hr
2. Wheelabrator Abrasive Blasting using Steel Shot at 57.7 lbs/hr
3. Two (2) Plasma Cutters #1 and #2

**Applicable Regulation:**

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

401 KAR 63:020, *Potentially hazardous matter or toxic substances* is applicable to because the facility may emit potentially hazardous matter or toxic substances which may be harmful to the health and welfare of humans, animals, and plants.

**Comments:**

401 KAR 63:002, Section 2(4)(vvvvv), 40 C.F.R. 63.11514 to 63.11523 Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories is not applicable because the SIC code for this company is not included in

**Insignificant Activities: Welding, Abrasive Blasting and Plasma Cutters**

the list of source categories subject to this regulation.

**SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)**

**Testing Requirements/Results**

N/A

**SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS**

**Table A - Group Requirements:**

<b>Emission and Operating Limit</b>	<b>Regulation</b>	<b>Emission Unit</b>
50 tpy of VOC emissions	401 KAR 52:030, <i>Federally-enforceable permits for nonmajor sources</i>	Source-wide
5.0 tpy of individual HAP emissions	To preclude major source status for HAP	Source-wide
12.5 tpy of combined HAP emissions	To preclude major source status for HAP	Source-wide

**Table B - Summary of Applicable Regulations:**

<b>Applicable Regulations</b>	<b>Emission Unit</b>
401 KAR 63:020, <i>Potentially hazardous matter or toxic substances.</i>	EU 01, EU 02
401 KAR 59:010, <i>New process operations</i>	EU 01, EU 02

**Table C - Summary of Precluded Regulations:**

<b>Precluded Regulations</b>	<b>Emission Unit</b>
401 KAR 52:020, <i>Title V Permits</i>	

**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 April 1, 2024 of potentially hazardous matter or toxic substances (Carbon Black, Chromium, Cobalt, Cumene, Ethyl Acetate, Ethyl Benzene, Manganese, Methyl Ethyl Ketone, Nickel, 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. 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.

**Single Source Determination**

N/A

**SECTION 5 - PERMITTING HISTORY**

<b>Permit</b>	<b>Permit Type</b>	<b>Activity#</b>	<b>Complete Date</b>	<b>Issuance Date</b>	<b>Summary of Action</b>	<b>PSD/Syn Minor</b>
F-06-041	Initial	APE20040001	12/4/2004	10/19/2006	Initial Construction / Operation Permit	N/A
F-12-030	Renewal	APE20120001	5/17/2012	1/11/2013	Renewal	N/A
F-18-021	Renewal	APE20180001	6/27/2018	11/18/2018	Renewal	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 <sub>x</sub>	– Nitrogen Oxides
NSR	– New Source Review
PM	– Particulate Matter
PM <sub>10</sub>	– Particulate Matter equal to or smaller than 10 micrometers
PM <sub>2.5</sub>	– Particulate Matter equal to or smaller than 2.5 micrometers
PSD	– Prevention of Significant Deterioration
PTE	– Potential to Emit
SO <sub>2</sub>	– Sulfur Dioxide
TF	– Total Fluoride (Particulate & Gaseous)
VOC	– Volatile Organic Compounds