JENKINS
ENVIRONMENTAL, INC.

February 11, 2016

Ms. Beverly D. McKeone, P.E.
NSR Program Manager
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: **Rust-Oleum Corporation – Plant ID 011-00045/Lesage Facility**
Class I Administrative Update - Permit No. R13-1512H

Dear Ms. McKeone:

Jenkins Environmental, Inc. on behalf of the Rust-Oleum Corporation is requesting an Administrative Update for the referenced Air Quality Permit. The permit update request is a result of several recent process changes. These changes are specified below for the Department's review and approval:

- Tank TK-12 (Methylene Chloride) has been emptied and taken out of service. TK-10 is now the designated tank being used to store Methylene Chloride. There is no change to tank size, emission factors or process.

  Permit Update Request: *Modify §4.1.2 - remove reference to TK-12 and replace with TK-10; Modify Table 4.1.1 - remove reference to TK-12 and replace with TK-10*

- Tank TK-20 (5000 gallons) will be used to store Xylene, in addition to Tank TK-29. The additional storage capacity provided by TK-20 is needed to process an anticipated 10,000 gallon increase Xylene throughput. The total annual Xylene throughput resulting from this change will equal approximately 20,000 gallons, which is significantly below the threshold limit of 150,000 gallons per year (§4.1 Limitations and Standards/Table 4.1.1). The proposed change in emissions will not exceed the current permit limitations.

  Permit Update Request: *Modify Table 4.1.1 -to include TK-12.*

8600 La Salle Road • York Building, Suite 509 • Towson, Maryland 21286
410.828.9888 (Phone) • 410.828.9899 (Fax) • 1.888.473.8200 (Toll-Free)

In addition to the Class I Administrative Updates described above the Rust-Oleum Corporation is providing the Department with informational notice that one (1) new 1000 gallon mixing tank (TD-46) and one (1) 5-gallon pail filing line were installed in 2015 to process OK 811 water-based paint that does not contain any hazardous ingredients or regulated air pollutants (See Attachment D).

We look forward to a favorable review and approval of this Class I Administrative Update. If you need any additional information please contact me at 410-935-7113.

Sincerely,

JENKINS ENVIRONMENTAL, INC.

Michael J. Cirri
President

Cc: Michael J. Newell

WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

PERMIT DETERMINATION FORM (PDF)

FOR AGENCY USE ONLY: PLANT I.D. # _____

PDF # _____ PERMIT WRITER: _____

1. NAME OF APPLICANT (AS REGISTERED WITH THE WV SECRETARY OF STATE'S OFFICE):
Rust-Oleum Corporation

2. NAME OF FACILITY (IF DIFFERENT FROM ABOVE):
SAME

3. NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (**NAICS**) CODE:
325510

4A. MAILING ADDRESS:
7850 Ohio River Road
Lesage, WV 25537

4B. PHYSICAL ADDRESS
SAME AS MAILING ADDRESS:

5A. DIRECTIONS TO FACILITY (PLEASE PROVIDE **MAP** AS **ATTACHMENT A**)
SEE ATTACHMENT A

5B. NEAREST ROAD:
Ohio River Rd

5C. NEAREST CITY OR TOWN:
Lesage

5D. COUNTY:
Cabell

5E. UTM NORTHING (KM):
4,268.4

5F. UTM EASTING (KM):
388.1

5G. UTM ZONE:
17

6A. INDIVIDUAL TO CONTACT IF MORE INFORMATION IS REQUIRED:
Michael J. Newell

6B. TITLE:
EHS Manager

6C. TELEPHONE:
304-762-1421

6D. FAX:
304-762-2542

6E. E-MAIL:
MNewell@rustoleum.com

7A. DAQ PLANT I.D. NO. (FOR AN EXISTING FACILITY ONLY):
011 - 00045

7B. PLEASE LIST ALL CURRENT 45CSR13, 45CSR14, 45CSR19 AND/OR TITLE V (45CSR30) PERMIT NUMBERS ASSOCIATED WITH **THIS** PROCESS (FOR AN EXISTING FACILITY ONLY):
R13-1512H

7C. IS THIS PDF BEING SUBMITTED AS THE RESULT OF AN ENFORCEMENT ACTION? IF YES, PLEASE LIST:
NO

8A. TYPE OF EMISSION SOURCE (CHECK ONE):
☐ **NEW SOURCE** ☒ **ADMINISTRATIVE UPDATE**
☐ **MODIFICATION** ☐ **OTHER** (PLEASE EXPLAIN IN 11B)

8B. IF ADMINISTRATIVE UPDATE, DOES DAQ HAVE THE APPLICANT'S CONSENT TO UPDATE THE EXISTING PERMIT WITH THE INFORMATION CONTAINED HEREIN?
☒ **YES** ☐ **NO**

9. IS *DEMOLITION* OR PHYSICAL *RENOVATION* AT AN EXISTING FACILITY INVOLVED? ☐ **YES** ☐ **NO**

10A. DATE OF ANTICIPATED INSTALLATION OR CHANGE:
2/4/2016

10B. DATE OF ANTICIPATED START-UP:
2/4/2016

11A. PLEASE PROVIDE A **DETAILED PROCESS FLOW DIAGRAM** SHOWING EACH PROPOSED OR MODIFIED PROCESS EMISSION POINT AS **ATTACHMENT B.** **On File at DAQ (Permit No. R13-1512H)**

11B. PLEASE PROVIDE A **DETAILED PROCESS DESCRIPTION** AS **ATTACHMENT C.** **On File at DAQ (Permit No. R13-1512H)**

12. PLEASE PROVIDE **MATERIAL SAFETY DATA SHEETS (MSDS)** FOR ALL MATERIALS PROCESSED, USED OR PRODUCED AS **ATTACHMENT D.** FOR CHEMICAL PROCESSE, PLEASE PROVIDE A MSDS FOR EACH COMPOUND EMITTED TO AIR.

13A. **REGULATED AIR POLLUTANT EMISSIONS:**

⇒ **FOR A NEW FACILITY,** PLEASE PROVIDE PLANT WIDE EMISSIONS BASED ON THE POTENTIAL TO EMIT (PTE) FOR THE FOLLOWING AIR POLLUTANTS INCLUDING ALL PROCESSES.

⇒ **FOR AN EXISTING FACILITY,** PLEASE PROVIDE THE PROPOSED CHANGE IN EMISSIONS BASED ON THE PTE OF ALL PROCESS CHANGES FOR THE FOLLOWING AIR POLLUTANTS.

PTE FOR A GIVEN POLLUTANT IS TYPICALLY BEFORE AIR POLLUTION CONTROL DEVICES AND IS COLLECTED BASED ON THE MAXIMUM DESIGN CAPACITY OF PROCESS EQUIPMENT.

POLLUTANT	HOURLY PTE (LB/HR)	YEARLY PTE (TON/YR) (HOURLY PTE MULTIPLIED BY 8760 HR/YR) DIVIDED BY 2000 LB/TON
PM		
PM_{10}		
VOCs	.006	5.2
CO		
NO_x		
SO_2		
Pb		
HAPs (AGGREGATE AMOUNT)		
TAPs (INDIVIDUALLY)*		
OTHER (INDIVIDUALLY)*		

* ATTACH ADDITIONAL PAGES AS NEEDED

13B. PLEASE PROVIDE ALL **SUPPORTING CALCULATIONS AS ATTACHMENT E.**

CALCULATE AN HOURLY AND YEARLY PTE OF EACH PROCESS EMISSION POINT (SHOWN IN YOUR DETAILED PROCESS FLOW DIAGRAM) FOR ALL AIR POLLUTANTS LISTED ABOVE INCLUDING INDIVIDUAL HAP'S (LISTED IN SECTION 112[b] OF THE 1990 CAAA), TAP'S (LISTED IN 45CSR27), AND OTHER AIR POLLUTANTS (E.G. POLLUTANTS LISTED IN TABLE 45-13A OF 45CSR13, MINERAL ACIDS PER 45CSR7, ETC.).

14. **CERTIFICATION OF DATA**

I, KEVIN WILLIAMS (*TYPE NAME*) ATTEST THAT ALL THE REPRESENTATIONS CONTAINED IN THIS APPLICATION, OR APPENDED HERETO, ARE TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE BASED ON INFORMATION AND BELIEF AFTER REASONABLE INQUIRY, AND THAT I AM A ***RESPONSIBLE OFFICIAL******** (*PRESIDENT, VICE PRESIDENT, SECRETARY OR TREASURER, GENERAL PARTNER OR SOLE PROPRIETOR*) OF THE APPLICANT.

SIGNATURE OF RESPONSIBLE OFFICIAL: Kevin Williams

TITLE: **VICE PRESIDENT OF OPERATIONS** DATE: 2 / 15 / 2016

***** THE DEFINITION OF THE PHRASE '***RESPONSIBLE OFFICIAL***' CAN BE FOUND AT 45CSR13, SECTION 2.23.

NOTE: PLEASE CHECK ENCLOSED ATTACHMENTS:

☒ **ATTACHMENT A** ☐ **ATTACHMENT B** ☐ **ATTACHMENT C** ☒ **ATTACHMENT D** ☒ **ATTACHMENT E**

RECORDS ON ALL CHANGES ARE REQUIRED TO BE KEPT AND MAINTAINED ON-SITE FOR TWO (2) YEARS.

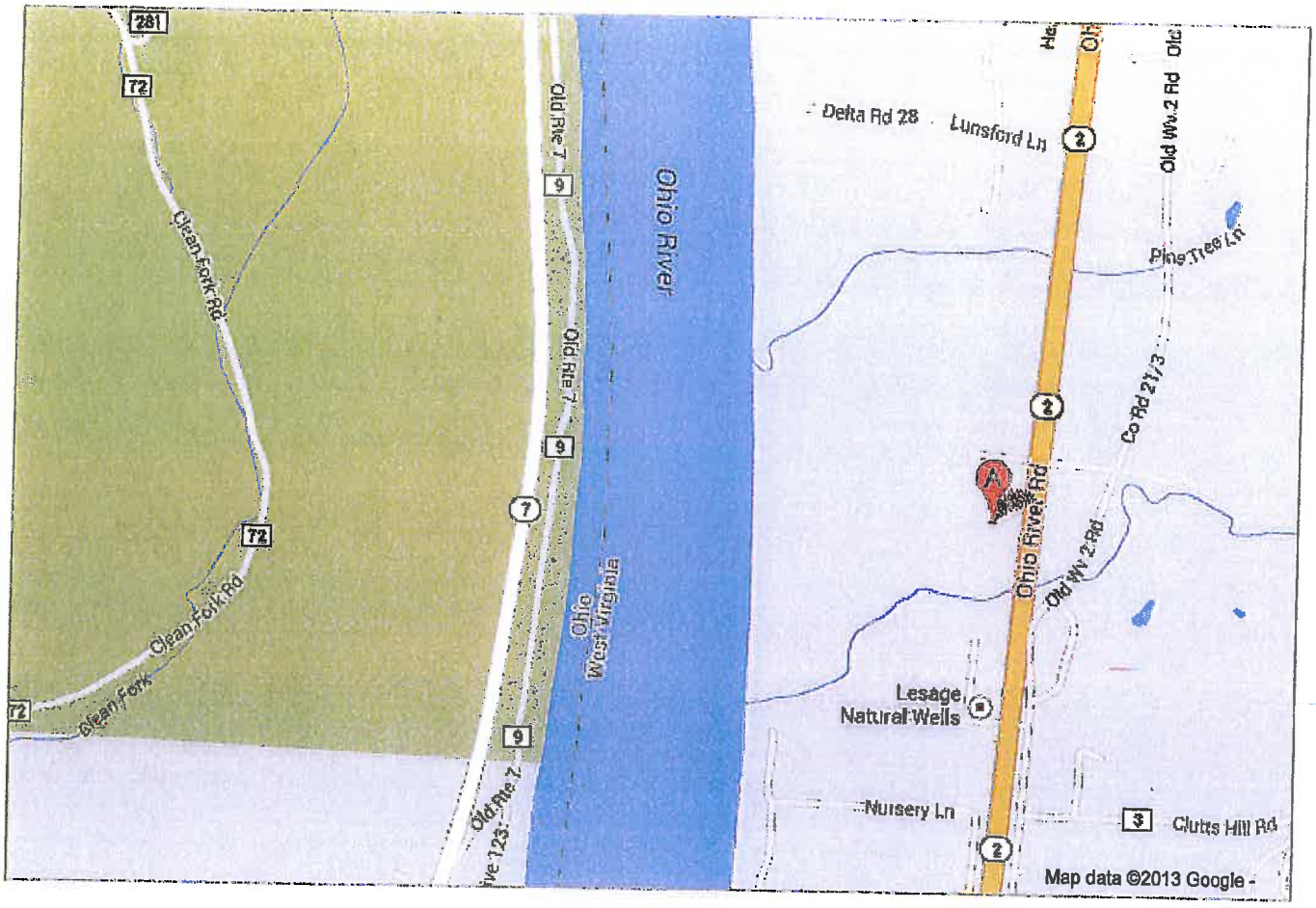
THE PERMIT DETERMINATION FORM WITH THE INSTRUCTIONS CAN BE FOUND ON DAQ'S PERMITTING SECTION WEB SITE:

www.dep.wv.gov/daq

Attachment A
Street Map

Google

To see all the details that are visible on the screen, use the "Print" link next to the map.



To see all the details that are visible on the screen, use the "Print" link next to the map.

Attachment D
Material Safety Data Sheet

Material Safety Data Sheet

24 Hour Assistance:
1-847-367-7700
Rust-Oleum Corp.
www.rustoleum.com

Section 1 - Chemical Product / Company Information

Product Name:	OKON 1-GL 6 PK PAINTBOOSTER	Revision Date:	05/02/2011
Identification Number:	OK811		
Product Use/Class:	Topcoat/ Waterbased		
Supplier:	Rust-Oleum Corporation 11 Hawthorn Parkway Vernon Hills, IL 60061 USA	Manufacturer:	Rust-Oleum Corporation 11 Hawthorn Parkway Vernon Hills, IL 60061 USA
Preparer:	Regulatory Department		

Section 2 - Composition / Information On Ingredients

None

Section 3 - Hazards Identification

*** Emergency Overview ***: Use ventilation necessary to keep exposures below recommended exposure limits, if any.

Effects Of Overexposure - Eye Contact: Causes eye irritation.

Effects Of Overexposure - Skin Contact: Substance may cause slight skin irritation.

Effects Of Overexposure - Inhalation: Low hazard for usual industrial handling or commercial handling by trained personnel.

Effects Of Overexposure - Ingestion: Substance may be harmful if swallowed.

Effects Of Overexposure - Chronic Hazards: No Information.

Primary Route(s) Of Entry: Skin Contact, Skin Absorption, Inhalation, Ingestion, Eye Contact

Section 4 - First Aid Measures

First Aid - Eye Contact: Immediately flush eyes with plenty of water for at least 15 minutes holding eyelids open. Get medical attention. Do NOT allow rubbing of eyes or keeping eyes closed.

First Aid - Skin Contact: Wash with soap and water. Get medical attention if irritation develops or persists.

First Aid - Inhalation: Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get immediate medical attention. Do NOT use mouth-to-mouth resuscitation.

First Aid - Ingestion: Swallowing less than an ounce will not cause significant harm. For larger amounts, do not induce vomiting, but give one or two glasses of water to drink and get medical attention.

Section 5 - Fire Fighting Measures

Flash Point: 212 F (Setaflash)

Extinguishing Media: Film Forming Foam, Carbon Dioxide, Dry Chemical, Water Fog

Unusual Fire And Explosion Hazards: FLASH POINT IS TESTED TO BE GREATER THAN 200 DEGREES F.

Special Firefighting Procedures: Water may be used to cool closed containers to prevent buildup of steam.

Section 6 - Accidental Release Measures

Steps To Be Taken If Material Is Released Or Spilled: Dispose of according to local, state (provincial) and federal regulations. Do not incinerate closed containers.

Section 7 - Handling And Storage

Handling: Avoid contact with eyes. Wash thoroughly after handling. Wash hands before eating.

Storage: Keep container closed when not in use. Keep from freezing.

Section 8 - Exposure Controls / Personal Protection

Engineering Controls: Prevent build-up of vapors by opening all doors and windows to achieve cross-ventilation. Use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below recommended exposure limits.

Respiratory Protection: A respiratory protection program that meets OSHA 1910.134 and ANSI Z88.2 requirements must be followed whenever workplace conditions warrant a respirator's use.

Skin Protection: Nitrile or Neoprene gloves may afford adequate skin protection. Use gloves to prevent prolonged skin contact.

Eye Protection: Use safety eyewear designed to protect against splash of liquids.

Other protective equipment: Refer to safety supervisor or industrial hygienist for further information regarding personal protective equipment and its application.

Hygienic Practices: Wash thoroughly with soap and water before eating, drinking or smoking.

Section 9 - Physical And Chemical Properties

Vapor Density:	Heavier than Air	Odor:	Mild Ammonia

Appearance:	Liquid	Evaporation Rate:	Slower than Ether
Solubility in H2O:	Slight	Freeze Point:	N.D.
Specific Gravity:	1.017	pH:	N.A.
Physical State:	Liquid		

(See section 16 for abbreviation legend)

Section 10 - Stability And Reactivity

Conditions To Avoid: Avoid contact with strong acid and strong bases.

Incompatibility: Incompatible with strong oxidizing agents, strong acids and strong alkalies.

Hazardous Decomposition: By open flame, carbon monoxide and carbon dioxide. When heated to decomposition, it emits acrid smoke and irritating fumes.

Hazardous Polymerization: Will not occur under normal conditions.

Stability: This product is stable under normal storage conditions.

Section 11 - Toxicological Information

Section 12 - Ecological Information

Ecological Information: Product is a mixture of listed components.

Section 13 - Disposal Information

Disposal Information: Dispose of material in accordance to local, state and federal regulations and ordinances. Do not allow to enter storm drains or sewer systems.

Section 14 - Transportation Information

	Domestic (USDOT)	International (IMDG)	Air (IATA)
Proper Shipping Name:	Not Regulated	Not Regulated	Not Regulated
Hazard Class:	N.A.	N.A.	N.A.
UN Number:	N.A.	N.A.	N.A.
Packing Group:	N.A.	N.A.	N.A.
Limited Quantity:	No	No	No

Section 15 - Regulatory Information

CERCLA - SARA Hazard Category

This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

CHRONIC HEALTH HAZARD

SARA Section 313:

Listed below are the substances (if any) contained in this product that are subject to the reporting requirements of Section 313 of Title III of the Superfund Amendment and Reauthorization Act of 1986 and 40 CFR part 372:

Toxic Substances Control Act:

Listed below are the substances (if any) contained in this product that are subject to the reporting requirements of TSCA 12(B) if exported from the United States:

U.S. State Regulations: As follows -

New Jersey Right-to-Know:

The following materials are non-hazardous, but are among the top five components in this product.

Chemical Name	CAS Number
Water	7732-18-5
Acrylic Polymer	25133-98-6
Hydrogenated Glycerides	68424-59-9
Paraffin Wax	8002-74-2
Ester Plasticizer	PROPRIETARY

Pennsylvania Right-to-Know:

The following non-hazardous ingredients are present in the product at greater than 3%.

Chemical Name	CAS Number
Water	7732-18-5
Acrylic Polymer	25133-98-6

International Regulations: As follows -

CANADIAN WHMIS:

This MSDS has been prepared in compliance with Controlled Product Regulations except for the use of the 16 headings.

CANADIAN WHMIS CLASS: D2B

Section 16 - Other Information

HMIS Ratings:

Health: 2 Flammability: 1 Reactivity: 0 Personal Protection: X

NFPA Ratings:

Health: 2 Flammability: 1 Instability: 0

VOLATILE ORGANIC COMPOUNDS, g/L: 44

REASON FOR REVISION: Regulatory Update

Legend: N.A. - Not Applicable, N.E. - Not Established, N.D. - Not Determined

Rust-Oleum Corporation believes, to the best of its knowledge, information and belief, the information contained herein to be accurate and reliable as of the date of this material safety data sheet. However, because the conditions of handling, use, and storage of these materials are beyond our control, we assume no responsibility or liability for personal injury or property damage incurred by the use of these materials. Rust-Oleum Corporation makes no warranty, expressed or implied, regarding the accuracy or reliability of the data or results obtained from their use. All materials may present unknown hazards and should be used with caution. The information and recommendations in this material safety data sheet are offered for the users' consideration and examination. It is the responsibility of the user to determine the final suitability of this information and to comply with all applicable international, federal, state, and local laws and regulations.

Attachment E
Emissions Calculations

13 A REGULATED AIR POLLUTANT EMISSIONS:

- Tank TK-20 (5000 gals) will be used in order to satisfy additional Xylene storage requirements (10,000 gallons/year) requested in this Class I Administrative Update.

- Xylene emissions associated with the additional 10,000 gallon throughput were calculated using a modified version of Rust-Oleum Corporation's monthly Air Emissions Summary Spreadsheet. (See Attachment E)

ATTACHMENT E - Estimated Annual Xylene Emissions Increase

		Useage	Useage	VOC	Molecular	Vapor	Bulk Storage Tank Emissions	Blend Tank Emissions	Mixing Emissions	Packing & Filling Emissions	Total Emissions
	lb/gal	gallons	lbs	Chemical	Weight	Pressure psi	lb/yr	lb/yr	lb/yr	lb/yr	lb/yr
Methylene Chloride	11.07			Same	**85**	**6.860**		0.00	0.00	0.00	**0.0**
Methanol	6.61			Same	**32**	**1.312**		0.00	0.00	0.00	**0.0**
Toluene	7.24			Same	**92**	**0.300**		0.00	0.00	0.00	**0.0**
Xylene	7.25	10,000	72,500	Same	**106**	**0.063**	0.39	1.59	1.59	1.59	**5.2**
Glycol Ether DPM	8.22			Same	**148**	**0.008**		0.00	0.00	0.00	**0.0**
Mineral Spirits	6.47			Same	**140**	**0.086**		0.00	0.00	0.00	**0.0**
Denatured Alcohol MF	6.59			Ethanol	**46**	**0.594**		0.00	0.00	0.00	**0.0**
Beckosol 1272	7.65			Min Spirits	**140**	**0.086**		0.00	0.00	0.00	**0.0**
Poly 75% Resin	7.63			Min Spirits	**140**	**0.086**		0.00	0.00	0.00	**0.0**
Poly 55% Resin	7.57			Min Spirits	**140**	**0.086**		0.00	0.00	0.00	**0.0**
Acetone	6.58			Same	**58**	**3.860**		0.00	0.00	0.00	**0.0**
Poly 60% Resin	7.44			Min Spirits	**140**	**0.086**		0.00	0.00	0.00	**0.0**
Denatured Alcohol 190	6.80			Ethanol	**46**	**0.594**		0.00	0.00	0.00	**0.0**
Hi Sol 10	7.26			Min Spirits	**120**	**0.121**		0.00	0.00	0.00	**0.0**
Methyl Ethyl Ketone	6.27			Same	**72**	**0.997**		0.00	0.00	0.00	**0.0**
VM&P Naptha	6.29			Same	**140**	**0.086**		0.00	0.00	0.00	**0.0**
Hydrocal	7.48			Same	**140**	**0.001**		0.00	0.00	0.00	**0.0**
AMSCO 142	6.59			Same	**140**	**0.086**		0.00	0.00	0.00	**0.0**
Oxsol 100	11.20			Same	**181**	**0.100**		0.00	0.00	0.00	**0.0**
Neocryl A-633	8.60			DPM	**148**	**0.005**		0.00	0.00	0.00	**0.0**
NeoREZ R-9637	9.51			DPM	**99**	**0.330**		0.00	0.00	0.00	**0.0**
RayCryl 61	8.92			Same	**148**	**0.008**		0.00	0.00	0.00	**0.0**
TOTAL											**5.2**

Vapor Displacement **F=0.001*Mw*Pv*Q*Kn**
M(w) = Molecular Weight Q= Throughput bbl/mo (gal/42)
P(v) = Vapor Pressure (psia) K(n) = Turnover Factor

Methylene Chloride	bbl/mo	**VOC (lb)**
F=(001*85*6.86)*D41	0.0	**0**

Inside Vapor Pressure 6.86
Outside Vapor Pressure 5.24

Blend Tank
Methylene Chloride 0.0
F=(001*85*6.86)*D26
Use 70% vapor balanced
Uncontrol
0

Mixing Emissions
60 Min of 300 Min batch Lid Open Max
0.80 x 90% = 72% efficiency used
0

Packaging Emissions
F=(001*85*6.86)*D26
0