

**Commonwealth of Kentucky  
Energy and Environment Cabinet  
Department for Environmental Protection  
Division for Air Quality  
300 Sower Boulevard, 2<sup>nd</sup> Floor  
Frankfort, Kentucky 40601  
(502) 564-3999**

**Draft**

**AIR QUALITY PERMIT  
Issued under 401 KAR 52:020**

**Permittee Name:** 3A Composites USA Inc.  
**Mailing Address:** 205 American Avenue, Glasgow, KY 42141

**Source Name:** 3A Composites USA Inc.  
**Mailing Address:** 205 American Avenue, Glasgow, KY 42141

**Source Location:** Same as above

**Permit:** V-24-027  
**Agency Interest:** 77  
**Activity:** APE20210001  
**Review Type:** Title V, Operating  
**Source ID:** 21-009-00060

**Regional Office:** Bowling Green Regional Office  
2642 Russellville Road  
Bowling Green, KY 42101  
(270) 746-7475

**County:** Barren

**Application Complete Date:** May 6, 2022  
**Issuance Date:**  
**Expiration Date:**

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**For Michael J. Kennedy, P.E.  
Director  
Division for Air Quality**

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<b>Permit</b>	<b>Permit Type</b>	<b>Activity#</b>	<b>Complete Date</b>	<b>Issuance Date</b>	<b>Summary of Action</b>
<b>V-24-027</b>	<b>Renewal</b>	<b>APE20210001</b>	<b>5/6/2022</b>		<b>Permit Renewal</b>

## **SECTION A - PERMIT AUTHORIZATION**

Pursuant to a duly submitted application the Kentucky Energy and Environment Cabinet (Cabinet) hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit was issued under the provisions of Kentucky Revised Statutes (KRS) Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **Emission Unit 01                      OAF BOILERS**

#### **B4                                              OAF Boiler #4**

Description:  
 Model:                                      Cleaver Brooks CBEX P100-800  
 Power:                                        125 hp  
 Maximum Capacity:                      5.34 mmBtu/hr  
 Fuel:                                         Natural Gas Only  
 Date of Construction:                    July 2019

#### **B5                                              OAF Boiler #5**

Description:  
 Model:                                      Cleaver Brooks CBEX P100-800  
 Power:                                        125 hp  
 Maximum Capacity:                      5.34 mmBtu/hr  
 Fuel:                                         Natural Gas Only  
 Date of Construction:                    July 2019

### **APPLICABLE REGULATIONS:**

401 KAR 59:015, New indirect heat exchangers.

### **STATE-ORIGIN REQUIREMENTS:**

401 KAR 63:020, Potentially hazardous matter or toxic substances.

### **NON-APPLICABLE REGULATIONS:**

401 KAR 60:005, Section 2(2)(d), 40 C.F.R. 60.40c through 60.48c (Subpart Dc), Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

401 KAR 63:002, Section 2(4)(iii), 40 C.F.R. 63.7480 through 63.7575, Tables 1 through 13 (Subpart DDDDD), National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

401 KAR 63:002, Section 2(4)(jjjjj), 40 C.F.R. 63.11193 through 63.11237, Tables 1 through 8 (Subpart JJJJJ), National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.

### **1. Operating Limitations:**

During a startup period or shutdown period, the permittee shall comply with the work practice standards established in 401 KAR 59:015, Section 7. [401 KAR 59:015, Section 7]

- a. The permittee shall comply with 401 KAR 50:055, Section 2(5); [401 KAR 59:015, Section 7(1)(a)]
- b. The frequency and duration of startup periods or shutdown periods shall be minimized by the affected facility; [401 KAR 59:015, Section 7(1)(b)]
- c. All reasonable steps shall be taken by the permittee to minimize the impact of emissions on ambient air quality from the affected facility during startup periods and shutdown periods; [401 KAR 59:015, Section 7(1)(c)]

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- d. The actions, including duration of the startup period, of the permittee during startup and shutdown periods, shall be documented in signed, contemporaneous logs or other relevant evidence; [401 KAR 59:015, Section 7(1)(d)]
- e. Startups and shutdowns shall be conducted according to either: [401 KAR 59:015, Section 7(1)(e)]
  - i) The manufacturer's recommended procedures; or [401 KAR 59:015, Section 7(1)(e)1.]
  - ii) Recommended procedures for a unit of similar design, for which manufacturer's recommended procedures are available, as approved by the cabinet based on documentation provided by the permittee. [401 KAR 59:015, Section 7(1)(e)2.]

**Compliance Demonstration Method:**

See **5. Specific Recordkeeping Requirements b.**

**2. Emission Limitations:**

- a. Refer to **Section D.3** for source-wide emission limitations.
- b. The permittee shall not cause emissions of particulate matter in excess of 0.55 lb/mmBtu of actual heat input from each boiler. [401 KAR 59:015, Section 4(1)(c)]
- c. The permittee shall not cause emissions of gases that contain sulfur dioxide in excess of 2.92 lb/mmBtu of actual heat input from each boiler. [401 KAR 59:015, Section 5(1)(c)2.b.]
- d. The opacity of visible emissions shall not exceed 20 percent except as provided below: [401 KAR 59:015, Section 4(2)]
  - i) A maximum of forty (40) percent opacity shall be allowed for a maximum of six (6) consecutive minutes in any sixty (60) consecutive minutes during fire box cleaning or soot blowing; and
  - ii) For emissions from an affected facility caused by building a new fire, emissions during the period required to bring the boiler up to operating conditions shall be allowed, if the method used is recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.
- e. Persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide the utmost care and consideration, in the handling of these materials, to the potentially harmful effects of the emissions resulting from such activities. No owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. Evaluation of such facilities as to adequacy of controls and/or procedures and emission potential will be made on an individual basis by the cabinet. [401 KAR 63:020, Section 3]

**Compliance Demonstration Method:**

- a. Refer to **Section D.3, Compliance Demonstration Method**, for the method of demonstrating compliance with source-wide emission limitations.
- b. Each indirect heat exchanger is assumed to be in compliance with the applicable mass emission standards (lb/mmBtu) for particulate matter and sulfur dioxide and opacity, while burning natural gas.
- c. Based upon the emission rates of toxics and hazardous air pollutants determined by the Cabinet using information provided in the application and supplemental information

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

submitted by the source, the Cabinet determines the affected facility to be in compliance with 401 KAR 63:020.

### **3. Testing Requirements:**

Performance testing using the reference methods specified in 401 KAR 50:015 shall be conducted if required by the Cabinet. [401 KAR 50:045, Section 1, and 401 KAR 59:005, Section 2(2)].

### **4. Specific Monitoring Requirements:**

The permittee shall maintain monthly records of natural gas burned from each indirect heat exchanger. [401 KAR 52:020, Section 10]

### **5. Specific Recordkeeping Requirements:**

- a. The permittee shall keep records of the monthly natural gas usage from each indirect heat exchanger and make them available to Division personnel upon request. [401 KAR 52:020, Section 10]
- b. The permittee shall keep records of the manufacturer's recommended procedures for startup and shutdown, any instance in which the recommended procedures were not followed, and any corrective action taken. [401 KAR 52:020, Section 10]

### **6. Specific Reporting Requirements:**

Refer to **Section F**.

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **Emission Unit 02 FOME COR® MATERIAL HANDLING AND PROCESSING**

#### **OAC (E7) Fome Cor® Extrusion Process**

**Description:**

[Includes Lamination, Die/Cold Rolls, Screen Changer, Bleed-off (start-up only), Steam Chest, Adhesive Coating, and Board Trimmers]

(E7a) Pentane Injection  
 Maximum Capacity: 65 lb/hr  
 Date of Construction: January 1993

(E7b) HFC-152a Injection  
 Maximum Capacity: 35 lb/hr  
 Date of Construction: January 1993

#### **E23 Conveyor for Board Trim with Waste System Cyclone (Compactor Cyclone)**

**Description:**

Maximum Capacity: 0.75 ton/hr  
 Date of Construction: January 1993

#### **APPLICABLE REGULATIONS:**

401 KAR 50:012, General Application, (OAC E7 only)

401 KAR 59:010, New process operations.

#### **STATE-ORIGIN REQUIREMENTS:**

401 KAR 63:020, Potentially hazardous matter or toxic substances.

#### **1. Operating Limitations:**

In the absence of a standard specified in administrative regulations 401 KAR 50 to 65, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical (RAP). [401 KAR 50:012, Section 1(2)]

- a. The permittee shall maintain the blowing agent at no more than 2.2 pounds of volatile organic compounds (VOC) per 1,000 square feet (ft<sup>2</sup>) of foam board produced on a calendar year average basis for the Fome Cor® Foam Board Production (E7). The facility has shown that it is in compliance with the above limit. If the facility makes any changes to affect the above RAP determination at the extrusion process associated with the Foam Board Production line, then they shall submit another RAP analysis [RAP Analysis Determination approved on June 20, 2016].

#### **Compliance Demonstration Method:**

See **4. Specific Monitoring Requirements**, **5. Specific Recordkeeping Requirements** and **6. Specific Reporting Requirements**.

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **2. Emission Limitations:**

- a. For emissions from a control device or stack no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility which is in excess of the quantity specified in Appendix A to 401 KAR 59:010 and summarized below: [401 KAR 59:010, Section 3(2)]

- i) For process weight rates  $\leq 1000$  lb/hr or less:  $E = 2.34$   
 ii) For process weight rates  $> 1000$  lb/hr up to 60,000 lb/hr:  $E = 3.59 \times P^{0.62}$

Where: E = rate of particulate emissions in lb/hr, and  
 P = process weight rate in tons/hr.

- b. No person shall cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity. [401 KAR 59:010, Section 3(1)(a)]
- c. Refer to **Section D.3** for source-wide emission limitations.
- d. Persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide the utmost care and consideration, in the handling of these materials, to the potentially harmful effects of the emissions resulting from such activities. No owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. Evaluation of such facilities as to adequacy of controls and/or procedures and emission potential will be made on an individual basis by the cabinet. [401 KAR 63:020, Section 3]

### **Compliance Demonstration Method:**

- a. The permittee is assumed to be in compliance with the mass emission standard as long as the emissions from the Conveyor for Board Trim with Waste System Cyclone (E23) are routed an enclosed compactor. See **3. Testing Requirements** and **4. Specific Monitoring Requirements**.
- b. See **4. Specific Monitoring Requirements** b. for opacity compliance.
- c. Refer to **Section D.3, Compliance Demonstration Method**, and **Section D.4** for the method of demonstrating compliance with source-wide emission limitations.
- d. Based upon the emission rates of toxics and hazardous air pollutants determined by the Cabinet using information provided in the application and supplemental information submitted by the source, the Cabinet determines the affected facility to be in compliance with 401 KAR 63:020.

### **3. Testing Requirements:**

Performance testing shall be conducted if requested by the Cabinet. [401 KAR 50:045, Section 1]

### **4. Specific Monitoring Requirements:**

- a. The permittee shall monitor the usage of the VOC blowing agent for each Fome Cor® Foam Board Production (E7) in terms of lb VOC/1,000 ft<sup>2</sup> of foam board on a calendar year average basis. [401 KAR 52:020, Section 10]
- b. The permittee shall perform a qualitative visual observation of the opacity of emissions at



**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

exhaust to the compactor cyclone no less than weekly while the affected facility (Conveyor for Board Trim with Waste System Cyclone (E23)) is operating. If visible emissions from the exhaust are observed (not including condensed water in the plume), the permittee shall determine the opacity using Reference Method 9. In lieu of determining the opacity using U.S. EPA Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume). [401 KAR 52:020, Section 10]

**5. Specific Recordkeeping Requirements:**

- a. The permittee shall maintain records of the amount of blowing agent used each month, monthly process rates and the monthly operating hours of each emission unit. [401 KAR 52:020, Section 10]
- b. The permittee shall maintain records of the VOC blowing agent usage rates in terms of lb VOC/1,000 ft<sup>2</sup> for each Fome Cor® Foam Board Production (E7) on a calendar year average basis. [401 KAR 52:020, Section 10]
- c. A log of the qualitative visual observations made as specified in **4. Specific Monitoring Requirements** including the date, time, initials of observer, whether any emissions were observed (yes/no), any Method 9 readings taken, and any corrective actions taken. [401 KAR 52:020, Section 10]
- d. The permittee shall keep records of the amount of trim shipped from the facility on an annual basis. These records shall be kept on site and made available for inspection. [401 KAR 52:020, Section 10]
- e. The permittee shall keep records of the hours that the compactor cyclone was not operation requiring waste to be sent to E24 and amount of trim sent to E24, on an annual basis. [401 KAR 52:020, Section 10]

**6. Specific Reporting Requirements:**

- a. The permittee shall report on a semi-annual basis the VOC blowing agent usage rates in terms of lb VOC/1,000 ft<sup>2</sup> for each Fome Cor® Foam Board Production (E7) on a calendar year average basis. [401 KAR 52:020, Section 10]
- b. Refer to **Section F**.

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **Emission Unit 03 OAE – WAREHOUSE**

#### **0AE (E9) Product Storage, Palletizing and Packaging for Shipment**

Description:

(E9a) Pentane Injection  
 Maximum Capacity: 65 lb/hr  
 Date of Construction: January 1993

(E9b) HFC-152a Injection  
 Maximum Capacity: 35 lb/hr  
 Date of Construction: January 1993

### **Emission Unit 05 THICK FOAM LINE EXTRUSION AND FOAM BLOWING SYSTEM**

#### **E19 Thick Foam Line Extrusion and Foam Blowing System**

Description:

Extruders, Blowing Agent, Die/Cold Rolls, Packaging, Finished Product Storage

Maximum Capacity: 6.76 lb/hr (Pentane)

Maximum Capacity: 95 lb/hr (HFC-152a)

Date of Construction: December 2016

### **APPLICABLE REGULATIONS:**

401 KAR 50:012, General Application

#### **1. Operating Limitations:**

In the absence of a standard specified in administrative regulations 401 KAR 50 to 65, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical (RAP). [401 KAR 50:012, Section 1(2)]

- a. See **1. Operating Limitations a.** for **Emission Unit 02 FOME COR® MATERIAL HANDLING AND PROCESSING - OAC (E7) Fome Cor® Extrusion Process**, and any monitoring and recordkeeping requirements therein.
- b. The permittee shall minimize the use of VOC blowing agents to the extent that customer product specifications and other requirements allow for the Thick Foam Line Extrusion and Foam Blowing System (E19). The blowing agent shall not exceed 12.75 pounds of VOC per 1,000 square feet of foam board produced on a calendar year average basis for E19. The facility has demonstrated that it is in compliance with the above limit. If the facility makes any changes to affect the above RAP determination at the extrusion process associated with the Thick Foam Production line, then they shall submit another RAP analysis [RAP Analysis Determination approved on December 19, 2016].

#### **Compliance Demonstration Method:**

See **4. Specific Monitoring Requirements, 5. Specific Recordkeeping Requirements and 6. Specific Reporting Requirements.**

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **2. Emission Limitations:**

Refer to **Section D.3** for source-wide emission limitations.

#### **Compliance Demonstration Methods:**

Refer to **Sections D.3, Compliance Demonstration Method** and **Section D.4** for the method of demonstrating compliance with source-wide emission limitations.

### **3. Testing Requirements:**

Performance testing shall be conducted if requested by the Cabinet. [401 KAR 50:045, Section 1]

### **4. Specific Monitoring Requirements:**

The permittee shall monitor the usage of the VOC blowing agent for the Thick Foam Line Extrusion and Foam Blowing System (E19) in terms of lb VOC/1,000 ft<sup>2</sup> of foam board on a calendar year average basis. [401 KAR 52:020, Section 10]

### **5. Specific Recordkeeping Requirements:**

- a. The permittee shall maintain records of the amount of blowing agent used each month, monthly process rates and the monthly operating hours of each emission unit. [401 KAR 52:020, Section 10]
- b. The permittee shall maintain records of the following usages of the VOC blowing agent on a calendar year average basis: [401 KAR 52:020, Section 10]
  - i) The Thick Foam Line Extrusion and Foam Blowing System (E19) in terms of lb VOC/1,000 ft<sup>2</sup> of foam board.

### **6. Specific Reporting Requirements:**

- a. The permittee shall report on a semi-annual basis the VOC blowing agent usage rates in terms of lb VOC/1,000 ft<sup>2</sup> for Thick Foam Line Extrusion and Foam Blowing System (E19) on a calendar year average basis. [401 KAR 52:020, Section 10]
- b. Refer to **Section F**.

## SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. MAU #1 (H1) and MAU #2 (H2) Natural Gas Hot Air Heaters 1 mmBtu/hr Each	401 KAR 63:020
2. (H8, H9, H10, H11 and H12) Natural Gas Hot Air Heaters 0.133 mmBtu/hr Each	401 KAR 63:020
3. (E2, E3, E4, E5 and E6) Storage Silos #1 – 5 (with Filter)	401 KAR 59:010
4. (E8) Fome Cor ® Vacuum Receiver/ Blender Hopper (with Filter)	401 KAR 59:010
5. (E10) Re grind Vortex Grinder (with Filter)	401 KAR 59:010
6. (E12) Re grind Surge Bin (with Filter)	401 KAR 59:010
7. (E13) Re grind Silo	401 KAR 59:010
8. MPG Grinder	None
9. Re grind Amacoil Grinder (with Filter)	None
10. (E14) Reclaim Cyclone (with Hopper and Filter)	401 KAR 59:010
11. (E15) Reclaim Extruder/Die/Water Trough (Alternative to Existing Re grind System)	401 KAR 59:010
12. (E16) Reclaim Black Pellet Silo (with Filter)	401 KAR 59:010
13. (E17) Reclaim White Pellet Silo (with Filter)	401 KAR 59:010
14. (E20) Thick Foam Line blender Hopper (with Filter)	401 KAR 59:010
15. (E24) Waste System 747 Storage Bins (2)	401 KAR 59:010
16. (T1) Pentane Storage Tank	None
17. (T2) HFC-152a Storage Tank	None

**SECTION C - INSIGNIFICANT ACTIVITIES (CONTINUED)**

<u>Description</u>	<u>Generally Applicable Regulation</u>
18. (T3) Adhesive Storage Tank (3,800 gallons)	401 KAR 63:020
19. (P1) Ink Printer (Vents Inside Building)	401 KAR 59:010
20. (P2) Hot Melt Glue Machines (Vents Inside Building)	401 KAR 59:010
21. (P3) Packaging Adhesive Area	None
22. Lab Burn Hood Vent	None
23. (I01) Schelling Saw w/ Dustek Filter (4,000 CFM Exhaust Air Flow) Particulate Emissions < 5 tpy	401 KAR 59:010
24. (OAF) Combined Comfort Heaters (H3-H7) Natural Gas-Fired Direct Heat Exchangers	401 KAR 63:020
25. (IA31) Schelling Saw w/ Dustek Filter (4,000 CFM Exhaust Air Flow) Particulate Emissions < 5 tpy	401 KAR 59:010
26. Vacuum /Blower unloading system for polystyrene pellets into Silo #1 & 2 (IA32)	401 KAR 59:010

## SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.
2. Particulate matter, opacity and VOC emissions, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan shall not exceed the respective limitations specified herein.
3. In order to preclude the applicability of 401 KAR 51:017, total source-wide emissions of VOC shall not exceed 245 tons per year (tpy) for any consecutive 12-month period.
  - a. If VOC emissions, on an actual basis, exceeds 225 tons per year, on a 12 consecutive month period, then the permittee must begin tracking **daily** emissions of VOC and use them to calculate the monthly emissions. These monthly emissions shall be used to calculate 12 consecutive month totals. The daily emissions shall be quantified by the end of the following operating day. The monthly emissions (based on daily emissions calculations) shall be calculated on the first operating day of the following calendar month. If VOC emissions, on an actual basis, return below 225 tons per year on a 12 consecutive month total, then the permittee may resume tracking actual VOC emissions on a monthly basis.
  - b. If the VOC emissions, on an actual basis, calculated on a 12 consecutive month is less than or equal to 225 tons per year, then the 12 consecutive month totals shall be calculated and recorded by the 30<sup>th</sup> day following the end of each month.

### **Compliance Demonstration Method:**

The permittee shall calculate the total source-wide VOC emissions on a monthly basis. VOC emissions shall be calculated as follows:

$$VOC_m = \sum[(BA_M \times VOC_{BA}) + (A_M \times VOC_A) + (NG_M \times NG_C)] \quad \text{Where:}$$

$VOC_m$  = Monthly VOC Emissions

$BA_M$  = Monthly usage of each blowing agent.

$VOC_{BA}$  = Percentage of VOC in each blowing agent emitted as established by the most recent approved stack test. (Assumed to be 100% unless demonstrated to be lower during testing)

$A_M$  = Monthly usage of each adhesive containing VOC.

$VOC_A$  = Percentage of VOC in each adhesive containing VOC. (Assumed to be 100% unless demonstrated to be lower during testing)

$NG_M$  = Monthly natural gas usage in mmscf.

$NG_C$  = VOC emission factors from AP-42 or Vendor for natural gas combustion.

4. In addition to the semi-annual reporting required in **Section F.5**, the permittee shall submit quarterly source-wide VOC emission reports to the Bowling Green Regional Office. All quarterly reports must be postmarked by the 30<sup>th</sup> day following the end of each calendar quarter.

## **SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS**

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

## **SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS**

1. Pursuant to Section 1b-IV-1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
  - a. Date, place as defined in this permit, and time of sampling or measurements;
  - b. Analyses performance dates;
  - c. Company or entity that performed analyses;
  - d. Analytical techniques or methods used;
  - e. Analyses results; and
  - f. Operating conditions during time of sampling or measurement.
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five (5) years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b-IV-2 and 1a-8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
3. In accordance with the requirements of 401 KAR 52:020, Section 3(1)h, the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
  - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
  - b. To access and copy any records required by the permit;
  - c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
5. Summary reports of any monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Sections 1b-V-1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].



## **SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)**

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020, Section 23. If continuous emission and opacity monitors are required by regulation or this permit, data shall be reported in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All deviations from permit requirements shall be clearly identified in the reports.
7. In accordance with the provisions of 401 KAR 50:055, Section 1, the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
  - a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
  - b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
8. The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken shall be submitted to the Regional Office listed on the front of this permit. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement does not identify a specific time frame for reporting deviations, prompt reporting, as required by Sections 1b-V, 3 and 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, shall be defined as follows:
  - a. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
  - b. For emissions of any regulated air pollutant, excluding those listed in F.8.a., that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
  - c. All deviations from permit requirements, including those previously reported, shall be included in the semiannual report required by F.6.
9. Pursuant to 401 KAR 52:020, Title V permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
  - a. Identification of the term or condition;
  - b. Compliance status of each term or condition of the permit;
  - c. Whether compliance was continuous or intermittent;
  - d. The method used for determining the compliance status for the source, currently and over the reporting period.

**SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)**

- e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
- f. The certification shall be submitted by January 30th of each year. Annual compliance certifications shall be sent to the following addresses:

Division for Air Quality  
Bowling Green Regional Office  
2642 Russellville Road  
Bowling Green, KY 42101

U.S. EPA Region 4  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth St. SW  
Atlanta, GA 30303-8960

- 10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within 30 days of the date the Kentucky Emissions Inventory System (KYEIS) emissions survey is mailed to the permittee.

## SECTION G - GENERAL PROVISIONS

### 1. General Compliance Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020, Section 3(1)(b), and a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
- b. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
- c. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
  - (1) If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
  - (2) The Cabinet or the United States Environmental Protection Agency (U. S. EPA) determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
  - (3) The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;
  - (4) New requirements become applicable to a source subject to the Acid Rain Program.

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

- d. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Sections 1a- 7 and 8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
- e. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:020, Section 3(1)(c)].

**SECTION G - GENERAL PROVISIONS (CONTINUED)**

- f. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].
- g. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
- h. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
- i. All emission limitations and standards contained in this permit shall be enforceable as a practical matter. All emission limitations and standards contained in this permit are enforceable by the U.S. EPA and citizens except for those specifically identified in this permit as state-origin requirements. [Section 1a-15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
- j. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a-10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
- k. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3) b].
- l. This permit does not convey property rights or exclusive privileges [Section 1a-9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
- m. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.
- n. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3) d.].
- o. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3) a.].

**SECTION G - GENERAL PROVISIONS (CONTINUED)**

- p. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.
- q. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
  - (1) Applicable requirements that are included and specifically identified in this permit; and
  - (2) Non-applicable requirements expressly identified in this permit.

**2. Permit Expiration and Reapplication Requirements**

- a. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six (6) months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].
- b. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020, Section 8(2)].

**3. Permit Revisions**

- a. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the State Implementation Plan (SIP) or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).
- b. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

**4. Construction, Start-Up, and Initial Compliance Demonstration Requirements**

No construction authorized by permit V-24-027.

**SECTION G - GENERAL PROVISIONS (CONTINUED)****5. Testing Requirements**

- a. Pursuant to 401 KAR 50:045, Section 2, a source required to conduct a performance test shall submit a completed Compliance Test Protocol form, DEP form 6028, or a test protocol a source has developed for submission to other regulatory agencies, in a format approved by the cabinet, to the Division's Frankfort Central Office a minimum of sixty (60) days prior to the scheduled test date. Pursuant to 401 KAR 50:045, Section 7, the Division shall be notified of the actual test date at least thirty (30) days prior to the test.
- b. Pursuant to 401 KAR 50:045, Section 5, in order to demonstrate that a source is capable of complying with a standard at all times, any required performance test shall be conducted under normal conditions that are representative of the source's operations and create the highest rate of emissions. If [When] the maximum production rate represents a source's highest emissions rate and a performance test is conducted at less than the maximum production rate, a source shall be limited to a production rate of no greater than 110 percent of the average production rate during the performance tests. If and when the facility is capable of operation at the rate specified in the application, the source may retest to demonstrate compliance at the new production rate. The Division for Air Quality may waive these requirements on a case-by-case basis if the source demonstrates to the Division's satisfaction that the source is in compliance with all applicable requirements.
- c. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

**6. Acid Rain Program Requirements**

- a. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.
- b. The permittee shall comply with all applicable requirements and conditions of the Acid Rain Permit and the Phase II permit application (including the Phase II NOx compliance plan and averaging plan, if applicable) incorporated into the Title V permit issued for this source. The source shall also comply with all requirements of any revised or future acid rain permit(s) issued to this source.

**7. Emergency Provisions**

- a. Pursuant to 401 KAR 52:020, Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
  - (1) An emergency occurred and the permittee can identify the cause of the emergency;
  - (2) The permitted facility was at the time being properly operated;

**SECTION G - GENERAL PROVISIONS (CONTINUED)**

- (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
  - (4) Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.1-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
  - (5) This requirement does not relieve the source of other local, state or federal notification requirements.
- b. Emergency conditions listed in General Condition G.7.a above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].
  - c. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].
8. Ozone Depleting Substances
- a. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
    - (1) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
    - (2) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
    - (3) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
    - (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.155.
    - (5) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156 and 40 CFR 82.157.
    - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
  - b. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

## **SECTION G - GENERAL PROVISIONS (CONTINUED)**

### 9. Risk Management Provisions

- a. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to U.S. EPA using the RMP\* eSubmit software.
- b. If requested, submit additional relevant information to the Division or the U.S. EPA.



**SECTION H - ALTERNATE OPERATING SCENARIOS**

None

**SECTION I - COMPLIANCE SCHEDULE**

None