AIR QUALITY PERMIT
Issued under 401 KAR 52:020

Permittee Name: AHF Products
Mailing Address: 630 Industry Road
Somerset, KY 42501

Source Name: AHF Products
Mailing Address: 630 Industry Road
Somerset, KY 42501

Source Location: 630 Industry Road

Permit: V-22-003
Agency Interest: 3813
Activity: APE20210005
Review Type: Title V, Operating
Source ID: 21-199-00074

Regional Office: London Regional Office
875 S. Main Street
London, KY 40741
(606) 330-2080

County: Pulaski

Application Complete Date: January 19, 2022
Issuance Date: Expiration Date:

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

Version 4/1/2022
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<th>Summary of Action</th>
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<td>Renewal</td>
<td>APE20210005</td>
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<td>6/28/2022</td>
<td>Renewal Permit</td>
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</tbody>
</table>
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 UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Unit 01    Wood-Fired Indirect Heat Exchangers

Description:
Two (2) Wood-fired boilers, Stokers
Model: Hurst M-2275-150-DF
Construction Date: April 1990
Maximum Continuous Rating: 16.74 MMBtu/hr, each
Primary Fuel: Wood
Secondary Fuel: Natural Gas
Controls: Multiclone mechanical collectors

APPLICABLE REGULATIONS:
401 KAR 59:015, New indirect heat exchangers

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

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

1. Operating Limitations:
   a. Equipment and controls shall be operated in such a manner as to assure compliance with Section B (2) Emission Limitations below.
   
   b. The permittee shall conduct a tune-up of the boilers biennially as specified in (b)(1) through (7) of 40 CFR 63.11223.
      (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, but the permittee shall inspect each burner at least once every 36 months).
      (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
      (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
      (4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
      (5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).
      (6) Maintain onsite and submit, if requested by the Division, biennial report containing the information in paragraphs (b)(6)(i) through (iii) of 40 CFR 63.11223.
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.
(ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
(iii) The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler.

(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

Compliance Demonstration Method:
The permittee shall comply with Section B (6) Specific Reporting Requirements below.

c. The permittee shall have a one-time energy assessment performed by a qualified energy assessor. [40 CFR 63.11201(b)]

Compliance Demonstration Method:
The assessment was completed on July 2nd, 2013 and compliance is assumed.

2. Emission Limitations:
   a. Pursuant to 401 KAR 59:015, Section 4(1)(c), particulate emissions shall not exceed 0.42 lb/MMBtu based on a three-hour-average for each boiler.

   b. Pursuant to 401 KAR 59:015, Section 5(1)(c)(2), sulfur dioxide emissions shall not exceed 1.83 lb/MMBtu actual heat input while burning natural gas.

   c. Pursuant to 401 KAR 59:015, Section 5(1)(c)(3), sulfur dioxide emissions shall not exceed 2.93 lb/mmBTU actual heat input while burning wood.

   d. See Section D for source wide emission limits on individual HAP, combined HAPs and VOC.

Compliance Demonstration Method:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Wood (lb/mmBTU)</th>
<th>Wood (lb/ton of wood)</th>
<th>Natural Gas (lb/mmSCF)</th>
<th>Natural Gas (lb/mmBTU)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>0.317</td>
<td>4.869</td>
<td>7.6</td>
<td>0.0074</td>
</tr>
<tr>
<td>SO₂</td>
<td>0.025</td>
<td>0.384</td>
<td>0.6</td>
<td>0.0006</td>
</tr>
<tr>
<td>VOC</td>
<td>0.017</td>
<td>0.261</td>
<td>5.5</td>
<td>0.0054</td>
</tr>
</tbody>
</table>

e. Pursuant to 401 KAR 59:015, Section 4(2), emissions shall not exceed twenty (20) percent opacity based on a six-minute average except:
   (1) 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
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) For emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer’s recommendations.

Compliance Demonstration Method:
The permittee shall perform a qualitative visual observation of the opacity of emissions at each stack no less than weekly while the affected facility is operating. If visible emissions from the stacks 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).

3. Testing Requirements:
Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005, Section 2(2) and 50:045, Section 4.

4. Specific Monitoring Requirements:
a. The tons of wood burned in the boilers shall be monitored monthly.

b. The million cubic feet of natural gas burned in the boilers shall be monitored monthly.

c. Source-wide emissions of individual HAP, combined HAPs and VOC shall be monitored on a monthly basis. Refer to Section D for details.

5. Specific Recordkeeping Requirements:
a. Records of the tons of wood burned in the boilers monthly shall be maintained.

b. Records of the source-wide million cubic feet of natural gas burned monthly shall be maintained.

c. Records of source-wide individual HAP, combined HAPs and VOC emissions shall be maintained. Refer to Section D for details.

d. Records of qualitative visual opacity monitoring for each stack, as well as the opacity readings taken by Method 9, if taken, and also any repairs or modifications that were made as a result of any opacity readings which exceeded the standard.

e. The permittee shall maintain the records specified in the following paragraphs (e)(1) through (4). [40 CFR 63.11225(c)]

(1) A copy of each notification, report and all supporting documentations.

(2) Records documenting conformance with the work practices, emission reduction measures, and management practices as specified in the following paragraphs (e)(2)(i) and (ii).

(i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(ii) Records documenting the fuel type(s) used monthly by boiler(s), including, but not limited to, a description of the fuel, and the total fuel usage amount with units of measure.

(3) Records of the occurrence and duration of each malfunction of the boiler.

(4) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler to its normal or usual manner of operation.

f. The permittee’s records shall be in a form suitable and readily available for expeditious review. The permittee shall keep each record for 5 years following the date of each recorded action. The permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years. [40 CFR 63.11225(d)]

6. Specific Reporting Requirements:

a. The permittee shall report the monthly usage rates of wood and natural gas in the boilers and the monthly and twelve-month rolling total HAP and VOC emissions.

b. The permittee shall prepare a biennial compliance report as specified in paragraphs (b)(1) through (4) of 40 CFR 63.11225.

(1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.

(3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

(4) The total fuel use by affected boilers for each calendar month within the reporting period, including, but not limited to, a description of the fuel, and the total fuel usage amount with units of measure.

7. Specific Control Equipment Operating Conditions:

a. The multiclone mechanical collectors shall be operated and maintained in accordance with manufacturer’s recommendations.

b. The multiclone mechanical collectors shall be physically inspected once monthly for cracks and holes. Repairs shall be made to the multiclone as necessary. A log of these inspections shall be kept on file for review by the Division. The log shall contain the date of inspections, conditions observed, any problems noted, and corrective actions taken.
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

8. **Alternate Operating Scenarios:**
   If the permittee intends to switch fuels, and this fuel switch may result in the applicability of a different subcategory or a switch out of subpart JJJJJJ due to a switch to 100 percent natural gas, 30 days notice prior to the switch must be provided. [40 CFR 63.11225(g)]
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit 03    Woodworking Operations

Description:
Various cutting, milling, sanding, truck load out, and finishing operations, including baker band saw, 2 PMK saws (off-line saws)
Construction Date: 1990
Controls: Particulate emissions are controlled by nine (9) baghouses.
   Baghouses 1 – 5 are Pneumafil, model # 11.5-320-12, baghouses 6 – 8 are Pneumafil model # 11.5-320-10 and baghouses 9 is Lignacon model # 16.5-700-10.
   Cyclones are used to transfer wood dust to the baghouses.
Installation Date: 1990 for baghouses 1 – 5; 2003 for baghouses 6 & 7; 2011 for baghouse 8; 2012 for baghouse 9.

APPLICABLE REGULATIONS:
401 KAR 59:010, New process operations

40 CFR Part 64, Compliance Assurance Monitoring

1. Operating Limitations:
   Particulate emissions shall be routed through the baghouses at all times when woodworking equipment is operated.

2. Emission Limitations:
   a. The following emission limitations for particulate matter are pursuant to 401 KAR 59:010, Section 3 (2):

<table>
<thead>
<tr>
<th>EMISSION POINT</th>
<th>AFFECTED FACILITY</th>
<th>MAXIMUM CAPACITY (ton/hr)</th>
<th>MAXIMUM ALLOWABLE EMISSION RATE (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>03</td>
<td>Woodworking Operations</td>
<td>0.5</td>
<td>2.34</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.5 &lt; P &lt; 5.554</td>
<td>E = 3.59P^{0.62}</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5.554</td>
<td>10.40</td>
</tr>
</tbody>
</table>

   Where:   E = the PM emissions rate (pounds/hour)
            P = the process rate (tons/hour)

   Compliance Demonstration Method:
   The source is considered to be in compliance when the baghouses are operating and properly maintained. Refer to Subsection 4, Monitoring Requirements.

   b. The opacity of visible emissions from each stack shall not equal or exceed 20 percent [401 KAR 59:010, Section 3 (1)].
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Compliance Demonstration Method:
The permittee shall perform a qualitative visual observation of the opacity of emissions at each stack no less than weekly while the affected facility is operating. If visible emissions from the stacks 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).

3. Testing Requirements:
Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1]

4. Specific Monitoring Requirements:
a. The following procedures are included to fulfill Compliance Assurance Monitoring (CAM) requirements:

TABLE 1. MONITORING APPROACH

| Compliance Assurance Monitoring Approach Summary for the Baghouses Controlling PM/PM₁₀ Emissions |
|---------------------------------------------------------------|---------------------------------------------------------------|
| **I. Indicator**                                             | **Indicator No. 1**                                           |
| Measurement Approach                                         | Visible Emissions                                            |
|                                                              | EPA Method 22 (visible/no visible emission observation technique) |
| **II. Indicator Range**                                      | **Indicator No. 2**                                           |
|                                                              | Pressure Drop                                                |
|                                                              | Pressure drop across the baghouse measured using a differential pressure gauge. |
|                                                              | The indicator range is a pressure drop between **0.5 to 5.5 inches of H₂O**. |
|                                                              | **Excursions** trigger an inspection and corrective action.   |
### III. Corrective action

| The bags in the baghouses shall be inspected and replaced as needed prior to starting back up. |
| First check for proper functioning of tube. Tube shall be cleaned as needed. If tube is working correctly a reading below 0.5 would indicate torn bags, a reading above 5.5 would indicate bags are beyond their useful life. Either case, bags shall be replaced prior to starting back up. |

### IV. Performance Criteria

| Data Representativeness | Observations are performed at the baghouse exhaust during operation when they are being vented outside the building. |
| Pressure drop across the baghouse is measured at the baghouse inlet and exhaust. The minimum accuracy of the device is ± 0.5 in H₂O. |
| Verification of Operational Status | NA |
| Calibrate, maintain, and operate instrumentation using manufacturer’s specifications. |
| Monitoring Frequency | A Method 22 observation will be conducted weekly. |
| Weekly |
| Data Collection Procedures | The VE observation is documented by the observer manually. |
| Operators log data manually. |
| Averaging Period | None |
| None |

5. **Specific Recordkeeping Requirements:**

a. The permittee shall maintain a log of the visual opacity observations for the baghouse, records of corrective actions taken as a result of visible emissions from a stack and records of any Reference Method 9 readings performed.

b. The permittee shall maintain records of weekly pressure drop readings.

c. The permittee shall maintain records of baghouse bag replacements, including date and time.

d. The permittee shall keep records for routine maintenance and repairs.
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

6. **Specific Reporting Requirements:**
   Any exceedance in the particulate emissions rate or visible emissions standard specified in this permit shall be reported semiannually. The permittee shall submit copies of the relevant information from the control device inspection and repair log for those times when corrective actions are required.

7. **Specific Control Equipment Operating Conditions:**
   The baghouses shall be maintained and operated in accordance with manufacturer's specifications and recommendations.
Emission Unit 04 (04, 05, 06 & 07) Finish Line North & South

North Line

04 (04) Stain Applications
UV lights & two (2) 1.2 MMBtu/hr natural gas fired drying ovens
Construction Date: 2003, A1C addition May 2020

04 (05) Fillers / Sealers / Topcoats Applications
Two (2) filler roll applicators (A3 & A4)
Four (4) sealer roll applicators (A5, A3, A7 & A8)
Two (2) topcoat roll applicators (A9 & A10)
One (1) emboss roll coater
Each application is cured with UV lights
Construction Date: 2003 & 2020

South Line

04 (06) Stain Applications
Four (4) UV, solvent, and water stain roll coaters (B1A, B1B, B2A & B2B)
UV lights & two (2) 1.2 MMBtu/hr natural gas fired drying ovens
Construction Date: 1990

04 (07) Fillers / Sealers / Topcoats Applications
Two (2) filler roll applicators (B3 & B4)
Four (4) sealer roll applicators (B5, B3, B7 & B8)
Two (2) topcoat roll applicators (B9 & B10)
One (1) emboss roll coater
Each application is cured with UV lights
Construction Date: 1990 & 2020

Emission Unit 04 (26) Puma Line
A flooring surface character prepping line consisting of five (5) Eagle wood surface character machines
Construction Date: 2012

Emission Unit 04 (27) Lamella Press
Consists of one (1) hot press and one (1) 1.2 MMBtu/hr natural gas fired drying oven
Construction Date: 2020

Emission Unit 04 (28) Blackwash Line
One (1) Denibing machine, two (2) Flap sanders, one (1) Dubois two head applicator roll coater and one (1) 1.2 MMBtu/hr natural gas fired drying oven.
Construction Date: 2012
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

APPLICABLE REGULATIONS:
401 KAR 50:012, General application

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

1. Operating Limitations:
The usage rates of coatings, solvents and any raw materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

2. Emission Limitations:
a. Refer to Section D for source-wide emission limits on individual HAP, combined HAPs and VOC.

b. 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:
   Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1]

4. Specific Monitoring Requirements:
a. The usage rate in gallons of stains, sealers, coatings, cleaning solvents or any other HAP/VOC containing material shall be monitored monthly.

b. The monthly and twelve-month rolling total emissions of individual HAP, combined HAPs and VOC shall be monitored.

5. Specific Recordkeeping Requirements:
a. Records of the usage in gallons of stains, sealers, coatings, cleaning solvents or any other HAP/VOC containing material shall be maintained on a monthly basis.

b. Records of the individual HAP emission factors and VOC emission factors (less water and exempt solvents) for materials as applied shall be maintained.

c. Records of the monthly and twelve-month rolling total emissions of individual HAP, combined HAPs and VOC shall be maintained.

d. All purchase orders and invoices for HAP/VOC containing materials shall be maintained.

6. Specific Reporting Requirements:
The permittee shall report the monthly usage rates of stains, sealers, coatings, cleaning solvents and the monthly and twelve-month rolling total emissions of HAP and VOC.

7. Specific Control Equipment Operating Conditions: N/A
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit 08 (08) Plywood Pressing using Adhesives

Description:
- Construction Date: 2003
- Controls: None

APPLICABLE REGULATIONS:
- 401 KAR 50:012, General application
- 401 KAR 63:020, Potentially hazardous matter or toxic substances

1. Operating Limitations:
The usage rates of coatings, solvents and any raw materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

2. Emission Limitations:
   a. Refer to Section D for source-wide emission limits on individual HAP, combined HAPs and VOC.
   
   b. 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:
   Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1]

4. Specific Monitoring Requirements:
   a. The usage rate in gallons of adhesive, stabilizer, coatings, cleaning solvents or any other HAP/VOC containing material shall be monitored monthly.
   
   b. The square footage of plywood processed by the press shall be monitored monthly.
   
   c. The monthly and twelve-month rolling total emissions of individual HAP, combined HAPs and VOC shall be monitored.

5. Specific Recordkeeping Requirements:
   a. Records of the usage in gallons of adhesives, stabilizer, coatings, cleaning solvents or any other HAP/VOC containing material shall be maintained on a monthly basis.
   
   b. Records of the individual HAP emission factors and VOC emission factors (less water and exempt solvents) for materials as applied shall be maintained.
   
   c. Records of the square footage of plywood processed in the press monthly shall be maintained.
SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

d. Records of the monthly and twelve-month rolling total emissions of individual HAP, combined HAPs and VOC shall be maintained. Refer to Section D.

e. All purchase orders and invoices for HAP/VOC containing materials shall be maintained.

6. **Specific Reporting Requirements:**
   The permittee shall report the monthly usage rates of plywood, adhesives, stabilizer, coatings, cleaning solvents and the monthly and twelve-month rolling total emissions of HAP and VOC.

7. **Specific Control Equipment Operating Conditions:**
   N/A
## 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.

<table>
<thead>
<tr>
<th>Description</th>
<th>Generally Applicable Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Two Resin Storage Tanks (7,200 gallon capacity)</td>
<td>N/A</td>
</tr>
<tr>
<td>2. Propane Space Heaters</td>
<td>N/A</td>
</tr>
<tr>
<td>3. Metal Machining/Welding, Maintenance Shop Activities</td>
<td>401 KAR 59:010</td>
</tr>
<tr>
<td>4. Machinery Lubrication Activities</td>
<td>N/A</td>
</tr>
<tr>
<td>5. Testing Equipment in the Quality Control Lab</td>
<td>N/A</td>
</tr>
<tr>
<td>6. Forklift Propane tanks, 33 lbs/each</td>
<td>N/A</td>
</tr>
<tr>
<td>7. Emboss Line: embossing roll and in-line ink jet</td>
<td>401 KAR 63:020</td>
</tr>
<tr>
<td>8. North Print Machine</td>
<td>401 KAR 63:020</td>
</tr>
<tr>
<td>9. Dogwood Cold Press</td>
<td>N/A</td>
</tr>
</tbody>
</table>
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. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) 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. The emissions of any individual Hazardous Air Pollutant (HAP) shall not exceed nine (9) tons during any consecutive twelve (12) month period. The emissions of combined HAPs shall not exceed twenty-two and one-half (22.5) tons during any consecutive twelve (12) month period. Monthly records, which demonstrate compliance with these limitations, shall be maintained and total HAP emissions shall be reported on a semi-annual basis. HAP emissions shall be calculated and recorded on a monthly basis. These records shall be summarized in tons per month HAP emissions; subsequently, tons of HAP emissions per rolling 12-month period shall be recorded. In addition, these records shall demonstrate compliance with HAP emission limitations listed herein. These records, as well as purchase orders and invoices for all HAP containing materials, shall be maintained on site for a period of five years from the date the data was collected and shall be provided to the Division upon request.

**Compliance Demonstration Method:**

HAP emitted (lb/month) = \[ \sum [\text{HAP emissions from coatings, adhesives and solvents} \] + [\text{HAP emissions from boilers}] + [\text{HAP emissions from plywood press}] \]

\[
E_{\text{HAPI}} = Q \times d \times \frac{\text{wt}\%_{\text{HAPI}}}{100} \times \left( \sum_{j=1}^{n} \frac{P_j}{\sum_{j=1}^{n} P_j} \right) + T \times \text{WEF}_{\text{HAPI}} + F \times \text{PEF}_{\text{HAPI}}
\]

Where:
- \( E_{\text{HAPI}} \) = Emissions of HAP “i” (lb/month)
- \( Q \) = Coating usage rate (gal/month)
- \( d \) = Density of the material used (lb/gal)
- \( \text{wt}\%_{\text{HAPI}} \) = Weight percent of HAP “i” in material (%)
- \( P_j \) = Number of parts of material “j” in the coating as applied
- \( T \) = Tons of wood burned in the boilers per month
- \( \text{WEF}_{\text{HAPI}} \) = HAP emission factor listed in AP-42 Tables 1.6-3 and 1.6-4
- \( F = 10,000 \text{ ft}^2 \) of flooring processed in the plywood press on a 3/8 inch basis per month
- \( \text{PEF}_{\text{HAPI}} \) = HAP emission factor listed in AP-42 Table 10.5-6

Note: Emission factors with units of lb/1,000 ft^2 must be multiplied by 10.

Combined HAP emitted (lb/month) = \[ \sum_{i=1}^{n} E_{\text{HAPI}} \]
SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

4. VOC emissions shall not exceed 230 tons during any consecutive twelve (12) month period. Monthly records to demonstrate compliance with this limitation shall be maintained and total VOC emissions shall be reported on a semi-annual basis. VOC emissions shall be calculated and recorded on a monthly basis. These records shall be summarized in tons per month of VOC emissions; subsequently, tons of VOC emissions per rolling 12-month period shall be recorded. In addition, these records shall demonstrate compliance with the VOC emission limitations listed herein. These records shall be maintained on site for a period of five years from the date the data was collected and shall be provided to the Division upon request.

**Compliance Demonstration Method:**

\[
E_{_{\text{VOC}}} = Q \times C_{\text{VOC}} \left( \frac{P_j}{\sum_{j=1}^{n} P_j} \right) + T \times WEF_{\text{VOC}} + S \times NEF_{\text{VOC}} + F \times PEF_{\text{VOC}}
\]

Where:

- \( E_{_{\text{VOC}}} \) = Emissions of VOC (lb/month)
- \( Q \) = Coating usage rate (gal/month)
- \( C_{\text{VOC}} \) = VOC content less water and exempt solvents in material “j”
- \( P_j \) = Number of parts of material “j” in the coating as applied
- \( T \) = Tons of wood burned in the boilers per month
- \( WEF_{\text{VOC}} \) = VOC emission factor for wood-fired boilers
- \( S \) = Million standard cubic feet of natural gas burned per month
- \( NEF_{\text{VOC}} \) = VOC emission factor for natural gas combustion in boilers, drying ovens and emergency generator
- \( F \) = 10,000 ft² of flooring processed in the plywood press on a 3/8 inch basis per month
- \( PEF_{\text{VOC}} \) = VOC emission factor listed in AP-42 Table 10.5-6

Note: Emission factors with units of lb/1,000 ft² must be multiplied by 10.
SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. 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.

2. Pursuant to 401 KAR 50:012, Section 1(2), General Application of Administrative Regulations and Standards, in the absence of a standard specified in the administrative regulations, 401 KAR Chapters 50 to 65, all major air contaminant sources shall, as a minimum, apply control procedures that are reasonable, available, and practical. **Compliance Demonstration Method:**

   All equipment and controls shall be operated in a manner to ensure compliance with VOC emission limits.
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;
 SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

d. The method used for determining the compliance status for the source, currently and over the reporting period.

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 U.S. EPA Region 4
London Regional Office Air Enforcement Branch
875 S. Main Street Atlanta Federal Center
London, KY 40741 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 this permit (V-22-003).
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 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.


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;
SECTION G - GENERAL PROVISIONS (CONTINUED)

(2) The permitted facility was at the time being properly operated;
(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)


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

N/A

SECTION I - COMPLIANCE SCHEDULE

N/A