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

Draft

AIR QUALITY PERMIT

Issued under 401 KAR 52:020

Permittee Name:	**Amcor Flexibles LLC**
Mailing Address:	**6850 Midland Industrial Drive** **Shelbyville, KY 40065**
Source Name:	**Amcor Flexibles Healthcare Shelbyville**
Mailing Address:	**6850 Midland Industrial Drive** **Shelbyville, KY 40065**
Source Location:	**Same as above**
Permit ID:	**V-25-032**
Agency Interest #:	**107007**
Activity ID:	**APE20250001**
Review Type:	**Title V, Operating**
Source ID:	**21-211-00054**
Regional Office:	**Frankfort Regional Office** **300 Sower Boulevard, 1st Floor** **Frankfort, KY 40601** **(502) 564-3358**
County:	**Shelby**
Application Complete Date:	**November 17, 2025**
Issuance Date:	
Expiration Date:	

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

Version 4/1/2022

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Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action
V-25-032	Renewal	APE20250001	11/17/2025		Renewal Permit

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.

Amcor Flexibles, LLC, ID # 21-211-00054, Permit # V-25-032, and Bemis Packaging Inc., ID # 21-211-00031, Permit # V-23-024, are located on contiguous properties, belong to the same industrial grouping, and are under common control. By the definition of major stationary source in 401 KAR 51:001, Amcor Flexibles, LLC and Bemis Packaging Inc. constitute one major source for PSD purposes. By the definition of major source in 401 KAR 52:001 for Title V program, they constitute one major source for non-hazardous regulated air pollutants and hazardous air pollutants, therefore, both facilities' emissions should be aggregated for the purpose of Title V, and PSD applicability determination. Both Amcor and Bemis's permits have individual emission limits listed in them for the purposes of precluding major source status, and each facility is responsible and liable for their own violations unless there is a joint cause for the violations.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Unit 01 (EP01) B4 – Boiler

Description:
EP01 is one 3.5 MMBtu/hr, natural gas fired boiler.
EP01 construction commenced: January 1994

Emission Unit 23 (EP23) B7, B8 (Pharma Boiler #3) and B9 (Pharma Boiler #4) - Boilers

Description:
EP23 is 3 natural gas fired boilers, one 9.85 MMBtu/hr and two 5.5 MMBtu/hr.
Construction Date: 2008

Emission Unit 24 (EP24) B1 – Boiler

Description:
EP24 is one 3.0 MMBtu/hr natural gas fired boiler.
EP24 construction commenced: December 2016

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

STATE-ORIGIN REQUIREMENT:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

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)]

   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.]

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

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:
Compliance shall be demonstrated according to **5. Specific Recordkeeping Requirements b.**

2. Emission Limitations:

a. The permittee shall not cause emissions of particulate matter from EP01 in excess of 0.56 lbs/MMBtu actual heat input, EP23 in excess of 0.45 lbs/MMBtu actual heat input and EP24 in excess of 0.44 lbs/MMBtu actual heat input. [401 KAR 59:015, Section 4(1)]

b. The permittee shall not cause emissions of particulate matter in excess of 20 percent opacity, except: [401 KAR 59:015, Section 4(2)]

i. A maximum of 40 percent opacity shall be allowed for a maximum of 6 consecutive minutes in any 60 consecutive minutes during fire box cleaning or soot blowing; and [401 KAR 59:015, Section 4(2)(b)]

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. [401 KAR 59:015, Section 4(2)(c)]

c. The permittee shall not cause emissions of gases that contain sulfur dioxide in excess of 3.0 lb/MMBtu actual heat input, EP23 in excess of 2.1 lbs/MMBtu actual heat input, and EP24 in excess of 2.0 lbs/MMBtu actual heat input. [401 KAR 59:015, Section 5(1)]

Compliance Demonstration Method:
Compliance with the 401 KAR 59:015 emission standards is assumed. [401 KAR 50:045, Section 4(3)(c)1.]

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:
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.

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

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 monitor the amount of natural gas combusted at each emissions unit, in MMscf, on a monthly basis. [401 KAR 52:020, Section 10]

5. Specific Recordkeeping Requirements:

a. The permittee shall maintain records of the amount of natural gas combusted at each emissions unit, in MMscf, on a monthly basis. [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 (EP02) Pharmaceutical Packaging - Storage and Mixing Areas

Description:
The storage and mixing areas are supporting facilities for the printing, coating and laminating activities.
EP02 construction commenced: 2005

APPLICABLE REGULATIONS:
401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*

401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*

STATE-ORIGIN REQUIREMENTS:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

1. **Operating Limitations:**
   Operation of a printer, coater or laminator, including raw material utilization, and operation of capture/control devices on the equipment shall be such that the source is in compliance with emission limitations in Sections B and D. See Section B Group Requirements for 401 KAR 59:210 and 401 KAR 59:212 emission limitations. [401 KAR 52:020, Section 10]

2. **Emission Limitations:**
   a. 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:
      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.

   b. See Section B Group Requirements emission limitations.

   c. See Section D for source-wide VOC and HAP emission limitations.

3. **Testing Requirements:**
   a. No testing requirements are applicable when best management practices are used. Best management practices are a minimization of emissions from supporting activities and shall include mixing in capped containers, storage of raw materials in closed containers, and utilization of closed vessels or piping when raw materials are transferred for mixing and use.

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

b. If best management practices are not used, to determine mixing and storage emission factor, the permittee shall submit an emission rate determination method for Division approval.

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

4. Specific Monitoring Requirements:

The permittee shall monitor that best management practices are used when mixing and storing raw materials, at least once a week. [401 KAR 52:020, Section 10]

5. Specific Recordkeeping Requirements:

a. The permittee shall record all monitoring observations related to best management practices (for example: caps were used on all mixing operations observed, raw materials in the mixing and storage room were observed to be in closed containers, and piping was used to minimize emissions where possible). Include, at a minimum, date and time of the observations, if caps were used when mixing, if all known volatile organic compound (VOC) and hazardous air pollutant (HAP) containers were closed, and other activities performed to minimize off-line VOC and HAP evaporative losses. [401 KAR 52:020, Section 10]

b. See Section B Group Requirements recordkeeping requirements.

c. See Section D for source-wide VOC and HAP recordkeeping requirements.

6. Specific Reporting Requirements:

a. The permittee shall state if best practices were used for storage and mixing activities in the facility's semiannual report. See Section F. [401 KAR 52:020, Section 10]

b. If monitoring does not confirm the use of best management practices, the permittee shall submit an emission rate determination test method to the Division for approval. [401 KAR 52:020, Section 10]

c. See Section B Group Requirements reporting requirements.

d. See Section D for source-wide VOC and HAP reporting requirements.

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

Emission Unit 03 (EP03) Off-Line Parts Cleaning

Description:
The cleaning is a support activity for the printing, coating and laminating.
One parts washer.
EP03 construction commenced: 2005

APPLICABLE REGULATIONS:
401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*

401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*

STATE-ORIGIN REQUIREMENTS:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

1. **Operating Limitations:**
   Operation of a printer, coater or laminator, including raw material utilization, and operation of capture/control devices on the equipment shall be such that the source is in compliance with emission limitations in Sections B and D. [401 KAR 52:020, Section 10]

2. **Emission Limitations:**
   a. See Section B Group Requirements emission limitations.

   b. See Section D for source-wide VOC and HAP emission limitations.

   c. 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:
   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].

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

4. Specific Monitoring Requirements:

The amount of each cleaning solvent consumed during all off-line parts cleaning shall be monitored over 30-day periods. [401 KAR 52:020, Section 10]

5. Specific Recordkeeping Requirements:

a. The permittee shall record the amount (in lbs or gals) of each cleaning solvent consumed during all off-line parts cleaning for each 30-day period. [401 KAR 52:020, Section 10]

b. The permittee shall record the VOC and individual HAP content of each cleaning solution used in units complimentary to the amount recorded (e.g. weight % with lbs weight and lbs/gal with gals). [401 KAR 52:020, Section 10]

c. The permittee shall, for each cleaning cycle, record which emission unit provided the majority of parts to be cleaned. [401 KAR 52:020, Section 10]

d. See Section B Group Requirements recordkeeping requirements.

e. See Section D for source-wide VOC and HAP recordkeeping requirements.

6. Specific Reporting Requirements:

a. See Section B Group Requirements reporting requirements.

b. See Section D for source-wide VOC and HAP reporting requirements.

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

P5, P9, and P10

These units are completely contained within a Building Enclosure.

Emission Unit 13 (EP13) P5 - Rotogravure Printer

Description:
Rotogravure Printing Press
8 natural gas fired ovens rated at a total of 10 MM Btu/hr combined. The ovens also utilize hot oil that recovers heat generated in control device #3.
Construction commenced: 1994
Control Device: Control Devices #3, #8, #10 (Regenerative Thermal Oxidizer)
Capture: Within a permanent total enclosure.

Emission Unit 18 (EP18) P9 - Rotogravure Printer with Laminator

Description:
Rotogravure Printing Press with Laminator
10 natural gas fired ovens rated at a total of 6.6 MM Btu/hr combined
Construction commenced: January 2015
Control Device: Control Devices #3, #8, #10 (Regenerative Thermal Oxidizer)
Capture: Within a permanent total enclosure.

Emission Unit 19 (EP19) P10 - Rotogravure Printer

Description:
Rotogravure Printing Press
6 natural gas fired ovens rated at a total of 9.0 MM Btu/hr combined
Construction commenced: September 2001
Control Device: Control Devices #3, #8, #10 (Regenerative Thermal Oxidizer)
Capture: Within a permanent total enclosure.

APPLICABLE REGULATIONS:
401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*

40 CFR Part 64, *Compliance Assurance Monitoring* for VOC

STATE-ORIGIN REQUIREMENTS:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

1. **Operating Limitations:**
   a. Operation of a printer, coater or laminator, including raw material utilization, and operation of capture/control devices on the equipment shall be such that the source is in compliance with emission limitations in Sections B and D. [401 KAR 52:020, Section 10]

   b. See Section E for permanent total enclosure and control device operating limitations.

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

2. Emission Limitations:

a. 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:
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.

b. See Section B Group Requirements emission limitations.

c. See Section D for source-wide VOC and HAP emission limitations.

3. Testing Requirements:

a. See Section B Group Requirements testing requirements.

b. See Section E for permanent total enclosure and control device testing requirements.

4. Specific Monitoring Requirements:

a. The amount of each surface preparation, cleanup, or washup solvent used (including exempt compounds) at the printing press shall be monitored over 30-day periods. [401 KAR 52:020, Section 10]

b. The amount of each cleaning solvent consumed during press cleaning at and around the line shall be monitored over 30-day periods. [401 KAR 52:020, Section 10]

c. Refer to Section E for permanent total enclosure and control device monitoring requirements pursuant to 40 CFR 64.

5. Specific Recordkeeping Requirements:

a. Daily records shall be maintained by the source for the most recent two (2) year period. These records shall be made available to the cabinet or the U.S. EPA upon request. These records shall include, but not be limited to, the following [401 KAR 59:212 Section 4(6)]
   (1) Applicable administrative regulation number;
   (2) Application method and substrate type;
   (3) Amount and type of graphic arts material or solvent used at each point of application, including exempt compounds;
   (4) The VOC content as applied in each graphic arts material or solvent;
   (5) The date for each application for graphic arts material or solvent; and

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

(6) The amount of surface preparation, cleanup, or washup solvent (including exempt compounds) used and the VOC content of each.

b. See Section B Group Requirements recordkeeping requirements.

c. See Section D for source-wide VOC and HAP recordkeeping requirements.

d. Refer to Section E for permanent total enclosure and control device recordkeeping requirements pursuant to 40 CFR 64.

6. Specific Reporting Requirements:

a. See Section B Group Requirements reporting requirements.

b. See Section D for source-wide VOC and HAP reporting requirements.

c. Refer to Section E for reporting requirements under 40 CFR 64.

7. Specific Control Equipment Operating Conditions:

Refer to Section E for CAM requirements pursuant to 40 CFR 64.

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

L4, L5, and L7

These units are completely contained within a Building Enclosure.

Emission Unit 12 (EP12) L4 - Laminating Line

Description:
Laminator
2 natural gas fired ovens rated at a total of 5.0 MM Btu/hr combined
Construction commenced: 1994
Control Device: Control Devices #3, #8, #10 (Regenerative Thermal Oxidizer)
Capture: Within a permanent total enclosure.

Emission Unit 14 (EP14) L5 - Laminating Line

Description:
Laminator
2 natural gas fired ovens rated at a total of 11.0 MM Btu/hr combined
Construction commenced: 2000
Control Device: Control Devices #3, #8, #10 (Regenerative Thermal Oxidizer)
Capture: Within a permanent total enclosure.

Emission Unit 16 (EP16) L7 - Laminating/Coating Line

Description:
Laminator and coater
3 natural gas fired ovens rated at a total of 6.6 MM Btu/hr combined
Construction commenced: May 2008
Control Device: Control Devices #3, #8, #10 (Regenerative Thermal Oxidizer)
Capture: Within a permanent total enclosure.

APPLICABLE REGULATIONS:
401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*

40 CFR Part 64, *Compliance Assurance Monitoring for VOC*

STATE-ORIGIN REQUIREMENTS:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

1. **Operating Limitations:**
   a. Operation of a printer, coater or laminator, including raw material utilization, and operation of capture/control devices on the equipment shall be such that the source is in compliance with emission limitations in Sections B and D. [401 KAR 52:020, Section 10]

   b. See Section E for permanent total enclosure and control device operating limitations.

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

2. Emission Limitations:

a. 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:
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.

b. See Section B Group Requirements emission limitations.

c. See Section D for source-wide VOC and HAP emission limitations.

3. Testing Requirements:

a. See Section B Group Requirements testing requirements.

b. See Section E for permanent total enclosure and control device testing requirements.

4. Specific Monitoring Requirements:

a. The amount and type of adhesive, coating, or solvent used (including exempt compounds) at each point of application, including exempt compounds shall be monitored over 30-day periods. [401 KAR 52:020, Section 10]

b. The amount of each surface preparation, cleanup, or washup solvent consumed during laminator cleaning at and around the line shall be monitored over 30-day periods. [401 KAR 52:020, Section 10]

c. Refer to Section E for permanent total enclosure and control device monitoring requirements pursuant to 40 CFR 64.

5. Specific Recordkeeping Requirements:

a. Daily records shall be maintained by the source for the most recent two (2) year period. These records shall be made available to the cabinet or the U.S. EPA upon request. These records shall include, but not be limited to, the following [401 KAR 59:210, Section 4(8)]
   (1) Applicable administrative regulation number;
   (2) Application method and substrate type;
   (3) Amount and type of adhesive, coating (including catalyst and reducer for multicomponent coatings), or solvent used at each point of application, including exempt compounds;
   (4) The VOC content as applied in each adhesive, coating, or solvent;

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

(5) The date for each application for adhesive, coating, or solvent; and
(6) The amount of surface preparation, cleanup, or washup solvent (including exempt compounds) used and the VOC content of each.

b. See Section B Group Requirements recordkeeping requirements.

c. See Section D for source-wide VOC and HAP recordkeeping requirements.

d. See Section E for permanent total enclosure and control device recordkeeping requirements.

6. Specific Reporting Requirements:

a. See Section B Group Requirements reporting requirements.

b. See Section D for source-wide VOC and HAP reporting requirements.

c. Refer to Section E for reporting requirements under 40 CFR 64.

7. Specific Control Equipment Operating Conditions:

Refer to Section E for CAM requirements pursuant to 40 CFR 64.

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

Group Requirements:

LIST of POINTS (Subject to 401 KAR 59:210 or 401 KAR 59:212)

EP02 Pharmaceutical Packaging - Storage and Mixing Areas
EP03 Off-Line Parts Cleaning
EP13 P5 - Rotogravure Printer
EP18 P9 - Rotogravure Printer with Laminator
EP19 P10 - Rotogravure Printer
EP12 L4 - Laminating Line
EP14 L5 - Laminating Line
EP16 L7 - Laminating/Coating Line

APPLICABLE REGULATIONS:
401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*

401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*

1. **Operating Limitations:**
   See individual operating limitations in Section B.

2. **Emission Limitations:**
   401 KAR 59:210
   a. **Applicable to EP12, EP14 and EP16 (L4, L5 and L7) -** No person shall cause, allow, or permit a coating line for fabric, vinyl, or paper to discharge into the atmosphere more than fifteen (15) percent by weight of the VOCs net input into the affected facility. [401 KAR 59:210, Section 3]

   401 KAR 59:212
   b. **Applicable to EP13, EP18 and EP19 (P5, P9, and P10) -** No person shall cause, allow, or permit an affected facility for packaging rotogravure printing or specialty rotogravure printing to discharge into the atmosphere more than thirty-five (35) percent by weight of the VOCs net input into the affected facility. [401 KAR 59:212, Section 3(1)]

   Compliance Demonstration Method for 401 KAR 59:210 and 401 KAR 59:212:
   The weight percentage of VOC emitted shall be calculated for each individual coating or graphic arts line. Emissions from offline parts cleaning shall be attributed to the appropriate coating or graphic arts line by determining, for each cleaning cycle, which line provides the majority of parts to be cleaned.

$$Weight\ percentage\ of\ VOCs\ emitted\ = \frac{VOC\ emitted}{VOC\ net\ input}\ x\ 100$$

$$VOC\ net\ input = \sum M_i w_i + \sum M_c w_c$$

$$VOC\ Emitted = \sum M_i w_i (1 - (C * D)) + \sum M_c w_c (1 - (C * D)) + \sum M_s w_s$$

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

Where:

M_i = lbs of ink, adhesive, coating, or solvent input to the unit
w_i = VOC weight % of ink, adhesives, coating, or solvent, expressed as a decimal
M_c = lbs of cleaning solution consumed during cleaning (offline and online cleaning)
w_c = VOC weight % of cleaning solution, expressed as a decimal
M_s = lbs of ink, adhesive coating, or solvent mixed and stored
w_s = appropriate mixing and storage emission factor
C = appropriate capture efficiency, expressed as decimal (the capture efficiency for off-line parts cleaning equals zero)
D = appropriate control efficiency, expressed as decimal

For the formulas above:

(1) Emission factor for mixing and storage of inks, coatings, and solvents is 0.2% of VOC throughput (total VOC usage) when best management practices are used. Best management practices are a minimization of emissions from supporting activities and shall include performance of mixing in capped containers, storage of raw materials in closed containers, and utilization of closed vessels or piping when raw materials are transferred for mixing and use. Otherwise, testing shall be performed in accordance with appropriate EPA testing methods to determine a representative emission factor.

(2) For a line that is in a permanent total enclosure, VOC capture efficiency realized at and around the line during cleaning was demonstrated to be 100%, for all other lines VOC capture efficiency realized at and around the line during cleaning shall be assumed to be 40% unless testing is performed in accordance with appropriate EPA testing methods to determine a more representative capture efficiency.

(3) The control efficiency of the each regenerative thermal oxidizer is the efficiency established during the most recent performance test.

(4) A control efficiency of 0% shall be assumed for all periods the regenerative thermal oxidizers are receiving emissions from the laminators or presses during which, the instantaneous combustion zone temperature measurement falls more than 28ºC (50ºF) below the average temperature measured during the most recent performance test, or any 3-hour average period when the average combustion zone temperature measurement of regenerative thermal oxidizer falls more than 28ºC (50ºF) below the average temperature measured during the most recent performance test.

3. Testing Requirements:

a. To demonstrate compliance with requirements resulting from applicability of 401 KAR 59:212 and 401 KAR 59:210, VOC content, solids content, and water content of inks, coatings, solvents, adhesives, and other materials shall be determined as required for compliance demonstration using;
   (1) Reference Method 24 in Appendix A of 40 CFR 60,
   (2) Formulation data from the coating, solvent, or other material manufacturer, or
   (3) An alternative technique approved by the Division and the U.S. EPA.

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

b. Organic HAP weight fraction of inks, coatings, solvents, adhesives, and other materials shall be determined using;
   (1) Reference Method 311 in Appendix A of 40 CFR 63,
   (2) Formulation data from the coating, solvent, or other material manufacturer, or
   (3) An alternative technique approved by the Division and the U.S. EPA. In the event of any inconsistency between any of the accepted techniques, Method 311 test results shall govern unless the permittee can satisfactorily demonstrate to the Division and the U.S. EPA that other data is more accurate.

4. Specific Monitoring Requirements:
See individual specific monitoring requirements in Section B.

5. Specific Recordkeeping Requirements:

a. The permittee shall keep record all calibration checks, adjustments, and maintenance performed on monitoring devices identified in Section B and Section E and include date and time. Additionally, the nature of the repairs and adjustments shall be recorded. [401 KAR 52:020, Section 10]

b. The permittee shall keep record of all maintenance conducted on the air pollution control equipment, including the date of maintenance. [401 KAR 52:020, Section 10]

c. The permittee shall keep records of all temperature, pressure, monitoring system performance evaluation, control equipment inlet and outlet concentration, capture efficiency, and raw material utilization measurements made during performance testing. [401 KAR 52:020, Section 10]

d. The permittee shall calculate and record the weight percentage of VOC emitted from a facility (press, coater or laminator and mixing, storage and clean-up) for each 30-day period. [401 KAR 52:020, Section 10]

6. Specific Reporting Requirements:

a. The permittee shall semiannually report deviations of any operating parameter limitations described in Section B and Section E. Include date, time, and duration of each violation. [401 KAR 52:020, Section 10]

b. The permittee shall semiannually report the operating condition of each monitoring system, including actions taken and observations made during the period to comply with the monitoring system quality control program. [401 KAR 52:020, Section 10]

c. The permittee shall semiannually report the weight percentage of VOCs emitted from each applicable printing press line for each 30-day period, ending in the respective semiannual periods. [401 KAR 52:020, Section 10]

d. The permittee shall semiannually report the weight percentage of VOCs emitted from each applicable laminator line for each 30-day period, ending in the respective semiannual periods. [401 KAR 52:020, Section 10]

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.

Description	Generally Applicable Regulation
1. 1 Dry Grinder for Repair of Rubber on Printing Cylinders (each is controlled by a series of filters: a furnace type filter and a bag filter)	401 KAR 59:010
2. Two Lab Bunsen Burners 3,412 Btu/hr each	401 KAR 63:020
3. Multiple Office Furnaces and Make-Up Air Units (Total capacity 5.4 MMBtu/hr, Natural Gas)	401 KAR 63:020
4. 2 Unit Heaters (Total capacity 0.45 MMBtu/hr, Natural Gas)	401 KAR 63:020
5. A 365,000 Btu/hr Water Heater, Natural Gas	401 KAR 63:020
6. Trim Systems	401 KAR 59:010
7. Bailing Systems	401 KAR 59:010
8. 8000 gal N-propyl acetate Solvent Storage Tank	401 KAR 59:212 401 KAR 59:210
9. 8000 gal Ethyl Acetate Solvent Storage Tank	401 KAR 59:210 401 KAR 59:212 401 KAR 63:020
10. 2000 gal N-Propyl Acetate Solvent Storage Tank	401 KAR 59:210 401 KAR 59:212
11. 0.8 MMBtu/hr Natural Gas Process Air Heater	401 KAR 63:020

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. VOC, HAPs, Particulate Matter, and Opacity 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. **Source-Wide Emission Limitations:**
   a. Source-wide emissions of VOC shall not exceed 230 tons during any consecutive 12-month period. [To preclude 401 KAR 51:017]

      Compliance Demonstration Method:
      The equation below or equivalent shall be used to calculate monthly and 12 consecutive month source-wide VOC emissions.

      Source-wide VOC emissions = Σ [VOC emissions from printing, laminating, coating, and supporting activities] + Σ [VOC emissions from fuel combustion] + Σ [VOC emissions from Insignificant Activities]

   b. Source-wide emissions of any single HAP shall not exceed 4.5 tons during any consecutive 12-month period. [To preclude major source status for HAP]

   c. Source-wide emissions of Combined HAPs shall not exceed 11.25 tons during any consecutive 12-month period from. [To preclude major source status for HAP]

      Compliance Demonstration Method for Single and Combined HAP:
      The equation below or equivalent shall be used to calculate monthly and 12 consecutive month source-wide single and combined HAP emissions.

      Source-wide HAP emissions = Σ [HAP emissions from printing, laminating, coating, and supporting activities] + Σ [HAP emissions from Insignificant Activities]

4. **Record Keeping Requirements:**
   a. The source-wide amount (in tons) of VOC emitted during each month and each 12 consecutive month period shall be recorded monthly.

   b. The source-wide monthly and 12 consecutive month emissions of single HAP shall be recorded.

   c. The source-wide monthly and 12 consecutive month emissions of combined HAPs shall be recorded.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

5. **Reporting Requirements:**
   a. The source-wide amount (in tons) of VOC emitted during each month and each 12 consecutive month period shall be reported.

   b. The source-wide monthly and 12 consecutive month emissions of single HAP in the semiannual period shall be reported.

   c. The source-wide monthly and 12 consecutive month emissions of combined HAPs in the semiannual period shall be reported.

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.

Regenerative Thermal Oxidizers (RTOs) - The thermal oxidizers share a common manifold through which they receive their air intake. The ductwork to the oxidizers contains dampers that allow for the isolation of a single oxidizer.

Control Device #3: is a MEGTEC Systems CS-II-400 regenerative thermal oxidizer, installed in December 2008 and the last compliance demonstrated through stack testing VOC control efficiency of 99.12% on March 8, 2022.

Control Device #8: is a MEGTEC Systems CS-500 regenerative thermal oxidizer installed in December 2008 and the last compliance demonstrated through stack testing a VOC control efficiency of 98.38% on March 8, 2022.

Control Device #10: is a regenerative thermal oxidizer installed in January 2011 and the last compliance demonstrated through stack testing a VOC control efficiency of 97.17% on March 8, 2022.

Note: The following limitations and requirements are in addition to the limitations and requirements found in SECTION B and SECTION D of this permit.

1. Regenerative Thermal Oxidizers (RTOs) Operating Limitations:

a. The permittee shall operate RTO at all times printing, coating or laminating is being performed. In addition, emissions from the process specified above shall be routed to the RTO at all times.

b. The average combustion temperature of RTO in any three (3) hour period shall not fall below the combustion temperature limit established during the most recent performance test. If the 3-hour average combustion chamber temperature falls below the operating temperature limit established for the thermal oxidizer, then the permittee shall assume destruction efficiency of zero, during the time period of the deviation for the purpose of demonstrating compliance with emission limitations.

c. The permittee shall install, calibrate, maintain and operate in accordance with manufacturer's specifications a temperature monitoring device equipped with a continuous recorder in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

2. Regenerative Thermal Oxidizers (RTOs) Testing Requirements:

a. The permittee shall conduct a performance test for RTO using EPA Reference Method 25A or alternate as approved by the Administrator to determine the control efficiency no later than 5 years following the previous performance test approved by the Division.

b. The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This calculated average combustion temperature is the minimum operating limit for the thermal oxidizer.

3. Regenerative Thermal Oxidizers (RTOs) Specific Monitoring Requirements:

The permittee shall monitor the temperature in the firebox of the RTO or immediately downstream of the firebox, before any substantial heat exchange occurs. Compliance shall be demonstrated by monitoring and recording the combustion temperature at least once every 15 minutes and by calculating and recording the 3-hour averages.

4. Regenerative Thermal Oxidizers (RTOs) Specific Recordkeeping Requirements:

a. The permittee shall maintain records of the following information for the thermal oxidizer (RTO):
   (1) The design and/or manufacturer's parameter specifications,
   (2) The operational procedures and preventive maintenance records,
   (3) The calibration records for the combustion temperature sensor, validation checks and the subsequent accuracy audits,
   (4) A log of visual inspections of each temperature sensor if redundant temperature sensors are not used,
   (5) A record of the average combustion chamber temperature limit established during the most recent performance test and all relevant supporting data,
   (6) The continuously recorded combustion chamber temperature of the thermal oxidizer along with the 3-hour averages,
   (7) Record all periods (during printing, laminating or coating operations), in which the 3-hour average combustion chamber temperature of the thermal oxidizer is below the temperature limit established during the most recent performance test. Each occurrence shall be considered a deviation from permit requirements.
   (8) During all periods of operation of the thermal oxidizer in which the 3-hour average combustion chamber temperature is below the combustion chamber temperature limit established by the most recent performance test, and a daily log of the following information shall be kept:
      i. Whether any air emissions were visible from the facilities associated with the thermal oxidizer;
      ii. Whether visible emissions were normal for the process;
      iii. The cause of the visible emissions; and
      iv. Corrective action(s) taken shall be recorded.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

5. Regenerative Thermal Oxidizers (RTOs) Specific Reporting Requirements:

a. The permittee shall identify, record, and submit a written report to the Field office listed in the front of the permit, for each deviation from the permitted conditions.
   (1) For the thermal oxidizer, this is each instance in excess of 3 hours during which the average temperature of the thermal oxidizer remains below the limit established during the most recent measurement of oxidizer efficiency,
   (2) For emissions reporting, treat the materials used during a deviation on a controlled printing, laminating or coating operations as if they were used on an uncontrolled printing, laminating or coating operations for the time period of the deviation.

b. If no deviations occur during a particular 6-month period, the permittee shall state this in the semi-annual report required by Permit Section F(6) - General Condition.

Building Enclosures (Permanent Total Enclosures)

1. Building Enclosure Operating Limitations:

a. Pressure differential across each building enclosure shall be at least 0.007 in H_2O (0.013 mm Hg) into the building enclosure during operation of affected units.

Compliance Demonstration Method:
Average 1-hr pressure differentials shall be calculated at least once every 15 minutes using continuous monitoring data when any affected unit in the enclosure is operating Compliance is demonstrated when the average 1-hr pressure differentials are at least 0.007 in H_2O (0.013 mm Hg) into the building enclosure.

b. To measure pressure differential between the inside and outside of each building enclosure, differential pressure gages with a continuous recorders shall be installed, calibrated, maintained, and operated in accordance with manufacturer's instructions.

Note: Building Enclosure Operating Limitation b. is required as part of compliance demonstration for Section E Building Enclosure Operating Limitations a.

c. Cargo doors into each building enclosure shall be programmed to close automatically when not in use. Cargo doors will be equipped with alarms that shall activate when the doors are open for longer than five minutes.

d. Man size entrances into each building enclosure shall utilize doors that close automatically (or an equivalent).

Compliance Demonstration Method:
Functioning spring-loaded hinges or equivalents may be used to demonstrate compliance with this condition.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

2. Building Enclosure Specific Monitoring Requirements:

a. Pressure differential across the building enclosure shall be monitored continuously when an affected unit is operating.

b. Functionality (operating normally, operating with something wrong, or fails to operate) of mechanisms used to comply with Building Enclosure Operating Limitations c.-d. shall be monitored at least once every three months (quarterly) except initially and when a mechanism fails. Initially, functionality of the mechanisms shall be monitored at least once a week for 4 consecutive weeks. Additionally, if a mechanism fails, functionality of the mechanisms shall be monitored at least once a week until 4 consecutive weeks without a failure is subsequently realized.

3. Building Enclosure Specific Recordkeeping Requirements:

a. The following records shall be retained on site for at least 5 years.

(1) Pressure differential monitoring described in Building Enclosure Specific Monitoring Requirements a. shall be recorded. In addition, continuous pressure differential data shall be averaged for 1-hr periods and recorded at least once every 15 minutes when an affected unit in the building enclosure is operating.

(2) Observations made as a result of compliance with Building Enclosure Specific Monitoring Requirements b. shall be recorded. Additionally, maintenance of the mechanisms shall be recorded and include the date.

Compliance Assurance Monitoring (CAM) PLAN - In accordance with 40 CFR Part 64, Compliance Assurance Monitoring (CAM), the permittee submitted a CAM Plan as part of the Tile V renewal process. This CAM Plan addresses those processes utilizing add-on control equipment; implementation of the CAM plan provides reasonable assurance of compliance with applicable requirements (i.e., VOC emission limitations).

Capture System for VOC Control: Permanent Total Enclosures (PTE)

I. Applicability

This protocol is applicable to the following emission units: EP13 (P5), EP18 (P9), EP19 (P10), EP12 (L4), EP14 (L5), and EP16 (L7).

II. Monitoring Approach

The elements of monitoring approach, including indicators to be monitored, indicator ranges, and performance criteria are presented in Table A.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

TABLE A. MONITORING APPROACH FOR PERMANENT TOTAL ENCLOSURES

UTILIZING PRESSURE DIFFERENTIAL

		Indicator #1	Indicator #2	Indicator # 3
I.	Indicator	Work Practice	Work Practice	Pressure differential
	Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect the operational condition of bypass damper position interlock. Inspect door closure systems and building enclosure alarms.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.

		Indicator #1	Indicator #2	Indicator # 3
II.	Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure have been compromised.	An excursion is any finding that a bypass damper, a door closure system, or alarm is inoperative. 1. Cargo doors into each building enclosure shall be fitted with automatic closures and equipped with alarms that shall activate when a door is open for longer than five minutes. 2. Personnel entrances into each building enclosure shall be fitted with door closures.	An excursion is defined as a 1-hour period when the average pressure differential is less than negative (-) 0.007 in. H_2O while the process is operating;
	Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

TABLE A. (CONTINUED)

	Indicator #1	Indicator #2	Indicator # 3
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere. Properly operating doors and alarms will assure that the doors are closed during process operation.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instruction.
D. Monitoring Frequency	Semiannually	Quarterly, except for when a mechanism fails, and then monitoring will increase to weekly for at least four (4) consecutive weeks until four (4) consecutive weeks without failure is recorded.	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections, including any maintenance of door mechanisms.	Record at least once every 15 minutes on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable.	One (1) hour.
E. Recordkeeping	Maintain, for a period of 5 years, records of inspections and of corrective actions taken in response to excursions.	Maintain, for a period of 5 years, records of inspections and of corrective actions taken in response to excursions.	Maintain, for a period of 5 years, records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion, and the corrective action taken.	Number, duration, cause of any excursion, and the corrective action taken.	Number, duration, cause of any excursion, and the corrective action taken.
Frequency	Semiannually.	Semiannually.	Semiannually.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

VOC Control Device: Regenerative Thermal Oxidizer

I. Applicability
This monitoring protocol is applicable to Regenerative Thermal Oxidizers #3, #8, and #10.

II. Monitoring Approach for Regenerative Thermal Oxidizers:

TABLE B. MONITORING APPROACH FOR REGENERATIVE THERMAL OXIDIZER

		Indicator #1	Indicator #2	Indicator #3
I.	Indicator	Oxidizer combustion zone temperature.	Work practice/inspection.	Performance test
	Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II.	Indicator Range	Whenever a connected process is in operation, an excursion is identified as a combustion zone temperature measurement of more than 50° F below the set point temperature used to demonstrate compliance during the most recent VOC emission test, or as any 3-hour period when the average combustion zone temperature is less than the set point temperature used to demonstrate compliance during the most recent VOC emission test.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
	Corrective Action	Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.
III.	Performance Criteria			
A.	Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 1% of the 3-hour average temperature measured during the most recent performance test.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by Kentucky Division for Air Quality prior to conducting the performance test.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

TABLE B. MONITORING APPROACH FOR REGENERATIVE THERMAL OXIDIZER

		Indicator #1	Indicator #2	Indicator #3
B.	Verification of Operational Status	Temperatures recorded on electronic media.	Inspection records.	Not applicable.
C.	QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria +20°F.	Not applicable.	EPA test methods approved in protocol.
D.	Monitoring Frequency	Measured continuously	• External inspection – quarterly. • Internal inspection – annually.	Once every 5 years.
	Data Collection Procedure	Recorded at least every 15 minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
	Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.
E.	Record Keeping	Maintain, for a period of 5 years, records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain, for a period of 5 years, records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F.	Reporting	Number, duration, cause of any excursion, and the corrective action taken.	Number, duration, cause of any excursion, and the corrective action taken.	Submit test protocol and notification of testing to Kentucky Division for Air Quality at least 60 days prior to test date. Submit test report within 45 days after conducting a performance test.
	Frequency	Semiannually.	Semiannually.	For each performance test conducted.

In addition, the permittee shall comply with the following requirements from 40 CFR Part 64.

a. Upon detecting an excursion or exceedance (as defined in the CAM plan), the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [40 CFR 64.7(d)(1)]

b. Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance (as defined in the CAM plan) will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [40 CFR 64.7(d)(2)]

c. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [40 CFR 64.9(b)(1)]

d. Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b)(2)]

e. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under CAM did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Division and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 CFR 64.7(e)]

f. On and after the date specified in 40 CFR 64.7(a) by which the permittee must use monitoring that meets the requirements of 40 CFR 64, the permittee shall submit monitoring reports to the Division in accordance with Section F. [40 CFR 64.9(a)(1)]

g. A report for monitoring under 40 CFR 64 shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable: [40 CFR 64.9(a)(2)]
   (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; [40 CFR 64.9(a)(2)(i)]
   (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and [40 CFR 64.9(a)(2)(ii)]
   (3) A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the permittee shall include in the

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. [40 CFR 64.9(a)(2)(iii)]

(4) The threshold for requiring the implementation of a QIP is an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a semiannual reporting period. [40 CFR 64.8(a)]

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.
   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

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

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 Frankfort Regional Office 300 Sower Boulevard, 1st Floor Frankfort, KY 40601	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 this permit (V-25-032).

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

N/A

SECTION I - COMPLIANCE SCHEDULE

N/A