

**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 52:030**

Permittee Name: Amrize Building Envelope LLC
Mailing Address: 8170 Holton Dr., Florence, KY 41042

Source Name: Amrize Building Envelope LLC
Mailing Address: 8170 Holton Dr., Florence, KY 41042

Source Location: Same as above

Permit ID: F-26-008
Agency Interest #: 71732
Activity ID: APE20250003
Review Type: Conditional Major, Operating
Source ID: 21-117-00177

Regional Office: Florence Regional Office
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**Application
Complete Date:** March 6, 2026
Issuance Date:
Expiration Date:


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

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Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action
F-26-008	Renewal	APE20250003	3/6/2026		Renewal Operating Permit, updated testing for EU #02, moving TK-01 to Section B

SECTION A - PERMIT AUTHORIZATION

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

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:030, Federally-enforceable permits for non-major sources.

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

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

Emission Unit 01: Trim/Sawing Foam Boards

Description:

Construction Date: 2005

Capacity: Max. 8 tons/hr

Controls: Dust Collector (Flex-Kleen)

APPLICABLE REGULATIONS:

401 KAR 59:010, *New process operations*

1. Operating Limitations:

- a. To preclude applicability of 401 KAR 52:020, the permittee shall operate the dust collector at the trimming and sawing operation properly, and in accordance with the manufacturer's specifications, or standard operating procedures as approved by the Division at all times. [401 KAR 52:030, Section 10]
- b. To preclude applicability of 401 KAR 52:020, the trimming and sawing operation shall not operate if the dust collector is not operational. [401 KAR 52:030, Section 10]

Compliance Demonstration Method:

See Section E, Source Control Equipment Requirements.

2. Emission Limitations:

- a. See Section D, Source Emission Limitations and Testing Requirements.
- b. The permittee shall not cause, suffer, allow, or permit any continuous emissions into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity. [401 KAR 59:010, Section 3(1)(a)]

Compliance Demonstration Method:

See 4. Specific Monitoring Requirements b.

- c. The permittee shall not cause, suffer, allow, or permit the emission into the open air of particulate matter in excess of the quantity specified below: [401 KAR 59:010, Section 3(2)]
 - (1) $E = 2.34$ lbs/hr for process rates up to 1,000 lbs/hr
 - (2) $E = 3.59 P^{0.62}$ for process rates greater than 1,000 lbs/hr up to 60,000 lbs/hrWhere: E = rate of particulate emissions in lb(s)/hr, and
 P = process weight rate in tons/hr.

Compliance Demonstration Method:

Compliance is demonstrated by operating the dust collector system at all times that Emission Unit 01 is operating. See 7. Specific Control Equipment Operating Conditions.

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:

- a. The permittee shall monitor the condition of the bags in the dust collector using a bag-break monitor. The permittee shall replace any defective bags as quickly as practicable after discovery of the need for replacement. Replacement bags shall be maintained at all times on the premises of the source. [401 KAR 52:030, Section 10]
- b. The permittee shall perform a qualitative visual observation of the opacity of emissions at each stack no less than once per day 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 U.S. EPA Reference Method 9. In lieu of determining the opacity using U.S. EPA Reference Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume). [401 KAR 52:030, Section 10]
- c. The permittee shall monitor the pressure drop of the dust collector on a daily basis to ensure that the pressure drop remains between 0.5 and 4.0 inches of water. [401 KAR 52:030, Section 10]

5. Specific Recordkeeping Requirements:

- a. The permittee shall keep a log of the qualitative visual observations required by **4. Specific Monitoring Requirements b.** including the date, time, initials of observer, whether any emissions were observed (yes/no), any U.S. EPA Reference Method 9 readings taken, and any corrective action taken including results due to observed emissions. [401 KAR 52:030, Section 10]
- b. The permittee shall maintain a written log of the daily pressure drop of the dust collector and make said log available for inspection by Division personnel upon request. The log shall indicate the name or initial of the person performing the pressure drop monitoring. [401 KAR 52:030, Section 10]

6. Specific Reporting Requirements:

See Section F, **Monitoring, Recordkeeping, and Reporting Requirements.**

7. Specific Control Equipment Operating Conditions:

Each time the permittee changes the brand or type of bags to be used in the dust collector, the permittee shall maintain records of manufacturer's specifications for the new bags.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Unit 02: Foam Board Laydown Process****Description:**

Construction Date: 2005

Capacity: Max. 8 tons/hr

Controls: Regenerative Thermal Oxidizer (RTO-2, 2.4 MMBtu/hr, Installed March 2021)

APPLICABLE REGULATIONS:**401 KAR 63:020**, *Potentially hazardous matter or toxic substances* [State-Origin Requirement]**PRECLUDED REGULATIONS:****401 KAR 51:017**, *Prevention of significant deterioration of air quality* (PSD)**1. Operating Limitations:**

The permittee shall route the exhaust gases from the laydown process and the enclosed hot laminator to RTO-2 at all times. [401 KAR 52:030, Section 10]

Compliance Demonstration Method:

See **3. Testing Requirements**, **4. Specific Monitoring Requirements**, **5. Specific Recordkeeping Requirements**, **7. Specific Control Equipment Operating Conditions** and **Section D. Source Emission Limitations and Testing Requirements**.

2. Emission Limitations:

a. The permittee shall provide the utmost care and consideration, in the handling of materials from which hazardous matter or toxic substances may be emitted, to the potentially harmful effects of the emissions resulting from such activities. The permittee shall not 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 toxic 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 D, Source Emission Limitations and Testing Requirements**.

3. Testing Requirements:

a. 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)

- b. Within 180 days of issuance of final permit F-26-008, and subsequently within 5 years of the most recent performance test approved by the Division, the permittee shall conduct performance testing to determine the control efficiency of VOC emissions of RTO-2 and uncontrolled VOC emission factors for Process ID 01 (Foam Board laydown process) and Process ID 03 (Laminator & Chem Pump to RTO). The performance test shall consist of 3 separate test runs and shall be conducted according to the following requirements. Any alternatives to these requirements shall be clearly identified in the test protocol submitted by the permittee and subject to approval by the Division: [401 KAR 50:055, Section 2(1)(a)]

(1) Method 1 or 1A of appendix A of 40 CFR 60 as appropriate, shall be used for selection of the sampling sites.

(i) Sampling sites shall be located at the inlet of RTO-2 and the outlet of RTO-2.

(2) The gas volumetric flow rate shall be determined during each test run at each sampling site using Method 2, 2A, 2C, or 2D of appendix A of 40 CFR part 60, as appropriate.

(3) To determine the control efficiency (CE) of RTO-2 for VOC, the permittee shall use Method 18 of appendix A of 40 CFR 60. Alternatively, any other method or data that has been validated according to the applicable procedures in Method 301 of appendix A to 40 CFR 63 may be used.

(i) The minimum sampling time for each test run shall be 1 hour in which either an integrated sample or a minimum of four grab samples shall be taken. If grab sampling is used, then the samples shall be taken at approximately equal intervals in time, such as 15-minute intervals during the run.

(ii) The analyte shall be isopentane.

(iii) The mass rate of VOC shall be computed for each test run using the following equations:

$$E_i = \frac{1}{K} (C_i \times MW) Q_i$$

$$E_o = \frac{1}{K} (C_o \times MW) Q_o$$

Where: E_i, E_o = Emission rate of VOC at the inlet and outlet of RTO-2, respectively, dry basis, lb/hr

K = Conversion constant from ppmv at standard conditions to lb/scf, 385.1×10^6

C_i, C_o = Concentration on a dry basis of isopentane, parts per million by volume of the gas stream at the inlet and outlet of RTO-2, respectively

MW = Molecular weight of isopentane, 72.15 lb/lbmole

Q_i, Q_o = Vent flow rate at the inlet and outlet of RTO-2, respectively, dscf/hr

(iv) The control efficiency of RTO-2 shall be calculated for each test run using the following equation:

$$CE = \frac{E_i - E_o}{E_i} (100)$$

Where: CE = Control efficiency of RTO-2, percent

(4) The RTO-2 combustion zone temperature shall be monitored and recorded during each test run. See **7. Specific Control Equipment Operating Conditions a.**

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

- (5) The amount of VOC (isopentane) input into the process (MP_{input}) during each test run shall be determined according to the following:
- The permittee shall monitor and record the amount of the mixture used during each test run in gallons.
 - The permittee shall calculate the amount of isopentane and acetone used in lbs by multiplying gallons of mixture used by the density of the mixture and weight percentage of each component determined according to the most recent certificate of analysis (COA) available. The permittee shall provide this COA with the test report.
 - The amount of VOC input into the process is the amount of isopentane used.
 - Alternatively, the permittee may perform EPA Method 204A or EPA Method 204F
- (6) The amount of board manufactured ($M_{Product}$) during each test run, not including the paper backing, shall be calculated and reported in lb based on a representative density and the volume of board produced during the run.
- (7) The weight percentage of isopentane in the manufactured board shall be determined for a sample manufactured during each test run by the following method:
- A small foam sample (approximately 1' by 1') shall be cut from a section of freshly manufactured board once per test run. The samples shall immediately be wrapped and packaged. The samples may be refrigerated during shipping and prior to analysis to prevent further loss of isopentane.
 - Measurement of the isopentane content of the samples shall be determined in accordance with South Coast Air Quality Management District (SCAQMD) Test Method 306-91, "Analysis of Pentanes in Expandable Styrene Polymers", except that dimethylformamide or any appropriate solvent, as approved by the Division, may be used to dissolve the foam instead of toluene and the target analyte is isopentane instead of pentane. An alternative test method may be used if approved in advance by the Division.
- (8) The following parameters shall be calculated for each test run using the following equations:

$$MP_{Product} = \frac{M_{Product} \times IP_{\%}}{T}$$

$$MP_{Capturable} = \frac{MP_{input}}{T} - MP_{Product}$$

- Where:
- $MP_{Product}$ = Total mass rate of VOC (isopentane) encapsulated in product, lb/hr
 - $M_{Product}$ = Mass of product produced during the test run, lb
 - $IP_{\%}$ = Isopentane fraction in the product produced during the test run, as determined according to (7) above
 - $MP_{Capturable}$ = Total mass rate of capturable VOC (isopentane), lb/hr
 - MP_{input} = Total mass of VOC (isopentane) used during the test run, lb, as determined according to (5) above
 - T = Duration of the test run, hr

- (9) Emission factors for VOC shall be determined for EU 02, process ID's 01 and 03 using the following equations:

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

$$EF_{02-03} = \frac{E_{i.avg}}{M_{Product.avg}/2000}$$

$$EF_{02-01} = \left(\frac{M_{Capturable.avg} - E_{i.avg}}{M_{Product.avg}/2000} \right) - EF_{01-01}$$

- Where:
- EF₀₂₋₀₁ = Emission factor for VOC for Emission Unit 02, Process ID 01 – Foam Board laydown process, lb/ton product produced
 - EF₀₂₋₀₃ = Emission factor for VOC for Emission Unit 02, Process ID 03 – Laminator & Chem Pump to RTO, lb/ton product produced
 - EF₀₁₋₀₁ = Emission factor for VOC for Emission Unit 01, Process ID 01 – Trim/sawing Foamboard, lb/ton product produced, as most recently approved by the Division
 - E_{i.avg} = Average emission rate of VOC at the inlet of RTO-2 during the performance test, lb/hr
 - M_{Product.avg} = Average production rate during the performance test, lb/hr
 - M_{Capturable.avg} = Average mass rate of capturable isopentane during the performance test, lb/hr

d. See **Section G.5** for additional testing requirements.

4. **Specific Monitoring Requirements:**

The permittee shall calibrate, maintain, and operate according to manufacturer's specifications a monitoring device for the measurement of the combustion zone temperature of RTO-2. The measurement device shall take a temperature reading at least once every fifteen (15) minutes. [401 KAR 52:030, Section 10]

5. **Specific Recordkeeping Requirements:**

- a. The permittee shall maintain records of the following: [401 KAR 52:030, Section 10]
- (1) Each incident when VOC emissions were not properly controlled by RTO-2. This record shall include the date, time, duration, cause, and any corrective action taken.
 - (2) Continuous records of the combustion chamber zone temperature of RTO-2.
 - (3) All maintenance activities performed at RTO-2, including preventive maintenance and routine inspections.
 - (4) The average combustion zone temperature of RTO-2 established during the most recent performance test.

b. See **Section D, Source Emission Limitations and Testing Requirements, 3.**

6. **Specific Reporting Requirements:**

See **Section F, Monitoring, Recordkeeping, and Reporting Requirements.**

7. **Specific Control Equipment Operating Conditions:**

- a. The combustion chamber temperature of RTO-2 must not fall below the average RTO-2 combustion zone temperature for RTO-2 established during the most recent performance test. [401 KAR 52:030, Section 10]

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

- b. If the combustion zone temperature drops below the minimum operating limit of RTO-2, an alarm shall sound and the interlocking system shall shutdown the process line. [401 KAR 52:030, Section 10]

Compliance Demonstration Method:

Refer to **5. Specific Recordkeeping Requirements.**

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

Emission Unit 03: Fugitive Emissions from Warehouse Foam Board Curing (FUG 04)

Description:

Maximum Annual Storage: 70,080 tons

Construction Date: 2005

Controls: None

APPLICABLE REGULATIONS:

401 KAR 50:012, *General application*

1. Operating Limitations:

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

Compliance Demonstration Method:

The permittee shall operate in accordance with the following work practice standards identified in the Reasonable, Available, and Practical (RAP) analysis submitted to the Division on August 4, 2020:

- (1) The primary saleable product shall be encapsulated in stretch wrapping to protect the product while in storage; and
- (2) The permittee shall limit the movement of the finished board while waiting for shipment.

2. Emission Limitations:

None

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:

None

5. Specific Recordkeeping Requirements:

The permittee shall maintain records of standard operating procedures or equivalent documentation of the work practice standards identified in the RAP analysis. [401 KAR 52:030, Section 10]

6. Specific Reporting Requirements:

See Section F, **Monitoring, Recordkeeping, and Reporting Requirements.**

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

Emission Unit TK-01: Horizontal Pentane Storage Tank

Description:

Capacity:	45,000 gallons (170.34 m ³)
Liquid Stored:	Isopentane and Acetone mixture (Max. 83% Isopentane)
Maximum Annual Throughput:	4,963,067 gallons per year
Maximum True Vapor Pressure:	> 76.6 kPa
Controls:	None

APPLICABLE REGULATIONS:

401 KAR 60:005 Section 2(2)(r), 40 C.F.R. 60.110b through 60.117b (**Subpart Kb**), *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

1. Operating Limitations:

The permittee of each storage vessel with a design capacity greater than or equal to 75 m³ which contains a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 76.6 kPa shall equip each storage vessel with one of the following: [40 CFR 60.112b(b)]

- a. A closed vent system and control device as specified in 40 CFR 60.112b(a)(3): [40 CFR 60.112b(b)(1)]
 - (1) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, 40 CFR 60.485(b). [40 CFR 60.112b(a)(3)(i)]
 - (2) See **2. Emission Limitations**.
 - (3) If the permittee equips the source with a closed vent system and control device as required in 40 CFR 60.112b(a)(3) (other than a flare), the permittee shall operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Administrator in accordance with 40 CFR 60.113b(c)(1), unless the plan was modified by the Administrator during the review process. In this case, the modified plan applies. [40 CFR 60.113b(c)(2)]
- b. A system equivalent to those described in 40 CFR 60.112b(b)(1) as provided in 40 CFR 60.114b. [40 CFR 60.112b(b)(2)]

Compliance Demonstration Method:

- (1) For general compliance requirements, see **3. Testing Requirements a.**, **5. Specific Recordkeeping Requirements a.** and **c.** through **e.**, and **6. Specific Reporting Requirements a.** and **c.** and **d.** The permittee must demonstrate compliance by meeting these requirements regardless of the method of compliance under 40 CFR 60.112b(b).
- (2) For compliance with **1. Operating Limitations a.**, see **3. Testing Requirements b.**, **4. Specific Monitoring Requirements a.**, **5. Specific Recordkeeping Requirements b.**, and **6. Specific Reporting Requirements b.**

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

- (3) For compliance with **1. Operating Limitations b.**, the permittee shall submit a written application to the Administrator (the EPA), see **6. Specific Reporting Requirements e.** If, in the Administrator's judgment, an alternative means of emission limitation will achieve a reduction in emissions at least equivalent to the reduction in emissions achieved by any requirement in 40 CFR 60.112b, the Administrator will publish in the Federal Register a notice permitting the use of the alternative means for purposes of compliance with that requirement. Any notice published under 40 CFR 60.114b(a) will be published only after notice and an opportunity for a hearing. The Administrator may condition the permission on requirements that may be necessary to ensure operation and maintenance to achieve the same emissions reduction as specified in 40 CFR 60.112b. The permittee shall demonstrate compliance with the requirements of 40 CFR 60.112b by complying with any such terms as published in the Federal Register and notifying the Division of any such approval. [40 CFR 60.114b(a), (b), and (d)]
- c. For the purposes of determining compliance with the source-wide emission limitation for VOC in **Section D**, prior to the permittee installing and operating a closed vent system and control device as specified in 40 CFR 60.112b(a)(3) or receiving approval for an alternative means of emission limitation under 40 CFR 60.114b (40 CFR 60, Subpart Kb control system), the permittee shall comply with the following requirements to achieve emission reductions at least equivalent to 90%: [401 KAR 52:030, Section 10]
- (1) No pressure relief device on the storage tank, or on an attached railcar or tank truck, shall open during loading or as a result of diurnal temperature changes (breathing losses).
 - (2) Any pressure relief devices on the storage tank must be set to release at no less than 14.9 psig at all times. Any release from a pressure relief device as indicated by a pressure reading greater than 14.9 psig is an excess emissions event which must be recorded and reported in accordance with **5. Specific Recordkeeping Requirements** and **6. Specific Reporting Requirements**.
 - (3) Each of the pressure relief devices and components of the vapor collection system on the affected tank must be monitored on a quarterly basis, using EPA Method 21 as specified in **4. Specific Monitoring Requirements a.** An instrument reading of 500 parts per million by volume or greater is an excess emissions event.
 - (4) The affected tank must be equipped with a vapor balance line that returns displaced vapors from the headspace within the tank to the railcar or tank truck during tank filling operations. The vapor balance line must be hard piped from the tank before terminating at the off-loading station. While there may be a number of necessary flanged connections, flanged valves, and flexible coupling lines as part of the vapor balance line, the tank vapor balance line must not contain any pressure relief devices or release points. Displaced vapors must be transferred to a vapor return fitting on the offloading bulk vehicle through a hose from the offloading station. Both the transfer hoses and the vapor balance return line must incorporate dry-disconnect fittings to prevent vapor discharge to the atmosphere when the line is not connected. Tank trucks and railcars must have a current certification in accordance with the DOT pressure test requirements of 49 CFR part 180 for tank trucks and 49 CFR 173.31 for railcars. Railcars or tank trucks that deliver the VOL to the storage tank must be reloaded or cleaned at a facility that utilizes the control techniques specified in (i) or (ii) below:

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

- (i) The railcar or tank truck must be connected to a closed-vent system with a control device that reduces inlet emissions of VOC by 90 percent by weight or greater.
- (ii) A vapor balancing system designed and operated to collect VOC vapor from the tank truck or railcar during reloading must be used to route the collected VOC vapor to the storage tank from which the liquid being transferred originated.

Compliance Demonstration Method:

Prior to installation and operation of a Subpart Kb control system, see **4. Specific Monitoring Requirements b.**, **5. Specific Recordkeeping Requirements f.** and **g.**, and **6. Specific Reporting Requirements f.** and **g.** After commencing installation and operation of a 40 CFR 60, Subpart Kb control system, see **1. Operating Limitations a.** and **b.** – **Compliance Demonstration Method (1)** through **(3)**.

2. Emission Limitations:

If the permittee equips to storage vessel with a closed vent system and control device, the control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR 60.18) of the General Provisions. [40 CFR 60.112b(a)(3)(ii)]

Compliance Demonstration Method:

See **1. Operating Limitations a.** and **b.** – **Compliance Demonstration Method (2)**.

3. Testing Requirements:

- a. The permittee shall meet the requirements of 40 CFR 60.113b(a), (b), or (c). The applicable paragraph for a particular storage vessel depends on the control equipment installed to meet the requirements of 40 CFR 60.112b. [40 CFR 60.113b]
- b. The permittee of each source that is equipped with a closed vent system and control device as required in 40 CFR 60.112b(a)(3) or (b)(2) (other than a flare) is exempt from 40 CFR 60.8 of the General Provisions and shall meet the following requirements. requirements of 40 CFR 60.113b(c)(1), (c)(1)(i) and (ii), and (c)(2). See **1. Operating Limitations a.(3)** and **6. Specific Reporting Requirements d.** [40 CFR 60.113b(c)]

4. Specific Monitoring Requirements:

- a. If the permittee equips the storage vessel with a closed vent system and control device, the permittee shall determine compliance with the requirements of 40 CFR 60.112b(a)(3)(i) as follows: [40 CFR 60.485(b) as referenced by 40 CFR 60.112b(a)(3)(i)]
 - (1) Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21. The following calibration gases shall be used: [40 CFR 60.485(b)(1)]
 - (i) Zero air (less than 10 ppm of hydrocarbon in air); and [40 CFR 60.485(b)(1)(i)]
 - (ii) A mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [40 CFR 60.485(b)(1)(i)]
- b. To demonstrate that the pressure relief device or conservation vent does not open, the permittee shall install, maintain, and operate a pressure monitoring device which

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

continuously monitors and records the pressure inside the tank in psig. [401 KAR 52:030, Section 10]

5. Specific Recordkeeping Requirements:

- a. The permittee of each storage vessel as specified in 40 CFR 60.112b(a) shall keep records and furnish reports as required by 40 CFR 60.115b(a), (b), or (c) depending upon the control equipment installed to meet the requirements of 40 CFR 60.112b. The permittee shall keep copies of all reports and records required by 40 CFR 60.115b, except for the record required by 40 CFR 60.115b(c)(1), for at least 2 years. The record required by 40 CFR 60.115b(c)(1) will be kept for the life of the control equipment. [40 CFR 60.115b]
- b. After installing a closed vent system and flare to comply with 40 CFR 60.112b, the permittee shall meet the following requirements. [40 CFR 60.115b(d)]
 - (1) Records shall be kept of all periods of operation during which the flare pilot flame is absent. [40 CFR 60.115b(d)(2)]
- c. The permittee shall keep copies of all records required by 40 CFR 60.116b, except for the records required by 40 CFR 60.116b(b) will be kept for the life of the source. [40 CFR 60.116b(a)]
- d. The permittee of each storage vessel as specified in 40 CFR 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)]
- e. Except as provided in 40 CFR 60.116b(f) and (g), the permittee of each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]
 - (1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [40 CFR 60.116b(e)]
 - (i) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [40 CFR 60.116b(e)(1)]
 - (ii) For other liquids, the vapor pressure: [40 CFR 60.116b(e)(3)]
 - (A) May be obtained from standard reference texts, or [40 CFR 60.116b(e)(3)(i)]
 - (B) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference – see 40 CFR 60.17); or [40 CFR 60.116b(e)(3)(ii)]
 - (C) Measured by an appropriate method approved by the Administrator; or [40 CFR 60.116b(e)(3)(iii)]
 - (D) Calculated by an appropriate method approved by the Administrator. [40 CFR 60.116b(e)(3)(iv)]

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

- (2) The permittee of each vessel equipped with a closed vent system and control device meeting the specification of 40 CFR 60.112b or with emissions reductions equipment as specified in 40 CFR 65.42(b)(4), (b)(5), (b)(6), or (c) is exempt from the requirements of 40 CFR 60.116b(c) and (d). [40 CFR 60.116b(g)]
- f. The permittee shall keep records of the equipment to be used and the procedures to be followed when unloading railcars or tank trucks and displacing vapors from the storage tank to the transport vessel from which the liquid originates, as well as a record of all components of the pressure relief device(s), including pressure relief valves and conservation vents. These records must be kept as long as the affected tank is in operation. [401 KAR 52:030, Section 10]
- g. The permittee shall maintain the following records for the affected tank: [401 KAR 52:030, Section 10]
- (1) For the material(s) stored in the tank, records of the maximum true vapor pressure (psia) and other supporting documentation, such as material safety data sheets and certificates of analysis.
- (2) Records of the throughput in Mgal on a monthly basis.
- (3) Inspection and maintenance records, which shall include:
- (i) Dates of inspections of the affected tank with observed conditions
- (ii) Dates and description of maintenance of the affected tank.
- (iii) Identification of each period when the affected tank was emptied for inspection or maintenance with calculations of emissions from degassing the tank, with supporting documentation.
- (4) Records of VOC emissions of the affected tank in tons on a monthly basis, with supporting data and calculations.
- 6. Specific Reporting Requirements:**
- a. The permittee of each storage vessel as specified in 40 CFR 60.112b(a) shall furnish reports as required by 40 CFR 60.115b(a), (b), or (c) depending upon the control equipment installed to meet the requirements of 40 CFR 60.112b. [40 CFR 60.115b]
- b. After installing a closed vent system and flare to comply with 40 CFR 60.112b, the permittee shall meet the following requirements. [40 CFR 60.115b(d)]
- (1) A report containing the measurements required by 40 CFR 60.18(f)(1) through (6) shall be furnished to the Administrator as required by 40 CFR 60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date. All reports must be submitted in PDF format following the procedures in 40 CFR 60.115b(d)(1). [40 CFR 60.115b(d)(1)]
- (2) Semiannual reports of all periods recorded under 40 CFR 60.115b(d)(2) in which the pilot flame was absent shall be furnished to the Administrator. All reports must be submitted in PDF format following the procedures specified in 40 CFR 60.115b(e). [40 CFR 60.115b(d)(3)]
- c. If and when the permittee is required to submit notifications or reports following the procedures specified in this paragraph, 40 CFR 60.115b(e), the permittee must submit notifications or reports to the EPA via the Compliance and Emissions Data Reporting

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

Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The EPA will make all the information submitted through CEDRI available to the public without further notice to the owner or operator. Do not use CEDRI to submit information the permittee claims as CBI. Although the EPA does not expect persons to assert a claim of CBI, if the permittee wishes to assert a CBI claim for some of the information in the report or notification, the permittee must submit a complete file in the format specified in 40 CFR 60, Subpart Kb, including information claimed to be CBI, to the EPA following the procedures in 40 CFR 60.115b(e)(1) and (e)(2). Clearly mark the part or all of the information claimed to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR part 2. All CBI claims must be asserted at the time of submission. Anything submitted using CEDRI cannot later be claimed CBI. Furthermore, under CAA section 114(c), emissions data is not entitled to confidential treatment, and the EPA is required to make emissions data available to the public. Thus, emissions data will not be protected as CBI and will be made publicly available. The permittee must submit the same file submitted to the CBI office with the CBI omitted to the EPA via the EPA's CDX as described earlier in this paragraph, 40 CFR 60.115b(e). [40 CFR 60.115b(e)]

- (1) The preferred method to receive CBI is for it to be transmitted electronically using email attachments, File Transfer Protocol, or other online file sharing services. Electronic submissions must be transmitted directly to the OAQPS CBI Office at the email address oaqpscbi@epa.gov, and as described above, should include clear CBI markings, and be flagged to the attention of the NSPS Kb Lead. Owners and operators who do not have their own file sharing service and who require assistance with submitting large electronic files that exceed the file size limit for email attachments should email oaqpscbi@epa.gov to request a file transfer link. [40 CFR 60.115b(e)(1)]
 - (2) If the permittee cannot transmit the file electronically, the permittee may send CBI information through the postal service to the following address: U.S. EPA, Attn: OAQPS Document Control Officer and NSPS Kb Lead, Mail Drop: C404-02, 109 T.W. Alexander, P.O. Box 12055, RTP, NC 27711. The mailed CBI material should be double wrapped and clearly marked. Any CBI markings should not show through the outer envelope. [40 CFR 60.115b(e)(2)]
- d. If the permittee equips the source with a closed vent system and control device as required in 40 CFR 60.112b(a)(3) or (b)(2) (other than a flare), the permittee shall submit for approval by the Administrator as an attachment to the notification required by 40 CFR 60.7(a)(1) or, if the facility is exempt from 40 CFR 60.7(a)(1), as an attachment to the notification required by 40 CFR 60.7(a)(2), an operating plan containing the information listed below. [40 CFR 60.113b(c)(1)]
- (1) Documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is to include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions (dynamic and static) and manufacturer's design specifications for the control device. If the control device or the closed vent capture system receives vapors, gases, or liquids other than fuels from sources that are not designated sources under this subpart, the efficiency demonstration is to include

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

- consideration of all vapors, gases, and liquids received by the closed vent capture system and control device. If an enclosed combustion device with a minimum residence time of 0.75 seconds and a minimum temperature of 816 °C is used to meet the 95 percent requirement, documentation that those conditions will exist is sufficient to meet the requirements of this paragraph. [40 CFR 60.113b(c)(1)(i)]
- (2) A description of the parameter or parameters to be monitored to ensure that the control device will be operated in conformance with its design and an explanation of the criteria used for selection of that parameter (or parameters). [40 CFR 60.113b(c)(1)(ii)]
- e. Any person seeking permission under 40 CFR 60.114b, Alternative means of emission limitation, shall submit to the Administrator a written application including:
- (1) An actual emissions test that uses a full-sized or scale-model storage vessel that accurately collects and measures all VOC emissions from a given control device and that accurately simulates wind and accounts for other emission variables such as temperature and barometric pressure. [40 CFR 60.114b(c)(1)]
- (2) An engineering evaluation that the Administrator determines is an accurate method of determining equivalence. [40 CFR 60.114b(c)(2)]
- f. Within 90 days of issuance of final permit F-26-008, the permittee must submit to the Division a written certification that the reloading or cleaning facilities for any tanker trucks or railcars delivering the VOL meet the requirements of **1. Operating Limitations c.(4)**.
- g. The permittee shall submit excess emissions and monitoring reports semiannually along with the report required by **Section F 5**. Written reports of excess emissions must include the following information: [401 KAR 52:030, Section 10]
- (1) The date and time of commencement and completion of each time period of excess emissions and the process operating time during the reporting period.
- (2) The date and time identifying each period during which the continuous pressure monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
- (3) A list of the affected sources or equipment, an estimate of the amount of VOC emitted in lb, and a description of the method used to estimate the emissions.
- (4) When the continuous pressure monitoring systems have not been inoperative, repaired, or adjusted, such information shall be stated in this section of the report.
- h. See Section F, Monitoring, Recordkeeping, and Reporting Requirements.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Unit IA2: Boiler for Building Heat****Description:**

Construction Date: 2005

Capacity: 2.6 MMBtu/hr

Fuel: Natural Gas

Controls: None

APPLICABLE REGULATIONS:**401 KAR 59:015**, *New indirect heat exchangers***STATE ORIGIN REQUIREMENTS:****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)]
 - (1) The manufacturer's recommended procedures; or [401 KAR 59:015, Section 7(1)(e)1.]
 - (2) Recommended procedures for a unit of similar design, for which manufacturer's recommended procedures are available, as approved by the cabinet based on documentation provided by the permittee. [401 KAR 59:015, Section 7(1)(e)2.]

Compliance Demonstration Method:See **5. Specific Recordkeeping Requirements b.****2. Emission Limitations:**

- a. The permittee shall not cause emissions of particulate matter in excess of 0.56 lb/MMBtu actual heat input. [401 KAR 59:015, Section 4(1)(a)]
- b. The permittee shall not cause emissions of particulate matter in excess of 20 percent opacity, except: [401 KAR 59:015, Section (4)(2)]

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

- (1) 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)]
 - (2) 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. [401 KAR 59:015, Section 5(1)(a)(1)]

Compliance Demonstration Method:

Compliance with the particulate matter, sulfur dioxide, and visible emission limits is assumed based on combustion of natural gas. See **4. Specific Monitoring Requirements.** [401 KAR 50:045, Section 4(3)(c)1.]

- d. The permittee shall provide the utmost care and consideration, in the handling of materials from which hazardous matter or toxic substances may be emitted, to the potentially harmful effects of the emissions resulting from such activities. The permittee shall not 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 toxic and hazardous air pollutants determined by the Cabinet using information provided in the application and supplemental information submitted by the source, the Cabinet determines the affected facility to be in compliance with 401 KAR 63:020.

3. Testing Requirements:

Performance testing 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 total fuel usage (scf) and the hours of operations of the boiler on a monthly basis. [401 KAR 52:030, Section 10]

5. Specific Recordkeeping Requirements:

- a. The permittee shall maintain records of the fuel usage (scf) and hours of operation on a monthly basis. [401 KAR 52:030, Section 10]
- b. The permittee shall keep records of the manufacturer's recommended procedures for startup and shutdown. [401 KAR 52:030, Section 10]

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

6. Specific Reporting Requirements:

See Section F, Monitoring, Recordkeeping, and Reporting Requirements.

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:030, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Ink jet printer (< 240gals ink and < 110 gals of solvent)	401 KAR 63:020
2. Four (4) 12,000 gallon MDI storage tanks	401 KAR 63:020
3. Four (4) 12,000 gallon Polyol storage tanks	None
4. Pentane tank transfer operations (valves, pump seals, flanges)	None
5. One (1) 8,000 gallon catalyst storage tank	None
6. 0.132 MMBtu/hr Building Heater (IA4B)	401 KAR 59:010, 401 KAR 63:020
7. Two (2) 0.66 MMBtu/hr (each) Furnaces (IA4C)	401 KAR 59:010, 401 KAR 63:020
8. Two (2) Direct-Fired 3.85 MMBtu/hr (each) Warehouse Heaters	401 KAR 59:010, 401 KAR 63:020
9. Three (3) Direct-Fired 6.65 MMBtu/hr (each) Warehouse Heaters	401 KAR 59:010, 401 KAR 63:020
10. Sawing Baghouse Briquetter	401 KAR 59:010

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENT

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, 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. PM and VOC emissions, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan shall not exceed the respective limitations specified herein.
3. To preclude the applicability of 401 KAR 52:020 *Title V permits* (for VOC) and 401 KAR 51:017, *Prevention of significant deterioration of air quality* (for VOC), total source-wide emissions of VOC shall not exceed 90 tons per year, each, on a consecutive twelve-month rolling basis. The twelve-month rolling total shall be calculated by adding monthly emissions to the previous eleven months' emissions.

Compliance Demonstration Method:

Compliance shall be demonstrated by calculating the pollutant specific monthly emissions using the following formula for each pollutant:

$$Pollutant\ Emissions\ \left(\frac{tons}{month}\right) = \sum \left(\frac{EF \times P}{2000 \frac{lb}{ton}} \times (1 - Control\ Efficiency) \right)$$

Where EF is the emission factor of each pollutant in the table below until unit specific values have been established during the most recent performance test, once conducted, P is the monthly processing rate of each unit, and Control Efficiency is the value listed in the following table until unit specific values have been established during the most recent performance test, once conducted.

Emission Unit (Process ID)	Process Name	Control Efficiency ¹	EF _{VOC} ¹ (lb/ton)
01 (1)	Trim/sawing foamboard	0%	1.706
02 (1)	Foam Board laydown process	0% ²	13.22
02 (3)	Laminator & Chem Pump to RTO	98% ²	9.54
Emission Unit (Process ID)	Process Name	Control Efficiency ¹	EF _{VOC} ¹ (lb/lb)
FUG05 (1)	Ink	N/A	0.9
FUG05 (2)	Make-up Ink	N/A	0.95

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

Emission Unit (Process ID)	Process Name	Control Efficiency ¹ .	EF _{VOC} ¹ . (lb/MMscf)
02 (2)	RTO NG Firing	0%	5.5
IA1A (1)	Warehouse Heater #1	0%	5.5
IA1B (1)	Warehouse Heater #2	0%	5.5
IA2 (1)	Boiler for Initial Curing	0%	5.5
IA4B (1)	NG Combustion	0%	5.5
IA4C (1)	NG Combustion	0%	5.5
IA4D (1)	NG Combustion	0%	5.5
Emission Unit (Process ID)	Process Name	Control Efficiency ¹ .	EF _{voc} ¹ . (lb/1000 gallons)
TK-01 (1)	Working Losses	90%/95% ³ .	6.546
IA5 (1)	MDI4 Tank system Working loss	0%	4e-08
IA5 (2)	MDI Tank system breathing loss	0%	4.98e-05
IA6 (1)	Polyol Four Tanks Working Loss	0%	0.0013
IA6 (2)	Polyol 4 Tanks Breathing Loss	0%	0.1702
1.	Control efficiency and the emission factors in the table above shall be used until unit specific values have been established through a Division approved performance test, if applicable; at which time the permittee shall use the values from testing. The updated emission factors shall be calculated following the procedures specified in Section B if applicable.		
2.	Control efficiency includes capture efficiency, which was demonstrated to be 100% for the Laminator and Chem Pump to RTO (Process ID 3) and is assumed to be 0% for emissions accounting purposes for the Foam Board laydown process (Process ID 1). Emissions from both processes shall be summed.		
3.	When operating in compliance with 1. Operating Limitations c. for TK-01, 90% control efficiency shall be assumed. When operating in compliance with 1. Operating Limitations a. or b. , 95% control efficiency shall be assumed.		

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. All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and recommendations of the respective manufacturers.
3. The permittee shall maintain an operation manual for all control devices. The manual shall be modified as necessary to reflect changes in equipment, manufacturer specifications, and the operating history of the devices. Operators of the control devices shall receive training on proper operation and maintenance of the control devices upon employment, upon modification of the manual, and at least annually.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b-IV-1 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 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 [401 KAR 52:030, Section 3(1)(f)1a, and Section 1a-7 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, Section 26].
3. In accordance with the requirements of 401 KAR 52:030, Section 3(1)f, 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 Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, Section 26].
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 52:030, Section 22. If continuous

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

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 Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, 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 52:030, 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 in accordance with the following requirements:
 - a. Identification of each 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 Division for Air Quality, Florence Regional Office, 8020 Veterans Memorial Drive, Suite 110, Florence, KY 41042.
10. In accordance with 401 KAR 52:030, Section 3(1)(d), 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. If a KYEIS emissions survey is not mailed to the permittee, then the permittee shall comply with all other emissions reporting requirements in this permit.
11. The Cabinet may authorize the temporary use of an emission unit to replace a similar unit that is taken off-line for maintenance, if the following conditions are met:
- a. The owner or operator shall submit to the Cabinet, at least ten (10) days in advance of replacing a unit, the appropriate Forms DEP7007AI to DD that show:
 - (1) The size and location of both the original and replacement units; and
 - (2) Any resulting change in emissions;
 - b. The potential to emit (PTE) of the replacement unit shall not exceed that of the original unit by more than twenty-five (25) percent of a major source threshold, and the emissions from the unit shall not cause the source to exceed the emissions allowable under the permit;
 - c. The PTE of the replacement unit or the resulting PTE of the source shall not subject the source to a new applicable requirement;
 - d. The replacement unit shall comply with all applicable requirements; and
 - e. The source shall notify Regional office of all shutdowns and start-ups.
 - f. Within six (6) months after installing the replacement unit, the owner or operator shall:
 - (1) Re-install the original unit and remove or dismantle the replacement unit; or
 - (2) Submit an application to permit the replacement unit as a permanent change.

SECTION G - GENERAL PROVISIONS

1. General Compliance Requirements

- a. The permittee shall comply with all conditions of this permit. A noncompliance shall be a violation of 401 KAR 52:030, 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 the termination, revocation and reissuance, revision, or denial of a permit [Section 1a-2 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, 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-5 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, Section 26].
- c. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:030, Section 18. 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 52:030, 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.

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- 6 and 7 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, Section 26].
- e. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:030, 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 52:030, 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-11 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, 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-3 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, 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-12 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, 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-9 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, 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 52:030, Section 11(3)].
- l. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, 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.
- 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.

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 52:030, 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 52:030, Section 12].
- b. The authority to operate granted through this permit 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 52:030, Section 8(2)].

3. Permit Revisions

- a. Minor permit revision procedures specified in 401 KAR 52:030, Section 14(3), 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 52:030, 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 is authorized by permit F-26-008.

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.

7. Emergency Provisions

- a. Pursuant to 401 KAR 52:030, Section 23(1), an emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other 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;
 - (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) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken.

SECTION G - GENERAL PROVISIONS (CONTINUED)

- (5) Notification of the Division does not relieve the source of any other local, state or federal notification requirements.
 - b. Emergency conditions listed in General Provision G.7.a above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:030, Section 23(3)].
 - c. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:030, Section 23(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 82.166.
 - (5) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - (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*.
9. Risk Management Provisions
- a. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to U.S. EPA using the RMP* eSubmit software.
 - b. If requested, submit additional relevant information to the Division or the U.S. EPA.

SECTION H - ALTERNATE OPERATING SCENARIOS

None

SECTION I - COMPLIANCE SCHEDULE

None