

Commonwealth of Kentucky
Division for Air Quality
STATEMENT OF BASIS / SUMMARY

Conditional Major, Operating
Permit ID: F-26-008

Amrize Building Envelope LLC
8170 Holton Dr.
Florence, KY 41042

April 27, 2026
Colby Freeman, Reviewer

Source ID: 21-117-00177
Agency Interest #: 71732
Activity ID: APE20250003

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SECTION 1 - SOURCE DESCRIPTION

SIC Code and description: 3086, Plastics Foam Products (except polystyrene foam products).

Single Source Det. Yes No If Yes, Affiliated Source AI:

Source-wide Limit Yes No If Yes, See Section 4, Table A

28 Source Category Yes No If Yes, Category:

County: Kenton

Nonattainment Area N/A PM₁₀ PM_{2.5} CO NO_x SO₂ Ozone Lead

If yes, list Classification:

PTE* greater than 100 tpy for any criteria air pollutant Yes No

If yes, for what pollutant(s)?

PM₁₀ PM_{2.5} CO NO_x SO₂ VOC

PTE* greater than 250 tpy for any criteria air pollutant Yes No

If yes, for what pollutant(s)?

PM₁₀ PM_{2.5} CO NO_x SO₂ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) Yes No

If yes, list which pollutant(s):

PTE* greater than 25 tpy for combined HAP Yes No

*PTE does not include self-imposed emission limitations.

Description of Facility:

Amrize Building Envelope LLC (Amrize) manufactures rigid polyurethane (PUR) insulation board for building industries. The insulation products are made by reacting a liquid polyol component with a liquid polymeric isocyanate, Methylene Diphenyl di-isocyanate (MDI), component in presence of a blowing agent and other additives. The mixed components then react exothermally to form a rigid thermosetting polymer and since the blowing agent evaporates during this exothermic reaction, a rigid closed cell low density insulation product is created. The processes at the facility include the following:

1. Unloading of raw materials into receiving tanks.
2. Mixing of 'B-Side' materials (Polyol and additives)
3. Delivery of 'B-Side' mixture (Polyol and additives) and blowing agent from the B-side, which are combined with A-side (MDI) at the lay-down nozzle. The combination begins the reaction to create the foam, which cures between paper backings.
4. 'Setting' of foam (Lay Down Process) while on the conveyor to the saw cut area.
5. Cutting of continuously fed sheets of foam panel product into various panel lengths and trimming on sides; and
6. Stacking, wrapping, and storing of panels in the production/warehouse building until shipping.

SECTION 2 – CURRENT APPLICATION

Permit Number: F-26-008

Activity: APE20250003

Application Received: 10/27/2025

Application Complete: 3/6/2026

Permit Action: Initial Renewal Significant Rev Minor Rev Administrative

Construction/Modification Requested? Yes No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action Yes No

Description of Action:

On October 27, 2025, the Division received an application for renewal of permit F-20-027 R2 which was issued on April 25, 2021 and expires April 25, 2026. The application requested removal of the capture efficiency testing requirement associated with the laminator enclosure and chemical pump enclosure included in EU #02. The Division recognizes that the results of the EPA Method 204 testing conducted on the laminator enclosure on August 10, 2021 confirmed this portion of the foam board laydown process meets the criteria of a permanent total enclosure. Therefore, the testing requirements associated with EPA Method 204 have been removed.

Amrize estimated an overall capture efficiency for EU #02 for the purpose of the August 10, 2021 testing based on the length of the nozzle laydown area compared to the full length of the enclosure. Review of the mass balance based capture efficiency calculations submitted with the required testing in 2011 and 2016 indicated significantly higher emissions occur outside of the laminator enclosure than indicated by this method. In 2016, the Division determined emissions occurring at the lay-down nozzle area are not fugitive and should count toward PTE and site-wide limits to preclude 401 KAR 52:020 and 401 KAR 51:017. Mass balance based testing language for EU #02 has been added as described in Section 3 of this Statement of Basis/Summary to determine an emission factor for the lay-down nozzle area.

In review of historical facility information, the Division discovered that the 45,000 gallon horizontal pentane storage tank (TK-01), which was previously listed as an insignificant activity, is subject to 40 CFR 60, Subpart Kb. The initial Conditional Major application received by the Division on May 17, 2005 (APE20050001) indicated that the storage tank was designed to operate “under pressure (250 psi)” and that no emissions would be vented to the atmosphere. During a compliance inspection at the facility on October 3, 2016, the Division’s inspectors identified emissions from a conservation vent on the vessel. In response, the facility stated the tank was built to operate under a maximum allowable working pressure of 250 psi. The conservation vent was “designed to maintain a vessel pressure between 14.9 psi and 2 oz. vacuum.” The definition of "storage vessel" under Subpart Kb does not exclude components that are "directly involved in the containment of liquids or vapors". As the conservation vent is "designed to relieve pressure" above 14.9 psi (by releasing emissions), the vessel does not meet the criteria for exemption under 40 CFR 60.110b(d)(2).

F-26-008				
Pollutant	2024 Actual (tpy)	Previous PTE F-20-027 R2 (tpy)	Change (tpy)	PTE F-26-008 (tpy)
CO	0.98	12.30	0	12.30
NO _x	1.17	14.64	0	14.64
PT	1.82	5.99*	0	5.99* (Allowable < 90)
PM ₁₀	1.82	5.99*	0	5.99* (Allowable < 90)
PM _{2.5}	1.82	5.99*	0	5.99* (Allowable < 90)
SO ₂	0.007	0.09	0	0.09
VOC	44.82	75.85*	0	531.63* (Allowable < 90)
Lead	--	0.00	0	0.00
Greenhouse Gases (GHGs)				
Carbon Dioxide	1,399	17,503	0	17,503
Methane	0.03	0.33	0	0.33
Nitrous Oxide	0.01	0.12	0	0.12
CO ₂ Equivalent (CO ₂ e)	1,402	17,547	0	17,547
Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				
Methylene Diphenyl Diisocyanate	-	0.007*	0	0.007*
Combined HAPs:	-	0.007*	0	0.007*

* Controlled emissions

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit #01 Trim/Sawing Foam Boards				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
PM	E = 2.34 lb/hr @ P ≤ 0.5 tph; E = 3.59 P ^{0.62} @ 0.5 tph < P ≤ 30 tph	401 KAR 59:010, Section 3(2)	22.572 lb/ton, Material Balance	Operating the Dust Collector
	20% Opacity	401 KAR 59:010, Section 3(1)(a)	NA	Daily qualitative visible observations

Initial Construction Date: 2005

Process Description:
 Capacity: Max. 8 tons/hr
 Controls: Dust Collector (Flex-Kleen)

Applicable Regulation:
401 KAR 59:010, *New process operations.* This regulation is applicable to each affected facility, associated with a process operation, which is not subject to another emission standard with respect to particulates, commenced on or after July 2, 1975.

Comments:
 Particulate and VOC emissions are estimated based on amount of board trimmed, and VOC concentration in the product.

The baghouse waste compactor associated with this emission unit has been replaced with a waste briquetter equipped with an integral fabric filter, and added to **Section C** of the permit. The associated insignificant emissions have been added to KYEIS.

Emission Unit #02 Foam Board Laydown Process
<p>Initial Construction Date: 2005</p> <p>Process Description: Capacity: Max. 8 tons/hr Controls: Regenerative Thermal Oxidizer (RTO-2 , 2.4 MMBtu/hr, proposed replacement March 2021) ‘B-Side’ mixture (Polyol and additives) and blowing agent are combined with A-side (MDI) at the lay-down nozzle. The mixture is conveyed into the enclosed laminator where it is heated and “sets,” forming the foam product. Vents at each end of the laminator enclosure route emissions to the RTO control device. Vents on each side of the lay-down area route a portion of emissions to the RTO control device.</p> <p>Applicable Regulation: 401 KAR 63:020, <i>Potentially hazardous matter or toxic substances.</i> This regulation applies to affected facilities which emit or may emit potentially hazardous matter or toxic substances, provided such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality.</p>

Emission Unit #02 Foam Board Laydown Process

MDI is a HAP listed in 401 KAR 63:060, therefore 401 KAR 63:020 applies.

Precluded Regulations:

401 KAR 51:017, *Prevention of significant deterioration of air quality (PSD)*.

Comments:

APE20200001: Renewal application was submitted with the proposed replacement of the existing RTO with a new RTO (designated RTO-2) with a lower heat rating (existing RTO rated at 5 MMBtu/hr). RTO-2 will be subject to the same monitoring and testing requirements as the existing RTO to ensure compliance with the 90 tpy VOC limit.

APE20250003: The renewal application requested the removal of capture efficiency testing requirements associated with the laminator enclosure and chemical pump enclosure. The Division removed testing requirements associated with confirmation of a total permanent enclosure at the laminator as this was adequately demonstrated in previous tests and no process changes have been made. Review of the mass balance based capture efficiency calculations submitted with the required testing in 2011 and 2016 indicated significantly higher emissions occur outside of the laminator enclosure than previously estimated. In 2016, the Division determined emissions occurring at the lay-down nozzle area are not fugitive and should count toward PTE and site-wide limits to preclude 401 KAR 52:020 and 401 KAR 51:017.

The Division updated emission factors based on the 2016 performance test results as the most recent performance test did not properly account for uncaptured emissions at the lay-down nozzle area. Additionally, the facility has switched from using n-pentane as a blowing agent to an isopentane/acetone mixture with higher volatility. In the 2016 testing, the amount of n-pentane retained in foam samples pulled immediately after sawing was determined by an analytical laboratory. The Division performed a mass balance accounting for n-pentane input, n-pentane retained in the foam, n-pentane measured at the inlet of the RTO, and estimated n-pentane emissions at the trim/sawing process (EU 01). The remainder was assumed to be emitted at the nozzle lay-down point (Process ID 1).

Performance testing is required within 180 days of the issuance of final Permit F-26-008 to determine representative emission factors which account for uncaptured emissions. The permittee shall determine the amount of VOC emitted (lb/ton product produced) during the process from the nozzle lay-down point through the trimming/sawing of boards (EU 01 and 02 collectively). 100% capture efficiency may be assumed for any emissions measured at the RTO-2 inlet and the permittee may apply the 98% control efficiency as guaranteed by the manufacturer and confirmed in initial testing on these emissions only (subject to subsequent testing). VOC not accounted for in representative foam samples taken immediately after trimming/sawing or captured by the RTO system shall be assumed to be emitted uncontrolled. Testing provisions included in Permit F-26-008 specify test methods for quantifying the VOC's present in each mass stream and assigning emissions to each process ID.

Emissions from natural gas combustion for the RTO-2 are calculated using AP-42 Chapter 1.4. The destruction efficiency of the RTO-2 for the lamination and chem pump enclosure emissions is guaranteed from the manufacturer as 98%.

Emission Unit #02 Foam Board Laydown Process

The following regulations are not applicable as the source does not manufacture Flexible Polyurethane Foam:

- **401 KAR 63:002, Section 2(4)(uu)**, 40 C.F.R. 63.1290 through 63.1309, Appendix, and Tables 1 through 3 (**Subpart III**), *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production*.
- **401 KAR 63:002, Section 2(4)(rrrr)**, 40 C.F.R. 63.8780 through 63.8830, Tables 1 through 7 (**Subpart MMMM**), *National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam Fabricating Operations*.
- **401 KAR 63:002, Section 2(4)(nnnnn)**, 40 C.F.R. 63.11414 through 63.11420, Table 1 (**Subpart OOOOOO**), *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area*.

Emission Unit #03 Fugitive Emissions from Warehouse (FUG 04)

Initial Construction Date: 2005

Process Description:

Maximum Annual Storage: 70,080 tons
Warehouse Fugitive emissions from panel storage
Controls: None

Applicable Regulation:

401 KAR 50:012, *General application*. This regulation applies to all major air contaminant sources for which there is no standard specified in 401 KAR Chapters 50 through 65 for VOC emissions and requires that as a minimum, sources apply control procedures that are reasonable, available, and practical (RAP). The uncontrolled potential emissions of VOC are 43.5 tons per year. These emissions are not subject to any applicable standards for VOC.

Comments:

VOC fugitive emissions are calculated based on the average values measured from the block testing conducted at three of Firestone Building Products (now Amrize Building Envelope) sister facilities in PA, TX and FL conducted in 2019. The maximum process rate is calculated using 140,160,000 lb/yr (16,000 lb/hr) as the total material processed through the warehouse.

A RAP analysis was submitted to the Division in February of 2019 and updated with a cost analysis in August of 2020, addressing the fugitive VOC emissions from the warehouse. The analysis concluded that none of the add-on control technology would be considered reasonable or practical.

To limit VOC off-gassing during storage, the facility has identified the following work practice standards to satisfy the requirement of 401 KAR 50:012, Section 1(2):

1. Stretch wrapping to protect the product while in storage; and
2. Limiting the movement of the finished board while waiting for shipment.

These are also required to maintain the VOC in the encapsulated cells of the finished product for better product quality.

Emission Unit TK-01 Isopentane Storage Tank				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
VOC	95% emission reduction	40 CFR 60.112b	6.546 lb/Mgal working losses only	See Comments
<p>Initial Construction Date: 2005</p> <p>Process Description: Capacity: 45,000 gallons (170.34 m³) 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: 14.9 psi Conservation Vent (100% Breathing Losses Control) Vapor Balancing (90% Working Losses Control)</p> <p>Applicable Regulations: 401 KAR 60:005 Section 2(2)(r), 40 C.F.R. 60.110b through 60.117b (Subpart Kb), <i>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 and On or Before October 4, 2023</i></p> <p>Comments: 40 CFR 60.110b through 60.117b, Subpart Kb: The existing tank is a horizontal storage tank originally rated for a maximum pressure of 250 psi. However, the tank is equipped with a conservation vent (which is a part of the storage vessel under 40 CFR 60, Subpart Kb definitions) which is designed to release emissions if the pressure of the tank exceeds 14.9 psi. Therefore, the tank does not meet the exemption criteria of 40 CFR 60.110b(d)(2): "Pressure vessels designed to operate in excess of 204.9 kPa (29.71 psi) and without emissions to the atmosphere." 40 CFR 60, Subpart Kb defines the maximum true vapor pressure (MTVP) for tanks stored at ambient conditions as the equilibrium partial pressure exerted by the volatile organic compounds in the stored volatile organic liquid (VOL) at the temperature equal to the highest calendar-month average of the local maximum monthly average temperature as reported by the National Weather service. The MTVP of the 83/17 isopentane/acetone mixture currently stored in the tank determined in accordance with the definition under 40 CFR 60.111b is 77.9 kPa. Pursuant to 40 CFR 60.112b(b), storage vessels with a design capacity greater than or equal to 75 m³ which contain a VOL that, as stored, has a MTVP greater than or equal to 76.6 kPa shall equip the storage vessel with a closed vent system and control device as specified in 40 CFR 60.112b(a)(3) or a system equivalent as provided in 40 CFR 60.114b. At the time of issuance of permit F-26-008, the storage vessel was not connected to a closed vent system and control device. The authority to grant an alternative means of emission limitation under 40 CFR 60.114b is retained by the EPA. Both compliance options were included in the permit.</p> <p>Emissions were estimated based on EPA's TANKS 5.2 program using tank design parameters, throughput, and liquid properties provided by the permittee via email on March 2 and March 6, 2026. As shown by the calculations, the conservation vent pressure containment is adequate to prevent breathing losses under the current operational design. The VOC emission factor only includes isopentane emissions, as acetone is an exempt VOC. The permittee provided documentation of standard operating procedures for filling of the tank which demonstrates that a vapor balancing system is used, which cannot be accounted for in TANKS 5.2. The Division finds that a 90% control efficiency is an appropriately conservative factor in accordance with AP-42 Section 7.1. The permit includes conditions requiring operation of the vapor balancing system and recordkeeping for any rail cars and/or tanker trucks unloading at the facility to</p>				

Emission Unit TK-01 Isopentane Storage Tank

ensure at least 90% control efficiency is achieved. The 90% control efficiency may be credited for the purpose of compliance with the sitewide emission limitation on VOC emissions in Section D of the permit.

40 C.F.R. 60.110c through 60.117c (**Subpart Kc**), *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023*: Pursuant to 40 CFR 60.110c(e), a change in operation (modification) occurs if the storage vessel is used to store a VOL that has a greater MTVP pressure than all VOL historically stored or permitted. The storage vessel was previously permitted to store n-pentane, which has a lower MTVP than the isopentane/acetone mixture currently stored. However, records provided by the facility via email on March 6, 2026 confirmed that the switch to an isopentane/acetone mixture was made prior to October 4, 2023. Therefore, this regulation does not apply to the storage vessel as currently permitted. If a change in the VOL stored occurs and the MTVP of the new VOL is greater than that of the 83/17 isopentane/acetone mixture currently permitted, the vessel would be considered modified for the purposes of Subpart Kc.

Emission Unit IA2 Boiler for Building Heat

Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
PM	0.56 lb/MMBtu	401 KAR 59:015, Section 4(1)(a)	7.6 lb/MMscf, AP-42 Chapter 1.4	Assumed compliance while burning natural gas
	20% Opacity	401 KAR 59:015, Section 4(2)	NA	
SO ₂	3.0 lb/MMBtu	401 KAR 59:015, Section 5(1)(a)1.	0.6 lb/MMscf, AP-42 Chapter 1.4	

Initial Construction Date: 2005

Process Description:

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*

Comments:

401 KAR 60:005, Section 2(2)(d), 40 C.F.R. 60.40c through 60.48c (**Subpart Dc**), *Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units*, is not applicable to the boiler, as the heating capacity is less than 10 MMBtu/hr.

401 KAR 63:002, Section 2(4)(jjjjj), 40 C.F.R. 63.11193 through 63.11237, Tables 1 through 8 (**Subpart JJJJJJ**), *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, is not applicable, as the boiler can only fire natural gas.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements/Results

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit	Test Result	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
02	RTO (previous)	VOC Destruction/ Removal Efficiency (DRE) and Capture Efficiency (CE)	401 KAR 52:030	Initial and subsequent every 5 years	25A	95% (DRE)	98.57% (DRE)	7.1 tons/hr	CMN20060001	12/13/2006
						95% (DRE)	98.33% (DRE) 91.36% (CE**)	95584 ft. board/hr	CMN20110001	4/20/2011
						NA	98.14% (DRE) 89.87% (CE**)	13,429 lb/hr	CMN20160001	8/13/2016
	NA	98.2% (DRE)				RTO Setpoint: 1550 °F	CMN20210001	8/10/2021		
	*RTO-2 (new)	VOC DRE and CE VOC EF's			TBD	NA	TBD	TBD	TBD	TBD

Footnotes:

* The new RTO was required by Permit F-20-027 to undergo initial performance testing to establish DRE, CE and operating parameters. The testing performed under CMN20210001 confirmed a permanent total enclosure at the laminator, but failed to establish an overall CE for the processes.

** Previous CE calculations included VOC incorporated into product as captured.

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
90 tpy of PM/PM ₁₀ /PM _{2.5}	To preclude 401 KAR 52:020, Title V Permits	Source-wide
90 tpy of VOC	To preclude 401 KAR 52:020, Title V permits and 401 KAR 51:017, Prevention of significant deterioration of air quality	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 50:012, <i>General application</i>	03
401 KAR 59:010, <i>New process operations</i>	01
401 KAR 59:015, <i>New indirect heat exchangers</i>	IA2
401 KAR 60:005 Section 2(2)(r), 40 C.F.R. 60.110b through 60.117b (Subpart Kb), <i>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</i>	TK-01
401 KAR 63:020, <i>Potentially hazardous matter or toxic substances</i>	02

Table C - Summary of Precluded Regulations:

None

Table D - Summary of Non Applicable Regulations:

None

Air Toxic Analysis

401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances

The Division for Air Quality (Division) has performed SCREEN View on February 25, 2026 of potentially hazardous matter or toxic substances (Methylene Diphenyl Diisocyanate) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

Single Source Determination

N/A

SECTION 5 - PERMITTING HISTORY

Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action
F-05-026	Initial	APE20050001	6/30/2005	8/24/2005	Initial Construction/Operating Permit
F-10-018	Renewal	APE20100001	6/16/2010	10/23/2010	Permit Renewal
F-10-018 R1	Revision	APE20110001	2/15/2011	3/23/2011	Admin. Amendment
F-10-018 R2	Revision	APE20110002	7/27/2011	11/21/2011	Permit Corrections
F-15-044	Renewal	APE20150001	10/13/2015	12/17/2015	Permit Renewal
F-15-044 R1	Minor Revision	APE20180001	8/19/2018	11/11/2018	Increase in hourly manufacturing rate
F-20-027	Renewal	APE20200001	7/30/2020	4/25/2021	Renewal construction/operating permit
F-20-027 R1	Admin Amendment	APE20220001	12/13/2022	12/14/2022	Name Change and QC saw route to baghouse
F-20-027 R2	Admin Amendment	APE20250001	7/14/2025	7/18/2025	Name Change

SECTION 6 – PERMIT APPLICATION HISTORY

None

APPENDIX A – ABBREVIATIONS AND ACRONYMS

Btu	– British thermal unit
CE	– Capture Efficiency
CO	– Carbon Monoxide
Division	– Kentucky Division for Air Quality
DRE	– Destruction/Removal Efficiency
GHG	– Greenhouse Gas
HAP	– Hazardous Air Pollutant
kPa	– Kilopascals
KYEIS	– Kentucky Emissions Inventory Survey
MSDS	– Material Safety Data Sheets
MTVP	– Maximum True Vapor Pressure
MMBtu	– Million British thermal units
mmHg	– Millimeter of mercury column height
NIST	– National Institute of Standards and Technology
NO _x	– Nitrogen Oxides
PM	– Particulate Matter
PM ₁₀	– Particulate Matter equal to or smaller than 10 micrometers
PM _{2.5}	– Particulate Matter equal to or smaller than 2.5 micrometers
psi	– Pounds per square inch
PTE	– Potential to Emit
RAP	– Reasonable, Available, and Practical
RTO	– Regenerative Thermal Oxidizer
SO ₂	– Sulfur Dioxide
VOC	– Volatile Organic Compounds
VOL	– Volatile Organic Liquid

APPENDIX B – INDIRECT HEAT EXCHANGER EMISSIONS LIMITATIONS

EU	Fuel	Capacity (MMBtu/hr)	Construction Date	Notes/ Removal Date	Basis for PM Limit	Total Heat Input Capacity for PM Limit (MMBtu/hr)	Basis for SO₂ Limit	Total Heat Input Capacity for SO₂ Limit (MMBtu/hr)
IA1	Natural Gas	2.6	2005	N/A	Section 4(1)(a)	2.6	Section 5(1)(a)1.	2.6