AIR QUALITY PERMIT
Issued under 401 KAR 52:020

Permittee Name: Carpenter Co.
Mailing Address: 200 Forrest Park Drive, Russellville, KY 42276

Source Name: Carpenter Co.
Mailing Address: 200 Forrest Park Drive, Russellville, KY 42276
Source Location: Same as above

Permit ID: V-22-023
Agency Interest #: 2751
Activity ID: APE20220001
Review Type: Title V, Operating
Source ID: 21-141-00012

Regional Office: Bowling Green Regional Office
2642 Russellville Road
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County: Logan

Application Complete Date: June 6, 2022
Issuance Date: June 6, 2022
Expiration Date: 

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

Version 4/1/2022
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Version 1/26/2021
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 has been issued under the provisions of Kentucky Revised Statutes (KRS) Chapter 224 and regulations promulgated pursuant thereto.

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

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Slabstock flexible polyurethane foam production line

EP01 (EU-01) Virgin Foam Line
EP02 (EU-02) Slabstock Curing

Description: Includes all portions of the flexible polyurethane foam line; transfer of raw materials, all connectors, valves, storage tanks, pumps and other leak components in diisocyanate service, and the foam line itself to the point in the process where the foam is completely cured.

Construction commenced: 1969 (modified 1999)
Control Equipment: No control equipment on slabstock production line; Sealed pumps in diisocyanate service.

APPLICABLE REGULATIONS:
401 KAR 63:002, Section 2(4)(nnnnn), 40 C.F.R. 63.11414 to 63.11420, Table 1 (Subpart OOOOOO), National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources

1. Operating Limitations:
   a. The usage rate of all Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

   b. The permittee shall use no material containing methylene chloride for any purpose in any slabstock flexible foam production process [40 CFR 63.11416(b)].

   Compliance Demonstration Method: Compliance with Operating Limitations a. and b. can be demonstrated using material usage records, Safety Data Sheets, and engineering calculations, [40 CFR 63.11416(f)]. See, 5. Specific Recordkeeping Requirements.

   c. See Group Requirements for Components in Diisocyanate Service.

2. Emission Limitations:
   a. See Section D for source-wide VOC and HAP emission limitations.

   b. See Group Requirements for Components in Diisocyanate Service.

3. Testing Requirements:
   Testing shall be conducted at such times as may be requested by the Cabinet [401 KAR 50:045, Section 1].
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. **Specific Monitoring Requirements:**
   See Group Requirements for Components in Diisocyanate Service.

5. **Specific Recordkeeping Requirements:**
   a. The permittee shall keep records of the amount of VOC and HAP containing materials used each month. Once each month, the permittee shall calculate and record the VOC and HAP emitted from the virgin foam line during the given month and new source-wide 12-month rolling totals as required by Section D of this permit. Emission factors for reactive materials shall be based on the most recent test data.

   b. The permittee must maintain records of the information used to demonstrate compliance, as required in 40 CFR 63.11416(f). All records must be maintained for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site, [40 CFR 63.11417(b)(3)].

6. **Specific Reporting Requirements:**
   The permittee shall report source-wide VOC and HAP emissions as part of the semiannual reporting as required in Section F (5) & (6).
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Rebond Foam Production Line

EP03 (EU-03)  Continuous Bonded Foam Line

Description: Trim from slabstock production is ground to small pieces that are bonded together.

Scrap Grinding System including; (1) Shredder, (2) Granulators, (1) Elutriator, (5) Storage Silos, (1) Surge Bin and Pneumatic Conveying

Rebond Production including; (1) Dry Mixer, (1) Wet Mixer, (1) Molding Unit, plus all connectors, valves, storage tanks, pumps and other leak components in diisocyanate service

Construction commenced: 1975
Control Equipment: Cyclones and Baghouses for control of particulates from granulators, shedders, and storage bins;
No control for Rebond Molding Unit or Slab Curing;
Sealed pumps in diisocyanate service.

List of Affected Tanks part of the Rebond Foam line and under 40 CFR 63 Subpart OOOOOO:
 Tank #27 (10,300 gallon) MDI
 Tank #28 (9,700 gallon) Binder Mix
 Tank #29 (3,100 gallon) Binder Day
 Tank #32 (11,480 gallon) MDI
 Tank #33 (11,480 gallon) MDI
 Tank #38 (10,000 gallon) Binder Storage

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

401 KAR 63:002, Section 2(4)(nnnnn), 40 C.F.R. 63.11414 to 63.11420, Table 1 (Subpart OOOOOO), National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources.

1. Operating Limitations:
   a. The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.
   b. The permittee shall not use a material containing methylene chloride as an equipment cleaner in a rebond foam process [40 CFR 63.11416(d)(1)].
   c. The permittee shall not use a mold release agent containing methylene chloride in a rebond foam process [40 CFR 63.11416(d)(2)].
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Compliance Demonstration Method:
Compliance with Operating Limitations a., b., and c. can be demonstrated using material usage records, Safety Data Sheets, and engineering calculations [40 CFR 63.11416(f)]. See, 5. Specific Recordkeeping Requirements

d. See Group Requirements for Components in Diisocyanate Service.

2. Emission Limitations:
   a. The opacity of visible emissions from each stack shall not equal or exceed 20 percent [401 KAR 59:010, Section 3 (1)].

      Compliance Demonstration Method:
      See subsections 4. Specific Monitoring Requirements and 5. Specific Recordkeeping Requirements

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

      Emission of particulate matter from a control device or stack of any affected facility up to a process rate of 1,000 lbs/hr shall not exceed 2.34 lbs/hr. For processing rates greater than 1,000 lbs/hr up to 60,000 lbs/hr, particulate emissions shall not exceed the emission rate calculated by the following equation:

      \[ E = 3.59 \times P^{0.62} \]

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

      Compliance Demonstration Method:
      See subsections 4. Specific Monitoring Requirements and 5. Specific Recordkeeping Requirements

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

   d. See Group Requirements for Components in Diisocyanate Service.

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

4. Specific Monitoring Requirements:
   a. The permittee shall perform a qualitative visual inspection for emissions from the Surge Bin Cyclone, Holding Bin Cyclone and associated pneumatic conveying ducts that are located outside of any building enclosure at least once per operating month. If visible emissions are seen;
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) The permittee shall initiate repairs to eliminate the visible emissions, or;
(2) Opacity of emissions shall be determined by Reference Method 9.
   i. If emissions are in excess of the applicable opacity limit, then the permittee shall initiate all necessary repairs to the equipment.
   ii. If emissions are not in excess of the applicable opacity limit then the permittee shall determine the opacity of emissions daily using Reference Method 9 for as long as cause or condition attributable for the visible emissions is present.

b. See Group Requirements for Components in Diisocyanate Service.

5. Specific Recordkeeping Requirements:
   a. Monthly records shall be kept of all VOC and HAP containing material including diisocyanates, mold release agents and clean-up solvents used during the month. Record the type of material, the amount of each material used during a given month, and the VOC and HAP content of each material by weight percent.
   b. Once each month, the permittee shall calculate and record the VOC and HAP emitted from rebond foam production line during the given month and new source-wide 12-month rolling totals as required by Section D of this permit. Emission factors for reactive materials shall be based on the most recent test data.
   c. The permittee shall maintain records of the following information for the particulate controls:
      (1) The permittee shall keep the control equipment manufacturer’s specifications on site.
      (2) Operational procedures, preventive maintenance records, and records of any repairs made to the equipment.
      (3) The permittee shall maintain a log of the visual observations noting date, time, initials of observers, and records of corrective actions taken as a result of visible emissions from a stack and records of any Reference Method 9 readings performed.
   d. The permittee must maintain records of the information used to demonstrate compliance, as required in 40 CFR 63.11416(f). All records must be maintained for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site, [40 CFR 63.11417(d)].

6. Specific Reporting Requirements:
   a. The permittee shall report VOC and HAP emissions as part of the semiannual reporting required by Section F (5) & (6).
   b. The permittee shall submit a copy of the control device inspection and repair log for those times when corrective actions are required due to an opacity exceedance and/or records of any Reference Method 9 opacity observations as noted in Section B (4) a. Copies of these records shall be submitted as a part of the semiannual reporting as required in Section F (5) & (6).
SECTI0N B - EMISSION POINTS, EMISION UNITS, APPLICABLE
REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Group Requirements for Components in Diisocyanate Service

Description: Includes storage tanks, valves, fittings, pumps and other leak components in
diisocyanate service.

Control Equipment: None on slabstock or rebond production lines;
Sealed pumps in diisocyanate service.

APPLICABLE REGULATIONS:
401 KAR 50:012, General application

The Cabinet has determined that the following control procedures and work practices are
reasonable, available and practical. The source is assumed to be in compliance when operated
according to the procedures as listed in subsections 1 through 6 below.

1. Operating Limitations:
   a. Transfer pumps in diisocyanate service. Each transfer pump in diisocyanate service shall
      meet the requirements of paragraph (a)(1) or (a)(2) of this subsection.
      (1) The pump shall be a sealless pump; or
      (2) The pump shall be a submerged pump system meeting the requirements in paragraphs
         a.(2)i. through iii. of this subsection.
          i. The pump shall be completely immersed in bis(2-ethylhexyl)phthalate (DEHP,
             CAS #118–81–7), 2(methyloctyl)phthalate (DINP, CAS #68515–48–0), or another
             neutral oil.
          ii. The pump shall be visually monitored weekly to detect leaks,
          iii. When a leak is detected, it shall be repaired in accordance with the procedures in
               paragraphs a.(2)iii A. and B. of this subsection, except as provided in paragraph c.
               of this subsection.
            A. The leak shall be repaired as soon as practicable, but not later than 20 calendar
days after it is detected.
            B. A first attempt at repair shall be made no later than 10 calendar days after the
               leak is detected. First attempts at repair include, but are not limited to, the
               following practices where practicable:
               1. Tightening of packing gland nuts.
               2. Ensuring that the seal flush is operating at design pressure and temperature.

   b. Other components in diisocyanate service. If evidence of a leak is found by visual, audible,
or any other detection method, it shall be repaired as soon as practicable, but not later than
20 calendar days after it is detected, except as provided in paragraph (c) of this section.
The first attempt at repair shall be made no later than 10 calendar days after each leak is
detected.
c. Delay of repair.
   (1) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in diisocyanate service.
   (2) Delay of repair for valves and connectors is also allowed if:
      i. The owner or operator determines that diisocyanate emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
      ii. The purged material is collected and destroyed or recovered in a control device when repair procedures are effected.
   (3) Delay of repair for pumps is also allowed if repair requires replacing the existing seal design with a sealless pump, and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

2. Emission Limitations:
   See Section D for source-wide VOC and HAP emission limitations.

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

4. Specific Monitoring Requirements:
   a. Leak Inspection and Maintenance Plan:
      The permittee maintain a written leak inspection and maintenance that specifies:
      (1) For all affected sources, a list of components in diisocyanate service.
      (2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump and the date of installation.
      (3) A systematic procedure for identifying leaks for all equipment in diisocyanate service;
      (4) An inspection schedule with a minimum inspection frequency of:
         i. Weekly visual inspection for submerged pumps in diisocyanate service;
         ii. Quarterly for valves and other leak components.
         iii. Semi-annual for fittings
      (5) Methods for documenting the date and results of each inspection and any repairs that were made;
      (6) The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
         i. A first attempt at repair shall be made no later than 10 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:
            A. Tightening of packing gland nuts.
            B. Ensuring that the seal flush is operating at design pressure and temperature.
         ii. Final repairs shall be completed not later than 20 calendar days after a leak is detected.
 iii. Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in diisocyanate service.

 iv. Delay of repair for valves and connectors is also allowed if:
   A. The owner or operator determines that diisocyanate emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
   B. The purged material is collected and destroyed or recovered in a control device when repair procedures are affected.
   C. Delay of repair for pumps is also allowed if repair requires replacing the existing seal design with a sealless pump, and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

 (7) To satisfy the requirements to provide a leak inspection and maintenance plan, the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this section.

 (8) The permittee shall keep the written leak inspection and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Division for the life of the affected source. In addition, if the leak inspection and maintenance plan is revised, the permittee shall keep previous (i.e. superseded) versions on record to be made available for inspection, upon request, by the Division for a period of 5 years after each revision to the plan.

5. **Specific Recordkeeping Requirements:**
   a. Equipment leak records.
      The information in paragraphs (a)(1) through (8) shall be recorded for leaking components.
      (1) For all affected sources, a complete list of components in diisocyanate service.
      (2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump and the date of installation.
      (3) The instrument or method used to determine the leak.
      (4) The date the leak was detected and the dates of each attempt to repair the leak.
      (5) Repair methods applied in each attempt to repair the leak.
      (6) The words ‘‘repair delayed’’ and the reason for the delay if a leak is not repaired within 20 calendar days after discovery of the leak.
      (7) The expected date of the successful repair of the leak if a leak is not repaired within 20 calendar days.
      (8) The date of successful repair of the leak.

6. **Specific Reporting Requirements:**
   a. The permittee shall report any deviations from the permit conditions including any equipment leaks that were not repaired in accordance with the Leak Inspection and Maintenance Plan.

   b. Information regarding deviations can be submitted as part of the semi-annual report required by Section F (6).
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP05 (EU05) Fiber Operation - Air Lay Line

**Description:** Astec Machinery – Custom designed, (5) Bailed Fiber Openers w/ Dust Collector, Blender, (2) Carding Machines w/ Dust Collectors, Lappers, (2) Enclosed Adhesive Spray Stations, (1) Natural Gas-Fired Drying Oven (6 MMBtu/hr), (2) Needle Looms, (2) Trim Knives and (1) Trim Re-grinder.

- Installed: December 1995
- Control Equipment: Dust Collectors for Control of Polyester Fiber Duct.

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

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

1. **Operating Limitations:**
   a. The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

   b. The dust collectors must be in place and operated according to the manufacturer's specifications and recommendations any time a Carding machine or Bailed Fiber Opener is in use.

2. **Emission Limitations:**
   a. The opacity of visible emissions from each stack shall not equal or exceed 20 percent [401 KAR 59:010, Section 3 (1)].

   **Compliance Demonstration Method:**
   The source is assumed to be in compliance when the dust collectors are in place and properly maintained. Refer to Subsection 4. Specific Monitoring Requirements.

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

   Emission of particulate matter from a control device or stack of any affected facility up to a process rate of 1,000 lbs/hr shall not exceed 2.34 lbs/hr. For processing rates greater than 1,000 lbs/hr up to 60,000 lbs/hr, particulate emissions shall not exceed the emission rate calculated by the following equation:

   \[ E = 3.59 \times P^{0.62} \]

   - E = the PM emissions rate (pounds/hour)
   - P = the process rate (tons/hour)
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Compliance Demonstration Method:
The source is assumed to be in compliance when the dust collectors are in place and properly maintained. Refer to Subsection 4. Specific Monitoring Requirements.

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

d. Based upon the emission rates of toxics and hazardous air pollutants determined by the Cabinet using information provided in the application and supplemental information submitted by the source, the Cabinet determines the affected facility to be in compliance with 401 KAR 63:020.

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

4. Specific Monitoring Requirements:
a. The permittee shall perform a qualitative visual inspection for emissions from the dust collector at least once per operating month when the equipment exhausts outside of the building. If visible emissions are seen;
   (1) The permittee shall initiate repairs to eliminate the visible emissions, or;
   (2) Opacity of emissions shall be determined by Reference Method 9.
      i. If emissions are in excess of the applicable opacity limit, then the permittee shall initiate all necessary repairs to the equipment.
      ii. If emissions are not in excess of the applicable opacity limit then the permittee shall determine the opacity of emissions daily using Reference Method 9 for as long as cause or condition attributable for the visible emissions is present.

b. The dust collectors’ pressure drop shall be monitored once daily to determine the need for filter maintenance. The filters shall be maintained as recommended by the manufacturer. For each dust collector, a permanent label indicating the established operating pressure drop range shall be placed next to the pressure drop monitor.
   (1) For each dust collector associated with a Carding machine, anytime the given Carding machine operates during that 24-hour period.
   (2) For the dust collector associated with the Bailed Fiber Openers, anytime the Bonded Line operates during that 24-hour period.

5. Specific Recordkeeping Requirements:
a. Monthly records should be kept of all adhesives, diluents, clean-up solutions, antimicrobial agents, additives, and other materials purchased and used during the month, along with the VOC and HAP content of each material used.

b. VOC and HAP emissions shall be calculated monthly per Section D of this permit, and every month, new 12-month rolling totals of VOC and HAP emissions shall be calculated.

c. The permittee shall maintain records of the following information for the particulate controls:
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) The permittee shall keep the manufacturer’s dust collector specifications on site.
(2) The operational procedures, preventive maintenance records and records of any repairs made to the equipment.
(3) The permittee shall maintain records of calibration of the monitoring device and a log of the pressure drop readings across the dust collectors, including the date, and dates of filter replacements.
(4) If a piece of equipment/filter is not in operation on a given day(s), this fact should also be noted in the log.
(5) The permittee shall maintain a log of the visual observations noting date, time, initials of observers, and records of corrective actions taken as a result of visible emissions from a stack and records of any Reference Method 9 readings performed.

6. Specific Reporting Requirements:
   a. The permittee shall report VOC and HAP emissions as part of the semiannual reporting required by Section F (5) & (6).
   b. The permittee shall submit a copy of the control device inspection and repair log for those times when corrective actions are required due to an opacity exceedance and/or records of any Reference Method 9 opacity observations as noted in Section B (4) a. Copies of these records shall be submitted as a part of the semiannual reporting as required in Section F (5) & (6).
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP07 (EU07) Foam Fabrication - Spray Glue Gun Operation

**Description:** (30) Spray Guns; Graco - 230-56X198A or equivalent

Installed: December 1969

EP08 (EU08) Slab Bonding - Spray Glue Gun Operation

**Description:** (8) Spray Guns; Graco - Optimizer M-1265 HVLP or equivalent

Installed: December 1969

APPLICABLE REGULATIONS:

401 KAR 61:020, Existing process operations

1. **Operating Limitations:**
   The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

2. **Emission Limitations:**
   a. The opacity of visible emissions from each stack shall not equal or exceed 40 percent [401 KAR 61:020, Section 3 (1)].

   **Compliance Demonstration Method:**
   The source is assumed to be in compliance as there are no exhaust streams from this process emitted directly to the ambient air.

   b. The following emission limitations for particulate matter are pursuant to 401 KAR 61:020, Section 3 (2):

   Emission of particulate matter from a control device or stack of any affected facility up to a process rate of 1000 lbs/hr shall not exceed 2.58 lbs/hr. For processing rates greater than 1000 lbs/hr up to 60,000 lbs/hr, particulate emissions shall not exceed the emission rate calculated by the following equation:

   \[ E = 4.10(P)^{0.67} \]
   
   - \( E \) = the PM emissions rate (pounds/hour)
   - \( P \) = the process rate (tons/hour)

   **Compliance Demonstration Method:**
   The source is assumed to be in compliance when the spray guns are operated and properly maintained in accordance with manufacturer’s recommendations.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

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

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:
The permittee shall monitor adhesive usage for the purpose of demonstrating compliance with source-wide emission limitations.

5. Specific Recordkeeping Requirements:
a. Monthly records should be kept of all VOC and HAP containing adhesives, diluents, clean-up solutions, antimicrobial agents and other additives used, including the type, amount, and the VOC and HAP content of each material by weight percent.

b. VOC and HAP emissions shall be calculated monthly per Section D of this permit, and every month, new 12-month rolling totals shall be calculated.

c. The permittee shall keep the manufacturer’s spray gun specifications on site.

6. Specific Reporting Requirements:
The permittee shall report VOC and HAP emissions as part of the semiannual reporting as required in Section F (5) & (6).
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP09 (EU09)  Ink Jet Printing

**Description:** Various ink jet printers using solvent-based inks for printing product identification.

**APPLICABLE REGULATIONS:**
None

1. **Operating Limitations:**
   The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

2. **Emission Limitations:**
   See Section D for source-wide VOC and HAP emission limitations.

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:**
   The permittee shall monitor solvent usage for the purpose of demonstrating compliance with source wide emission limitations.

5. **Specific Recordkeeping Requirements:**
   The permittee shall keep records of all solvent containing materials used during each month including all inks, additives and clean up solvents. The records shall contain the amount of each material used and the VOC and HAP content of each material used.

6. **Specific Reporting Requirements:**
   The permittee shall report VOC and HAP emissions as part of the semiannual reporting as required in Section F (5) & (6).
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP04a, b (401, 402) Two (2) Natural Gas Fired Boilers

**Description:** Two American Standard, Kewanee Fire Tube Boilers, Natural Gas-fired
Rated Capacity: 14.645 MMBtu/hr (each)
Installed: 1969

**APPLICABLE REGULATIONS:**
401 KAR 61:015, *Existing indirect heat exchangers*

1. **Operating Limitations:**
The permittee shall only combust pipeline quality natural gas and shall maintain and operate the units in accordance with manufacturer’s recommendations.

2. **Emission Limitations:**
   a. 401 KAR 61:015, Section 4(1) limits emissions of particulate matter to 0.63 pounds per million BTU actual heat input.
   b. 401 KAR 61:015, Section 4(1)(c) limits visible emissions from each stack to less than 40% opacity.
   c. 401 KAR 61:015, Section 5(1)(a) limits emissions of sulfur dioxide to 5.23 pounds per million BTU actual heat input.

   **Compliance Demonstration Method:**
The source is assumed to be in compliance with particulate matter, opacity, and sulfur dioxide limits when the boilers are firing natural gas.

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

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:**
The permittee shall monitor the amount of natural gas burned on a monthly basis.

5. **Specific Recordkeeping Requirements:**
The permittee shall maintain records of the amount of natural gas burned on a monthly basis.

6. **Specific Reporting Requirements:**
See Section F for general reporting requirements.
EP04c (403) One (1) Natural Gas Fired Boiler

**Description:** Cleaver Brooks, Fire Tube Package Boiler, Natural gas-fired
Rated Capacity: 14.645 MMBtu/hr
Installed: 1983

**APPLICABLE REGULATIONS:**

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

1. **Operating Limitations:**
   The permittee shall only combust pipeline quality natural gas and shall maintain and operate the units in accordance with manufacturer’s recommendations.

2. **Emission Limitations:**
   a. 401 KAR 59:015, Section 4(1)(c) limits emissions of particulate matter to 0.39 pounds per million BTU actual heat input.
   b. 401 KAR 59:015, Section 4(2) limits visible emissions from each stack to less than 20% opacity.
   c. 401 KAR 59:015, Section 5(1)(c) limits emissions of sulfur dioxide to 1.63 pounds per million BTU actual heat input.

   **Compliance Demonstration Method:**
   The source is assumed to be in compliance with particulate matter, opacity, and sulfur dioxide limits when the boiler is firing natural gas.
   d. See Section D for source-wide VOC and HAP emission limitations.

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:**
   The permittee shall monitor the amount of natural gas burned on a monthly basis.

5. **Specific Recordkeeping Requirements:**
   The permittee shall maintain records of the amount of natural gas burned on a monthly basis.

6. **Specific Reporting Requirements:**
   See Section F for general reporting requirements.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP12  Diesel Emergency Fire Pump Engine  
Installed: 2018  
Power Output: 1760 Horsepower

APPLICABLE REGULATIONS:
401 KAR 63:002, Section 2(4)(eeee), 40 C.F.R. 63.6580 to 63.6675, Tables 1a to 8, and Appendix A (Subpart ZZZZ), National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

401 KAR 60:005, Section 2(2)(ddddd), 40 C.F.R. 60.4200 to 60.4219, Tables 1 to 8 (Subpart IIII), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

1. Operating Limitations:
   a. The permittee shall operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4204 and 60.4205 over the entire life of the engine [40 CFR 60.4206].

   b. The permittee shall use diesel fuel that meets the requirements of 40 CFR 1090.305 for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted [40 CFR 60.4207(b)].

   c. The owner or operator must do all of the following, except as permitted under paragraph (g) of 40 CFR 60.4211 [40 CFR 60.4211(a)]:
      (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;
      (2) Change only those emission-related settings that are permitted by the manufacturer; and
      (3) Meet the requirements of 40 CFR Part 1068, as they apply.

   d. The permittee must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of 40 CFR 60.4211. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3) of 40 CFR 60.4211, is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs (f)(1) through (3) of 40 CFR 60.4211, the engine will not be considered an emergency engine under 40 CFR 63 Subpart IIII and must meet all requirements for non-emergency engines [40 CFR 60.4211(f)].
      (1) There is no time limit on the use of emergency stationary ICE in emergency situations [40 CFR 60.4211(f)(1)].
      (2) The permittee may operate the emergency stationary ICE for the purpose specified in paragraph (f)(2)(i) of 40 CFR 60.4211 for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of 40 CFR 60.4211 counts as part of the 100 hours per calendar year allowed by this paragraph[40 CFR 60.4211(f)(2)].
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year [40 CFR 60.4211(f)(2)(i)].

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (f)(2) of 40 CFR 60.4211. Except as provided in paragraph (f)(3)(i) of 40 CFR 60.4211, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity[40 CFR 60.4211(f)(3)].

2. **Emission Limitations:**
   a. The permittee shall comply with the emission standards in table 4 of 40 CFR 60 Subpart IIII, for all pollutants [40 CFR 60.4205(c)].

<table>
<thead>
<tr>
<th></th>
<th>NMHC + NOx</th>
<th>PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>g/KW-hr (g/HP-hr)</td>
<td>6.4 (4.8)</td>
<td>0.20 (0.15)</td>
</tr>
</tbody>
</table>

**Compliance Demonstration Method:**
The permittee shall demonstrate compliance with the emission standards by purchasing an engine certified to the emission standards specified in 40 CFR 60.4205(c), for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine shall be installed and configured according to the manufacturer’s emission-related specifications, except as permitted in 40 CFR 60.4211(g). [40 CFR 60.4211(c)]

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

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

4. **Specific Monitoring Requirements:**
   a. The permittee shall monitor the amount of diesel consumed by the generators on a monthly basis.

b. The permittee must install a non-resettable hour meter prior to startup of the engines [40 CFR 60.4209(a)].
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. **Specific Record Keeping Requirements:**
   a. The permittee shall maintain records of the amount of diesel consumed by the generators on a monthly basis.

   b. The permittee shall maintain records of the total hours of operation for the generator on an annual basis.

   c. The owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time [40 CFR 60.4214(b)].

6. **Specific Reporting Requirements:**
   See Section F for general reporting requirements.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP13  500 gallon Gasoline Storage Tank  
Construction date: 2011

APPLICABLE REGULATIONS:
401 KAR 63:002 Section 2(4), 40 C.F.R. 63.11110 to 63.11132, Tables 1 to 3 (Subpart C), National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

1. Operating Limitations:
   a. If the permittee’s gasoline dispensing facility has a monthly throughput of less than 10,000 gallons of gasoline, the permittee shall comply with the requirements in 40 CFR 63.11116 [40 CFR 63.11111(b)].
      (1) The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following [40 CFR 63.11116(a)]:
         i. Minimize gasoline spills;
         ii. Clean up spills as expeditiously as practicable;
         iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
         iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
      (2) The permittee is not required to submit notifications or reports as specified in 40 CFR 63.11125, 40 CFR 63.11126, or subpart A of 40 CFR part 63, but the permittee shall have records available within 24 hours of a request by the Administrator to document your gasoline throughput [40 CFR 63.11116(b)].
      (3) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3) of 40 CFR 63.11116 [40 CFR 63.11116(d)].
   
   b. The permittee shall, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source [40 CFR 63.11115(a)].

2. Emission Limitations:
   See Section D for source-wide VOC and HAP emission limitations.

3. Testing Requirements:
   Testing shall be conducted at such times as may be requested by the Cabinet [401 KAR 50:045, Section 1].
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. **Specific Monitoring Requirements:**
   The permittee shall maintain a log of the quantity of gasoline delivered to the facility during each month to demonstrate that it is equal to or less than 10,000 gallons per month.

5. **Specific Recordkeeping Requirements:**
   a. The permittee shall, upon request by the Administrator, demonstrate that their monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable. Records required under this paragraph shall be kept for a period of 5 years [40 CFR 63.11111(e)].

   b. Each owner or operator of an affected source under this subpart shall keep records as specified in paragraphs (d)(1) and (2) of 40 CFR 63.11125.
      (1) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment [40 CFR 63.11125(d)(1)].
      (2) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation [40 CFR 63.11125(d)(2)].

6. **Specific Reporting Requirements:**
   See Section F for general reporting requirements.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP14  Used Oil Tank (1,100 gallon)
      Construction date: 1992

APPLICABLE REGULATIONS:
401 KAR 59:050, New storage vessels for petroleum liquids

1. Operating Limitations:
   a. The owner or operator of each storage vessel commenced on or after April 9, 1972 to which
      401 KAR 59:050 applies shall store petroleum liquids as follows: If the storage vessel has
      a storage capacity greater than 2,195 liters (580 gallons), and if the true vapor pressure of
      the petroleum liquid, as stored, is equal to or greater than ten and three-tenths (10.3) kPa
      (one and five-tenths (1.5) psia), as a minimum it shall be equipped with a permanent
      submerged fill pipe [401 KAR 59:050 Section 3.(2)].

   b. There shall be no visible holes, tears, or other opening in the seal, any seal fabric, shoe, or
      seal envelope [401 KAR 59:050 Section 4.(1)].

   c. All openings, except stub drains, automatic bleeder vents, rim space vents, and leg sleeves,
      shall be equipped with covers, lids, or seals such that [401 KAR 59:050 Section 4.(2)]:
         (1) The cover, lid, or seal is in the closed position at all times (i.e., no visible gap) except
             when in actual use or as described in subsection (3)(f) of section 4 of 401 KAR 59:050;
         (2) Automatic bleeder vents are closed at all times except when the roof is floated off or
             landed on the roof leg supports; and
         (3) Rim vents, if provided, are set to open when the roof is being floated off the roof leg
             supports or at the manufacturer's recommended setting.

2. Emission Limitations:
   See Section D for source-wide VOC and HAP emission limitations.

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

4. Specific Monitoring Requirements:
   a. Available data on the typical Reid vapor pressure and the maximum expected storage
      temperatures of the stored product may be used to determine the maximum true vapor
      pressure as specified by the cabinet, unless the cabinet specifically requests that the liquid
      be sampled, the actual storage temperature determined, and the Reid vapor pressure
      determined from the sample(s) [401 KAR 59:050 Section 5.(2)].

   b. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than
      thirteen and eight-tenths (13.8) kPa (two and zero-tenths (2.0) psia) or whose physical
      properties preclude determination by the recommended method is to be determined from
      available data and recorded if the estimated true vapor pressure is greater than six and nine-
      tenths (6.9) kPa (one and zero-tenths (1.0) psia) [401 KAR 59:050 Section 5.(3)].
c. The following are exempt from the requirements of section 5 of 401 KAR 59:050 [401 KAR 59:050 Section 5.(4)]:
   (1) Each owner or operator of each storage vessel storing a petroleum liquid with a Reid vapor pressure of less than six and nine-tenths (6.9) kPa (one and zero-tenths (1.0) psia) provided the maximum true vapor pressure does not exceed six and nine-tenths (6.9) kPa (one and zero-tenths (1.0) psia).
   (2) Each owner or operator of each storage vessel equipped with a vapor recovery and return or disposal system in accordance with the requirements of Section 3(1)(a) and (b), (3)(c) and (4) of 401 KAR 59:050.

5. **Specific Recordkeeping Requirements:**
   See Section F for general recordkeeping requirements.

6. **Specific Reporting Requirements:**
   See Section F for general reporting requirements.
SECTION C - INSIGNIFICANT ACTIVITIES

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

<table>
<thead>
<tr>
<th>Description</th>
<th>Generally Applicable Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. EP-06 (EU-06) Fiber Operation</td>
<td>401 KAR 59:010</td>
</tr>
<tr>
<td>Thermal bonded 4.5 MMBtu/hr - Card Line</td>
<td></td>
</tr>
<tr>
<td>w/ rotary dust collector</td>
<td></td>
</tr>
<tr>
<td>2. EP-10 (EU-10) Fiber Operation</td>
<td>401 KAR 59:010</td>
</tr>
<tr>
<td>Two Needle Lines w/ rotary dust collector</td>
<td></td>
</tr>
<tr>
<td>3. IA-03 Powered vent for tanks 27-29</td>
<td>N/A</td>
</tr>
<tr>
<td>4. IA-04 Laboratory fume hoods (2)</td>
<td>N/A</td>
</tr>
<tr>
<td>5. IA-04 Corona Treater Exhaust</td>
<td>N/A</td>
</tr>
<tr>
<td>6. IA-05 Fire fighting pump house heater</td>
<td>N/A</td>
</tr>
<tr>
<td>7. IA-07 Truck Shop Tractor Exhaust Vents</td>
<td>N/A</td>
</tr>
<tr>
<td>8. IA-08 Consumer Dept. Grind Line</td>
<td>401 KAR 59:010</td>
</tr>
<tr>
<td>9. IA-10 CO₂ Laser Cutters (2 units)</td>
<td>401 KAR 59:010</td>
</tr>
<tr>
<td>10. Tank Farm – Located indoors</td>
<td></td>
</tr>
<tr>
<td>Tanks #1-8 (13,000 gallons each) Polyol (1969)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #9 (13,000 gallon) TDI#3 (1969)</td>
<td>401 KAR 63:020</td>
</tr>
<tr>
<td>Tank #10 (13,000 gallon) Polyol (1969)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tanks #11-12 (10,000 gallons each)</td>
<td>401 KAR 63:020</td>
</tr>
<tr>
<td>TDI Tanks #1 and #2 (1969)</td>
<td></td>
</tr>
<tr>
<td>Tanks #13-17 (13,000 gallons each) Polyol (1999)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #18 (7,500 gallon) Silicone (1969)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #19 (10,000 gallon) Empty (1969)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #20 (8,000 gallon) Polyol (1969)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #21 (9,100 gallon) Empty (1969)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #22 (13,000 gallon) Polyol (1999)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #23 (13,000 gallon) Polyol (1999)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #24 (11,600 gallon) Polyol (2012)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #25 (10,300 gallon) Off-Spec Polyol (1969)</td>
<td>N/A</td>
</tr>
</tbody>
</table>
### SECTION C - INSIGNIFICANT ACTIVITIES (CONTINUED)

<table>
<thead>
<tr>
<th>Description</th>
<th>Generally Applicable Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tank #26 (10,300 gallon) Off-Spec Polyol (1969)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tank #30 (12,156 gallon) MDI (2008)</td>
<td>401 KAR 63:020</td>
</tr>
<tr>
<td>Tank #31 (12,156 gallon) Polyol (2008)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tanks #34-37 (51,438 gallons each) TDI Tanks (2008)</td>
<td>401 KAR 63:020</td>
</tr>
<tr>
<td>Gel Bead/Polyol (400 gallon) (2011)</td>
<td>N/A</td>
</tr>
<tr>
<td>Polyol / Calcium Slurry (3,751 gallon) (2011)</td>
<td>N/A</td>
</tr>
<tr>
<td>Tanks, (2) Off-spec polyol (10,300 gallons each)</td>
<td>N/A</td>
</tr>
</tbody>
</table>

11. Indoor Tank Farm – Truck Stop

   Truck Shop 15W40 Oil Tank (550 gal.)                  | N/A                             |

12. Indoor Tank Farm - Building 3

   EVCL Resin Tank (8,000 gal.)                          | N/A                             |
   Vinyl Acetate Tank (8,000 gal.)                       | 401 KAR 63:020                  |
   Wastewater Tank (8,000 gal.)                          | N/A                             |
   Wastewater Tank (2,300 gal.)                          | N/A                             |

13. Outside Storage Tanks

   East side Liquid CO₂ Tank (60,000 lbs.)               | N/A                             |
   Tank #39A (350 gallon) Methyl Formate (2010)          | N/A                             |
   Tank #39B (2,000 gallon) Pentane (2010)               | N/A                             |
   East side Polyol Tank #1 (400,000 gallon) (1975)     | N/A                             |
   East side Polyol Tank #2 (400,000 gallon) (1975)     | N/A                             |
   West side Diesel Tank (10,000 gallon) (2013)          | N/A                             |
   West side Diesel Tank (275 gallon) (2016)            | N/A                             |
   West side Diesel Tank (275 gallon) (2016)            | N/A                             |
   West side Diesel Tank (300 gallon) (2017)            | N/A                             |
SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

2. VOC and HAP emissions, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan shall not exceed the respective limitations specified herein.

3. **Emission Limitations:**
   a. **HAP Limitations**
      (1) Source-wide emissions of any individual HAP shall not exceed nine (9) tons during any consecutive twelve (12) month period.
      
      **Compliance Demonstration Method:**
      Monthly HAP species emissions = \( \sum \) HAP emissions from Slabstock Foam Line
      
      + \( \sum \) HAP emissions from Rebond
      + \( \sum \) HAP emissions from adhesive usage, antimicrobial agents, misc. operations
      + \( \sum \) HAP emissions from storage tanks
      + \( \sum \) HAP emissions from Insignificant Activities, if applicable

      (2) Source-wide total HAP emissions shall not exceed 22.5 tons during any consecutive twelve (12) month period.
      
      **Compliance Demonstration Method:**
      
      \[
      \text{Combined HAP Emissions} = \sum_{j=1}^{m} \text{HAP}_j
      \]
      
      Where;  \( j \) = individual HAP emission (i.e. xylene, etc.)
      \( m \) = total number of single HAP emissions

   b. **VOC Limitations**
      (1) Source-wide emissions of VOC shall not exceed 225 tons per rolling twelve (12) month total.
      
      **Compliance Demonstration Method:**
      Monthly VOC emissions = \( \sum \) VOC emissions from Slabstock Foam Line
      
      + \( \sum \) VOC emissions from Rebond
      + \( \sum \) VOC emissions from adhesive usage, antimicrobial agents, printing, and misc. operations
      + \( \sum \) VOC emissions from storage tanks
      + \( \sum \) VOC emissions from fuel combustion
      + \( \sum \) VOC emissions from Insignificant Activities, if applicable
SECTIONS D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

c. Compliance with annual limits is based on a rolling twelve month total. Emissions shall be calculated on a monthly basis and shall be added to previous eleven months emissions to get a total of actual emissions for each consecutive twelve (12) month period. Rolling totals shall be reported in units of tons.
SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

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

1. Pursuant to Section 1b-IV-1 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place as defined in this permit, and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five (5) years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b-IV-2 and 1a-8 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].

3. In accordance with the requirements of 401 KAR 52:020, Section 3(1)h, the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
   a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
   b. To access and copy any records required by the permit;
   c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.
   Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Summary reports of any monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Sections 1b-V-1 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].
SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020, Section 23. If continuous emission and opacity monitors are required by regulation or this permit, data shall be reported in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All deviations from permit requirements shall be clearly identified in the reports.

7. In accordance with the provisions of 401 KAR 50:055, Section 1, the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
   a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
   b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.

8. The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken shall be submitted to the Regional Office listed on the front of this permit. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement does not identify a specific time frame for reporting deviations, prompt reporting, as required by Sections 1b-V, 3 and 4 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26, shall be defined as follows:
   a. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
   b. For emissions of any regulated air pollutant, excluding those listed in F.8.a., that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
   c. All deviations from permit requirements, including those previously reported, shall be included in the semiannual report required by F.6.

9. Pursuant to 401 KAR 52:020, Title V permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
   a. Identification of the term or condition;
   b. Compliance status of each term or condition of the permit;
   c. Whether compliance was continuous or intermittent;
   d. The method used for determining the compliance status for the source, currently and over the reporting period.
SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

f. The certification shall be submitted by January 30th of each year. Annual compliance certifications shall be sent to the following addresses:

Division for Air Quality  U.S. EPA Region 4  
Bowling Green Regional Office  Air Enforcement Branch  
2642 Russellville Road  Atlanta Federal Center  
Bowling Green, KY 42101  61 Forsyth St. SW  
Atlanta, GA 30303-8960

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

1. General Compliance Requirements

The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020, Section 3(1)(b), and a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a-3 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].

b. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a-6 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].

c. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:

   (1) If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;

   (2) The Cabinet or the United States Environmental Protection Agency (U. S. EPA) determines that the permit must be revised or revoked to assure compliance with the applicable requirements;

   (3) The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

   (4) New requirements become applicable to a source subject to the Acid Rain Program.

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

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

e. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:020, Section 3(1)(c)].
SECTION G - GENERAL PROVISIONS (CONTINUED)

f. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

g. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-14 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].

h. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-4 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].

i. All emission limitations and standards contained in this permit shall be enforceable as a practical matter. All emission limitations and standards contained in this permit are enforceable by the U.S. EPA and citizens except for those specifically identified in this permit as state-origin requirements. [Section 1a-15 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].

j. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a-10 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].

k. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3) 2].

l. This permit does not convey property rights or exclusive privileges [Section 1a-9 of the Cabinet Provisions and Procedures for Issuing Title V Permits incorporated by reference in 401 KAR 52:020, Section 26].

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

n. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3) 4.].

o. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3) 1.].
SECTION G - GENERAL PROVISIONS (CONTINUED)

p. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

q. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
   (1) Applicable requirements that are included and specifically identified in this permit; and
   (2) Non-applicable requirements expressly identified in this permit.

2. Permit Expiration and Reapplication Requirements

   a. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six (6) months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].

   b. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020, Section 8(2)].

3. Permit Revisions

   a. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the State Implementation Plan (SIP) or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).

   b. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

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

   No construction authorized by this permit (V-22-023).
SECTION G - GENERAL PROVISIONS (CONTINUED)

5. Testing Requirements

a. Pursuant to 401 KAR 50:045, Section 2, a source required to conduct a performance test shall submit a completed Compliance Test Protocol form, DEP form 6028, or a test protocol a source has developed for submission to other regulatory agencies, in a format approved by the cabinet, to the Division's Frankfort Central Office a minimum of sixty (60) days prior to the scheduled test date. Pursuant to 401 KAR 50:045, Section 7, the Division shall be notified of the actual test date at least thirty (30) days prior to the test.

b. Pursuant to 401 KAR 50:045, Section 5, in order to demonstrate that a source is capable of complying with a standard at all times, any required performance test shall be conducted under normal conditions that are representative of the source’s operations and create the highest rate of emissions. If the maximum production rate represents a source’s highest emissions rate and a performance test is conducted at less than the maximum production rate, a source shall be limited to a production rate of no greater than 110 percent of the average production rate during the performance tests. If and when the facility is capable of operation at the rate specified in the application, the source may retest to demonstrate compliance at the new production rate. The Division for Air Quality may waive these requirements on a case-by-case basis if the source demonstrates to the Division's satisfaction that the source is in compliance with all applicable requirements.

c. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

6. Acid Rain Program Requirements

a. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

b. The permittee shall comply with all applicable requirements and conditions of the Acid Rain Permit and the Phase II permit application (including the Phase II NOx compliance plan and averaging plan, if applicable) incorporated into the Title V permit issued for this source. The source shall also comply with all requirements of any revised or future acid rain permit(s) issued to this source.


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

(3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

(4) Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.1-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.

(5) This requirement does not relieve the source of other local, state or federal notification requirements.

b. Emergency conditions listed in General Condition G.7.a above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].

c. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

8. Ozone Depleting Substances

a. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
   (1) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
   (2) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
   (3) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
   (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.155.
   (5) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156 and 40 CFR 82.157.
   (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

b. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
SECTION G - GENERAL PROVISIONS (CONTINUED)


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

b. If requested, submit additional relevant information to the Division or the U.S. EPA.
SECTION H - ALTERNATE OPERATING SCENARIOS
N/A

SECTION I - COMPLIANCE SCHEDULE
N/A