# FEDERALLY ENFORCEABLE STATE ORIGIN PERMIT RENEWAL APPLICATION Permit No. F-19-021 R3

AI: 161081



# Independent Stave Company, LLC / Commonwealth

Cooperage

201 Rodney Hitch Blvd Morehead, KY 40351

**Prepared By:** 

#### TRINITY CONSULTANTS

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July 2024



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## **1.1 Purpose of Application**

Independent Stave Company, LLC (ISC), headquartered in Lebanon, Missouri, owns and operates several cooperages throughout Kentucky that produce barrels for the wine and spirits industry. Commonwealth Cooperage (CWC), owned by ISC and located in Morehead, Kentucky, specifically manufactures wood barrels for the Kentucky bourbon whiskey industry. CWC is currently regulated as a conditional major source under the Title V operating permit program based on its potential to emit CO, particulate matter (PM), PM<sub>10</sub>, and PM<sub>2.5</sub>. CWC operates under the authority of the Federally Enforceable State Origin Permit (FESOP) F-19-021 R3, issued by the Kentucky Division for Air Quality (KDAQ) on March 29, 2024.

This document and its appendices constitute the renewal application for the CWC facility, as required by Condition G.2.a. of the existing permit and 401 KAR 52:030, Section 12. This permit condition and the underlying regulation require that the renewal application be submitted at least six months prior to the expiration date of the permit. Due to recent staff turnover within ISC and changes to environmental responsibilities at CWC, the FESOP renewal application deadline was overlooked. Upon identifying this issue, ISC promptly commissioned Trinity Consultants (Trinity) to prepare the requisite renewal application.

This renewal application does not request additional permit changes relative to the FESOP revision issued by KDAQ on March 29, 2024 (F-19-021 R3), as the current permit accurately identifies applicable regulatory requirements and is based on up-to-date emission calculation methodologies for emission units (EUs) at CWC. Rather, this submission summarizes the scope of permit revisions that have been requested by CWC since issuance of the initial Conditional Major permit (F-19-021), as required for a FESOP renewal application. Specifically, in accordance with 401 KAR 52:030, Section 4(2)(c), this renewal application is limited to "only the information that is new or different from the most recent source-wide permit application."

## **1.2 Organization of Air Permit Application**

Following this introduction, a brief description of the existing process operations located at CWC is provided in Section 2. Section 2 also identifies each permit action undertaken by CWC since issuance of Permit No. F-19-021, which represents the initial construction/operating permit for the facility and was issued in response to the most recent (i.e., only) source-wide permit application submitted to date. Section 3 summarizes the requested emission calculation methodology updates documented by the permit actions submitted by CWC since the initial permit application. Section 4 provides an overview of applicable regulatory requirements under state and federal air quality programs that have changed since the original application.

A set of Kentucky's DEP7007-series application forms are provided in Appendix A to summarize changes since the most recent source-wide permit application submitted in 2019. Specifically, AI forms are provided to facilitate the processing of this permit revision application, N forms are provided to show changes in the basis of emission calculations and stack information, and DD forms are provided to show changes in

Insignificant Activities (IAs) since the original permit application's submission.<sup>1</sup> Appendix B presents a summarized list of the current site-wide Potential-to-Emit (PTE), which is consistent with the current FESOP F-19-021 R3.

<sup>&</sup>lt;sup>1</sup> As the current permit (F-19-021 R3) identifies the correct operating rate for each piece of equipment at the cooperage, revised A and B forms are not included in this renewal application. Likewise, as the current permit accurately identifies applicable regulatory requirements for the facility, revised V forms are not included.

## 2. EXISTING FACILITY AND OPERATIONS DESCRIPTION

### 2.1 Facility Location

The CWC facility is located at 201 Rodney Hitch Blvd., Morehead, Kentucky (Rowan County). The facility is approximately one mile south-east of the Morehead-Rowan County Airport. The Universal Transverse Mercator (UTM) coordinates of the center of the facility's property are (approximately) 4,232,057 meters (m) North and 275,341 m East (UTM Zone 17, NAD83).

### 2.2 Facility Operations Summary

The CWC facility produces charred wood barrels for the Kentucky bourbon industry. The facility operates two wood-fired boilers, storage silos, stave and head woodworking / charring operations, and steam-heated kilns, all of which facilitate the production of wood barrels. Stave and head woodworking operations consist of saws, planers, jointers, sanders, a steam tunnel, and a dryer.

### 2.3 Conditional Major Permit History Summary

The initial Conditional Major operating permit for the CWC facility was issued on September 30, 2019. Table 2-1 summarizes all permit actions that have been submitted since issuance of the initial permit.

#### Table 2-1. Summary of Permit Actions

APE# from			Corresponding Permit	
ORR	Date	Type of Permit Action	Revision	Permit Action Summary
APE20190001	04/2019	Initial FESOP Permit	F-19-021	Independent Stave Company submitted a construction permit application to o permit for the CWC site.
APE20210002	03/2021	Section 502(b)(10) Change	F-19-021 R1	CWC submitted a Section 502(b)(10) change notification to add a steam-heat two in the original permit application. This letter also addressed an error in pr kiln operations.
APE20210003 (replaced by APE20220001)	10/2021	Minor Permit Revision	F-19-021 R1	CWC submitted a minor permit revision application to increase the process rat tons per hour (tph) to 4.7 tph and to include the truck wood waste loadout (E cyclone on the wood waste silo with a bin vent as part of a design change to
APE20220001	01/2022	Minor Permit Revision	F-19-021 R1	<ul> <li>As CWC finalized the facility construction phase, more discrepancies between discovered, and this minor permit revision application was submitted as a repl application. Additional changes documented by this application included: <ul> <li>Update of the natural gas combustion rate of the head charring process for the barrel and head charring operations (EP-07 &amp; EP-14) designate steam-heated kilns in EU03;</li> <li>Clarification that the kilns (EU03) use steam rather than flue gas from</li> <li>Change in operating rates and control devices to multiple non-fugitive</li> <li>Removal of roads T3 and T6 and change from paved to unpaved haul</li> </ul> </li> </ul>
APE20220002	02/2022	Minor Permit Revision	F-19-021 R1	CWC submitted a minor permit revision application requesting the addition of to the existing kins (EP-01 & EP-24) in EU03. The addition of these kilns also associated emissions from EU05.
APE20230002	07/2023	Minor Permit Revision	F-19-021 R2	CWC submitted a minor permit revision application requesting the addition of and the redesignation of all six lumber drying kilns as IAs (IA-1).
APE20230003	08/2023	Off-Permit Change	F-19-021 R2	CWC submitted an off-permit change notification to provide notice of its planr for IA status, Toasting Operations (IA-2; EP-29). Toasting Operations consist prepare barrels for processing through the barrel charring process.
APE20230006	11/2023	Minor Permit Revision	F-19-021 R3	CWC submitted this permit revision application as the site installed new equip through the facility's non-fugitive woodworking (EU04) and charring operation of the site. In addition, CWC installed a new wood-fired boiler (EU01; EP-30) facility's steam-heated kilns (IA-1). This permit action also included the revision of the carbon monoxide (CO) em charring operations (EU02; EP-07 & EP-14) and toasting operations (IA-2; EP- profile of the Haul Roads (EU05), the construction of Baghouse #2 CD5 to ser updated emission factors for Weima grinders (EU04; EP-22 & EP-23).

btain a conditional major construction/operating

ed kiln to EU03 so that the permit reflected the revious permitting regarding emissions from the

te of the wood waste silo (EU04; EP-19) from 3.7 EU04; EP-21) in the permit. CWC also replaced a better control PM emissions.

the initial FESOP and as-constructed facility were lacement for the 10/2021 minor permit revision

ss (EP-14) and inclusion of wood charring rates ed as EU02; reconciliation of the number of

EU01 for drying staves and headings; woodworking operations (EU04); and roads (EU05).

two new kilns (EP-25 & EP-26) that are identical resulted in a direct increase of vehicle traffic and

two new lumber drying kilns (EP-27 & EP-28)

ned installation of a new emissions unit qualifying of seventy-two (72) electric burners designed to

ment and increased manufacturing capacity ns (EU02) to increase the maximum barrel output to provide additional steam capacity to the

ission factors used to estimate emissions from -29), the recharacterization of the emissions rvice non-fugitive woodworking units (EU04), and

## 3. EMISSION CALCULATION UPDATES

In accordance with the provisions outlined in 401 KAR 52:030, Section 4(2)(c), Kentucky's regulations allow applicants to limit the content of a renewal application to encompass solely information that is new or different from the most recent facility-wide permit application. The most recent (i.e., only) source-wide permit application submitted by CWC to date corresponds to the issuance of FESOP F-19-021. Accordingly, Section 3.1 of this renewal application details the air emissions impacts from permit actions occurring since the issuance of this initial construction/operating permit.

## **3.1 Emission Calculation Changes from Previous Permit Actions**

Refer to Table 3-1 below for a summary of emission calculation updates that have occurred since submittal of the original 2019 permit application.

APE# from ORR	Date	Type of Permit Action	Corresponding Permit Revision	Permit Action Emission Calculation Changes
APE202 10002	03/2021	Section 502(b)(10) Change Letter	F-19-021 R1	- Second steam heated Kiln (IA1; EP-24) added
APE202 10003	10/2021	Minor Permit Revision	F-19-021 R1	<ul> <li>Increased throughput of Wood Waste Silo (EU04; EP- 19) and Wood Waste Truck Loadout (EU04; EP-21)</li> <li>Replaced Wood Waste Silo control device with "Bin Vent", no control efficiency change</li> <li>Added Wood Waste Truck Loadout "Baghouse" control device, no control efficiency change</li> </ul>
APE202 20001	01/2022	Minor Permit Revision	F-19-021 R1	<ul> <li>Increased wood throughput for Barrel Charring Operations (EU02; EP-07)</li> <li>Decreased wood throughput for Head Charring Operations (EU02; EP-14)</li> <li>Addition of emission calculations for the natural gas burners for the Head Charring Operations</li> <li>Increased throughputs for various non-fugitive woodworking equipment (EU04; EP-04, EP-09, EP-10, EP-11, EP-13, EP-15, EP-19, EP-21 &amp; EP-23)</li> <li>Control device reconciliation for Crozer (EU04; EP- 08), no control efficiency change</li> <li>Removal of six Tongue &amp; Groove Units (EU04; EP-12)</li> <li>Change in Haul Road naming and vehicle-mile design for T1A, T1B, T2, T4, T5 &amp; T7 (EU05)</li> <li>Removal of Haul Roads T3 &amp; T6 (EU05)</li> <li>Disconnected emission points EP-19, EP-08, and EP- 21 from stack CD1, added new stacks for each unit.</li> </ul>
APE202 20002	02/2022	Minor Permit Revision	F-19-021 R1	<ul> <li>Two additional steam heated Kilns (IA1; EP-25 &amp; EP- 26) added.</li> </ul>

Table 3-1. Emission Calculation Impacts of Recent Permit Actions

APE# from ORR	Date	Type of Permit Action	Corresponding Permit Revision	Permit Action Emission Calculation Changes
APE202 30002	07/2023	Minor Permit Revision	F-19-021 R2	<ul> <li>Two additional steam heated Kilns (IA1; EP-27 &amp; EP- 28) added.</li> </ul>
APE202 30003	08/2023	Off-Permit Change	F-19-021 R2	- Toasting Operations (IA2, EP-29) added.
APE202 30006	11/2023	Minor Permit Revision	F-19-021 R3	<ul> <li>Addition of a new Wood-Fired Boiler (EU01; EP-30)</li> <li>Updated emission factors for the original Wood-Fired Boiler (EU01; EP-20)</li> <li>Increased throughput and revised emission factors for PM, NO<sub>x</sub>, and CO for Barrel and Head Charring Operations (EU03; EP-07 &amp; EP-14)</li> <li>Revised Natural Gas Combustion throughput and revised emission factor for CO for Barrel and Head Charring Operations</li> <li>Revised throughputs for various non-fugitive woodworking units (EU04; EP-02, EP-03, EP-04, EP- 05, EP-08, EP-09, EP-10, EP-11, EP-13, EP-16, EP-17, EP-19, EP-22 &amp; EP-23)</li> <li>Updated emission factors for Weima Grinders (EU04; EP-22 &amp; EP-23)</li> <li>Revised emission factors for Haul Roads T1A, T1B, T2, T4, T5 &amp; T7 (EU05)</li> </ul>

Please refer to the corresponding permit action for specifics and narrative concerning each respective emission unit. See Attachment B for revised N forms for each applicable unit with green formatting highlighting emission units, emission factors, emission rates, and throughputs that have changed since the original permit application.

## 4. APPLICABLE REQUIREMENTS SUMMARY

Section 4.1 provides general air quality regulatory information for the CWC facility, including the facility's status with respect to the Prevention of Significant Deterioration (PSD) and Title V permitting programs. Section 4.2 provides relevant regulatory updates to state and federal air regulatory requirements that are addressed in previous permitting actions occuring subsequent to the initial permit application submitted in 2019. Table 4-1 summarizes the regulatory changes associated with each of these permit actions.

## 4.1 Source Classification

#### 4.1.1 **PSD** Permitting Program

The CWC facility is located in Rowan County, which has been designated by U.S. Environmental Protection Agency (EPA) as an unclassified/attainment area for all criteria pollutants.<sup>2</sup> Therefore, with respect to the federal New Source Review (NSR) permitting program, only PSD requirements could potentially apply to the source.

The PSD preconstruction permitting program in Kentucky has been approved by the EPA and incorporated into the Kentucky State Implementation Plan (SIP) under 401 KAR 51:017 to implement the federal requirements of 40 CFR 51.166 or 52.21. Requirements for a major source can be summarized as follows:

- One of the 28 listed stationary sources that emits, or has the potential to emit, 100 tons per year (tpy) or more of any regulated NSR pollutant, where fugitive emissions from the listed source category must be included in the total; or
- Any source not belonging to one of the listed source categories that emits, or has the potential to emit, 250 tpy or more of any regulated NSR pollutant, where fugitive emissions are not included in the total.

Based on CWC's Standard Industry Classification (SIC) code, it does not belong to one of the 28 listed source categories. As documented in CWC's permit applications, the facility's non-fugitive emissions have remained below the 250 tpy PSD major source threshold for each regulated criteria air pollutant. Therefore, CWC is an existing minor source with respect to the PSD permitting program.

#### 4.1.2 Title V Permitting Program

40 CFR 70 contains the regulations implementing the federal Title V operating permit program. Kentucky has incorporated the provisions of this federal program in its Title V operating program at 401 KAR 52:020. As specified in 401 KAR 52:001, Section 1(46), a major source with respect to the Title V regulations encompasses facilities with potential emissions of 100 tpy of any regulated pollutant, 10 tpy of any single hazardous air pollutant (HAP), and/or 25 tpy of any combination of HAPs. CWC has opted to preclude the applicability of 401 KAR 52:020, *Title V Permits,* by ensuring compliance with a 90 ton per year limit on CO, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions. Therefore, the facility remains a minor source with respect the Title V permitting program and is subject to FESOP requirements under 401 KAR 52:030.

<sup>&</sup>lt;sup>2</sup> 401 KAR 51:010 Sections 4 through 9.

## 4.2 Regulatory Applicability Review

Table 4-1 identifies newly applicable air requirements triggered as a result of the permit actions undertaken by the CWC facility since issuance of the initial FESOP permit on September 30, 2019. These entries are sorted chronologically by KDAQ's activity number for each permit action.

APE# from ORR	Date	Type of Permit Action	Corresponding Permit Revision	Newly Applicable Regulations Associated with Permit Action
APE2021 0002	03/2021	Section 502(b)(10) Change	F-19-021 R1 No new Regulations – New Kiln added subject to 40 59:010 and 401 KAR 63:020.	
APE2021 0003	10/2021	Minor Permit Revision	F-19-021 R1	<b>401 KAR 59:010</b> – Revised throughputs for EP-19 and EP-21 affected the applicability of the process weight rule.
APE2022 0001	01/2022	Minor Permit Revision	F-19-021 R1	No new Regulations – Specified feed gas for EU02, changed EU04 operating rates and changed EU05 basis. 401 KAR 59:010 remained applicable to EU02 and EU04, 401 KAR 63:020 remained applicable to EU02, and 401 KAR 63:010 remained applicable to EU05.
APE2022 0002	02/2022	Minor Permit Revision	F-19-021 R1	No new Regulations – New Kiln added subject to 401 KAR 59:010 and 401 KAR 63:020.
APE2023 0002	07/2023	Minor Permit Revision	F-19-021 R2	<b>401 KAR 52:030, Section 6.</b> – Kilns redesignated as IAs and must remain compliant with general regulations 401 KAR 59:010 and 401 KAR 63:020.
APE2023 0003	08/2023	Off-Permit Change	F-19-021 R2	<b>401 KAR 52:030, Section 6.</b> – Toasting operations permitted as IA and must comply with general regulations 401 KAR 59:010 and 401 KAR 63:020.
APE2023 0006	23 5 11/2023 Minor Permit Revision F-19-021		F-19-021 R3	<b>401 KAR 59:015: New Indirect Heat Exchangers</b> – CWC installed a new boiler (EP-30) that pushed the total heat input for the site over the 10 MMBtu/hr threshold set forth in 401 KAR 59:015 Section 4(1)(c) and Section 5(1)(c)3. The PM and SO <sub>2</sub> limits for the new boiler were decreased from 0.56 lb/MMBtu to 0.48 lb/MMBtu and from 5.0 lb/MMBtu to 3.818 lb/MMBtu, respectively.

Table 4-1. Regulatory Impacts of Recent Permit Actions

## **APPENDIX A. DEP7007 APPLICATION FORMS**

DEP7007AI – Administrative Information DEP7007N – Source Emissions Profile DEP7007DD – Insignificant Activities

Division for Air Qualit		mality		DEP7	007AI		Add	itional Documentation
Division		uanty	Administrative InformationSection AI.1: Source Information				None	
300 Sc	ower Bouleva	ard				Addit	ional Documentation attached	
Frankt	fort, KY 406	01	Sec	ction AI.2	Applicant Infor	mation		
(502) 564-3999			Sec	ction AI.3 ction AI.4	: Owner Informa : Type of Applica	tion ation		
			Section AI.5: Other Required Information Section AI.6: Signature Block					
			Sec	tion AI.7	Notes, Commer	nts, and Expla	anations	
Source Name: Commonwealth Cooperage								
KY EIS (AFS) #:		21- 205-00068						
Permit #:		F-19-021 R3						
Agency Interest (A	I) ID:	161081						
Date:		7/30/2024						
Section AI.1:	Source In	formation						
Physical Location	Street:	201 RODNEY	HITCH BLVD					
Address:	City:	MOREHEAD		County	ROWAN		Zip Code:	40351
Mailing Address:	Street or P.O. Box:	PO BOX 104						
Maning Address.	City:	LEBANON		State:	MO		Zip Code:	65536 
Standard Coordinates for Source Physical Location								
Longitude:		-83.5655	(decimal degrees)		Latitude:	38.209	614	_ (decimal degrees)
Primary (NAICS) Category: Wood Conta			ner and Pallet Mfg	_	Primary NAICS	6 #: <u>321</u>	920	

Classification (SIC)	Classification (SIC) Category:							
Briefly discuss the ty	ne of business	Wood Containers		Primary SIC #:	2449			
Briefly discuss the type of business conducted at this site:		Manufacture of Bourbon Bar	rels					
Description of Area Surrounding	✓ Rural Area	Industrial Park	Residential Area	Is any part of the source located on federal land?	Yes	Number of 87		
Source: Approximate distance	Urban Area	Industrial Area	Commercial Area		✓ No			
or commercial property:	800		Property Area:3	5 acres	Is this source portable	e? 🗌 Yes 🔄 No		
	What other e	nvironmental permits	or registrations does	s this source currently hol	d or need to obtain in	Kentucky?		
NPDES/KPDES:	Currently H	old 🗌 Need	N/A					
Solid Waste:	Currently H	old 🗌 Need	✓ N/A					
RCRA:	Currently H	old 🗌 Need	✓ N/A					
UST:	Currently H	old 🗌 Need	✓ N/A					
Type of Regulated	Mixed Wast	e Generator	Generator	Recycler	Other:			
Waste Activity:	U.S. Import	er of Hazardous Waste	Transporter	Treatment/Storage/Dispos	al Facility 🛛 🗹 N	[/A		

11/2018	
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Section AI.2: A	Section AI.2: Applicant Information						
Applicant Name:	Johnathan Sullivan						
Title: (if individual)	1st Shift Heading Supervisor						
Mailing Address:	Street or P.O. Box:         201 RODNEY HITCH BLVD           City:         MOREHEAD         State:         KY         Zip Code:         40351						
Email: (if individual)	Johnathan.Sullivan@commonwealthcooperage.com						
Phone:	703-938-4919						
Technical Contact							
Name: Title:	Same As Applicant						
Mailing Address:	Street or P.O. Box:						
Email: Phone:							
Air Permit Contact fo	r Source						
Name:	Same As Applicant						
Title:							
Mailing Address:	Street or P.O. Box:         Zip Code:           City:         State:         Zip Code:						
Email: Phone:							

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Section AI.3: Owner Information								
Owner same as applicant								
Street or P.O. Box:								
City:		State:	Zip Code:					
and officers of the company who	) have an interest in t	he company of 5% or	· more.					
Name			Position					
	vner Information         as applicant         street or P.O. Box:         City:	vner Information         as applicant         street or P.O. Box:         City:	vner Information         as applicant         street or P.O. Box:         City:       State:         nd officers of the company who have an interest in the company of 5% or         Name	vner Information         : as applicant         :: as applicant         Street or P.O. Box:         City:				

Section AI.4: Ty	ype of Application	1			
Current Status:	☐Title V ✓ Condition	al Major 🗌 State-Orig	gin General Permit	Registratio	n 🗌 None
Requested Action: (check all that apply)	<ul> <li>Name Change</li> <li>Renewal Permit</li> <li>502(b)(10)Change</li> <li>Revision</li> <li>Ownership Change</li> </ul>	Initial Registration Revised Registration Extension Request Off Permit Change Closure	<ul> <li>Significant Revision</li> <li>Minor Revision</li> <li>Addition of New Facility</li> <li>Landfill Alternate Compliance Submit</li> </ul>	Adminis	strative Permit Amendment ource-wide OperatingPermit e Plant Relocation Notice cation of Existing Facilities
Kequesicu Status.		ional Major 📋 State-C			·
Is the source reques	ting a limitation of pot	ential emissions?	✓ Yes □ No		
Pollutant:		<b>Requested Limit:</b>	Pollutant:		<b>Requested Limit:</b>
✓ Particulate Mat	tter	90 tons per year Single HAP			
🗌 Volatile Organ	ic Compounds (VOC)		Combined HAPs		
✓ Carbon Monox	tide	90 tons per year	Air Toxics (40 CFR	68, Subpart F)	
Nitrogen Oxide	es		Carbon Dioxide		
Sulfur Dioxide			Greenhouse Gases (	GHG)	
Lead				,	
For New Constru	uction:				
<b>Proposed Start Date of Construction:</b> (MM/YYYY)		N/A	Proposed Operation Start-Up Dat	e: (MM/YYYY)	N/A
For Modification	ns:				
Proposed Start (A	t <b>Date of Modification:</b> <i>MM/YYYY)</i>	N/A	Proposed Operation Start-Up Dat	e: (MM/YYYY)	N/A
Applicant is seek	ing coverage under a pe	rmit shield. 🗌 Yes	Identify any non-appli ✓ No sought on a se	cable requireme parate attachme	ents for which permit shield is ent to the application.

Section AI.5 Other Required Information	
Indicate the documents a	attached as part of this application:
DEP7007A Indirect Heat Exchangers and Turbines	DEP7007CC Compliance Certification
DEP7007B Manufacturing or Processing Operations	✓ DEP7007DD Insignificant Activities
DEP7007C Incinerators and Waste Burners	DEP7007EE Internal Combustion Engines
DEP7007F Episode Standby Plan	DEP7007FF Secondary Aluminum Processing
DEP7007J Volatile Liquid Storage	DEP7007GG Control Equipment
DEP7007K Surface Coating or Printing Operations	DEP7007HH Haul Roads
DEP7007L Mineral Processes	Confidentiality Claim
DEP7007M Metal Cleaning Degreasers	Ownership Change Form
DEP7007N Source Emissions Profile	Secretary of State Certificate
DEP7007P Perchloroethylene Dry Cleaning Systems	Flowcharts or diagrams depicting process
DEP7007R Emission Offset Credit	Digital Line Graphs (DLG) files of buldings, roads, etc.
DEP7007S Service Stations	Site Map
DEP7007T Metal Plating and Surface Treatment Operations	Map or drawing depicting location of facility
DEP7007V Applicable Requirements and Compliance Activities	Safety Data Sheet (SDS)
DEP7007Y Good Engineering Practice and Stack Height Determination	Emergency Response Plan
DEP7007AA Compliance Schedule for Non-complying Emission Units	Other:
DEP7007BB Certified Progress Report	

#### Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official\*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

**Authorized Signature** 

**Mike Knudson** 

Type or Printed Name of Signatory

\*Responsible official as defined by 401 KAR 52:001.

7-30-24

Date

General Manager

**Title of Signatory** 

Section AI.7: Notes, Comments, and Explanations										

	Div	vision fo	or Air Oua	lity				Ι	DEP700'	7N								
	DIV	151011 10	JI All Qua	iity				Source	Emission	ns Profile			Α	dditional D	ocumentation	I		
	3	300 Sow	er Boulevard	1				Section N	N.1: Emission	n Summary								
	]	Frankfor	t, KY 40601					Section N	N.2: Stack In	formation			Comple	Complete DEP7007AI				
		(502)	564-3999					Section N	N.3: Fugitive									
								Section N	N.4: Notes, C	omments, and	Explanation	15						
Source N	lame:				Commo	nwealth	Cooperage											
KY EIS	(AFS) #:			21-	205-000	68												
Permit #	:				F-19-021	R3												
Agency l	Interest (AI) II	):			161081													
Date:					7/30/202	4												
<b>N.1: E</b>	mission Sur	nmary																
Emission	Emission Unit	Process	Drawers Name	Control	Control	Stack	Maximum Design	Delluterat	Uncontrolled Emission	Emission Factor Source (e.g. AP-42.	Capture	Control	Hourly Em	iissions	Annual Er	nissions		
Unit #	Name	ID	Process Name	Name	ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)		
EU-01 EP-20	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	РМ	6.76	AP-42 Table 1.6- 1, Dry Wood	100%	85%	3.72	0.56	16.29	2.44		
EU-01 EP-20	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	PM10	6.09	AP-42 Table 1.6- 1, Dry Wood	100%	85%	3.35	0.50	14.66	2.20		
EU-01 EP-20	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	PM2.5	5.24	AP-42 Table 1.6- 1, Dry Wood	100%	85%	2.88	0.43	12.63	1.89		
EU-01 EP-20	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	NOx	8.28	AP-42 Table 1.6- 2, Dry Wood	N/A	N/A	4.56	N/A	19.96	N/A		
EU-01 EP-20	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	CO	10.14	AP-42 Table 1.6- 2, Dry Wood	N/A	N/A	5.58	N/A	24.44	N/A		
EU-01 EP-20	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	VOC	0.29	AP-42 Table 1.6-3	N/A	N/A	0.16	N/A	0.69	N/A		
EU-01 EP-20	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	SOx	0.42	AP-42 Table 1.6- 2, Dry Wood	N/A	N/A	0.23	N/A	1.02	N/A		
EU-01 EP-20	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	Total HAPs Pa	<b>0.64</b> ge 8 of 23	AP-42 Table 1.6-3	N/A	N/A	0.35	N/A	1.54	N/A		

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Emission	Emission Unit	Process		Control	Control	Stack	Maximum		Uncontrolled Emission	Emission Factor	Capture	Control	Hourly Em	issions	Annual En	nissions
Unit #	Name	ID	Process Name	Device Name	Device ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-01 EP-30	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	РМ	6.76	AP-42 Table 1.6- 1, Dry Wood	100%	85%	3.72	0.56	16.29	2.44
EU-01 EP-30	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	PM10	6.09	AP-42 Table 1.6- 1, Dry Wood	100%	0.85	3.35	0.50	14.66	2.20
EU-01 EP-30	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	PM2.5	5.24	AP-42 Table 1.6- 1, Dry Wood	100%	0.85	2.88	0.43	12.63	1.89
EU-01 EP-30	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	NOx	8.28	AP-42 Table 1.6- 2, Dry Wood	N/A	N/A	4.56	N/A	19.96	N/A
EU-01 EP-30	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	со	10.14	AP-42 Table 1.6- 2, Dry Wood	N/A	N/A	5.58	N/A	24.44	N/A
EU-01 EP-30	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	VOC	0.29	AP-42 Table 1.6-3	N/A	N/A	0.16	N/A	0.69	N/A
EU-01 EP-30	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	SOx	0.42	AP-42 Table 1.6- 2, Dry Wood	N/A	N/A	0.23	N/A	1.02	N/A
EU-01 EP-30	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Wood Fired Heater	N/A	N/A	N/A	0.55 tons/hr	Total HAPs	0.64	AP-42 Table 1.6-3	N/A	N/A	0.35	N/A	1.54	N/A
EU-02 EP-06	2.0 MMBtu/hr Dry Fired Operations	01	Natural Gas Combustion	N/A	N/A	N/A	0.002 MMscf/hr	РМ	7.60	AP-42 Table 1.4-2	N/A	N/A	0.02	N/A	0.067	N/A
EU-02 EP-06	2.0 MMBtu/hr Dry Fired Operations	01	Natural Gas Combustion	N/A	N/A	N/A	0.002 MMscf/hr	PM10	7.60	AP-42 Table 1.4-2	N/A	N/A	0.02	N/A	0.067	N/A
EU-02 EP-06	2.0 MMBtu/hr Dry Fired Operations	01	Natural Gas Combustion	N/A	N/A	N/A	0.002 MMscf/hr	PM2.5	7.60	AP-42 Table 1.4-2	N/A	N/A	0.02	N/A	0.067	N/A
EU-02 EP-06	2.0 MMBtu/hr Dry Fired Operations	01	Natural Gas Combustion	N/A	N/A	N/A	0.002 MMscf/hr	NOx	100.00	AP-42 Table 1.4-1	N/A	N/A	0.20	N/A	0.876	N/A

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Emission	Emission Unit	Process		Control	Control	Stack	Maximum Design		Uncontrolled Emission	Emission Factor	Capture	Control	Hourly Em	issions	Annual Em	nissions
Unit #	Name	ID	Process Name	Device Name	Device ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-02 EP-06	2.0 MMBtu/hr Dry Fired Operations	01	Natural Gas Combustion	N/A	N/A	N/A	0.002 MMscf/hr	СО	84.00	AP-42 Table 1.4-1	N/A	N/A	0.17	N/A	0.736	N/A
EU-02 EP-06	2.0 MMBtu/hr Dry Fired Operations	01	Natural Gas Combustion	N/A	N/A	N/A	0.002 MMscf/hr	VOC	5.50	AP-42 Table 1.4-2	N/A	N/A	0.01	N/A	0.048	N/A
EU-02 EP-06	2.0 MMBtu/hr Dry Fired Operations	01	Natural Gas Combustion	N/A	N/A	N/A	0.002 MMscf/hr	SOx	0.60	AP-42 Table 1.4-2	N/A	N/A	0.00	N/A	0.005	N/A
EU-02 EP-06	2.0 MMBtu/hr Dry Fired Operations	01	Natural Gas Combustion	N/A	N/A	N/A	0.002 MMscf/hr	Methane	2.30	AP-42 Table 1.4-2	N/A	N/A	0.00	N/A	0.020	N/A
EU-02 EP-07	Barrel Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.5696 ton/hr (wood burned from barrels)	РМ	6.76	AP-42 Table 1.6-1	N/A	N/A	3.85	N/A	16.87	N/A
EU-02 EP-07	Barrel Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.5696 ton/hr (wood burned from barrels)	PM10	6.09	AP-42 Table 1.6-1	N/A	N/A	3.47	N/A	15.19	N/A
EU-02 EP-07	Barrel Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.5696 ton/hr (wood burned from barrels)	PM2.5	5.24	AP-42 Table 1.6-1	N/A	N/A	2.99	N/A	13.08	N/A
EU-02 EP-07	Barrel Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.5696 ton/hr (wood burned from barrels)	NOx	8.28	AP-42 Table 1.6-2	N/A	N/A	4.72	N/A	20.67	N/A
EU-02 EP-07	Barrel Charring Operations	01	Wood Burned	N/A	N/A	N/A	13.706 ton/hr (total wood bbl throughput)	СО	0.34	Based on 9/19/2023 head char test results	N/A	N/A	4.63	N/A	20.27	N/A
EU-02 EP-07	Barrel Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.5696 ton/hr (wood burned from barrels)	VOC	0.29	AP-42 Table 1.6-3	N/A	N/A	0.16	N/A	0.72	N/A
EU-02 EP-07	Barrel Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.5696 ton/hr (wood burned from barrels)	SOx	0.42	AP-42 Table 1.6-2	N/A	N/A	0.24	N/A	1.05	N/A
EU-02 EP-07	Barrel Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.5696 ton/hr (wood burned from barrels)	Total HAPs	0.64	AP-42 Table 1.6- 3; AP-42 Table 1.6- 4	N/A	N/A	0.13	N/A	0.56	N/A

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Emission	Emission Unit	Process		Control	Control	Stack	Maximum Design		Uncontrolled Emission	Emission Factor	Capture	Control	Hourly Em	issions	Annual En	nissions
Unit #	Name	ID	Process Name	Device Name	Device ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-02 EP-07	5.13 MMBtu/hr Barrel Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.005 MMscf/hr	РМ	7.60	AP-42 Table 1.4-2	N/A	N/A	0.038	N/A	0.17	N/A
EU-02 EP-07	5.13 MMBtu/hr Barrel Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.005 MMscf/hr	PM10	7.60	AP-42 Table 1.4-2	N/A	N/A	0.038	N/A	0.17	N/A
EU-02 EP-07	5.13 MMBtu/hr Barrel Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.005 MMscf/hr	PM2.5	7.60	AP-42 Table 1.4-2	N/A	N/A	0.038	N/A	0.17	N/A
EU-02 EP-07	5.13 MMBtu/hr Barrel Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.005 MMscf/hr	NOx	100	AP-42 Table 1.4-1	N/A	N/A	0.50	N/A	2.20	N/A
EU-02 EP-07	5.13 MMBtu/hr Barrel Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.005 MMscf/hr	СО	-	-	N/A	N/A	-	N/A		N/A
EU-02 EP-07	5.13 MMBtu/hr Barrel Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.005 MMscf/hr	VOC	5.50	AP-42 Table 1.4-2	N/A	N/A	0.028	N/A	0.12	N/A
EU-02 EP-07	5.13 MMBtu/hr Barrel Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.005 MMscf/hr	SOx	0.60	AP-42 Table 1.4-2	N/A	N/A	3.02E-03	N/A	0.013	N/A
EU-02 EP-07	5.13 MMBtu/hr Barrel Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.005 MMscf/hr	Formaldehyde	0.08	AP-42 Table 1.4-3	N/A	N/A	3.77E-04	N/A	1.65E-03	N/A
EU-02 EP-14	Head Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.44 ton/hr (wood burned from heads)	РМ	6.76	AP-42 Table 1.6-1	N/A	N/A	3.00	N/A	13.16	N/A
EU-02 EP-14	Head Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.44 ton/hr (wood burned from heads)	PM10	6.09	AP-42 Table 1.6-1	N/A	N/A	2.70	N/A	11.84	N/A
EU-02 EP-14	Head Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.44 ton/hr (wood burned from heads)	PM2.5	5.24	AP-42 Table 1.6-1	N/A	N/A	2.33	N/A	10.20	N/A

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Emission	Emission Unit	Process		Control	Control	Stack	Maximum Design		Uncontrolled Emission	Emission Factor	Capture	Control	Hourly Em	issions	Annual En	nissions
Unit #	Name	ID	Process Name	Device Name	Device ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-02 EP-14	Head Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.44 ton/hr (wood burned from heads)	NOx	8.28	AP-42 Table 1.6-2	N/A	N/A	3.68	N/A	16.12	N/A
EU-02 EP-14	Head Charring Operations	01	Wood Burned	N/A	N/A	N/A	3.35 ton/hr (total wood head throughput)	СО	0.34	Based on 9/19/2023 head char test results	N/A	N/A	1.130	N/A	4.95	N/A
EU-02 EP-14	Head Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.44 ton/hr (wood burned from heads)	VOC	0.29	AP-42 Table 1.6-3	N/A	N/A	0.128	N/A	0.56	N/A
EU-02 EP-14	Head Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.44 ton/hr (wood burned from heads)	SOx	0.42	AP-42 Table 1.6-2	N/A	N/A	0.188	N/A	0.82	N/A
EU-02 EP-14	Head Charring Operations	01	Wood Burned	N/A	N/A	N/A	0.44 ton/hr (wood burned from heads)	Total HAPs	0.64	AP-42 Table 1.6- 3; AP-42 Table 1.6- 4	N/A	N/A	0.128	N/A	0.56	N/A
EU-02 EP-14	1.25 MMBtu/hr Head Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.001 MMscf/hr	РМ	7.60	AP-42 Table 1.4-2	N/A	N/A	9.31E-03	N/A	0.041	N/A
EU-02 EP-14	1.25 MMBtu/hr Head Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.001 MMscf/hr	PM10	7.60	AP-42 Table 1.4-2	N/A	N/A	9.31E-03	N/A	0.041	N/A
EU-02 EP-14	1.25 MMBtu/hr Head Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.001 MMscf/hr	PM2.5	7.60	AP-42 Table 1.4-2	N/A	N/A	9.31E-03	N/A	0.041	N/A
EU-02 EP-14	1.25 MMBtu/hr Head Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.001 MMscf/hr	NOx	100.00	AP-42 Table 1.4-1	N/A	N/A	0.12	N/A	0.54	N/A

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Emission	Emission Unit	Process		Control	Control	Stack	Maximum Design		Uncontrolled Emission	Emission Factor	Capture	Control	Hourly Em	iissions	Annual En	nissions
Unit #	Name	ID	Process Name	Device Name	ID ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-02 EP-14	1.25 MMBtu/hr Head Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.001 MMscf/hr	со	-		N/A	N/A	-	N/A	-	N/A
EU-02 EP-14	1.25 MMBtu/hr Head Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.001 MMscf/hr	VOC	5.50	AP-42 Table 1.4-2	N/A	N/A	6.74E-03	N/A	0.030	N/A
EU-02 EP-14	1.25 MMBtu/hr Head Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.001 MMscf/hr	SOx	0.60	AP-42 Table 1.4-2	N/A	N/A	7.35E-04	N/A	3.22E-03	N/A
EU-02 EP-14	1.25 MMBtu/hr Head Char Natural Gas Burners	02	Natural Gas Combustion	N/A	N/A	N/A	0.001 MMscf/hr	Formaldehyde	0.08	AP-42 Table 1.4-3	N/A	N/A	9.19E-05	N/A	4.03E-04	N/A
EU-04 EP-02	Stave Equalizer	01	Tons Wood Processed	N/A	N/A	N/A	19.35 tons/hr	PM	4.30	SC DHEC	100%	99%	83.21	0.83	364	3.64
EU-04 EP-02	Stave Equalizer	01	Tons Wood Processed	N/A	N/A	N/A	19.35 tons/hr	PM10	2.10	SC DHEC	100%	99%	40.64	0.41	178	1.78
EU-04 EP-02	Stave Equalizer	01	Tons Wood Processed	N/A	N/A	N/A	19.35 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	15.03	0.75	65.85	3.29
EU-04 EP-03	Stave Planer	01	Tons Wood Processed	N/A	N/A	N/A	18.86 tons/hr	PM	4.30	SC DHEC	100%	99%	81.10	0.81	355	3.55
EU-04 EP-03	Stave Planer	01	Tons Wood Processed	N/A	N/A	N/A	18.86 tons/hr	PM10	2.10	SC DHEC	100%	99%	39.61	0.40	173	1.73
EU-04 EP-03	Stave Planer	01	Tons Wood Processed	N/A	N/A	N/A	18.86 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	14.65	0.73	64.19	3.21
EU-04 EP-04	G5 Machines	01	Tons Wood Processed	N/A	N/A	N/A	16.84 tons/hr	PM	4.30	SC DHEC	100%	99%	72.41	0.72	317	3.17
EU-04 EP-04	G5 Machines	01	Tons Wood Processed	N/A	N/A	N/A	16.84 tons/hr	PM10	2.10	SC DHEC	100%	99%	35.36	0.35	155	1.55
EU-04 EP-04	G5 Machines	01	Tons Wood Processed	N/A	N/A	N/A	16.84 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	13.08	0.65	57.31	2.87
EU-04 EP-05	Rip Saw & Cutoff Saw	01	Tons Wood Processed	N/A	N/A	N/A	0.9 tons/hr	PM	4.30	SC DHEC	100%	99%	3.87	0.039	16.95	0.17
EU-04 EP-05	Rip Saw & Cutoff Saw	01	Tons Wood Processed	N/A	N/A	N/A	0.9 tons/hr	PM10	2.10	SC DHEC	100%	99%	1.89	0.019	8.28	0.083
EU-04 EP-05	Rip Saw & Cutoff Saw	01	Tons Wood Processed	N/A	N/A	N/A	0.9 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	0.70	0.035	3.06	0.15
EU-04 EP-08	Crozer	01	Tons Wood Processed	N/A	N/A	N/A	11.76 tons/hr	PM	4.30	SC DHEC	100%	99%	50.57	0.51	221	2.21
EU-04 EP-08	Crozer	01	Tons Wood Processed	N/A	N/A	N/A	11.76 tons/hr	PM10	2.10	SC DHEC	100%	99%	24.70	0.25	108	1.08
EU-04 EP-08	Crozer	01	Tons Wood Processed	N/A	N/A	N/A	11.76 tons/hr	PM2.5 Pa	0.78 ae 13 of 23	SC DHEC	100%	95%	9.14	0.46	40.02	2.00

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Emission	Emission Unit	Process		Control	Control	Stack	Maximum Design		Uncontrolled Emission	Emission Factor	Capture	Control	Hourly Em	issions	Annual En	nissions
Unit #	Name	ID	Process Name	Device Name	Device ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-04 EP-09	Heading Planer	01	Tons Wood Processed	N/A	N/A	N/A	3.67 tons/hr	PM	4.30	SC DHEC	100%	99%	15.78	0.16	69	0.69
EU-04 EP-09	Heading Planer	01	Tons Wood Processed	N/A	N/A	N/A	3.67 tons/hr	PM10	2.10	SC DHEC	100%	99%	7.71	0.077	34	0.34
EU-04 EP-09	Heading Planer	01	Tons Wood Processed	N/A	N/A	N/A	3.67 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	2.85	0.14	12.49	0.62
EU-04 EP-10	Heading Jointers	01	Tons Wood Processed	N/A	N/A	N/A	3.38 tons/hr	РМ	4.30	SC DHEC	100%	99%	14.53	0.15	63.66	0.64
EU-04 EP-10	Heading Jointers	01	Tons Wood Processed	N/A	N/A	N/A	3.38 tons/hr	PM10	2.10	SC DHEC	100%	99%	7.10	0.071	31.09	0.31
EU-04 EP-10	Heading Jointers	01	Tons Wood Processed	N/A	N/A	N/A	3.38 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	2.63	0.13	11.50	0.58
EU-04 EP-11	Rip Saws & Jointers	01	Tons Wood Processed	N/A	N/A	N/A	0.76 tons/hr	PM	4.30	SC DHEC	100%	99%	3.27	0.03	14.31	0.14
EU-04 EP-11	Rip Saws & Jointers	01	Tons Wood Processed	N/A	N/A	N/A	0.76 tons/hr	PM10	2.10	SC DHEC	100%	99%	1.60	0.016	6.99	0.07
EU-04 EP-11	Rip Saws & Jointers	01	Tons Wood Processed	N/A	N/A	N/A	0.76 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	0.59	0.03	2.59	0.13
EU-04 EP-12	Tongue & Groove (6)	<del>0</del> 1	Tons Wood Processed	<del>N/A</del>	N/A	<del>N/A</del>	1.65 tons/hr	PM10	<del>2.10</del>	SC DHEC	<del>100%</del>	<del>99%</del>	<del>3.47</del>	<del>0.03</del>	<del>15.18</del>	0.15
EU-04 EP-12	Tongue & Groove (6)	01	Tons Wood Processed	<del>N/A</del>	N/A	N/A	1.65 tons/hr	PM2.5	0.78	SC DHEC	<del>100%</del>	<del>99%</del>	<del>1.28</del>	<del>0.013</del>	<del>5.62</del>	0.06
EU-04 EP-13	Rounder	01	Tons Wood Processed	N/A	N/A	N/A	2.903 tons/hr	РМ	4.30	SC DHEC	100%	99%	12.48	0.12	54.68	0.55
EU-04 EP-13	Rounder	01	Tons Wood Processed	N/A	N/A	N/A	2.903 tons/hr	PM10	2.10	SC DHEC	100%	99%	6.10	0.061	26.70	0.27
EU-04 EP-13	Rounder	01	Tons Wood Processed	N/A	N/A	N/A	2.903 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	2.26	0.11	9.88	0.49
EU-04 EP-16	Bung Bore	01	Tons Wood Processed	N/A	N/A	N/A	14.36 tons/hr	PM	4.30	SC DHEC	100%	99%	61.75	0.62	270	2.70
EU-04 EP-16	Bung Bore	01	Tons Wood Processed	N/A	N/A	N/A	14.36 tons/hr	PM10	2.10	SC DHEC	100%	99%	30.16	0.30	132	1.32
EU-04 EP-16	Bung Bore	01	Tons Wood Processed	N/A	N/A	N/A	14.36 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	11.16	0.56	48.87	2.44
EU-04 EP-17	Copy Saw	01	Tons Wood Processed	N/A	N/A	N/A	0.2 tons/hr	РМ	4.30	SC DHEC	100%	99%	0.86	8.60E-03	3.77	0.04
EU-04 EP-17	Copy Saw	01	Tons Wood Processed	N/A	N/A	N/A	0.2 tons/hr	PM10	2.10	SC DHEC	100%	99%	0.42	4.20E-03	1.84	0.018
EU-04 EP-17	Copy Saw	01	Tons Wood Processed	N/A	N/A	N/A	0.2 tons/hr	PM2.5	0.78	SC DHEC	100%	95%	0.16	7.77E-03	0.68	0.034

Emission	Emission Unit	Process		Control	Control	Stack	Maximum Design		Uncontrolled Emission	Emission Factor	Capture	Control	Hourly Em	issions	Annual En	nissions
Unit #	Name	ID	Process Name	Device Name	Device ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-04 EP-19	Wood Waste Silo	01	Tons Wood Processed	N/A	N/A	N/A	4.7 tons/hr	PM	2.00	SC DHEC	100%	99%	9.40	0.094	41.17	0.41
EU-04 EP-19	Wood Waste Silo	01	Tons Wood Processed	N/A	N/A	N/A	4.7 tons/hr	PM10	1.00	SC DHEC	100%	99%	4.70	0.047	20.59	0.21
EU-04 EP-19	Wood Waste Silo	01	Tons Wood Processed	N/A	N/A	N/A	4.7 tons/hr	PM2.5	0.37	SC DHEC	100%	95%	1.74	0.087	7.62	0.38
EU-04 EP-22	Weima Grinder	01	Tons Wood Processed	N/A	N/A	N/A	1.04 tons/hr	РМ	4.30	South Carolina Wood Processing Emission Factors	100%	99%	4.47	0.045	19.59	0.196
EU-04 EP-22	Weima Grinder	01	Tons Wood Processed	N/A	N/A	N/A	1.04 tons/hr	PM10	2.10	South Carolina Wood Processing Emission Factors	100%	99%	2.18	0.022	9.57	0.096
EU-04 EP-22	Weima Grinder	01	Tons Wood Processed	N/A	N/A	N/A	1.04 tons/hr	PM2.5	0.78	South Carolina Wood Processing Emission Factors	100%	95%	0.81	0.040	3.54	0.18
EU-04 EP-23	Weima Grinder	01	Tons Wood Processed	N/A	N/A	N/A	1.148 tons/hr	РМ	4.30	South Carolina Wood Processing Emission Factors	100%	99%	4.94	0.049	21.62	0.22
EU-04 EP-23	Weima Grinder	01	Tons Wood Processed	N/A	N/A	N/A	1.148 tons/hr	PM10	2.10	South Carolina Wood Processing Emission Factors	100%	99%	2.41	0.024	10.56	0.11
EU-04 EP-23	Weima Grinder	01	Tons Wood Processed	N/A	N/A	N/A	1.148 tons/hr	PM2.5	0.78	South Carolina Wood Processing Emission Factors	100%	95%	0.89	0.045	3.91	0.20
EU-05 EP-T1A	Dried material truck load and unload 1600ft	01	Paved Haul Road	N/A	N/A	N/A	4.70 VMT/Day	РМ	14.85	AP 42 Chapter 13.2.1	N/A	N/A	2.67	N/A	11.70	N/A
EU-05 EP-T1A	Dried material truck load and unload 1600ft	01	Paved Haul Road	N/A	N/A	N/A	4.70 VMT/Day	PM10	2.97	AP 42 Chapter 13.2.1	N/A	N/A	0.53	N/A	2.34	N/A
EU-05 EP-T1A	Dried material truck load and unload 1600ft	01	Paved Haul Road	N/A	N/A	N/A	4.70 VMT/Day	PM2.5	0.73	AP 42 Chapter 13.2.1	N/A	N/A	0.13	N/A	0.57	N/A

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Emission	Emission Unit	Process		Control	Control	Stack	Maximum		Uncontrolled	Emission Factor	Capture	Control	Hourly Em	issions	Annual En	nissions
Unit #	Name	ID	Process Name	Device Name	Device ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Source (e.g. AP-42, Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-05 EP-T1B	Staves and heading load and unload 1600ft	01	Paved Haul Road	N/A	N/A	N/A	0.33 VMT/Day	РМ	15.00	AP 42 Chapter 13.2.1	N/A	N/A	0.19	N/A	0.82	N/A
EU-05 EP-T1B	Staves and heading load and unload 1600ft	01	Paved Haul Road	N/A	N/A	N/A	0.33 VMT/Day	PM10	3.00	AP 42 Chapter 13.2.1	N/A	N/A	0.037	N/A	0.16	N/A
EU-05 EP-T1B	Staves and heading load and unload 1600ft	01	Paved Haul Road	N/A	N/A	N/A	0.33 VMT/Day	PM2.5	0.74	AP 42 Chapter 13.2.1	N/A	N/A	9.18E-03	N/A	0.040	N/A
EU-05 EP-T2	Finished product truck round trip 1800ft	01	Paved Haul Road	N/A	N/A	N/A	2.93 VMT/Day	РМ	16.01	AP 42 Chapter 13.2.1	N/A	N/A	1.79	N/A	7.85	N/A
EU-05 EP-T2	Finished product truck round trip 1800ft	01	Paved Haul Road	N/A	N/A	N/A	2.93 VMT/Day	PM10	3.20	AP 42 Chapter 13.2.1	N/A	N/A	0.36	N/A	1.57	N/A
EU-05 EP-T2	Finished product truck round trip 1800ft	01	Paved Haul Road	N/A	N/A	N/A	2.93 VMT/Day	PM2.5	0.79	AP 42 Chapter 13.2.1	N/A	N/A	0.088	N/A	0.39	N/A
<del>EU-05</del> EP-T3	Empty finished product Semis into Trailer Parking	01	Paved Haul- Road	<del>N/A</del>	N/A	N/A	<del>1.32 VMT/Day</del>	PM10	0 <del>.56</del>	AP 42 Chapter 13.2.2	N/A	<del>N/A</del>	0.03	N/A	<del>0.13</del>	N/A
EU-05 EP-T3	Empty finished product Semis into Trailer Parking	01	Paved Haul- Road	N/A	N/A	N/A	1.32 VMT/Day	PM2.5	0.14	AP 42 Chapter 13.2.2	N/A.	N/A	0.008	N/A.	0.034	N/A
EU-05 EP-T4	Kilns forklift to and from kilns 1500 ft	01	Unpaved Haul Road	N/A	N/A	N/A	1.86 VMT/Day	РМ	8.96	AP 42 Chapter 13.2.2	N/A	N/A	0.47	N/A	2.05	N/A
EU-05 EP-T4	Kilns forklift to and from kilns 1500 ft	01	Unpaved Haul Road	N/A	N/A	N/A	1.86 VMT/Day	PM10	2.56	AP 42 Chapter 13.2.2	N/A	N/A	0.13	N/A	0.58	N/A
EU-05 EP-T4	Kilns forklift to and from kilns 1500 ft	01	Unpaved Haul Road	N/A	N/A	N/A	1.86 VMT/Day	PM2.5	0.26	AP 42 Chapter 13.2.2	N/A	N/A	0.013	N/A	0.058	N/A

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Emission	Emission Unit	Process		Control	Control	Stack	Maximum Design		Uncontrolled Emission	Emission Factor	Capture	Control	Hourly Em	issions	Annual Er	nissions
Unit #	Name	ID	Process Name	Device Name	ID	ID	Capacity (SCC Units/hour)	Pollutant	Factor (Ib/SCC Units)	Stack Test, Mass Balance)	Efficiency (%)	Efficiency (%)	Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
EU-05 EP-T5	Wood waste truck round trip 1300 ft	01	Paved Haul Road	N/A	N/A	N/A	1.11 VMT/Day	РМ	16.01	AP 42 Chapter 13.2.1	N/A	N/A	0.68	N/A	2.98	N/A
EU-05 EP-T5	Wood waste truck round trip 1300 ft	01	Paved Haul Road	N/A	N/A	N/A	1.11 VMT/Day	PM10	3.20	AP 42 Chapter 13.2.1	N/A	N/A	0.14	N/A	0.60	N/A
EU-05 EP-T5	Wood waste truck round trip 1300 ft	01	Paved Haul Road	N/A	N/A	N/A	1.11 VMT/Day	PM2.5	0.79	AP 42 Chapter 13.2.1	N/A	N/A	0.033	N/A	0.15	N/A
<del>EU-06</del> <del>EP-T6</del>	Semi-trailer Wood Waste Loaded Out	01	Paved Haul- Road	<del>N/A</del>	N/A	<del>N/A</del>	3.12 VMT/Day	PM10	<del>0.56</del>	AP-42 Chapter- 13.2.2	<del>N/A</del>	N/A	<del>0.07</del>	N/A	<del>0.32</del>	N/A
<del>EU-06</del> <del>EP-T6</del>	Semi-trailer Wood Waste Loaded Out	01	Paved Haul Road	<del>N/A</del>	N/A	<del>N/A</del>	3.12 VMT/Day	PM2.5	<del>0.1</del> 4	AP 42 Chapter 13.2.2	N/A	N/A	0.018	N/A	<del>0.079</del>	N/A
EU-05 EP-T7	Ash to Dumpster load and unload 500 ft	01	Paved Haul Road	N/A	N/A	N/A	2.00E-03 VMT/Day	РМ	8.78	AP 42 Chapter 13.2.1	N/A	N/A	5.65E-04	N/A	2.47E-03	N/A
EU-05 EP-T7	Ash to Dumpster load and unload 500 ft	01	Paved Haul Road	N/A	N/A	N/A	2.00E-03 VMT/Day	PM10	1.76	AP 42 Chapter 13.2.1	N/A	N/A	1.13E-04	N/A	4.95E-04	N/A
EU-05 EP-T7	Ash to Dumpster load and unload 500 ft	01	Paved Haul Road	N/A	N/A	N/A	2.00E-03 VMT/Day	PM2.5	0.43	AP 42 Chapter 13.2.1	N/A	N/A	2.77E-05	N/A	1.21E-04	N/A

## Section N.2: Stack Information

### UTM Zone: 17

	Identify all Emission Units (with Process ID)	Sta	ack Physical D	ata	Stack UTM	Coordinates	Sta	ick Gas Stream D	Data
Stack ID	and Control Devices that Feed to Stack	Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
EP-30	EU-01 EP-30	1.5	3	990.81	4,232,184.24	275,380.80	3,875	350	36.54
CD1	EP-02-EP-05, <del>EP-08</del> , EP-09- EP-11, <del>EP-12,</del> EP-13, EP-15- EP17, <del>EP-19, EP-21</del> , EP-22, EP-23	4.5	40	990.81	4,232,184.24	275,380.80	60,000	AMB	62.9
CD2	EP-19	1.4	72	990.81	4,232,184.24	275,380.80	17,000	AMB	2880
CD3	EP-08		40	990.81	4,232,184.24	275,380.80	4,000	АМВ	
CD4	EP-21	1	30	990.81	4,232,184.24	275,380.80	8,500	АМВ	2880
EP-24	EU03 EP-24	4.81		990.81	4,232,184.24	275,380.80		200	
EP-25	EU03 EP-25	4.81		990.81	4,232,184.24	275,380.80		200	
EP-26	EU03 EP-26	4.81		990.81	4,232,184.24	275,380.80		200	
EP-27	EU03 EP-27	4.81		990.81	4,232,184.24	275,380.80		200	

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Stock ID	Identify all Emission Units (with Process ID)	Sta	nck Physical D	ata	Stack UTM	Coordinates	Sta	ck Gas Stream D	Pata
Stack ID	and Control Devices that Feed to Stack	Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	<b>Temperature</b> (°F)	Exit Velocity (ft/sec)
EP-28	EU03 EP-28	4.81		990.81	4,232,184.24	275,380.80		200	

#### Section N.3: Fugitive Information **UTM Zone:** Area Physical Data **Area UTM Coordinates** Area Release Data Emission Unit # **Emission Unit Name** Process ID Length of the X Length of the Release Release Northing Easting Side Y Side Temperature Height (m) (m) (ft) (°F) (ft) (ft) T1A, T1B, T2, <del>T3,</del> Truck Traffic 4,232,184.24 275,380.80 AMB 3 1 10 10 T4, T5, <del>T6,</del> T7

Section N.4: Notes, Comments, and Explanations	

Division f 300 Sow Frankfor (502)	for Air Quality er Boulevard t, KY 40601 564-3999	In Section DI Section DI Section DI	<b>DEP7007DD</b> significant Activitie D.1: Table of Insignificant D.2: Signature Block D.3: Notes, Comments, and	S Activities I Explanations							
Source Name:		Commonwealth Cooperage									
KY EIS (AFS) #	21-	205-00068									
Permit #:		F-19-021 R3									
Agency Interest	(AI) ID:	161081									
Date:		7/30/2024									
Section DD.1:	Table of Insignifi	icant Activities									
*Identify each activ	Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3 etc.										
Insignificant Activity #	InsignificantDescription of ActivitySerial Number or Other Unique IdentifierApplicable Regulation(s)Calculated EmissionsActivity #CapacityCapacityCalculated EmissionsCalculated Emissions										
EU-03	Six Steam Heated Kilns (EP-01 & EP-24 - EP-28)	EU-03 (EP-01 & EP-24 - EP-28)	401 KAR 59:010 401 KAR 63:020	Annual Emissions for each Kiln: VOC: 0.12 tpy Acetaldehyde: 8.00E-04 tpy							
EU-06 EP-29	Toasting Operations (EP-29)	EU-06 (EP-29)	401 KAR 59:010 401 KAR 63:020	3.84 tpy NOx , 4.22 tpy CO , 3.14 tpy PM 0.13 tpy VOC , 0.20 tpy SO2 , 3.76E-04 tpy Lead 0.30 tpy Total HAPs							
Section DD.2:	Signature Block										
I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.											
	7-30-24										
Authorized Signature Date											
By: Mike Knudson General Manager											
Mike Khudson     General Manager       Type/Print Name of Siguatory     Title of Siguatory											

Section DD.3: Notes, Comments, and Explanations										

**APPENDIX B. SITE-WIDE POTENTIAL TO EMIT CALCULATIONS** 



#### Appendix 2. Facility Wide Potential to Emit Summary - Permit Renewal Application

Table 2-1. Facility Wide Potential to Emit Summary<sup>2,5</sup>

									Emission Factors Controlled Emissions <sup>1</sup>															
EU ID	ep id	Title V Emission Group	Emission Unit Description	KyEIS Process ID	Units Description	Maximum Capae	Design city (Units/hr)	Control Efficiency	PM (Ib/Units)	PM <sub>10</sub> (Ib/Units)	PM <sub>2.5</sub> (Ib/Units)	NO <sub>x</sub> (Ib/Units)	CO (Ib/Units)	VOC (Ib/Units)	SO <sub>x</sub> (Ib/Units)	HAPS (lb/Units)	PM (tpy)	PM <sub>10</sub> (tpy)	РМ <sub>2.5</sub> (tpy)	NO <sub>x</sub> (tpy)	CO (tpy)	VOC (tpy)	SO <sub>x</sub> (tpy)	HAPS (tpy)
									FF - PM	EE - PM10	EE - PM2 5	FE - NOX	FF - CO	FE - VOC	EE - SOX	FF - HAPS	FF - PM	EE - PM10	EE - PM2.5	FF - NOX	FF - CO	EE - VOC	FF - SOX	FE - HAPS
01	20	Two Wood-Fired Indirect Heat Exchangers	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Tons Wood Burned	0.55	tons/hr	PM, PM10, PM2.5 - 85%	6.76	6.09	5.24	8.28	10.14	0.29	0.42	0.64	2.44	2.20	1.89	19.96	24.44	0.69	1.02	1.54
01	30	Two Wood-Fired Indirect Heat	9.229 MMBtu/hr Wood Refuse Heat Exchanger	01	Tons Wood Burned	0.55	tons/hr	PM, PM10, PM2.5 - 85%	6.76	6.09	5.24	8.28	10.14	0.287	0.42	0.64	2.44	2.20	1.89	19.96	24.44	0.69	1.02	1.54
02	06	Barrel (and Head)	2.0 MMBtu/hr Dry Fired Operations	01	MMscf	0.002	MMscf/hr	None	7.60	7.60	7.60	100	84.00	5.50	0.60	3.69	0.067	0.067	0.067	0.88	0.74	0.048	5.26E-03	0.032
02	07	Charring Operations Barrel (and Head)	Barrel Charring Operations	01	Natural Gas Tons Wood	0.57	tons/hr <sup>3</sup>	None	6.76	6.09	5.24	8.28	0.34	0.29	0.42	0.64	16.87	15.19	13.08	20.67	20.27	0.72	1.05	0.56
02	07	Charring Operations Barrel (and Head)	5.13 MMBtu/hr Barrel Char Natural	02	Burned MMscf	0.005	MMscf/hr	None	7.60	7.60	7.60	100	-	5.50	0.60	0.08	0.17	0.17	0.17	2.20		0.12	0.013	1.65E-03
02	14	Charring Operations Barrel (and Head)	Gas Burners Head Charring Operations	01	Natural Gas Tons Wood	0.44	tons/hr4	None	6.76	6.09	5.24	8.28	0.34	0.29	0.42	0.64	13.16	11.84	10.20	16.12	4.95	0.56	0.82	0.56
02	14	Charring Operations Barrel (and Head)	1.25 MMBtu/hr Head Char Natural Gas	i 02	Burned MMscf	0.001	MMscf/hr	None	7.60	7.60	7.60	100	_	5.50	0.60	0.08	0.041	0.041	0.041	0.537	_	0.030	3.22E-03	4.03E-04
		Charring Operations	Burners		Natural Gas																			
03 (IA1)	01	Steam Heated Kilns	Steam Heated Kiln	01	Tons Wood Processed	1.11	tons/hr	None		-				0.116		1.64E-04			-			0.568		8.00E-04
03 (IA1)	24	Steam Heated Kilns	Steam Heated Kiln	01	Tons Wood	1.11	tons/hr	None	-	-	-	-	-	0.116	-	1.64E-04		-	-	-	-	0.568	-	8.00E-04
03 (IA1)	25	Steam Heated Kilns	Steam Heated Kiln	01	Tons Wood	1.11	tons/hr	None	-	-	-	-	-	0.116	-	1.64E-04	-	-	-	-	-	0.568	-	8.00E-04
03 (IA1)	26	Steam Heated Kilns	Steam Heated Kiln	01	Tons Wood	1.11	tons/hr	None	-	-	-	-	-	0.116	-	1.64E-04	-	-	-	-		0.568		8.00E-04
03 (IA1)	27	Steam Heated Kilns	Steam Heated Kiln	01	Tons Wood	1.11	tons/hr	None	-	-	-	-	-	0.116	-	1.64E-04	-	-	-	-	-	0.568	-	8.00E-04
03 (IA1)	28	Steam Heated Kilns	Steam Heated Kiln	01	Tons Wood	1.11	tons/hr	None	-	-	-	-	-	0.116	-	1.64E-04	-	-	-	-		0.568		8.00E-04
04	02	Non-fugitive Wood	Stave Equalizer	01	Tons Wood	19.35	tons/hr	PM, PM10 - 99%	4.30	2.10	0.78		-			-	3.64	1.78	3.29		-	-		
04	03	Operations Non-fugitive Wood	Stave Planer	01	Processed Tons Wood	18.86	tons/hr	PM2.5 = 95% PM, PM10 - 99%	4.30	2.10	0.78					-	3.55	1.73	3.21			-		
04	04	Operations Non-fugitive Wood	G5 Machines	01	Processed Tons Wood	16.84	tons/hr	PM2.5 = 95% PM. PM10 - 99%	4.30	2.10	0.78					-	3.17	1.55	2.87			-		
	05	Operations	Dia 0	04	Processed		1	PM2.5 = 95%	4.00	0.40	0.70						0.47	0.000	0.45					
04	05	Operations	Rip Saw & Culoli Saw	01	Processed	0.90	tons/nr	PM, PM10 - 99% PM2.5 = 95%	4.30	2.10	0.70					-	0.17	0.005	0.15			-		
04	80	Non-fugitive Wood Operations	Crozer	01	I ons Wood Processed	11.76	tons/hr	PM, PM10 - 99% PM2.5 = 95%	4.30	2.10	0.78						2.21	1.08	2.00			-		
04	09	Non-fugitive Wood	Heading Planer	01	Tons Wood Processed	3.67	tons/hr	PM, PM10 - 99% PM2 5 = 95%	4.30	2.10	0.78					-	0.69	0.34	0.62			-		
04	10	Non-fugitive Wood	Heading Jointers	01	Tons Wood	3.38	tons/hr	PM, PM10 - 99%	4.30	2.10	0.78		-	-		-	0.64	0.31	0.58			-		
04	11	Non-fugitive Wood	Rip Saws & Jointers	01	Tons Wood	0.76	tons/hr	PM, PM10 - 99%	4.30	2.10	0.78					-	0.14	0.070	0.13			-		
04	13	Non-fugitive Wood	Rounder	01	Tons Wood	2.90	tons/hr	PM2.5 = 95% PM, PM10 - 99%	4.30	2.10	0.78					-	0.55	0.27	0.49			-		
04	15	Operations Non-fugitive Wood	Head Repair - Jointer, T&G, & Planer	01	Processed Tons Wood	0.42	tons/hr	PM2.5 = 95% PM, PM10 - 99%	4.30	2.10	0.78					-	0.079	0.039	0.071			-		
04	16	Operations Non-fugitive Wood	Bung Bore	01	Processed Tons Wood	14.36	tons/hr	PM2.5 = 95% PM, PM10 - 99%	4.30	2.10	0.78					-	2.70	1.32	2.44			-		
04	17	Operations Non-fugitive Wood	Copy Saw	01	Processed Tons Wood	0.20	tons/hr	PM2.5 = 95% PM, PM10 - 99%	4.30	2.10	0.78		-			-	0.038	0.018	0.034			-		
04	19	Operations Non-fugitive Wood	Wood Waste Silo	01	Processed Tons Wood	4.70	tons/hr	PM2.5 = 95% PM, PM10 - 99%	2.00	1.00	0.37					-	0.41	0.21	0.38			-		
04	21	Operations Non-fugitive Wood	Wood Waste Truck Loadout	01	Processed Tons Wood	4 33	tons/hr	PM2.5 = 95% PM. PM10 - 99%	2.00	1.00	0.37					-	0.38	0.19	0.35			-		
		Operations			Processed			PM2.5 = 95%	2.00		0.01						0.00	5.15	0.00					
04	22	Non-fugitive Wood Operations	Weima Grinder	01	Foressed	1.04	tons/hr	PM, PM10 - 99% PM2.5 = 95%	4.30	2.10	0.78	-				-	0.20	0.10	0.18			-		
04	23	Non-fugitive Wood Operations	Weima Grinder	01	Tons Wood Processed	1.15	tons/hr	PM, PM10 - 99% PM2.5 = 95%	4.30	2.10	0.78		-			-	0.22	0.11	0.20			-		



#### Table 2-1. Facility Wide Potential to Emit Summary<sup>2,5</sup>

						Maximum	Deelen					Emissior	n Factors				Controlled Emissions <sup>1</sup>							
EU ID	EP ID	Title V Emission Group	Emission Unit Description	KyEIS Process ID	Units Description	Capacity (Units/hr)		Control Efficiency	PM (Ib/Units)	PM <sub>10</sub> (Ib/Units)	PM <sub>2.5</sub> (Ib/Units)	NO <sub>x</sub> (Ib/Units)	CO (Ib/Units)	VOC (Ib/Units)	SO <sub>x</sub> (Ib/Units)	HAPS (Ib/Units)	PM (tpy)	PM <sub>10</sub> (tpy)	PM <sub>2.5</sub> (tpy)	NO <sub>x</sub> (tpy)	CO (tpy)	VOC (tpy)	SO <sub>x</sub> (tpy)	HAPS (tpy)
05	T1A	Fugitive Emissions - Paved Haul Roads	Dried material truck load and unload 1600ft	01	VMT	4.70	VMT/Day	8.22%	14.85	2.97	0.73					1	11.70	2.34	0.57			-		
05	T1B	Fugitive Emissions - Paved Haul Roads	Staves and heading load and unload 1600ft	01	VMT	0.33	VMT/Day	8.22%	15.00	3.00	0.74					-	0.82	0.16	0.040			-		-
05	T2	Fugitive Emissions - Paved Haul Roads	Finished product truck round trip 1800ft	01	VMT	2.93	VMT/Day	8.22%	16.01	3.20	0.79					-	7.85	1.57	0.39			-		
05	T4	Fugitive Emissions - Paved Haul Roads	Kilns forklift to and from kilns 1500 ft	01	VMT	1.86	VMT/Day	32.88%	8.96	2.56	0.26	-	-			-	2.05	0.58	0.058			-		
05	T5	Fugitive Emissions - Paved Haul Roads	Wood waste truck round trip 1300 ft	01	VMT	1.11	VMT/Day	8.22%	16.01	3.20	0.79	-	-			-	2.98	0.60	0.15			-		-
05	T7	Fugitive Emissions - Paved Haul Roads	Ash to Dumpster load and unload 500 ft	01	VMT	2.00E-03	VMT/Day	8.22%	8.78	1.76	0.43		-			-	2.47E-03	4.95E-04	1.21E-04			-		-
06 (IA2)	29	Toasting Operations	s Electric Burners (72)	01	Tons Wood Burned	0.11	tons/hr	None	6.76	6.09	5.24	8.28	0.34	0.29	0.42	0.640	3.14	2.82	2.43	3.94	0.16	0.13	0.20	0.30
																	-					-		
Total Potential Emissions - Post-Permit Actions Total Non-Fugitive Emissions - Post-Permit Actions								-	-			-		-	-	82.5 57.1	49.0 43.7	48.0 46.8	84.3 84.3	75.0 75.0	6.4 6.4	4.1 4.1	4.5 4.5	

<sup>1</sup> SOx is representative of SO2 emissions, these terms are used synonymously throughout this application.

<sup>2</sup> Changes reflected from the original permit application to this renewal permit application are represented in light green highlight and bold maroon font in the table above.

<sup>3</sup> CO throughput is based on a 13.706 ton/hour total wood barrel throughput as the emission factor basis is based on 9/19/2023 head charing test results.

<sup>4</sup> CO throughput is based on a 3.35 ton/hour total wood head throughput as the emission factor basis is based on 9/19/2023 head charing test results.

<sup>5</sup> Emission Points EP-12, T3 and T6 have been removed since the original permit application and are not shown in this summary.