AIR QUALITY PERMIT
Issued under 401 KAR 52:030

Permittee Name: Interplastic Corporation
Mailing Address: 3535 Latonia Avenue, Fort Wright, KY 41015

Source Name: Interplastic Corporation
Mailing Address: 3535 Latonia Avenue
Fort Wright, KY 41015

Source Location: Same as Above

Permit ID: F-22-022
Agency Interest #: 2466
Activity ID: APE20220001
Review Type: Conditional Major, Operating
Source ID: 21-117-00086

Regional Office: Florence Regional Office
8020 Veterans Memorial Drive, Suite 110
Florence, KY 41042
(859) 525-4923

County: Kenton

Application Complete Date: April 18, 2022
Issuance Date: Expiration Date:

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

Version 4/1/2022
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<th>Permit Type</th>
<th>Activity#</th>
<th>Complete Date</th>
<th>Issuance Date</th>
<th>Summary of Action</th>
</tr>
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<tbody>
<tr>
<td>F-22-022</td>
<td>Renewal</td>
<td>APE20220001</td>
<td>4/18/2022</td>
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<td>Renewal Permit</td>
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</table>

Version 9/4/2019
SECTION A - PERMIT AUTHORIZATION

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

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

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

Process and Thinning Kettles

(SEU 57) Batch Polyester Polymerization Reaction and Thinning
Consisting of:

<table>
<thead>
<tr>
<th>Equipment:</th>
<th>Process Kettle (K1)</th>
<th>Thinning Kettles (T1 &amp; T2)</th>
<th>Weigh Tank (W1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capacity (gal.):</td>
<td>5,200</td>
<td>8,000 each</td>
<td>3,200</td>
</tr>
</tbody>
</table>

(SEU 58) Batch Polyester Polymerization Reaction and Thinning
Consisting of:

<table>
<thead>
<tr>
<th>Equipment:</th>
<th>Process Kettle (K2)</th>
<th>Thinning Kettles (T3 &amp; T4)</th>
<th>Weigh Tank (W1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capacity (gal.):</td>
<td>5,200</td>
<td>8,000 each</td>
<td>3,200</td>
</tr>
</tbody>
</table>

(SEU 101) Batch Polyester Polymerization Reaction and Thinning (also see blending Processes)
Consisting of:

<table>
<thead>
<tr>
<th>Equipment:</th>
<th>Process Kettle (K3)</th>
<th>Thinning Kettles (T5 &amp; T6)</th>
<th>Weigh Tank (W2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capacity (gal.):</td>
<td>8,000</td>
<td>13,000 each</td>
<td>4,500</td>
</tr>
</tbody>
</table>

(SEU 74) Batch Polyester Polymerization Reaction and Thinning
Consisting of:

<table>
<thead>
<tr>
<th>Equipment:</th>
<th>Process Kettle (K4)</th>
<th>Thinning Kettles (T7 &amp; T8)</th>
<th>Weigh Tank (W2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capacity (gal.):</td>
<td>8,000</td>
<td>13,000 each</td>
<td>4,500</td>
</tr>
<tr>
<td>Construction Date:</td>
<td>2017</td>
<td>2017</td>
<td>1997</td>
</tr>
</tbody>
</table>

Primary Control: (SEU 103) Primary Thermal Oxidizer
Manufacturer: John Zink
Model: SO# 901078
Description: Single chamber, 30 mmBtu/hr, incorporating waste heat boiler
(See SEU 102 in Insignificant Activities)
Fuel: Natural Gas – primary, Propane – auxiliary
Date constructed: 1996

Back-up Control: (SEU 26) Back-up Thermal Oxidizer
Manufacturer: John Zink
Model: SO# X43231
Description: Single chamber, 2 mmBtu/hr
Fuel: Natural Gas – primary, Propane – auxiliary
Date constructed: 1980
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

APPLICABLE REGULATIONS:
401 KAR 50:012, General application.

401 KAR 59:010, New Process Operations, applies to the PM emissions from SEU 58, 101 and 74.

401 KAR 61:020, Existing Process Operations, applies to the PM emissions from SEU 57.

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

1. Operating Limitations:
VOC and HAP emissions from SEU 57, 58, 101 and 74 shall be captured and controlled at all times they are in operation [401 KAR 50:012, Section 1(1); and 401 KAR 52:030, Section 1].

Compliance Demonstration Method:
See subsections 3 through 6 Testing, Specific Monitoring, Specific Recordkeeping, and Specific Reporting Requirements.

2. Emission Limitations:
   a. Emissions of particulate matter (PM) from the SEU 58, 101, and 74 Process Kettles (K2, K3 and K4) shall not exceed the following emission limitations [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 1000 lbs/hr shall not exceed 2.34 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:
         \[ E = 3.59P^{0.62} \]
      \( E \) = the PM emissions rate (pounds/hour)
      \( P \) = the process rate (tons/hour)

   b. The opacity of visible emissions from the SEU 58 101 and 74 Process Kettles (K2, K3 and K4) shall not equal or exceed 20 percent [401 KAR 59:010, Section 3 (1)].

c. Emissions of PM from the SEU 57 Process Kettle (K1) shall not exceed the following emission limitations [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:
      \[ E = 4.10P^{0.67} \]
      \( E \) = the PM emissions rate (pounds/hour)
      \( P \) = the process rate (tons/hour)
SECTI0N B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

d. The opacity of visible emissions from the SEU 57 Process Kettle (K1) shall not equal or exceed 40 percent [401 KAR 61:020, Section 3 (1)].

Compliance Demonstration Method:
(1) Mass Emission Standard:
The source is assumed to be in compliance when the thermal oxidizer is operating and properly maintained according to the manufacturer’s specifications.

(2) Opacity Limits:
See subsection 4. Monitoring Requirements for opacity compliance demonstration.

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

f. 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:
a. See Section E for control-device testing requirements.

b. 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 perform a qualitative visual observation of the opacity of emissions at each stack no less than weekly while the affected facility is operating. If visible emissions from the stacks are observed (not including condensed water in the plume), the permittee shall determine the opacity using Reference Method 9. In lieu of determining the opacity using U.S. EPA Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume).

5. Specific Recordkeeping Requirements:
a. The permittee shall record the occurrence, date, time, duration, cause, point of release, and any corrective action taken for each incident when any VOC and/or HAP emissions from any of the equipment listed above is not routed to either one of the Thermal Oxidizers.

b. The permittee shall record the following parameters:
   (1) Total weight of alkyd, in tons, produced at each Process Kettle each month;
   (2) Total weight and type of thinning solvent, in tons, used in each Thinning Kettle each month.

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

6. **Specific Reporting Requirements:**
   See Section E, [Specific Recordkeeping Requirements](#) 6.b.

7. **Specific Control Equipment Operating Conditions:**
   See Section E
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Blending Processes

Blending Operations in Controlled Vessels

Consisting of:

<table>
<thead>
<tr>
<th>Emission Unit:</th>
<th>Equipment:</th>
<th>Interplastic ID</th>
<th>Capacity:</th>
<th>Constructed:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEU112</td>
<td>Blend tank 1</td>
<td>B1</td>
<td>6000 gallons</td>
<td>1997</td>
</tr>
<tr>
<td>SEU113</td>
<td>Blend tank 2</td>
<td>B2</td>
<td>6000 gallons</td>
<td>1997</td>
</tr>
<tr>
<td>SEU63</td>
<td>Blend tank 3</td>
<td>B3</td>
<td>5000 gallons</td>
<td>2017</td>
</tr>
<tr>
<td>SEU64</td>
<td>Blend tank 4</td>
<td>B4</td>
<td>5000 gallons</td>
<td>2017</td>
</tr>
<tr>
<td>SEU65</td>
<td>Blend tank 5</td>
<td>B5</td>
<td>2600 gallons</td>
<td>2017</td>
</tr>
<tr>
<td>SEU111</td>
<td>Blend tank 6 – high shear tank</td>
<td>H1</td>
<td>1200 gallons</td>
<td>1997</td>
</tr>
<tr>
<td>SEU116</td>
<td>Small Batch Tank 1</td>
<td>SB1</td>
<td>600 gallons</td>
<td>1993</td>
</tr>
<tr>
<td>SEU115</td>
<td>Small Batch Tank 2</td>
<td>SB2</td>
<td>1200 gallons</td>
<td>1990</td>
</tr>
<tr>
<td>SEU101</td>
<td>Thinning Tank 5 (a part of SEU101 Process and Thinning Kettle T5)</td>
<td>T5</td>
<td>13000 gallons</td>
<td>1997</td>
</tr>
</tbody>
</table>

**Primary Control:**  
(SEU 103) Primary Thermal Oxidizer  
Manufacturer: John Zink  
Model: SO# 901078  
Description: Single chamber, 30 mmBtu/hr, incorporating waste heat boiler  
(See SEU 102 in Insignificant Activities)  
Fuel: Natural Gas – primary, Propane – auxiliary  
Date constructed: 1996

**Back-up Control:**  
(SEU 26) Back-up Thermal Oxidizer  
Manufacturer: John Zink  
Model: SO# X43231  
Description: Single chamber, 2 mmBtu/hr  
Fuel: Natural Gas – primary, Propane – auxiliary  
Date constructed: 1980

**Blending Operations in Uncontrolled Vessels**  
**Description:** Drum Blend Tote Area with fugitive emissions  
Construction Date: Various
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

APPLICABLE REGULATION:
401 KAR 50:012, General application.

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

1. Operating Limitations:
VOC and HAP emissions from the Blending Operations in Controlled Vessels shall be captured and controlled at all times they are in operation [401 KAR 50:012, Section 1(1); and 401 KAR 52:030, Section 1].

Compliance Demonstration Method:
See subsections 3 through 6 Testing, Specific Monitoring, Specific Recordkeeping, and Specific Reporting Requirements.

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

   b. 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:
   a. See Section E for control-device testing requirements.

   b. 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 total amount, in tons, of resin blended each month in controlled and uncontrolled vessels.

5. Specific Recordkeeping Requirements:
   a. The permittee shall record the occurrence, date, time, duration, cause, point of release, and any corrective action taken for each incident when any VOC and/or HAP emissions from Blending Operations in Controlled Vessels are not routed to either one of the Thermal Oxidizers.

   b. The permittee shall record the total amount, in tons, of resin blended each month in controlled and uncontrolled vessels, keeping the controlled and uncontrolled sums separate.

6. Specific Reporting Requirements:
See Section E, Specific Recordkeeping Requirements 6.b.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

7. **Specific Control Equipment Operating Conditions:**
   See Section E
### Resin Storage Tanks

#### Resin 12k
**Description:** 16 controlled 12,000-gal resin product storage tanks

Consisting of:

<table>
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<tr>
<th>Emission Unit</th>
<th>Equipment:</th>
<th>Interplastic ID</th>
<th>Constructed:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEU05</td>
<td>Resin Storage F1</td>
<td>F1</td>
<td>1972</td>
</tr>
<tr>
<td>SEU04</td>
<td>Resin Storage F2</td>
<td>F2</td>
<td>1972</td>
</tr>
<tr>
<td>SEU45</td>
<td>Resin Storage F3</td>
<td>F3</td>
<td>1972</td>
</tr>
<tr>
<td>SEU19</td>
<td>Resin Storage F4</td>
<td>F4</td>
<td>1972</td>
</tr>
<tr>
<td>SEU12</td>
<td>Resin Storage Tank 1</td>
<td>S1</td>
<td>1972</td>
</tr>
<tr>
<td>SEU11</td>
<td>Resin Storage Tank 2</td>
<td>S2</td>
<td>1972</td>
</tr>
<tr>
<td>SEU18</td>
<td>Resin Storage Tank 3</td>
<td>S3</td>
<td>1972</td>
</tr>
<tr>
<td>SEU17</td>
<td>Resin Storage Tank 4</td>
<td>S4</td>
<td>1972</td>
</tr>
<tr>
<td>SEU30</td>
<td>Resin Storage Tank 5</td>
<td>S5</td>
<td>1972</td>
</tr>
<tr>
<td>SEU29</td>
<td>Resin Storage Tank 6</td>
<td>S6</td>
<td>1972</td>
</tr>
<tr>
<td>SEU35</td>
<td>Resin Storage Tank 7</td>
<td>S7</td>
<td>1972</td>
</tr>
<tr>
<td>SEU34</td>
<td>Resin Storage Tank 8</td>
<td>S8</td>
<td>1972</td>
</tr>
<tr>
<td>SEU110</td>
<td>Resin Storage Tank 9</td>
<td>S9</td>
<td>1984</td>
</tr>
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<td>SEU48</td>
<td>Resin Storage Tank 10</td>
<td>S10</td>
<td>1984</td>
</tr>
<tr>
<td>SEU37</td>
<td>Resin Storage Tank 11</td>
<td>S11</td>
<td>1984</td>
</tr>
<tr>
<td>SEU55</td>
<td>Resin Storage Tank 12</td>
<td>S12</td>
<td>1984</td>
</tr>
</tbody>
</table>

#### Resin 16k
**Description:** 4 controlled 16,000-gal resin product storage tanks

Consisting of:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Equipment:</th>
<th>Interplastic ID</th>
<th>Constructed:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEU104</td>
<td>Resin Storage Tank 13</td>
<td>S13</td>
<td>1997</td>
</tr>
<tr>
<td>SEU105</td>
<td>Resin Storage Tank 14</td>
<td>S14</td>
<td>1997</td>
</tr>
<tr>
<td>SEU75</td>
<td>Resin Storage Tank 15</td>
<td>S15</td>
<td>2017</td>
</tr>
<tr>
<td>SEU76</td>
<td>Resin Storage Tank 16</td>
<td>S16</td>
<td>2017</td>
</tr>
</tbody>
</table>
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Resin 30k
Description: 4 controlled 30,000-gal resin product storage tanks

Consisting of:

<table>
<thead>
<tr>
<th>Emission Unit:</th>
<th>Equipment:</th>
<th>Interplastic ID:</th>
<th>Constructed:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEU136</td>
<td>Resin Storage Tank 17</td>
<td>S17</td>
<td>2015</td>
</tr>
<tr>
<td>SEU137</td>
<td>Resin Storage Tank 18</td>
<td>S18</td>
<td>2015</td>
</tr>
<tr>
<td>SEU106</td>
<td>Resin Storage Tank 19</td>
<td>S19</td>
<td>1997</td>
</tr>
<tr>
<td>SEU107</td>
<td>Resin Storage Tank 20</td>
<td>S20</td>
<td>1997</td>
</tr>
</tbody>
</table>

**Primary Control:** (SEU 103) Primary Thermal Oxidizer
Manufacturer: John Zink
Model: SO# 901078
Description: Single chamber, 30 mmBtu/hr, incorporating waste heat boiler
(See SEU 102 in Insignificant Activities)
Fuel: Natural Gas – primary, Propane – auxiliary
Date constructed: 1996

**Back-up Control:** (SEU 26) Back-up Thermal Oxidizer
Manufacturer: John Zink
Model: SO# X43231
Description: Single chamber, 2 mmBtu/hr
Fuel: Natural Gas – primary, Propane – auxiliary
Date constructed: 1980

**APPLICABLE REGULATION:**
401 KAR 50:012, General application.

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

1. **Operating Limitations:**
VOC and HAP emissions from the Resin Storage Tanks shall be captured and controlled at all times they are in operation [401 KAR 50:012, Section 1(1); and 401 KAR 52:030, Section 1].

   **Compliance Demonstration Method:**
See subsections 3 through 6 Testing, Specific Monitoring, Specific Recordkeeping, and Specific Reporting Requirements.

2. **Emission Limitations:**
a. See Section D for source-wide VOC and HAP emission limitations.
b. 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:
   a. See Section E for control-device testing requirements.

   b. 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 throughput, in thousands of gallons (1000 gallons), of resin for each resin storage tank size group each month. A storage tank size group represents tanks of the same size and contents.

5. Specific Recordkeeping Requirements:
   a. The permittee shall record the occurrence, date, time, duration, cause, point of release, and any corrective action taken for each incident when any VOC and/or HAP emissions from the Resin Storage Tanks are not routed to either one of the Thermal Oxidizers.

   b. The permittee shall record the throughput, in thousands of gallons (1000 gallons), of resin for each resin storage tank each month.

6. Specific Reporting Requirements:
   See Section E, Specific Recordkeeping Requirements 6.b.

7. Specific Control Equipment Operating Conditions:
   See Section E
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Raw Material Storage Tanks

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Interplastic ID</th>
<th>Tank Contents</th>
<th>Capacity</th>
<th>Construction Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEU8</td>
<td>UST 890</td>
<td>Styrene</td>
<td>30,000</td>
<td>1998</td>
</tr>
<tr>
<td>SEU13</td>
<td>AST 821</td>
<td>Phthalic Anhydride or Maleic Anhydride</td>
<td>15,000</td>
<td>1972</td>
</tr>
<tr>
<td>SEU14</td>
<td>AST 830</td>
<td>Phthalic Anhydride or Maleic Anhydride</td>
<td>15,000</td>
<td>1972</td>
</tr>
<tr>
<td>SEU73</td>
<td>AST 831</td>
<td>Phthalic Anhydride or Maleic Anhydride</td>
<td>30,000</td>
<td>2017</td>
</tr>
<tr>
<td>SEU28</td>
<td>AST 853</td>
<td>Ethylene Glycol</td>
<td>13,000</td>
<td>1979</td>
</tr>
<tr>
<td>SEU43</td>
<td>AST 854</td>
<td>Ethylene Glycol</td>
<td>13,000</td>
<td>1988</td>
</tr>
<tr>
<td>SEU20</td>
<td>UST 870</td>
<td>Glycols (non-HAP)</td>
<td>23,000</td>
<td>1976</td>
</tr>
<tr>
<td>SEU21</td>
<td>UST 871</td>
<td>Glycols (non-HAP)</td>
<td>12,000</td>
<td>1976</td>
</tr>
<tr>
<td>SEU16</td>
<td>AST 850</td>
<td>Acetone</td>
<td>13,000</td>
<td>1972</td>
</tr>
<tr>
<td>SEU40</td>
<td>UST 881</td>
<td>2 Ethyl Hexanol</td>
<td>10,000</td>
<td>1998</td>
</tr>
<tr>
<td>SEU22</td>
<td>UST 882</td>
<td>Vinyl Toluene</td>
<td>10,000</td>
<td>1988</td>
</tr>
<tr>
<td>SEU108</td>
<td>AST 840</td>
<td>Dicyclopentadiene</td>
<td>30,000</td>
<td>1997</td>
</tr>
<tr>
<td>SEU114</td>
<td>AST 841</td>
<td>Glycols (non-HAP)</td>
<td>30,000</td>
<td>1997</td>
</tr>
<tr>
<td>SEU36</td>
<td>AST 855</td>
<td>Glycols (non-HAP)</td>
<td>13000</td>
<td>1985</td>
</tr>
<tr>
<td>SEU15</td>
<td>AST 851</td>
<td>Glycols (non-HAP)</td>
<td>13000</td>
<td>1972</td>
</tr>
<tr>
<td>SEU24</td>
<td>AST 852</td>
<td>Glycols (non-HAP)</td>
<td>13000</td>
<td>1990</td>
</tr>
</tbody>
</table>

* Underground Storage Tank (UST), Aboveground Storage Tank (AST)

** Glycols (non-HAP) refers to propylene based glycols with a vapor pressure less than or equal to propylene glycol

APPLICABLE REGULATION:
401 KAR 50:012, General application.

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

1. **Operating Limitations:**
The usage rates of materials used in all affected facilities shall be limited so as not to exceed the emission limitations in Section B.2.

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

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

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

4. **Specific Monitoring Requirements:**
   The permittee shall monitor the throughput, in thousands of gallons (1000 gallons), of raw material for each raw material storage tank each month.

5. **Specific Recordkeeping Requirements:**
   The permittee shall record the throughput, in thousands of gallons (1000 gallons), of raw material for each raw material storage tank each month.

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

Packaging Processes

(SEU 139) Packaging Processes (Controlled)
Description: Top/Splash Loading Product with Thermal Oxidizer Control
Construction Date: 1998

Primary Control: (SEU 103) Primary Thermal Oxidizer
Manufacturer: John Zink
Model: SO# 901078
Description: Single chamber, 30 mmBtu/hr, incorporating waste heat boiler
(See SEU 102 in Insignificant Activities)
Fuel: Natural Gas – primary, Propane – auxiliary
Date constructed: 1996

Back-up Control: (SEU 26) Back-up Thermal Oxidizer
Manufacturer: John Zink
Model: SO# X43231
Description: Single chamber, 2 mmBtu/hr
Fuel: Natural Gas – primary, Propane – auxiliary
Date constructed: 1980

(SEU 140) Packaging Processes (Uncontrolled)
Description: Process ID 1: Bottom Loading to Truck
Process ID 2: Resin Packaging in Containers
Process ID 3: Methyl Methacrylate Packaging in Containers
Construction Date: 1998

APPLICABLE REGULATION:
401 KAR 50:012, General application.

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

1. Operating Limitations:
   a. The usage rates of materials used in all affected facilities shall be limited so as not to exceed the emission limitations in Section B.2.

   b. VOC and HAP emissions from the Packaging Processes (Controlled) SEU 139 shall be captured and controlled at all times they are in operation.

2. Emission Limitations:
   a. See Section D for source-wide VOC and HAP emission limitations.
b. 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:**
   The permittee shall monitor the amount, in thousands of gallons (1000 gallons), of each material packaged each month.

5. **Specific Recordkeeping Requirements:**
   a. The permittee shall record the occurrence, date, time, duration, cause, point of release, and any corrective action taken for each incident when any VOC and/or HAP emissions from Packaging Processes (Controlled) SEU 139 are not routed to a vapor return system and to either one of the Thermal Oxidizers.

   b. The permittee shall record the amount, in thousands of gallons (1000 gallons), of resin packaged each month. Separate records shall be maintained based on whether the process was controlled or uncontrolled, and the applicable process ID.

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

Hot Boxes

(SEU 120) Hot Box #1
Description: 4 Drum Capacity
Construction Date: August 2022

(SEU 121) Hot Box #2
Description: 4 Drum Capacity
Construction Date: August 2022

(SEU 134) Hot Box #3
Description: 4 Drum Capacity
Construction Date: August 2022

Primary Control: (SEU 103) Primary Thermal Oxidizer
Manufacturer: John Zink
Model: SO# 901078
Description: Single chamber, 30 mmBtu/hr, incorporating waste heat boiler
(See SEU 102 in Insignificant Activities)
Fuel: Natural Gas – primary, Propane – auxiliary
Date constructed: 1996

Back-up Control: (SEU 26) Back-up Thermal Oxidizer
Manufacturer: John Zink
Model: SO# X43231
Description: Single chamber, 2 mmBtu/hr
Fuel: Natural Gas – primary, Propane – auxiliary
Date constructed: 1980

APPLICABLE REGULATION:
401 KAR 50:012, General application.

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

1. Operating Limitations:
   VOC and HAP emissions from the Hot Boxes shall be captured and controlled at all times they are in operation [401 KAR 50:012, Section 1(1); and 401 KAR 52:030, Section 1].

   Compliance Demonstration Method:
   See subsections 3 through 6 Testing, Specific Monitoring, Specific Recordkeeping, and Specific Reporting Requirements.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

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

   b. 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:**
   a. See Section E for control-device testing requirements.

   b. 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 throughput, in tons, of resin processed each month.

5. **Specific Recordkeeping Requirements:**
   a. The permittee shall record the occurrence, date, time, duration, cause, point of release, and any corrective action taken for each incident when any VOC and/or HAP emissions from any of the equipment listed above is not routed to either one of the Thermal Oxidizers.

   b. The permittee shall record the throughput, in tons, of resin processed each month.

6. **Specific Reporting Requirements:**
   See Section E, **Specific Recordkeeping Requirements** 6.b.

7. **Specific Control Equipment Operating Conditions:**
   See Section E
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Bulk Powder Handling System

(SEU 132) Isophthalic Acid (IPA) Bulk Powder Handling System

Description: Storage silo, 2 x blowers, 4 x cyclones, pneumatic lines
Construction Date: 2005

Control: (132) 111A Baghouse
Manufacturer: Chicago Conveyor Corp.
Model: 440R-28-45
Description: Bin vent baghouse w/ rev. nitrogen pulse-jet
Control Efficiency: 95% (Assumed)
Date constructed: 2005

(SEU 133) Bagged Powder Handling System

Description: Supersack charging station, 2 x blowers, 3 x cyclones, pneumatic lines
Fumaric Acid, Terephthalic Acid, Tetrahydrophthalic Anhydride, Phthalic Anhydride, and Adipic Acid
Construction Date: 2005

Control: (133) 211C Cartridge Filter
Manufacturer: Chicago Conveyor Corp.
Model: 440-36-50
Description: Cartridge housing w/ rev. nitrogen pulse-jet
Control Efficiency: 95% (Assumed)
Date constructed: 2005

(SEU 135) Bulk Bag Powder Handling System

Description: Flexicon Supersack charging station, blower, pneumatic lines;
Talc, Aluminum Trihydrate
Construction Date: 2014

Control: (135) Flexicon Filter Receiver
Model: FRCT-C48W-X
Description: 2 stage filtering system-primary 26 PTFE membrane filter cartridges & secondary 1 polyester filter cartridge with reverse air pulse-jet
Control Efficiency: 99.9%
Date constructed: 2014

(SEU 62) Fumed Silica Weigh Tank

Description: Capacity: 2700 gallons (working capacity)
Construction Date: 2017
(SEU 66) Adipic Weigh System

Description:
Two (2) Weigh Tanks
Construction Date: 2017

Control:
Adipic Baghouse
Control Efficiency: 99.9%
Construction Date: 2017

APPLICABLE REGULATIONS:
401 KAR 50:055, General compliance requirements.

1. Operating Limitations:
PM emissions from SEU 132, 133, 135 and 66 shall vent to the 111A Baghouse, 211C Cartridge Filter, Flexicon Filter Receiver, and Adipic Baghouse respectively. Controls shall be operating at all times that PM emissions are routed to them [401 KAR 50:055, Section 2(5)].

Compliance Demonstration Method:
See subsections 3 through 6 Testing, Specific Monitoring, Specific Recordkeeping, and Specific Reporting Requirements.

2. Emission Limitations:
a. 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 1000 lbs/hr shall not exceed 2.34 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:

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

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

b. 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:
(1) Mass Emission Standard:
The source is considered to be in compliance when the 111A Baghouse, 211C Cartridge Filter, Flexicon Filter Receiver, Adipic Baghouse and weigh tanks are operating and properly maintained according to manufacturer’s specification.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) Opacity Limits:
   See 4. Monitoring Requirements for opacity compliance demonstration.

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 perform a qualitative visual observation of the opacity of emissions at each stack no less than weekly while the affected facility is operating. If visible emissions from the stacks are observed (not including condensed water in the plume), the permittee shall determine the opacity using Reference Method 9. In lieu of determining the opacity using U.S. EPA Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume).

5. Specific Recordkeeping Requirements:
   a. The permittee shall record the occurrence, date, time, duration, cause, point of release, and any corrective action taken for each incident when PM emissions from SEU 132, 133, 135 or 66 are not routed to the 111A Baghouse, 211C Cartridge Filter, Flexicon Filter Receiver and Adipic Baghouse, respectively.
   b. The permittee shall record the following parameters:
      (1) Total weight of powdered material throughput, in tons, from each unit each month;
      (2) Total weight of powdered material throughput, both bulk bags and smaller bags, in tons, charged into kettle and blend tank manways;
   c. 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:
   Each incident when PM emissions from SEU 132, 133, 135 or 66 are not routed to the 111A Baghouse, 211C Cartridge Filter, Flexicon Filter Receiver or Adipic Baghouse respectively, shall be reported to the Division for Air Quality’s Florence office in accordance with Section F.7. of this permit.

7. Specific Control Equipment Operating Conditions:
   a. Operate the 111A Baghouse, 211C Cartridge Filter, Flexicon Filter Receiver and Adipic Baghouse in accordance with the manufacturer’s instructions.
   b. Maintain a copy of the manufacturer’s instructions for each filter on site at all times.

8. Alternate Operating Scenarios:
   IPA bulk bags are charged into kettle manways when bulk powder is not available for the Silo Bulk Powder Handling System. All powders, including IPA, can be charged through kettle and blend tank manways.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Pipeline Fugitives

(--) Pipeline Fugitive Emissions

**Description:** 1663 valves, 58 pump seals, 11,092 connectors
Total Equipment Count: 12,813

**APPLICABLE REGULATION:**
401 KAR 50:012, General application

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

1. **Operating Limitations:**
The permittee shall provide the utmost care and consideration, in the handling of hazardous matter or toxic substances, to the potentially harmful effects of the emissions resulting from such activities [401 KAR 63:020, Section 3].

**Compliance Demonstration Method:**
a. Compliance with 401 KAR 50:012 and 63:020 will be demonstrated as follows in Compliance Demonstration Method 1.b. through 1.s., by the Testing, Monitoring, Recordkeeping, and Reporting Requirements that follow, and Section D.

Pumps – Light Liquid Service
(Excluding Resin Pumps. See Compliance Demonstration Method 1.s.-t. of this section for special Resin Pump requirements)
b. Each pump in light liquid service shall be checked by visual inspection each calendar month for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected.

c. (1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Compliance Demonstration Method 1.o. – 1.r. of this section.
   (2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

Open-ended Valves or Lines
d. (1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve.
   (2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.

e. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

f. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with Compliance Demonstration Method 1.d. of this section at all other times.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

g. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of Compliance Demonstration Method 1.d., 1.e., and 1.f. of this section.

h. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in Compliance Demonstration Method 1.d., 1.e., and 1.f. of this section are exempt from the requirements of those paragraphs.

Valves – Light Liquid Service

i. Each valve shall be checked by visual, audible, and olfactory inspection once each calendar quarter for indications of leaks from the valve. A leak is detected if there are indications of leaking from the valve.

j. (1) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Compliance Demonstration Method 1.o. – 1.r. of this section.
   (2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

k. First attempts at repair include, but are not limited to, the following best practices where practicable:
   (1) Tightening of bonnet bolts;
   (2) Replacement of bonnet bolts;
   (3) Tightening of packing gland nuts;
   (4) Injection of lubricant into lubricated packing.

Pumps & Valves – Heavy Liquid Service, and Connectors

l. Each pump, valve, and connector shall be checked by visual, audible, and olfactory inspection once each calendar quarter for indications of leaks. If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, the owner or operator shall eliminate the visual, audible, olfactory, or other indication of a potential leak.

m. (1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Compliance Demonstration Method 1.o. – 1.r. of this section.
   (2) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

n. First attempts at repair include, but are not limited to, the best practices described under Compliance Demonstration Method 1.k. of this section.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Delay of Repair

o. Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

p. Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.

q. Delay of repair for valves will be allowed if:
   (1) The owner or operator demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
   (2) When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with Section D.

r. Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

Resin Pumps

s. Each Resin Pump shall be checked by visual inspection each calendar month for indications of abnormal leaks.

t. (1) When an abnormal leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Compliance Demonstration Method 1.o. – 1.r. of this section, above.
   (2) A first attempt at repair shall be made no later than 5 calendar days after each abnormal leak is detected.

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

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

b. The owner or operator shall inspect each piece of equipment unless he demonstrates that a process unit is not in VOC service, i.e., that the VOC content would never be reasonably expected to exceed 10 percent by weight. For purposes of this demonstration, the following methods and procedures shall be used:

(1) Procedures that conform to the general methods in ASTM E260–73, 91, or 96, E168–67, 77, or 92, E169–63, 77, or 93 shall be used to determine the percent VOC content in the process fluid that is contained in or contacts a piece of equipment.

(2) Organic compounds that are considered by the Division to have negligible photochemical reactivity may be excluded from the total quantity of organic compounds in determining the VOC content of the process fluid.

(3) Engineering judgment may be used to estimate the VOC content, if a piece of equipment had not been shown previously to be in service. If the Division disagrees with the judgment, subparagraphs 3.b.(1) and (2) of this section shall be used to resolve the disagreement.

c. The owner or operator shall demonstrate that an equipment is in light liquid service by showing that all the following conditions apply:

(1) The vapor pressure of one or more of the components is greater than 0.3 kPa at 20 °C (1.2 in. H₂O at 68 °F). Standard reference texts or ASTM D2879–83, 96, or 97 shall be used to determine the vapor pressures.

(2) The total concentration of the pure components having a vapor pressure greater than 0.3 kPa at 20 °C (1.2 in. H₂O at 68 °F) is equal to or greater than 20 percent by weight.

(3) The fluid is a liquid at operating conditions.

d. Samples used in conjunction with paragraphs 3.b. and 3.c. of this section shall be representative of the process fluid that is contained in or contacts the equipment.

4. Specific Monitoring Requirements:
The Specific Monitoring Requirements are included above in subsection 1. Operating Limitations, Compliance Demonstration Method.

5. Specific Recordkeeping Requirements:
a. When each leak is detected as specified in subsection 1. Operating Limitations, Compliance Demonstration Method, the following requirements apply:

(1) A weatherproof and readily visible identification, shall be attached to the leaking equipment.

(2) The identification on equipment, may be removed after it has been repaired.

b. When each leak is detected as specified in subsection 1. Operating Limitations, Compliance Demonstration Method, the following information shall be recorded in a log:

(1) The component type, process unit, and general location of the leaking component.

(2) The date the leak was detected and the dates of each attempt to repair the leak.

(3) Repair methods applied in each attempt to repair the leak.

(4) “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(5) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown.
(6) The expected date of successful repair of the leak if a leak is not repaired within 15 days.
(7) Dates of process unit shutdowns that occur while the equipment is unrepaired.
(8) The date of successful repair of the leak.

c. Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location.

6. **Specific Reporting Requirements:**
   a. All semiannual reports (See Section F.5. and F.6. of this permit) to the Division shall include the following information, summarized from the information in the **Specific Recordkeeping Requirements:**
   i. Process unit identification.
   (2) For each quarter during the semiannual reporting period,
      i. Number of valves for which leaks were detected as described in **Compliance Demonstration Method 1.i.,**
      ii. Number of valves for which leaks were not repaired as required in **Compliance Demonstration Method 1.j.(1),**
      iii. Number of pumps for which leaks were detected as described in **Compliance Demonstration Method 1.b.,**
      iv. Number of pumps for which leaks were not repaired as required in **Compliance Demonstration Method 1.c.(1),** and
      v. The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.
   (3) Dates of process unit shutdowns which occurred within the semiannual reporting period.
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Heat Exchangers

(SEU 9) Cleaver-Brooks Fire-Tube Boiler
Description: Rating: 20.92 mmBtu/hr
Fuel: Natural Gas – primary, Propane – auxiliary
Constructed: 1972

(SEU 103) Primary John Zink Thermal Oxidizer
Description: Equipped with waste-heat boiler (See SEU 102 in Insignificant Activities)
Rating: 30.0 mmBtu/hr
Fuel: Natural Gas – primary, Propane – auxiliary
Constructed: 1997

(SEU 61) Heatec Oil Heater
Description: Rating: 20.0 mmBtu/hr
Fuel: Natural Gas
Construction Date: 2017

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

401 KAR 60:005 Section 2(2)(d), 40 C.F.R. 60.40c through 60.48c (Subpart Dc), Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units applies to the Primary John Zink Thermal Oxidizer (SEU 103) and the Oil Heater (SEU 61).

1. Operating Limitations:
The usage rates of materials used in all affected facilities shall be limited so as not to exceed the emission limitations in Section B.2.

2. Emission Limitations:
a. Particulate matter emissions shall not exceed the limits specified below for each boiler [401 KAR 59:015, Section 4 (1)(c)].

<table>
<thead>
<tr>
<th>Heat Exchanger</th>
<th>Emission Limit (lb/mmBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cleaver-Brooks Boiler (SEU 9)</td>
<td>0.43</td>
</tr>
<tr>
<td>Primary J.Z. Thermal Oxidizer (SEU 103)</td>
<td>0.35</td>
</tr>
<tr>
<td>Oil Heater (SEU 61)</td>
<td>0.35</td>
</tr>
</tbody>
</table>

b. Sulfur dioxide emissions shall not exceed the limits specified below for each boiler [401 KAR 59:015, Section 5 (1)(c)].

<table>
<thead>
<tr>
<th>Boiler</th>
<th>Emission Limit (lb/mmBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cleaver-Brooks Boiler (SEU 9)</td>
<td>1.96</td>
</tr>
<tr>
<td>Primary J.Z. Thermal Oxidizer (SEU 103)</td>
<td>1.39</td>
</tr>
<tr>
<td>Oil Heater (SEU 61)</td>
<td>1.34</td>
</tr>
</tbody>
</table>
c. The opacity of visible emissions shall not exceed 20 percent [401 KAR 59:015, Section 4 (2)].

**Compliance Demonstration Method:**

**Mass Emission Limits:**
The heat exchangers shall be deemed in compliance with the applicable mass emission standards (lb/mmBtu) for particulate matter and sulfur dioxide while natural gas or LPG is the only fuel used.

**Opacity Limit:**
The heat exchangers shall be deemed in compliance with the applicable visible emission standard while natural gas or LPG is the only fuel used.

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:**
See Subsection 5. **Specific Recordkeeping Requirements.**

5. **Specific Recordkeeping Requirements:**
The permittee shall record and maintain records of the amount of natural gas combusted during each day pursuant to 40 CFR 60.48c(g)(1) or each month pursuant to 40 CFR 60.48c(g)(2) or (3).

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

(SEU 138) Natural Gas Fired Emergency Spark Ignition (SI) Reciprocating Internal Combustion Engine (RICE)

Description:
Rated Capacity: 125 kW; 190.2 bhp; 1800 rpm
Fuel: Natural Gas
Displacements: 6.8 L (6767cc) / 10 cylinder
Model year: 2016
Construction commenced: February 20, 2017

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)(eee), 40 C.F.R. 60.4230 to 60.4248, Tables 1 to 4 (Subpart JJJJ), Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

1. Operating Limitations:
   a. The permittee shall install a non-resettable hour meter upon startup of your emergency engine [40 CFR 60.4237(c)].

   b. Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieves the emission standards as required in 40 CFR 60.4233 over the entire life of the engine [40 CFR 60.4234].

   c. The permittee must operate the emergency stationary ICE according to the requirements in paragraphs (d)(1) through (3) of 40 CFR 60.4243. In order for the engine to be considered an emergency stationary ICE under 40 CFR 60 Subpart JJJJ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (d)(1) through (3) of 40 CFR 60.4243, is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs (d)(1) through (3) of 40 CFR 60.4243, the engine will not be considered an emergency engine under 40 CFR 60 Subpart JJJJ and must meet all requirements for non-emergency engines [40 CFR 60.4243(d)].
      (1) There is no time limit on the use of emergency stationary ICE in emergency situations [40 CFR 60.4243(d)(1)].
      (2) The permittee may operate your emergency stationary ICE for the purpose specified in paragraph (d)(2)(i) of 40 CFR 60.4243 for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (d)(3) of 40 CFR 60.4243 counts as part of the 100 hours per calendar year allowed by this paragraph [40 CFR 60.4243(d)(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 60.4243(d)(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 (d)(2) of 40 CFR 60.4243. Except as provided in paragraph (d)(3)(i) of 40 CFR 60.4243, the 50 hours per 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 60.4243(d)(3)].

d. If the SI ICE engine is equipped with an air-to-fuel ratio controller (AFR), then the AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times [40 CFR 60.4243 (g)].

2. Emission Limitations:
   a. The permittee shall comply with the emission standards in Table 1 to subpart JJJJ of Part 60 for the stationary emergency engine [40 CFR 60.4233(e)].

Table 1 to Subpart JJJJ of Part 60 - Emission Standards for Stationary Emergency Engines

<table>
<thead>
<tr>
<th>Engine type and fuel</th>
<th>Maximum engine power</th>
<th>Manufacture date</th>
<th>Emission standards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Emergency</td>
<td></td>
<td>NOx   CO   VOCd   NOx   CO   VOCd</td>
</tr>
<tr>
<td></td>
<td>HP≥130</td>
<td></td>
<td>2.0    4.0    1.0    160    540    86</td>
</tr>
</tbody>
</table>

Owners and operators of stationary non-certified SI engines may choose to comply with the emission standards in units of either g/HP-hr or ppmvd at 15 percent O2.

For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

Compliance Demonstration Method:
The permittee shall demonstrate compliance by purchasing an engine certified according to procedures specified in 40 CFR 60, Subpart JJJJ, and operating and maintaining the engines and control devices according to the manufacturer’s emission-related written instructions, and keeping records of conducted maintenance [40 CFR 60.4243(b)(1) and (a)(1)].
SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

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 hours of operation of the emergency generator through the use of the non-resettable hour meter.

5. **Specific Recordkeeping Requirements:**
   a. Pursuant to 40 CFR 60.4245(a), owners and operators of all stationary SI ICE must keep records of the information in paragraphs (a)(1) through (4) of 40 CFR 60.4245:
      (1) All notifications submitted to comply with this subpart and all documentation supporting any notification.
      (2) Maintenance conducted on the engine.
      (3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts, 1048, 1054, and 1060, as applicable.
      (4) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), documentation that the engine meets the emission standards.
   
   b. The owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation [40 CFR 60.4245(b)].

   c. The permittee shall keep records of the amount of fuel used on a monthly basis.

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

<table>
<thead>
<tr>
<th>Description</th>
<th>Generally Applicable Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Raw Material Storage Tanks</strong></td>
<td></td>
</tr>
<tr>
<td><em>(SEU 130) AST - 917 (Liquid Nitrogen)</em></td>
<td>None.</td>
</tr>
<tr>
<td>13,000 gal., Constructed 2014, Vert. Fixed Roof</td>
<td></td>
</tr>
<tr>
<td><em>(ASME Pressure tank – no emissions)</em></td>
<td></td>
</tr>
<tr>
<td><em>(SEU 131) AST - 905 (Liquid Propane)</em></td>
<td>None.</td>
</tr>
<tr>
<td>30,000 gal., Constructed 1996, Horz. Fixed Roof</td>
<td></td>
</tr>
<tr>
<td><em>(ASME Pressure tank – no emissions)</em></td>
<td></td>
</tr>
<tr>
<td><strong>Miscellaneous Units</strong></td>
<td></td>
</tr>
<tr>
<td><em>(SEU 42) QC/Production Lab Hood</em></td>
<td>401 KAR 50:012 &amp; 401 KAR 63:020</td>
</tr>
<tr>
<td><em>(SEU 54) Maintenance Bldg. Exhaust Fan</em></td>
<td>None.</td>
</tr>
<tr>
<td><em>(SEU 56) Production Bldg. 3 Roof Exhaust</em></td>
<td>401 KAR 50:012 &amp; 401 KAR 63:020</td>
</tr>
<tr>
<td><em>(SEU 102) Hot Oil Heater</em></td>
<td>401 KAR 50:012 &amp; 401 KAR 63:020</td>
</tr>
<tr>
<td><em>(SEU 123) R &amp; D Lab Hood #1</em></td>
<td>401 KAR 50:012 &amp; 401 KAR 63:020</td>
</tr>
<tr>
<td><em>(SEU 124) Two (2) Cooling Towers</em></td>
<td>401 KAR 59:010</td>
</tr>
<tr>
<td><em>(SEU 125) Hazardous Material Storage Area</em></td>
<td>401 KAR 50:012 &amp; 401 KAR 63:020</td>
</tr>
<tr>
<td><em>(SEU 126) Storm Water Pit</em></td>
<td>None.</td>
</tr>
<tr>
<td><em>(SEU 127) R &amp; D Sink Fabrication Area</em></td>
<td>401 KAR 59:010</td>
</tr>
<tr>
<td><em>(SEU 128) R &amp; D Pilot Lab Area</em></td>
<td>401 KAR 59:010</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>(SEU 129) R &amp; D Lab Hood #2</td>
<td>401 KAR 50:012 &amp; 401 KAR 63:020</td>
</tr>
<tr>
<td>(SEU 141) R &amp; D Reactor (5-gal)</td>
<td>401 KAR 63:020</td>
</tr>
<tr>
<td>(SEU 142) R &amp; D Emulsion Mixer</td>
<td>401 KAR 63:020</td>
</tr>
</tbody>
</table>
SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

2. 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. **Source-wide Emission Limitations:**
   a. Source-wide emissions of VOC shall be reduced so that controlled and uncontrolled emissions (combined) are no more than 10% of pre-control source-wide VOC emissions [401 KAR 50:012, Section 1(1)(a)2.].
   b. The total annual source-wide emissions shall not exceed the following limitations on a twelve (12) month rolling total: [401 KAR 52:030, Section 1]
      (1) Volatile Organic Compound (VOC) emissions shall not exceed 90 tons per year.
      (2) Emissions of any single Hazardous Air Pollutant (HAP) shall not exceed 9.0 tons per year.
      (3) Emissions of combined Hazardous Air Pollutants (HAP’s) shall not exceed 22.5 tons per year.

   **Compliance Demonstration Method:**
   a. Calculate annual source-wide emissions for each month of the previous 12-month period (i.e.: for the month of January, the compliance demonstration shall be completed in February and shall include all data from February of the previous year to the last day of January). The monthly compliance demonstration shall include a comparison of pre-control and combined controlled and uncontrolled VOC emissions, and the monthly and 12-month rolling VOC, individual HAP, and combined HAP emissions from the following operations:
      (1) All Process and Thinning Kettle operations.
      (2) All Blending Operations.
      (3) All Packaging Process operations.
      (4) All Resin (Product) Storage Tank operations.
      (5) All Raw Material Storage Tanks
      (6) All Hot Boxes.
      (7) All Pipeline Fugitives.
      (8) All Heat Exchangers.
      (9) All Emergency Engines
      (10) All Insignificant Activities.

4. **Source Recordkeeping Requirements:**
   The permittee shall retain a record of each source-wide monthly compliance demonstration completed in accordance with **Compliance Demonstration Method 3.a.**
5. **Source Reporting Requirements:**
   The permittee shall submit a report of the following information to the Division for Air Quality’s Florence office in accordance with Section F.5. and F.6. of this permit:
   a. A summary report containing a copy of all monthly source-wide compliance demonstration records during the previous reporting period.
   b. Identification of any deviations from source-wide permit requirements that occurred during the reporting period.
SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

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

2. Operating Limitations:
   a. VOC’s and/or HAP’s emitted from the equipment specified in Section B of the permit must be routed to one of the Thermal Oxidizers described below (SEU 103 or 26). The Thermal Oxidizer receiving the VOC’s and/or HAP’s shall be operating at all times that the emissions are routed to it [401 KAR 50:012, Section 1(1); 401 KAR 52:030, Section 1; and 401 KAR 63:020, Section 3].
      Primary Control: (SEU 103) Primary Thermal Oxidizer
         Manufacturer: John Zink
         Model: SO# 901078
         Description: Single chamber, 30 mmBtu/hr, incorporating waste heat boiler (See SEU 102 in Insignificant Activities)
         Fuel: Natural Gas – primary, Propane – auxiliary
         Date constructed: 1996
      Back-up Control: (SEU 26) Back-up Thermal Oxidizer
         Manufacturer: John Zink
         Model: SO# X43231
         Description: Single chamber, 2 mmBtu/hr
         Fuel: Natural Gas – primary, Propane – auxiliary
         Date constructed: 1980
   b. Each Thermal Oxidizer (SEU 103 and 26) shall have a destruction efficiency of at least 97.94% [401 KAR 50:012, Section 1(1)(a)2.; 401 KAR 52:030, Section 1].
   c. The permittee shall maintain the 3-hour average combustion temperature limit established during the most recent performance test (see Testing Requirement 3.c.), in the Thermal Oxidizers (SEU 103 and 26).

Compliance Demonstration Method: See the Testing, Monitoring, Recordkeeping, and Reporting Requirements, below.

3. Testing Requirements:
   a. Pursuant to Regulations 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in Regulation 401 KAR 50:015 shall be conducted as required by the Division.
SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

b. The permittee shall conduct a Method 25 or 25A performance test, as applicable, for each of the Thermal Oxidizers (SEU 103 and 26) every five years as outlined in Appendix A to 40 CFR Part 60 to verify the overall reduction efficiency of VOC’s. This testing requirement is also applicable to the reconstruction or modification of any component of the Thermal Oxidizers (SEU 103 and 26), or construction, reconstruction, or modification of any component venting to them that may affect the reduction efficiency of VOC’s and potentially hazardous matter or toxic substances [401 KAR 50:045 Section 1].

c. The permittee shall use the data collected during the performance test to calculate and record the 3-hour average combustion temperature of each Thermal Oxidizer (SEU 103 and 26). This combustion temperature shall be the minimum operating temperature for the Thermal Oxidizers (SEU 103 and 26) [See Operating Limitation 2.c.].

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

4. Specific Monitoring Requirements:

a. The permittee shall utilize a temperature measurement device according to the manufacturer’s specifications for monitoring the combustion temperature of the Thermal Oxidizers (SEU 103 and 26). Each device shall have an accuracy of the greater of 0.75% of the temperature being measured expressed in °C (or °F) or +/- 2.5 °C (or Fahrenheit equivalent). Temperature measurement devices shall be calibrated or replaced at least annually.

b. The temperature measurement devices shall be equipped with a continuous recording device (strip chart recorder or digital data acquisition system or equivalent).

c. The Thermal Oxidizers (SEU 103 and 26) shall be set to operate under conditions of excess air (greater than stoichiometric ratio) at all times the unit is in operation.

d. The Thermal Oxidizers (SEU 103 and 26) shall be equipped with a feedback loop control system controlling the feed rate of natural gas and combustion air to the afterburner. The control system shall be designed to maintain the required minimum temperature in the fume afterburner firebox by controlling natural gas flow in sufficient amounts, while ensuring combustion air is available in excess amounts.

e. The Thermal Oxidizers (SEU 103 and 26) shall be equipped with a monitoring device that will be activated whenever the afterburner firebox temperature drops 50°F below the 3-hour average combustion temperature limit established during the most recent performance test. The device shall deliver an audio and/or visual signal indicating that the afterburner firebox temperature dropped 50°F below the 3-hour average combustion temperature limit established during the most recent performance test.

5. Specific Recordkeeping Requirements:

a. The permittee shall keep continuous records of the temperature in the firebox of the Thermal Oxidizers (SEU 103 and 26) at all times during which VOC and/or HAP’s is vented to them.
b. The permittee shall maintain a record of the occurrence of all upset conditions of the Thermal Oxidizers (SEU 103 and 26). An upset condition is one during which the following three conditions are met:
   (1) Any of the equipment specified in Section B of the permit to vent to the Thermal Oxidizers (SEU 103 and 26) is releasing VOC’s or HAP’s;
   (2) The temperature in the Thermal Oxidizers (SEU 103 and 26) drops 50°F below the 3-hour average combustion temperature limit established during the most recent performance test; and
   (3) The temperature stays 50°F below the 3-hour average combustion temperature limit established during the most recent performance test, for a period of 30 minutes or more.

c. For all upset conditions described above, the permittee shall also keep a log of the following information:
   (1) The phase of operation of each Process Kettle and/or each Thinning Kettle during the event.
   (2) The duration of the event, i.e., the total time period for which the temperature was 50°F below the 3-hour average combustion temperature limit established during the most recent performance test.
   (3) The probable cause of the temperature drop.
   (4) Corrective action taken to elevate the thermal oxidizer firebox temperature back to the 3-hour average combustion temperature limit established during the most recent performance test.

d. The permittee shall maintain records of any unplanned shutdowns of the thermal oxidizers.

e. The permittee shall maintain records of all non-routine maintenance and repair activities conducted on the thermal oxidizers and the associated monitoring devices and recorders.

6. **Specific Reporting Requirements:**
   a. Upset conditions, as defined in **Specific Recordkeeping Requirement 5.b.**, shall be reported to the Division for Air Quality’s Florence office in accordance with Section F.7. of this permit.

   b. Periods when any of the equipment specified in Section B that vent to the Thermal Oxidizers (SEU 103 and 26) are releasing VOC’s or HAP’s, but the Thermal Oxidizers are not working properly (i.e.: in accordance with manufacturer’s specifications) shall be reported to the Division for Air Quality’s Florence office in accordance with Section F.7. of this permit.
SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b-IV-1 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030 Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place (as defined in this permit), and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five (5) years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:030, Section 3(1)(f)1a, and Section 1a-7 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

3. In accordance with the requirements of 401 KAR 52:030, Section 3(1)f, the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
   a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
   b. To access and copy any records required by the permit;
   c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

   Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

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

5. Summary reports of any monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Sections 1b-V-1 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].
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 52:030, Section 22. 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 Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26 shall be defined as follows:
   a. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
   b. For emissions of any regulated air pollutant, excluding those listed in F.8.a., that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
   c. All deviations from permit requirements, including those previously reported, shall be included in the semiannual report required by F.6.

9. Pursuant to 401 KAR 52:030, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit in accordance with the following requirements:
   a. Identification of each term or condition;
   b. Compliance status of each term or condition of the permit;
   c. Whether compliance was continuous or intermittent;
   d. The method used for determining the compliance status for the source, currently and over the reporting period.
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 Division for Air Quality, Florence Regional Office, 8020 Veterans Memorial Dr., Suite 110, Florence, KY 41042.

10. In accordance with 401KAR 52:030, Section 3(1)(d), the permittee shall provide the Division with all information necessary to determine its subject emissions within 30 days of the date the Kentucky Emissions Inventory System (KYEIS) emissions survey is mailed to the permittee. If a KYEIS emissions survey is not mailed to the permittee, then the permittee shall comply with all other emissions reporting requirements in this permit.

11. The Cabinet may authorize the temporary use of an emission unit to replace a similar unit that is taken off-line for maintenance, if the following conditions are met:
   a. The owner or operator shall submit to the Cabinet, at least ten (10) days in advance of replacing a unit, the appropriate Forms DEP7007AI to DD that show:
      (1) The size and location of both the original and replacement units; and
      (2) Any resulting change in emissions;
   b. The potential to emit (PTE) of the replacement unit shall not exceed that of the original unit by more than twenty-five (25) percent of a major source threshold, and the emissions from the unit shall not cause the source to exceed the emissions allowable under the permit;
   c. The PTE of the replacement unit or the resulting PTE of the source shall not subject the source to a new applicable requirement;
   d. The replacement unit shall comply with all applicable requirements; and
   e. The source shall notify Regional office of all shutdowns and start-ups.
   f. Within six (6) months after installing the replacement unit, the owner or operator shall:
      (1) Re-install the original unit and remove or dismantle the replacement unit; or
      (2) Submit an application to permit the replacement unit as a permanent change.
SECTION G - GENERAL PROVISIONS

1. General Compliance Requirements

   a. The permittee shall comply with all conditions of this permit. A noncompliance shall be a violation of 401 KAR 52:030, Section 3(1)(b), and a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to the termination, revocation and reissuance, revision, or denial of a permit [Section 1a-2 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

   b. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a-5 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

   c. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:030, Section 18. The permit will be reopened for cause and revised accordingly under the following circumstances:

      (1) If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:030, Section 12;

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

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

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

   d. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Sections 1a- 6 and 7 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

   e. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:030, Section 3(1)(c)].
SECTION G - GENERAL PROVISIONS (CONTINUED)

f. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:030, Section 7(1)].

g. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

h. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

i. All emission limitations and standards contained in this permit shall be enforceable as a practical matter. All emission limitations and standards contained in this permit are enforceable by the U.S. EPA and citizens except for those specifically identified in this permit as state-origin requirements. [Section 1a-12 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

j. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a-9 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

k. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:030, Section 11(3)].

l. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].

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

n. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry.

o. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders.
SECTION G - GENERAL PROVISIONS (CONTINUED)

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

q. Pursuant to 401 KAR 52:030, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
   (1) Applicable requirements that are included and specifically identified in this permit; and
   (2) Non-applicable requirements expressly identified in this permit.

2. Permit Expiration and Reapplication Requirements

a. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six (6) months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:030, Section 12].

b. The authority to operate granted through this permit shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:030, Section 8(2)].

3. Permit Revisions

a. Minor permit revision procedures specified in 401 KAR 52:030, Section 14(3), may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the State Implementation Plan (SIP) or in applicable requirements and meet the relevant requirements of 401 KAR 52:030, Section 14(2).

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

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

No construction authorized by this permit (F-22-022).
SECTION G - GENERAL PROVISIONS (CONTINUED)

5. Testing Requirements

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

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

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

6. Acid Rain Program Requirements

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.


a. Pursuant to 401 KAR 52:030, Section 23(1), an emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
   (1) An emergency occurred and the permittee can identify the cause of the emergency;
SECTION G - GENERAL PROVISIONS (CONTINUED)

(2) The permitted facility was at the time being properly operated;
(3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
(4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken.
(5) Notification of the Division does not relieve the source of any other local, state or federal notification requirements.

b. Emergency conditions listed in General Provision G.7.a above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:030, Section 23(3)].

c. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:030, Section 23(2)].

8. Ozone depleting substances

a. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
   (1) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
   (2) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
   (3) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
   (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.165.
   (5) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
   (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

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