
IMAGE


1831


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RENAPP


215


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RTP Company
580 East Front Street
PO Box 5439
Winona, Minnesota
55987-0439 USA

Telephone (507) 454-6900
Fax (507) 454-4629
Internet www.rtpcompany.com

December 15, 2023

Division for Air Quality
Permit Support Section
300 Sower Blvd., Second Floor
Frankfort, KY 40601

RE: Permit Renewal – Permit F-19-001-R2
RTP Company
AI ID # 1831
Henderson, Kentucky

Permit Reviewer,

RTP is submitting a permit renewal application for the existing, FESOP for the Henderson, Kentucky facility. There has been a removal of the Schick Loading Hopper (001-14). There are currently three Finished Product Load Stations. Enclosed, please find the required forms and supporting documentation demonstrating compliance with Division for Air Quality regulations.

Should you have any questions concerning this application, please contact me.

Sincerely,

Andrew Grigg
Environmental Specialist
RTP Company
580 East Front Street
Winona, MN 55987
Direct # 507-474-5438
Cell # 507-470-6215
agrigg@rtpcompany.com

SOURCES OF EMISSION FACTORS

MONSANTO

G.E. PLASTICS

SHELL CHEMICAL CO

ALLIED-SIGNAL, INC.

QUANTUM CHEMICAL CO.

LEXMARK-IBM

SOCIETY Of The PLASTICS INDUSTRY

Hoff, A.; Jacobsson, S.; Pfaffli, P.; Zitting, A.; Frostling, H.: Degradation Products of Plastics. Scand. J. Work Envir. Health, (1982) suppl 2, 60

Barlow, A; Contos, D; Holdren, W; Garrison, P; Harris, L; Janke, B: Development of Emission Factors for Polyethylene Processing. Journal of the Air & Waste Management Association, June 1996, Volume 46, pp 569-580.

In-Plant Source Testing; Caprolactum Emissions from Nylon Processing.
Formaldehyde/Acrolein Emissions from Polypropylene

Emission Inventory Improvement Program, Volume II, Chapter 14, Page 14.A-29

MWM dba RTP Company
Line 5, Formerly K01
ESTIMATED PTE EMISSIONS

Product :

Air Pollutant	KYEIS#	%	Production Lbs	E-Factor per lb produced	Est. Emissions Lbs/hr.	Capture Efficiency 0.95	Control Efficiency TORIT 0.9999	Control Efficiency Baghouse 0.999	Estimated Net Emissions Lbs	Estimated PTE Emissions Tons
Carbon Black		0.41	4000							
Carbon Black	001-08			0.01	16.4	15.58	15.56442	0.81918	0.0164	71.832
Carbon Black	001-10				16.4	15.58	15.56442	0.81918	0.0164	71.832
Resins		0.59	4000							
Particulates	001-08			0.0004	0.944	0.8968	0.8959032	0.0471528	0.000944	4.13472
Particulates	001-10			0.0004	0.944	0.8968	0.8959032	0.0471528	0.000944	4.13472
Black Plastic Resin		100%	4000	0.0104	17.344	16.4768	16.4603232	0.8663328	0.017344	75.96672
VOC's	001-11			0.00011	0.44120				0.44120	1.93246
Formaldahyde	001-11			3.611E-07	1.444E-03				1.444E-03	6 327E-03
Acrolein	001-11			9.603E-09	3.841E-05				3.841E-05	1.683E-04
Propionaldehyde	001-11			7.276E-09	2.910E-05				2.910E-05	1.275E-04
MEK	001-11			5.882E-08	2.353E-04				2.353E-04	1.031E-03
Acrylic Acid	001-11			1.128E-08	4.513E-05				4.513E-05	1.977E-04
Acetaldehyde	001-11			6.386E-05	2.554E-01				2.554E-01	1.119E+00
Xylene	001-11			7.166E-08	2.866E-04				2.866E-04	1.255E-03
Methylene Chloride	001-11			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Phenol	001-11			7.166E-08	2.866E-04				2.866E-04	1.255E-03
Phthalic Anhydride	001-11			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Biphenyl	001-11			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Benzene	001-11			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Styrene Dimer Isomers	001-11			1.185E-06	4.740E-03				4.740E-03	2.076E-02
Toluene	001-11			7.166E-08	2.866E-04				2.866E-04	1.255E-03
Styrene	001-11			7.359E-06	2.944E-02				2.944E-02	1.289E-01
Ethylbenzene	001-11			2.307E-07	9.227E-04				9.227E-04	4.042E-03
Acrylonitrile	001-11			1.325E-07	5.301E-04				5.301E-04	2.322E-03
Caprolactum	001-11			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Other HAPS	001-11			1.325E-07	5.301E-04				5.301E-04	2.322E-03
Total HAPS				**0.0000736**	**0.2942442**				**0.2942442**	**1.2887895**

MWM dba RTP Company
K-02
ESTIMATED PTE EMISSIONS

Product :

Air Pollutant	KYEIS#	%	Production Lbs	E-Factor per lb produced	Est. Emissions Lbs/hr.	Capture Efficiency 0.95	Control Efficiency TORIT 0.9999	Control Efficiency Baghouse 0.999	Estimated Net Emissions Lbs	Estimated PTE Emissions Tons
Carbon Black		0.34	2000							
Carbon Black	001-04			0.01	6.8	5.1	6.45354	1.6983	0.0068	29.784
Carbon Black	001-06				6.8	6.46	6.45354	0.33966	0.0068	29.784
Resin		0.66	2000							
Particulates	001-04			0.0004	0.528	0.5016	0.5010984	0.0263736	0.000528	2.31264
Particulates	001-06			0.0004	0.528	0.5016	0.5010984	0.0263736	0.000528	2.31264
Black Plastic Resin		100%	2000	0.0104	7.328	5.6016	6.9546384	1.7246736	0.007328	32.09664
VOC's				0.00030	0.60140				0.60140	2.63413
Formaldahyde	001-07			1.495E-08	2.990E-05				2.990E-05	1.310E-04
Acrolein	001-07			2.145E-09	4.291E-06				4.291E-06	1.879E-05
Propionaldehyde	001-07			1.390E-09	2.781E-06				2.781E-06	1.218E-05
MEK	001-07			2.116E-09	4.233E-06				4.233E-06	1.854E-05
Acrylic Acid	001-07			1.148E-09	2.297E-06				2.297E-06	1.006E-05
Acetaldehyde	001-07			1.279E-04	2.558E-01				2.558E-01	1.120E+00
Xylene	001-07			8.043E-08	1.609E-04				1.609E-04	7.046E-04
Methylene Chloride	001-07			3.572E-06	7.143E-03				7.143E-03	3.129E-02
Phenol	001-07			1.130E-06	2.259E-03				2.259E-03	9.896E-03
Phthalic Anhydride	001-07			2.521E-07	5.043E-04				5.043E-04	2.209E-03
Biphenyl	001-07			2.521E-07	5.043E-04				5.043E-04	2.209E-03
Benzene	001-07			2.521E-07	5.043E-04				5.043E-04	2.209E-03
Styrene Dimer Isomers	001-07			1.481E-06	2.962E-03				2.962E-03	1.297E-02
Toluene	001-07			4.202E-07	8.405E-04				8.405E-04	3.681E-03
Styrene	001-07			4.197E-05	8.393E-02				8.393E-02	3.676E-01
Ethylbenzene	001-07			6.156E-06	1.231E-02				1.231E-02	5.393E-02
Acrylonitrile	001-07			9.006E-07	1.801E-03				1.801E-03	7.889E-03
Caprolactum	001-07			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Other HAPS	001-07			1.606E-05	3.212E-02				3.212E-02	1.407E-01
Total HAPS				**0.0002005**	**0.4009083**				**0.4009083**	**1.7559785**

MWM dba RTP Company
K-03
ESTIMATED PTE EMISSIONS

Product :

Air Pollutant	KYEIS#	%	Production Lbs	E-Factor per lb produced	Est. Emissions Lbs/hr.	Capture Efficiency 0.95	Control Efficiency TORIT 0.9999	Control Efficiency Baghouse 0.999	Estimated Net Emissions Lbs	Estimated PTE Emissions Tons
Carbon Black		0.3	1000							
Carbon Black	001-01			0.01	3	2.85	2.84715	0.14985	0.003	13.14
Carbon Black	001-02				3	2.85	2.84715	0.14985	0.003	13.14
Resins		0.7	1000							
Particulates	001-01			0.0004	0.28	0.266	0.265734	0.013986	0.00028	1.2264
Particulates	001-02			0.0004	0.28	0.266	0.265734	0.013986	0.00028	1.2264
Black Plastic Resin		100%	1000	0.0104	3.28	3.116	3.112884	0.163836	0.00328	14.3664
VOC's	001-03			0.00017	0.16600				0.16600	0.72708
Formaldahyde	001-03			6.136E-10	6.136E-07				6.136E-07	2.688E-06
Acrolein	001-03			2.194E-10	2.194E-07				2.194E-07	9.609E-07
Propionaldehyde	001-03			4.990E-10	4.990E-07				4.990E-07	2.186E-06
MEK	001-03			2.017E-10	2.017E-07				2.017E-07	8.832E-07
Acrylic Acid	001-03			3.008E-10	3.008E-07				3.008E-07	1.317E-06
Acetaldehyde	001-03			7.776E-05	7.776E-02				7.776E-02	3.406E-01
Xylene	001-03			7.399E-08	7.399E-05				7.399E-05	3.241E-04
Methylene Chloride	001-03			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Phenol	001-03			7.399E-08	7.399E-05				7.399E-05	3.241E-04
Phthalic Anhydride	001-03			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Biphenyl	001-03			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Benzene	001-03			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Styrene Dimer Isomers	001-03			0.000E+00	0.000E+00				0.000E+00	0.000E+00
Toluene	001-03			1.110E-06	1.110E-03				1.110E-03	4.861E-03
Styrene	001-03			1.900E-05	1.900E-02				1.900E-02	8.322E-02
Ethylbenzene	001-03			2.764E-06	2.764E-03				2.764E-03	1.211E-02
Acrylonitrile	001-03			3.892E-07	3.892E-04				3.892E-04	1.705E-03
Caprolactum	001-03			2.381E-06	2.381E-03				2.381E-03	1.043E-02
Other HAPS	001-03			7.134E-06	7.134E-03				7.134E-03	3.125E-02
Total HAPS				**0.0001107**	**0.1106863**				**0.1106863**	**0.4848061**

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007AI

Administrative Information

___ Section AI.1: Source Information

___ Section AI.2: Applicant Information

___ Section AI.3: Owner Information

___ Section AI.4: Type of Application

___ Section AI.5: Other Required Information

___ Section AI.6: Signature Block

___ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

___ Additional Documentation attached

Source Name: Miller Waste Mills DBA RTP Company

KY EIS (AFS) #: 21- 101-00125

Permit #: F-19-001

Agency Interest (AI) ID: 1831

Date: 12/15/2023

Section AI.1: Source Information

Physical Location Address:	**Street:**	1450 Commonwealth Drive				
	City:	Henderson	**County:**	Henderson	**Zip Code:**	42420
Mailing Address:	**Street or P.O. Box:**	1450 Commonwealth Drive				
	City:	Henderson	**State:**	Henderson	**Zip Code:**	42420

Standard Coordinates for Source Physical Location

Longitude: 37.81536 (decimal degrees) **Latitude:** 87.59008 (decimal degrees)

Primary (NAICS) Category: Plastic Compounding **Primary NAICS #:** 325991

Classification (SIC) Category: Plastic Compounding **Primary SIC #:** 3087

Briefly discuss the type of business conducted at this site: RTP produces color concentrate plastic pellets with extruders from carbon black and various resins.

Description of Area Surrounding Source: ☐ Rural Area ☑ Industrial Park ☐ Residential Area ☐ Urban Area ☑ Industrial Area ☐ Commercial Area

Is any part of the source located on federal land? ☐ Yes ☐ No

Number of Employees: 50

Approximate distance to nearest residence or commercial property: *460 feet*

Property Area: 13 acres

Is this source portable? ☐ Yes ☑ No

What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?

NPDES/KPDES:	☑ Currently Hold	☐ Need	☐ N/A
Solid Waste:	☐ Currently Hold	☐ Need	☑ N/A
RCRA:	☐ Currently Hold	☐ Need	☑ N/A
UST:	☐ Currently Hold	☐ Need	☑ N/A

Type of Regulated Waste Activity:

☐ Mixed Waste Generator ☐ Generator ☐ Recycler ☐ Other: _____

☐ U.S. Importer of Hazardous Waste ☐ Transporter ☐ Treatment/Storage/Disposal Facility ☑ N/A

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DEP7007B

Manufacturing or Processing Operations

___ Section B.1: Process Information
___ Section B.2: Materials and Fuel Information
___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
001-11b	K-01 FCM	K-01 Farrel Continous Mixer	001-11b	Continuous Mixer	FCM	Custom	08/2022	Continuous	N/A	N/A
001-08	K-01 FCM Dump Station	K-01 FCM Dump Station	001-08	Polymer Dump Station	FCM	Custom	03/1998	Continuous	N/A	N/A
001-09	K-01 FCM Additive Station	K-01 FCM Additive Station	001-09	Polymer Additive Station	FCM	Custom	03/1998	Continuous	N/A	N/A
001-10	K-01 FCM Feed Station	K-01 FCM Feed Station	001-10	Polymer Feed Station	FCM	Custom	03/1998	Continous	N/A	N/A

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
001-11b	K-01 FCM	Carbon Black Resins Additive Filler Material	4000	lbs	2	Black Plastic Concentrate	4000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-08	K-01 FCM Dump Station	Carbon Black Resins	2341	lbs	1	Black Plastic Concentrate	2341	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-09	K-01 FCM Additive Station	Additive Filler Material	2341	lbs	1.75	Black Plastic Concentrate	2341	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-10	K-01 FCM Feed Station	Carbon Black Resins Additive Filler Material	2341	lbs	2	Black Plastic Concentrate	2341	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A

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DEP7007B

Manufacturing or Processing Operations

___ Section B.1: Process Information
___ Section B.2: Materials and Fuel Information
___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- Miller Waste Mills DBA RTP Company
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
001-07	K-02 FCM	K-02 Farrel Continous Mixer	001-07	Continuous Mixer	FCM	Custom	02/1998	Continuous	N/A	N/A
001-04	K-02 FCM Dump Station	K-02 FCM Dump Station	001-04	Polymer Dump Station	FCM	Custom	07/2018	Continuous	N/A	N/A
001-05	K-02 FCM Additive Station	K-02 FCM Additive Station	001-05	Polymer Additive Station	FCM	Custom	07/2018	Continuous	N/A	N/A
001-06	K-02 FCM Feed Station	K-02 FCM Feed Station	001-06	Polymer Feed Station	FCM	Custom	07/2018	Continuous	N/A	N/A

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input	(Specify Units/hr)	Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output	(Specify Units/hr)	Fuel Type	Maximum Hourly Fuel Usage Rate	(Specify Units)	Maximum Yearly Fuel Usage Rate	(Specify Units)	Sulfur Content (%)	Ash Content (%)
001-07	K-02 FCM	Carbon Black Resins Additive Filler Material	1000 lbs 1900 lbs 160 lbs			Black Plastic Concentrate	2000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-004	K-02 FCM Dump Station	Carbon Black Resins	1000 lbs 1900 lbs			Black Plastic Concentrate	2000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-05	K-02 FCM Additive Station	Additive Filler Material	160 lbs			Black Plastic Concentrate	2000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-06	K-02 FCM Feed Station	Carbon Black Resins Additive Filler Material	1000 lbs 1900 lbs 160 lbs			Black Plastic Concentrate	2000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A

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DEP7007B

Manufacturing or Processing Operations

___ Section B.1: Process Information
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___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
001-01	K-03 FCM Dump Station	K-03 FCM Dump Station	001-01	Polymer Dump Station	FCM	Custom	08/1997	C	N/A	N/A
001-02	K-03 FCM Feed Station	K-03 FCM Feed Station	001-02	Polymer Feed Station	FCM	Custom	08/1997	C	N/A	N/A
001-03	K-03 FCM	K-03 Farrel Continuous Mixer	001-03	Continuous Mixer	FCM	Custom	08/1997	C	N/A	N/A

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
001-01	K-03 FCM Dump Station	Carbon Black Resins	1000	lbs/hr		Black Plastic Concentrate	1000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-02	K-03 FCM Feed Station	Carbon Black Resins Additive Filler Material	1000	lbs/hr		Black Plastic Concentrate	1000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-03	K-03 FCM	Carbon Black Resins Additive Filler Material	1000	lbs/hr		Black Plastic Concentrate	1000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A

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DEP7007B

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___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
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Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
001-15	Finshed Product Load Station # 1	Finshed Product Load Station # 1	001-15	Pneumatic Loading Station			08/1997	C	N/A	N/A
001-16	Finshed Product Load Station # 2	Finshed Product Load Station # 2	001-16	Pneumatic Loading Station			08/1997	C	N/A	N/A
001-17	Finshed Product Load Station # 3	Finshed Product Load Station # 3	001-17	Pneumatic Loading Station			09/2022	C	N/A	N/A

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
001-15	Finshed Product Load Station # 1					Black Plastic Concentrate	8000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-16	Finshed Product Load Station # 2					Black Plastic Concentrate	8000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
001-17	Finshed Product Load Station # 3					Black Plastic Concentrate	8000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
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DEP7007B

Manufacturing or Processing Operations

___ Section B.1: Process Information
___ Section B.2: Materials and Fuel Information
___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
002-04	100 cu. ft. Ribbon Blender	100 cu. ft. Ribbon Blender	002-004	Pre-blending			08/1997			
002-11	Marion Mixer FCS-HA 140 SV	Marion Mixer FCS-HA 140 SV	002-11	Blending of finished plastic pellets			04/2021			

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
002-04	100 cu. ft. Ribbon Blender	Plastic Resins	6000	lbs/hr		Black Plastic Consintrate	6000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A
002-11	Marion Mixer FCS-HA 140 SV	Plastic Resins	12000	lbs/hr		Black Plastic Consintrate	12000	lbs/hr	Electric	N/A	N/A	N/A	N/A	N/A	N/A

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DEP7007B

Manufacturing or Processing Operations

___ Section B.1: Process Information
___ Section B.2: Materials and Fuel Information
___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
2	Process Room 2	Room adjacent to production	11	Marion Mixer	Marion	12,000 FCS-HA 140SV	04/2021	Batch	1	1

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DEP7007B

Manufacturing or Processing Operations

___ Section B.1: Process Information
___ Section B.2: Materials and Fuel Information
___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
003-01	Two (2) Outdoor Silos	Two (2) Outdoor Silos	003-01	Bulk Material Silo			08/1997			

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
003-01	Two (2) Outdoor Silos	Plastic Resins	44000	lbs/silo					Electric	N/A	N/A	N/A	N/A	N/A	N/A

Section GG.6: Filter

Control Device ID #	Identify all Emission Units and Control Devices that Feed to Filter	Identify Type of Filter Unit: Baghouse, Cartridge Collector, or Other (specify)	Identify Type of Filtering Material: Fabric, Paper, Synthetic, or Other (specify)	Total Filter Area (ft²)	Effective Air-to-Filter Ratio (acfm/ft²)	Continuous Monitoring Instrumentation (e.g. COMS, BLDS, none)	Additional Materials Introduced into the Control System (e.g. lime, carbon)		Identify Cleaning Method: Shaker, Pulse Air, Reverse Air, Pulse Jet, or Other (specify)	Identify Gas Cooling Method: Ductwork, Heat Exchanger, Bleed-in Air, Water Spray, or Other (specify)	For Ductwork:		For Bleed-in Air:	For Water Spray:
							Material	Injection Rate (lb/hr)			Length (ft)	Diameter (ft)	Flowrate (scfm @ 68 °F)	Flowrate (gal/min)
1	K-01 Dump, Feed and Additive Stations	Baghouse	Oleophobic Polyester	485 FT SQ	3696 acfm/ 485 ft Sq = 7.6:1	Baghouse Pressure Monitor			Pulse Jet					
2	K-2 Dump, Feed and Additive Stations	Baghouse	Oleophobic Polyester	485 FT SQ	3696 acfm/ 485 ft Sq = 7.6:1	Baghouse Pressure Monitor			Pulse Jet					
3	K-03 Dump and Feed Stations	Baghouse	Oleophobic Polyester	485 FT SQ	3696 acfm/ 485 ft Sq = 7.6:1	Baghouse Pressure Monitor			Pulse Jet					

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DEP7007N

Source Emissions Profile

__ Section N.1: Emission Summary
__ Section N.2: Stack Information
__ Section N.3: Fugitive Information
__ Section N.4: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
Process Rm 1, Line 5		001-04	K-1 FCM Dump Station	Daycon polyester baghouse, with secondary baghouse	0003	0003	4	Particulates	16.400	Engineering Estimate	95.00%	99.90%	16.400	0.01640	71.832	0.072
		001-05	K-1 FCM Feed Station	Daycon polyester baghouse, with secondary baghouse												
		001-06	K-1 FCM Additive Station	Daycon polyester baghouse, with secondary baghouse												
		001-04	K-1 FCM Dump Station	Daycon polyester baghouse, with secondary baghouse	0003	0003	4	Carbon Black	0.994	Engineering Estimate	95.00%	99.90%	0.994	0.00099	4.354	0.004
		001-05	K-1 FCM Feed Station	Daycon polyester baghouse, with secondary baghouse												
		001-06	K-1 FCM Additive Station	Daycon polyester baghouse, with secondary baghouse												
Ptocess Particulate Totals													17.394	0.017394	76.18572	0.07618572
		001-03	K-1 FCM	None	0003	0003	4	VOC	0.4412	Engineering Estimate			0.441	0.44120	1.932	1.932
		001-03	K-1 FCM	None	0003	0003	4	Total HAPs	0.2942	Engineering Estimate			0.294	0.29424	1.289	1.289

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter *(ft)*	Height *(ft)*	Base Elevation *(ft)*	Northing *(m)*	Easting *(m)*	Flowrate *(acfm)*	Temperature *(° F)*	Exit Velocity *(ft/sec)*
1	K-01 Dump, Feed and Additive Stations	1.6	28				3696	80	30.64

Section N.4: Notes, Comments, and Explanations
PTE based on annual operating hours 8,760 hours/year.

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Source Emissions Profile

__ Section N.1: Emission Summary
__ Section N.2: Stack Information
__ Section N.3: Fugitive Information
__ Section N.4: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
Process Rm 1, Line K-2		001-04	K-2 FCM Dump Station	Daycon polyester baghouse, with secondary baghouse	0002	0002	1	Particulates	0.528	Engineering Estimate	95.00%	99.90%	0.528	0.00053	2.313	0.002
		001-05	K-2 FCM Feed Station	Daycon polyester baghouse, with secondary baghouse												
		001-06	K-2 FCM Additive Station	Daycon polyester baghouse, with secondary baghouse												
		001-04	K-2 FCM Dump Station	Daycon polyester baghouse, with secondary baghouse	0002	0002	1	Carbon Black	6.800	Engineering Estimate	95.00%	99.90%	6.800	0.00680	29.784	0.030
		001-05	K-2 FCM Feed Station	Daycon polyester baghouse, with secondary baghouse												
		001-06	K-2 FCM Additive Station	Daycon polyester baghouse, with secondary baghouse												
Ptocess Particulate Totals													**7.328**	**0.007328**	**32.09664**	**0.03209664**
		001-03	K-2 FCM	None	0002	0002	1	VOC	0.6014	Engineering Estimate			0.601	0.601	2.634	2.634
		001-03	K-2 FCM	None	0002	0002	1	Total HAPs	0.4009	Engineering Estimate			0.401	0.401	1.756	1.756

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter *(ft)*	Height *(ft)*	Base Elevation *(ft)*	Northing *(m)*	Easting *(m)*	Flowrate *(acfm)*	Temperature *(° F)*	Exit Velocity *(ft/sec)*
2	K-2 Dump, Feed and Additive Stations	1.6	28				3696	90	30.64

Section N.4: Notes, Comments, and Explanations
PTE based on annual operating hours 8,760 hours/year.

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Source Emissions Profile

__ Section N.1: Emission Summary
__ Section N.2: Stack Information
__ Section N.3: Fugitive Information
__ Section N.4: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
Process Rm 1, Line K-3		001-01	K-3 FCM Dump Station	Daycon polyester baghouse, with secondary baghouse	0001	0001	0.5	Particulates	0.28	Engineering Estimate	0.95	0.999	0.28	0.00028	1.2264	0.0012264
		001-02	K-3 FCM Feed Station	Daycon polyester baghouse, with secondary baghouse												
		001-01	K-3 FCM Feed Station	Daycon polyester baghouse, with secondary baghouse	0001	0001	0.5	Carbon Black	3	Engineering Estimate	0.95	0.999	3	0.003	13.14	0.01314
		001-02	K-3 FCM Feed Station	Daycon polyester baghouse, with secondary baghouse												
Ptocess Particulate Totals													**3.280**	**0.00328**	**14.3664**	**0.0143664**
		001-03	K-3 FCM	None	0001	0001	0.5	VOC	0.1660	Engineering Estimate	NA	NA	0.166	0.16600	0.727	0.727
		001-03	K-3 FCM	None	0001	0001	0.5	Total HAPs	0.1107	Engineering Estimate	NA	NA	0.111	0.11068	0.485	0.485

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter *(ft)*	Height *(ft)*	Base Elevation *(ft)*	Northing *(m)*	Easting *(m)*	Flowrate *(acfm)*	Temperature *(° F)*	Exit Velocity *(ft/sec)*
3	K-03 Dump and Feed Stations	1.6	28				3696	80	30.64

Section N.4: Notes, Comments, and Explanations
PTE based on annual operating hours 8,760 hours/year.

Division for Air Quality

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Source Emissions Profile

__ Section N.1: Emission Summary
__ Section N.2: Stack Information
__ Section N.3: Fugitive Information
__ Section N.4: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date: 12/15/2023

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
Process Rm 1, 001-12	Blending Silo 1	001-12	Blending Silo 1	None	NA	Internal	8000	PM	0.8	Engineering Estimate			3.2	NA	8.32	NA
Process Rm 1, 001-13	Blending Silo 2	001-12	Blending Silo 1	None	NA	Internal	8000	PM	0.8	Engineering Estimate			3.2	NA	8.32	NA

Section N.4: Notes, Comments, and Explanations
PTE calculated using a maximum of 5,200 operating hours per year.

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DEP7007N

Source Emissions Profile

__ Section N.1: Emission Summary
__ Section N.2: Stack Information
__ Section N.3: Fugitive Information
__ Section N.4: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: Miller Waste Mills DBA RTP Company
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date:

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
Process Rm 1, 001-15	Finished Product Loading Station 1	001-15	Finished Product Loading Station 1	None	NA	Internal	8000	PM	0.8	Engineering Estimate			3.2	NA	8.32	NA
Process Rm 1, 001-16	Finished Product Loading Station 2	001-15	Finished Product Loading Station 1	None	NA	Internal	8000	PM	0.8	Engineering Estimate			3.2	NA	8.32	NA
Process Rm 1, 001-17	Finished Product Loading Station 3	001-15	Finished Product Loading Station 1	None	NA	Internal	8000	PM	0.8	Engineering Estimate			3.2	NA	8.32	NA

Section N.4: Notes, Comments, and Explanations
PTE calculated using a maximum of 5,200 operating hours per year.

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DEP7007N

Source Emissions Profile

__ Section N.1: Emission Summary
__ Section N.2: Stack Information
__ Section N.3: Fugitive Informatio
__ Section N.4: Notes, Comments, and Explanations

Additional Documentation
___ Complete DEP7007AI

Source Name: Miller Waster Mills, Inc. DBA RTP CompanyRTP
KY EIS (AFS) #: 21- 101-00125
Permit #: F-19-001
Agency Interest (AI) ID: 1831
Date:

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity *(SCC Units/hour)*	Pollutant	Uncontrolled Emission Factor *(lb/SCC Units)*	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency *(%)*	Control Efficiency *(%)*	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential *(lb/hr)*	Controlled Potential *(lb/hr)*	Uncontrolled Potential	Controlled Potential *(tons/yr)*
Process Room 2, 002-11	Marion Mixer	002-11	Marion Mixer	None	None	None	6 TPH	PM	0.8	EIIP Vol II Ch14	0.00%	0.00%	48 lb/hr	48 lb/hr	0.4 TPY	0.4 TPY
Process Room 2, 002-11	Marion Mixer	002-11	Marion Mixer	None	None	None	6 TPH	VOC	0.01	EIIP Vol II Ch14	0.00%	0.00%	0.06 lb/hr	0.06 lb/hr	0.005 TPY	0.005 TPY

Section N.4: Notes, Comments, and Explanations
This blender is used for mixing off-spec pellets. The maximum output is estimated to be 2 million pounds (1,000 tons).

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DEP7007V

Applicable Requirements and Compliance Activities

___ Section V.1: Emission and Operating Limitation(s)

___ Section V.2: Monitoring Requirements

___ Section V.3: Recordkeeping Requirements

___ Section V.4: Reporting Requirements

___ Section V.5: Testing Requirements

___ Section V.6: Notes, Comments, and Explanations

Additional Documentation
___ Complete DEP7007AI

Source Name: Miller Waste Mills DBA RTP Company

KY EIS (AFS) #: 21- 101-00125

Permit #: F-19-001

Agency Interest (AI) ID: 1831

Date: 12/15/2023

Section V.1: Emission and Operating Limitation(s)

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
001	Process Room 2	Permit F-13-012 59.:010 63:020	Carbon Black PM VOCs HAPs	3.15 lbs/hr carbon black <90 tpy PM <90 tpyVOCs <9/22.5 tpy HAPs			Monthly Emissions Inventory Pressure Drop Readings on Control Units Semi-Annual Reporting Annual Compliance Certificaiton
002	Process Room 1	Permit F-13-012 59.:010 63:020	Carbon Black PM VOCs HAPs	3.15 lbs/hr carbon black <90 tpy PM <90 tpyVOCs <9/22.5 tpy HAPs			Monthly Emissions Inventory Pressure Drop Readings on Control Units Semi-Annual Reporting Annual Compliance Certificaiton
003	Ouotdoor Silos	Permit F-13-012 59.:010	PM	<90 tpy PM			Monthly Emissions Inventory Pressure Drop Readings on Control Units Semi-Annual Reporting Annual Compliance Certificaiton

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
001	Process Room 2	Carbon Black PM VOCs HAPs	Permit F-13-012 59.:010 63:020	Pressure Drop Production	Maintain written weekly log of pressure drop readings Maintain HAP and PM calculations
002	Process Room 1	Carbon Black PM VOCs HAPs	Permit F-13-012 59.:010 63:020	Pressure Drop Production	Maintain written weekly log of pressure drop readings Maintain HAP and PM calculations
003	Ouotdoor Silos	PM	Permit F-13-012 59.:010	Pressure Drop Production	Maintain written weekly log of pressure drop readings Maintain HAP and PM calculations

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
001	Process Room 2	Carbon Black PM VOCs HAPs	Permit F-13-012 59.:010 63:020	Pressure Drop Production	Semi-Annual Reports of pressure drop readings and emission Calculations Annual Compliance Certification
002	Process Room 1	Carbon Black PM VOCs HAPs	Permit F-13-012 59.:010 63:020	Pressure Drop Production	Semi-Annual Reports of pressure drop readings and emission Calculations Annual Compliance Certification
003	Ouotdoor Silos	PM	Permit F-13-012 59.:010 63:020	Pressure Drop Production	Semi-Annual Reports of pressure drop readings and emission Calculations Annual Compliance Certification

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
001	Process Room 2	Carbon Black PM VOCs HAPs	Permit F-13-012 59.:010 63:020	PM HAPs	Within 60 days of being requested by DAQ
002	Process Room 1	Carbon Black PM VOCs HAPs	Permit F-13-012 59.:010 63:020	PM HAPs	Within 60 days of being requested by DAQ
003	Ouotdoor Silos	PM	Permit F-13-012 59.:010	PM	Within 60 days of being requested by DAQ

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DEP7007DD

Insignificant Activities

___ Section DD.1: Table of Insignificant Activities
___ Section DD.2: Signature Block
___ Section DD.3: Notes, Comments, and Explanations

Source Name: **Miller Waste Mills DBA RTP Company**

KY EIS (AFS) #: **21- 101-00125**

Permit #: **F-19-001**

Agency Interest (AI) ID: **1831**

Date: **12/15/2023**

Section DD.1: Table of Insignificant Activities

*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3… etc.

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
	Pneumatic Conveying System		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM
	Cook Off Oven		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM, < 0.5 TPY HAPs
	55 lb. Bagger		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM
	Resin Dumps		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM
	Resin Feeds		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
	Central Vacuum Cleaner		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM

Section DD.2: Signature Block

I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.

Authorized Signature

12/22/2023

Date

By:

Rich Sevic

Type/Print Name of Siguatory

Reginal Production Manager

Title of Siguatory

Division for Air Quality

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DEP7007AI

Administrative Information

___ Section AI.1: Source Information

___ Section AI.2: Applicant Information

___ Section AI.3: Owner Information

___ Section AI.4: Type of Application

___ Section AI.5: Other Required Information

___ Section AI.6: Signature Block

___ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

___ Additional Documentation attached

Source Name: Miller Waste Mills DBA RTP Company

KY EIS (AFS) #: 21- 101-00125

Permit #: F-19-001

Agency Interest (AI) ID: 1831

Date: 12/15/2023

Section AI.1: Source Information

Physical Location Address:	**Street:**	1450 Commonwealth Drive				
	City:	Henderson	**County:**	Henderson	**Zip Code:**	42420
Mailing Address:	**Street or P.O. Box:**	1450 Commonwealth Drive				
	City:	Henderson	**State:**	Henderson	**Zip Code:**	42420

Standard Coordinates for Source Physical Location

Longitude: 37.81536 (decimal degrees) **Latitude:** 87.59008 (decimal degrees)

Primary (NAICS) Category: Plastic Compounding **Primary NAICS #:** 325991

Classification (SIC) Category: Plastic Compounding **Primary SIC #:** 3087

Briefly discuss the type of business conducted at this site: RTP produces color concentrate plastic pellets with extruders from carbon black and various resins.

Description of Area Surrounding Source: ☐ Rural Area ☑ Industrial Park ☐ Residential Area ☐ Urban Area ☑ Industrial Area ☐ Commercial Area

Is any part of the source located on federal land? ☐ Yes ☐ No

Number of Employees: 50

Approximate distance to nearest residence or commercial property: *460 feet*

Property Area: 13 acres

Is this source portable? ☐ Yes ☑ No

What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?

NPDES/KPDES:	☑ Currently Hold	☐ Need	☐ N/A
Solid Waste:	☐ Currently Hold	☐ Need	☑ N/A
RCRA:	☐ Currently Hold	☐ Need	☑ N/A
UST:	☐ Currently Hold	☐ Need	☑ N/A

Type of Regulated Waste Activity:

☐ Mixed Waste Generator ☐ Generator ☐ Recycler ☐ Other: _____

☐ U.S. Importer of Hazardous Waste ☐ Transporter ☐ Treatment/Storage/Disposal Facility ☑ N/A

Section AI.2: Applicant Information

Applicant Name: Miller Waste Mills, DBA RTP Company

Title: (if individual)

Mailing Address: **Street or P.O. Box:** 580 E. Front Street, PO Box 5439
City: Winona **State:** MN **Zip Code:** 55987

Email: (if individual)

Phone: 507-454-6900

Technical Contact

Name: Randy Nedrelo

Title: Corporate Environmental Manager

Mailing Address: **Street or P.O. Box:** 508 E. Front St.
City: Winona **State:** MN **Zip Code:** 55987

Email: rnedrelo@rtpcompany.com

Phone: 507-474-5308

Air Permit Contact for Source

Name: Rich Sevic

Title: Manufacturing Manager

Mailing Address: **Street or P.O. Box:** 1450 Commonwealth Dr.
City: Henderson **State:** KY **Zip Code:** 42420

Email: rsevic@rtpcompany.com

Phone: 270-869-9000

Section AI.3: Owner Information

☑ **Owner same as applicant**

Name: _____

Title: _____

Mailing Address: Street or P.O. Box: _____

City: _____ State: _____ Zip Code: _____

Email: _____

Phone: _____

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name	Position

Section AI.4: Type of Application

Current Status: ☐ Title V ☑ Conditional Major ☐ State-Origin ☐ General Permit ☐ Registration ☐ None

Requested Action: *(check all that apply)*

☐ Name Change	☐ Initial Registration	☐ Significant Revision	☐ Administrative Permit Amendment
☑ Renewal Permit	☐ Revised Registration	☐ Minor Revision	☐ Initial Source-wide OperatingPermit
☐ 502(b)(10)Change	☐ Extension Request	☐ Addition of New Facility	☐ Portable Plant Relocation Notice
☐ Revision	☐ Off Permit Change	☐ Landfill Alternate Compliance Submittal	☐ Modification of Existing Facilities
☐ Ownership Change	☐ Closure		

Requested Status: ☐ Title V ☑ Conditional Major ☐ State-Origin ☐ PSD ☐ NSR ☐ Other: _____

Is the source requesting a limitation of potential emissions? ☐ Yes ☐ No

Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☑ Particulate Matter	90 TPY	☐ Single HAP	
☐ Volatile Organic Compounds (VOC)		☐ Combined HAPs	
☐ Carbon Monoxide		☐ Air Toxics (40 CFR 68, Subpart F)	
☐ Nitrogen Oxides		☐ Carbon Dioxide	
☐ Sulfur Dioxide		☐ Greenhouse Gases (GHG)	
☐ Lead		☐ Other	

For New Construction:

Proposed Start Date of Construction: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

For Modifications:

Proposed Start Date of Modification: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

Applicant is seeking coverage under a permit shield. ☑ Yes ☐ No

Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

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

Section AI.6: Signature Block

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

Richard J. Sevic

Authorized Signature

2/22/2023

Date

Richard Sevic

Type or Printed Name of Signatory

Manufacturing Manager

Title of Signatory

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

Section AI.7: Notes, Comments, and Explanations

Division for Air Quality
300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007DD

Insignificant Activities

___ Section DD.1: Table of Insignificant Activities
___ Section DD.2: Signature Block
___ Section DD.3: Notes, Comments, and Explanations

Source Name: **Miller Waste Mills DBA RTP Company**

KY EIS (AFS) #: **21- 101-00125**

Permit #: **F-19-001**

Agency Interest (AI) ID: **1831**

Date: **12/15/2023**

Section DD.1: Table of Insignificant Activities

*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3… etc.

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
	Pneumatic Conveying System		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM
	Cook Off Oven		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM, < 0.5 TPY HAPs
	55 lb. Bagger		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM
	Resin Dumps		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM
	Resin Feeds		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
	Central Vacuum Cleaner		401 KAR 59:010, 401 KAR 52:020	< 5 TPY PM

Section DD.2: Signature Block

I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.

Richard L Sevic — **Authorized Signature**

3/4/2023 — **Date**

By:

Rich Sevic — **Type/Print Name of Siguatory**

Reginal Production Manager — **Title of Siguatory**

Outlook

Re: AI 1831 Renewal Questions & Insignificant Activities

From Luma, Johnson (EEC) <johnson.luma@ky.gov>
Date Thu 2/27/2025 5:24 PM
To Andrew Grigg <agrigg@rtpcompany.com>

This helps a lot!
Will update the calculations as much as I can this afternoon. The Supervisor wants to start reviewing the permit tomorrow so we can send you guys at least a courtesy copy soon.

Thanks,
Johnson Luma
Environmental Engineer Technologist II
Kentucky Department for Environmental Protection
Division for Air Quality
Permit Review Branch
Chemical Section
300 Sower Blvd., 2nd Floor
Frankfort, KY 40601
Johnson.Luma@ky.gov
(502)-782-1751

From: Andrew Grigg <agrigg@rtpcompany.com>
Sent: Thursday, February 27, 2025 5:14 PM
To: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Subject: RE: AI 1831 Renewal Questions & Insignificant Activities

Johnson,

I have got a good start on these. Please see the attached document. The answers to your questions are in red. I just wanted to get what I could to you right away. I will work more on this. Let me know if you have any questions.

Thank you

Andrew Grigg
Senior Environmental Specialist
RTP Company
580 East Front Street

Winona, MN 55987
www.rtpcompany.com
Direct # 507-474-5438
Cell # 507-470-6215
agrigg@rtpcompany.com

From: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Sent: Wednesday, February 26, 2025 2:42 PM
To: Andrew Grigg <agrigg@rtpcompany.com>
Subject: Re: AI 1831 Renewal Questions & Insignificant Activities

No problem

Thanks,
Johnson Luma
Environmental Engineer Technologist II
Kentucky Department for Environmental Protection
Division for Air Quality
Permit Review Branch
Chemical Section
300 Sower Blvd., 2nd Floor
Frankfort, KY 40601
Johnson.Luma@ky.gov
(502)-782-1751

From: Andrew Grigg <agrigg@rtpcompany.com>
Sent: Wednesday, February 26, 2025 3:40 PM
To: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Subject: RE: AI 1831 Renewal Questions & Insignificant Activities

Johnson,

This is very helpful. I am working on filling out what I know and I will send the few questions I don't know to my colleagues in Henderson. I will also address the importance of them getting this information back to me. Thank you so much for helping me with this. It is difficult not being on site to be able to get all the answers I need.

Thank you

Andrew Grigg
Senior Environmental Specialist
RTP Company

580 East Front Street
Winona, MN 55987
www.rtpcompany.com
Direct # 507-474-5438
Cell # 507-470-6215
agrigg@rtpcompany.com

From: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Sent: Tuesday, February 25, 2025 5:28 PM
To: Andrew Grigg <agrigg@rtpcompany.com>
Subject: Fw: AI 1831 Renewal Questions & Insignificant Activities

Good afternoon Andrew,
I hope all is going well. I had sent the previous message twice as it seems it had some embedded format issue from my end. Please let me know if you were not able to view it.

And maybe if I phrase things as I do below, it could help some more:

1) For the Resin Dumps and Resin Feeds:
Could you let me know if the process is similar to the K-03 Feed Station and K-03 Dump Station?
You did mention that they also go to the Baghouse! Is that the same Baghouse (99.9% control efficiency) as the K-03 Dump & K-03 Feed Station?
On page 2/18 from the most recently issued permit (F-19-001 R2), for Emission Points 001-01 and 0001-002 (the K-03 Dump Station and K-03 Feed Station), we see maximum capacities of 1000 lbs/hour respectively with a note that says Carbon Black and PM = PM_{10}, and construction Date = August 1997, and another note detailing the Control Equipment.
Please provide something similar for the Resin Dumps and Resin Feeds, as well as share how many hours per year the Resin Dumps and Resin Feeds operate. Provide the same info for all of the remaining insignificant activities.
Please also share a short description (just 2-5 sentences) of what the Resin Dumps and Resin Feeds do for your facility and how does that compare with the K-03 Feed Station and K-03 Dump Station (This will help me see if I should derive emission factors the same way as well as give me an indication if there is Carbon Black being emitted - if you have not yet found the answer to that).
Also provide descriptions for the Remaining Insignificant activities as far as what their role is for your facility and what material or product goes into and out of them.

2) For the Central Vacuum System:
From the examples that I see in the past from various facilities, most vacuum systems have the same pollutants that are generally emitted by other facility equipment (so here it would be Particulate Matter as well as Carbon Black (but you can specify)), and the vacuum systems also go to the Fabric Filter/Baghouse with the same Control Efficiencies as other equipment. The capacities are also generally in tons/hr or lbs/hr. I'm not sure how different your vacuum system is, but definitely describe its role for your facility and what it is processing, as well as provide annual operating hours and estimated capacity or design rate. Emission Factors will generally be derived similarly to the other predominant and general

equipment employed within the facility, so if you can give me all the other info, I will see what needs to be done.

3) For the Pneumatic Conveying System:
Please provide the description and the role of this System in your facility. You mentioned that is also goes to the Baghouse, so the 99.9% Control Efficiency can be applied. From what I see online as far as definition, I would assume that the Pneumatic Conveying System is moving the material to their designated locations. If it is the raw material, I think it would also have Carbon Black, and Emission Factors for PM and Carbon Black can de derived similarly as the other predominant equipment in your facility. If there is one specific equipment in the permit that the Conveying System is closest to, you can let me know what that equipment is.
If it is significant part of your process, I believe 8760 hours/year can be estimated for annual operation. So I would just need the process rate or capacity in lbs/hr or tons/hr.

4.) For the Cookoff Oven:
What is this oven used for?
What is the material that is being cooked off?
Besides the natural gas being burned, is anything emitted from the actual material that is being cooked off?
What is the Cook Off Oven's design rate or capacity in BTU/hr?
Does it operate continuously (8760 hours/year)? If not provide an estimate of how many hours per year it operates.

5.) Please provide all other requested info that is outstanding from the initial set of questions if not covered above, and specify which baghouse (Baghouse 1 or Baghouse 2) is being used for each Insignificant Activity.

Please share this with appropriate members of your team so we can finish this permit this week.
Thanks,
Johnson

From: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Sent: Friday, February 21, 2025 6:19 PM
To: Andrew Grigg <agrigg@rtpcompany.com>
Subject: Re: AI 1831 Renewal Questions & Insignificant Activities

Hi Andrew,
Thanks for getting back to me.
I will remove the 55lb bagger from the permit.
For the Cook Off Oven, I do see the document you provided with the emission factors, and I can this calculate emissions as a unit that burns natural gas.
Could you also inform me of what is being Cooked off?

So the remaining items requested read as follow, and I am inputting some commentary in red:

A) The
design/process
rates for each
activity, along
with estimated
hours of

operation per year (8760 hours is usually our assumption but you can clarify if needed)
By the design/process rate, this can also mean throughput of material processed or produced in the emission unit, or just the maximum capacity at which the equipment can operate. This can be tons/year or lbs/hr or something else. If you do not have those, but have manufacturer data, or model no., you are welcome to share those and I can take a look.
B) Calculation Methods to obtain pollutant emission.
If you provide the design/process rates (aka throughputs or capacity), as well as hours of operation for the 5 insignificant emission units,

we can derive emission factors.
Let me know which of the 5 insignificant emission units are controlled by the baghouse? And let me know if there are any control efficiencies for the baghouse and filters you mentioned in you last email.
C) What Percentage of the Particulate Matter is PM10 and PM2.5, out of the max 4.999 tpy Total PM (assumed based on 5 tpy maximum reported).
All particulate matter from the DEP7007DD form is assumed to be total_Particulate Matter. Just provide a quick breakdown of how much of that is PM_10 or PM_2.5 for each emission unit.
D) Does only the Cook Off Oven emit HAPS? Which HAPS are assumed to be emitted? (You can share Safety Data Sheet if needed.)

Thanks for letting me know this unit combusts natural gas.
The next thing to clarify is the material that is being cooked off and whether your facility estimates that pollutant emissions are produced from the cook off process (from that material) and letting me know which pollutants and provide some emission estimates.
E) Is any Carbon Black emitted through the Insignificant Activities?
You or your consultant or design/process engineer would probably have the answer to this question.
If so, would appreciate an estimate in tons/year.

Thanks,

Johnson Luma
Environmental Engineer Technologist II
Kentucky Department for Environmental Protection
Division for Air Quality
Permit Review Branch
Chemical Section
300 Sower Blvd., 2nd Floor

Frankfort, KY 40601
Johnson.Luma@ky.gov
(502)-782-1751

From: Andrew Grigg <agrigg@rtpcompany.com>
Sent: Thursday, February 20, 2025 3:31 PM
To: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Subject: RE: AI 1831 Renewal Questions & Insignificant Activities

Johnson,

I have attached a calculation I did for the cook off oven. It runs on natural gas I was able to use a calculation through the State of Minnesota to figure out the emissions on this. I talked with the plant manager and the 55 lb bagger is no longer located at that facility.

I have been struggling to find factors for the systems. (Pneumantic Conveying system, Resin Dumps, Resin Feeds, and Central Vac System) The pneumatic convey, resin dumps, and resin feeds do go to the baghouse. The central vac system does have filters as well. If you could send me some examples that would be very helpful.

Please let me know if you have any questions.

Thank You

Andrew Grigg
Senior Environmental Specialist
RTP Company
580 East Front Street
Winona, MN 55987
www.rtpcompany.com
Direct # 507-474-5438
Cell # 507-470-6215
agrigg@rtpcompany.com

From: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Sent: Thursday, February 20, 2025 10:07 AM
To: Andrew Grigg <agrigg@rtpcompany.com>
Cc: Richard Sevic <rsevic@rtpcompany.com>; Nicole Danfield <ndanfield@rtpcompany.com>; Kylee C. Hall <khall@rtpcompany.com>; Randy Nedrelo <rnedrelo@rtpcompany.com>; Patil, Durga D (EEC) <Durga.Patil@ky.gov>; Ross, Dakota D (EEC) <dakota.ross@ky.gov>
Subject: Re: AI 1831 Renewal Questions & Insignificant Activities

Good morning,
Please remember to send the requested info this week.
If you have any questions or need any clarification or examples, just let me know.

Thanks,
Johnson Luma
Environmental Engineer Technologist II
Kentucky Department for Environmental Protection
Division for Air Quality
Permit Review Branch
Chemical Section
300 Sower Blvd., 2nd Floor
Frankfort, KY 40601
Johnson.Luma@ky.gov
(502)-782-1751

From: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Sent: Wednesday, February 5, 2025 10:35 AM
To: Andrew Grigg <agrigg@rtpcompany.com>
Cc: Richard Sevic <rsevic@rtpcompany.com>; Nicole Danfield <ndanfield@rtpcompany.com>; Kylee C. Hall <khall@rtpcompany.com>; Randy Nedrelo <rnedrelo@rtpcompany.com>; Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Subject: Re: AI 1831 Renewal Questions & Insignificant Activities

Yes that's fine!
Safe travels!

Thanks,
Johnson Luma
Environmental Engineer Technologist II
Kentucky Department for Environmental Protection
Division for Air Quality
Permit Review Branch
Chemical Section
300 Sower Blvd., 2nd Floor
Frankfort, KY 40601
Johnson.Luma@ky.gov
(502)-782-1751

From: Andrew Grigg <agrigg@rtpcompany.com>
Sent: Wednesday, February 5, 2025 10:27 AM
To: Luma, Johnson (EEC) <johnson.luma@ky.gov>; Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Cc: rsevic@rtpcompany.co <rsevic@rtpcompany.co>; Nicole Danfield <ndanfield@rtpcompany.com>; Kylee C. Hall <khall@rtpcompany.com>
Subject: RE: AI 1831 Renewal Questions & Insignificant Activities

Johnson,

I am currently not in my office this week. I am visiting one of our other locations. Is it possible for me to get this too you next week as information I have concerning this is back in my office in Minnesota.

Thank You

Andrew Grigg
Senior Environmental Specialist
RTP Company
580 East Front Street
Winona, MN 55987
www.rtpcompany.com
Direct # 507-474-5438
Cell # 507-470-6215
agrigg@rtpcompany.com

From: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Sent: Monday, February 3, 2025 10:11 AM
To: Patil, Durga D (EEC) <Durga.Patil@ky.gov>; Andrew Grigg <agrigg@rtpcompany.com>
Cc: rsevic@rtpcompany.co; Nicole Danfield <ndanfield@rtpcompany.com>; Kylee C. Hall <khall@rtpcompany.com>
Subject: Re: AI 1831 Renewal Questions & Insignificant Activities

Good morning,
We are trying to wrap up this permit this week and get it reviewed and signed.
We are still waiting for answers to the following questions:

2.) I have to start tracking the Insignificant Activities as well as their potential annual pollutant emissions for the Kentucky Emissions Inventory System (KYEIS).

I see the DEP7077DD form has a list of six Insignificant Activities with PM being the predominant pollutant emitted from each activity.
Could you provide a short write-up of the following:
A) The design/process rates for each activity, along with estimated hours of operation per year (8760 hours is usually our assumption but you can clarify if needed)
B) Calculation Methods to obtain pollutant emission.
C) What Percentage of the Particulate Matter is PM10 and PM2.5, out of the max 4.999 tpy Total PM (assumed based on 5 tpy maximum reported).
D) Does only the Cook Off Oven emit HAPS? Which HAPS are assumed to be emitted? (You can share Safety Data Sheet if needed.)
E) Is any Carbon Black emitted through the Insignificant Activities?

Hope to hear back from you this week, but please let me know how I can help!
You can reach me by email, phone, or set up a Team's/Webex/Zoom call with me to go through any questions or get any clarification. My job is to make sure things are done as accurately and efficiently as possible, so no problem.

Thanks,
Johnson Luma
Environmental Engineer Technologist II
Kentucky Department for Environmental Protection
Division for Air Quality
Permit Review Branch
Chemical Section
300 Sower Blvd., 2nd Floor
Frankfort, KY 40601
Johnson.Luma@ky.gov
(502)-782-1751

From: Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Sent: Wednesday, January 15, 2025 4:58 PM
To: Andrew Grigg <agrigg@rtpcompany.com>
Cc: rsevic@rtpcompany.co <rsevic@rtpcompany.co>; Nicole Danfield <ndanfield@rtpcompany.com>; Kylee C. Hall <khall@rtpcompany.com>; Luma, Johnson (EEC) <johnson.luma@ky.gov>
Subject: RE: AI 1831 Renewal Questions & Insignificant Activities

Good afternoon:
Thank you for getting part of the information on the queries sent by Johnson on December 19, 2024. With regards to the insignificant activities, if they are available now, you could send it via email. If sending through the eportal, please provide the submittal ID so that we can follow up with the information as soon as it is received.

Thank you,
Durga Patil
Environmental Scientist Consultant
Permit Review Branch
Department for Environmental Protection
Division for Air Quality

300 Sower Blvd
Frankfort, KY 40601
Phone: (502)- 782-6730

From: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Sent: Monday, January 6, 2025 2:46 PM
To: Andrew Grigg <agrigg@rtpcompany.com>
Cc: rsevic@rtpcompany.co; Patil, Durga D (EEC) <Durga.Patil@ky.gov>; Nicole Danfield <ndanfield@rtpcompany.com>; Kylee C. Hall <khall@rtpcompany.com>
Subject: Re: AI 1831 Renewal Questions & Insignificant Activities

Got it!
Thanks!

From: Andrew Grigg <agrigg@rtpcompany.com>
Sent: Monday, January 6, 2025 2:22 PM
To: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Cc: rsevic@rtpcompany.co <rsevic@rtpcompany.co>; Patil, Durga D (EEC) <Durga.Patil@ky.gov>; Nicole Danfield <ndanfield@rtpcompany.com>; Kylee C. Hall <khall@rtpcompany.com>
Subject: RE: AI 1831 Renewal Questions & Insignificant Activities

---

Johnson,

I wanted to get you the information for the top part of the questions you had. I have provided them below in red. The second part about the insignificant activities I am still waiting on some information to be sent to me from Henderson as I am located at our corporate office in Winona, MN. I will get that information to you as soon as possible.

Thank You

Andrew Grigg
Senior Environmental Specialist
RTP Company
580 East Front Street
Winona, MN 55987
www.rtpcompany.com
Direct # 507-474-5438
Cell # 507-470-6215
agrigg@rtpcompany.com

From: Luma, Johnson (EEC) <johnson.luma@ky.gov>
Sent: Thursday, December 19, 2024 5:10 PM
To: Andrew Grigg <agrigg@rtpcompany.com>; Randy Nedrelo <rnedrelo@rtpcompany.com>
Cc: rsevic@rtpcompany.co; Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Subject: AI 1831 Renewal Questions & Insignificant Activities

Good afternoon Andrew & Randy,

I am working on the Miller Waste Mills, DBA RTP Company's Permit Renewal and had a few questions.

1.) Besides the removal of the Schick Loading Hopper (001-14), is there anything else that I should change for this Renewal Permit? NO
A.) Are any Processing Rates or Design Rates changing for any equipment? No there are no changes.
B.) A statement in the opening letter mentions that there are currently "three Finished Product Load Stations". Is that just to say there are "three process rooms" or "Groups" as seen on the permit? No change is needed by the aforementioned statement? Yes there are three groups.

2.) I have to start tracking the Insignificant Activities as well as their potential annual pollutant emissions for the Kentucky Emissions Inventory System (KYEIS).
I see the DEP7077DD form has a list of six Insignificant Activities with PM being the predominant pollutant emitted from each activity.
Could you provide a short write-up of the following:
A) The design/process rates for each activity, along with estimated hours of operation per year (8760 hours is usually our assumption but you can clarify if needed)
B) Calculation Methods to obtain pollutant emission.
C) What Percentage of the Particulate Matter is PM10 and PM2.5, out of the max 4.999 tpy Total PM (assumed based on 5 tpy maximum reported).
D) Does only the Cook Off Oven emit HAPS? Which HAPS are assumed to be emitted? (You can share Safety Data Sheet if needed.)
E) Is any Carbon Black emitted through the Insignificant Activities?

Thanks,
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Air emissions from burning natural gas

Natural gas combustion (less than 100 million Btu per hour)

If you have a boiler with a rating of more than 100 million Btu per hour, different emission factors must be used (see EPA AP-42 Chapter 1.4).

What is the total maximum rated heat input for your natural gas units?		1000000	Btu per hour (Check your units!)
In the previous 12 months, how many	cubic feet of natural gas were burned? (you can use your gas bill)	8790	cu ft/year

Natural gas potential and actual emissions

Pollutant	a GWP[1]	b Maximum hourly usage (cu ft/hr) (Btu/hr) / (1020 Btu/cuft)	c Actual natural gas burned (cu ft/yr)	d Hours in a Year (hr/yr) 24 hr/day * 365 day/yr	e Emission Factor (lbs/cu ft)	Potential Emissions (ton/yr) (b * d * e) / 2000	Actual Emissions (tons/yr) (c * e) / 2000	Insignificant Activity[3] Limits (tons/yr)
		980.39	8790.00	8760	by pollutant			
Criteria Air Pollutants						Source: EPA AP-42 Chapter 1.4		
PM					0.0000076	0.03	0.00	1.0
PM10					0.0000076	0.03	0.00	1.0
PM2.5					0.0000076	0.03	0.00	
SOx					0.0000006	0.00	0.00	1.0
NOx					0.0001	0.43	0.00	1.0
VOC					0.0000055	0.02	0.00	1.0
CO					0.000084	0.36	0.00	2.0
Lead					0.0000000005	0.00	0.00	
Greenhouse Gas Emissions								
CO_2[2]	1				0.120	515.37	0.53	
CH_4[2]	25				0.00000226	0.01	0.00	
N_2O[2]	298				0.00000023	0.00	0.00	
				GHG Total (CO_2e)[2]		515.91	0.53	1000
Hazardous Air Pollutants						Source: EPA AP-42 Chapter 1.4		
Benzene					0.0000000021	0.0000	0.0000	
Formaldehyde					0.000000075	0.0003	0.0000	
Hexane					0.0000018	0.0077	0.0000	
Naphthalene					0.00000000061	0.0000	0.0000	
Toluene					0.0000000034	0.0000	0.0000	
Arsenic					0.00000000020	0.0000	0.0000	
Beryllium					0.000000000012	0.0000	0.0000	
Cadmium					0.0000000011	0.0000	0.0000	
Chromium					0.0000000014	0.0000	0.0000	
Cobalt					0.000000000084	0.0000	0.0000	
Manganese					0.00000000038	0.0000	0.0000	
Mercury					0.00000000026	0.0000	0.0000	
Nickel					0.0000000021	0.0000	0.0000	
Selenium					0.000000000024	0.0000	0.0000	
				HAP total		0.0081	0.0000	

[1] Global Warming Potential from 40 CFR Part 98, Subpart A, Table A-1

[2] CO_2e = carbon dioxide equivalents

[3] See insignificant activities at Minn. R. 7007.1300 and on the 'Permits & Requirements' tab. Minn. R. 7007.1300

Good afternoon Andrew,
I hope all is going well. I had sent the previous message twice as it seems it had some embedded format issue from my end. Please let me know if you were not able to view it.

And maybe if I phrase things as I do below, it could help some more:

1) For the Resin Dumps and Resin Feeds:
Could you let me know if the process is similar to the K-03 Feed Station and K-03 Dump Station? Yes, this is similar to that process

You did mention that they also go to the Baghouse! Is that the same Baghouse (99.9% control efficiency) as the K-03 Dump & K-03 Feed Station? Yes, they are connected to that baghouse.

On page 2/18 from the most recently issued permit (F-19-001 R2), for Emission Points 001-01 and 0001-002 (the K-03 Dump Station and K-03 Feed Station), we see maximum capacities of 1000 lbs/hour respectively with a note that says Carbon Black and PM = $PM_{10,}$ and construction Date = August 1997, and another note detailing the Control Equipment.
Please provide something similar for the Resin Dumps and Resin Feeds, as well as share how many hours per year the Resin Dumps and Resin Feeds operate. Provide the same info for all of the remaining insignificant activities.
Please also share a short description (just 2-5 sentences) of what the Resin Dumps and Resin Feeds do for your facility and how does that compare with the K-03 Feed Station and K-03 Dump Station (This will help me see if I should derive emission factors the same way as well as give me an indication if there is Carbon Black being emitted - if you have not yet found the answer to that). All of the resin dump stations are the same, meaning in comparison to K-03 Feed Station and K-03 Dump Station.

Also provide descriptions for the Remaining Insignificant activities as far as what their role is for your facility and what material or product goes into and out of them.

2) For the Central Vacuum System:

1) From the examples that I see in the past from various facilities, most vacuum systems have the same pollutants that are generally emitted by other facility equipment (so here it would be Particulate Matter as well as Carbon Black (but you can specify)), and the vacuum systems also go to the Fabric Filter/Baghouse with the same Control Efficiencies as other equipment. The capacities are also generally in tons/hr or lbs/hr. I'm not sure how different your vacuum system is, but definitely describe its role for your facility and what it is processing, as well as provide annual operating hours and estimated capacity or design rate. Emission Factors will generally be derived similarly to the other predominant and general equipment employed within the facility, so if you can give me all the other info, I will see what needs to be done. The central vac system is only used when needed. Material is vacuumed up from an area and dumped in a vessel that is then opened up to discharge into a trash container.

3) For the Pneumatic Conveying System:

Please provide the description and the role of this System in your facility. You mentioned that is also goes to the Baghouse, so the 99.9% Control Efficiency can be applied. From what I see online as far as definition, I would assume that the Pneumatic Conveying System is moving the material to their designated locations. If it is the raw material, I think it would also have Carbon Black, and Emission Factors for PM and Carbon Black can de derived similarly as the other predominant equipment in your facility. If there is one specific equipment in the permit that the Conveying System is closest to, you can let me know what that equipment is.
If it is significant part of your process, I believe 8760 hours/year can be estimated for annual operation. Yes this is a significant part of the process, The system does transfer resin and carbon black

So I would just need the process rate or capacity in lbs/hr or tons/hr. Anywhere from 500 lbs/hr to 2000 lbs/hr

4.) For the Cookoff Oven:
What is this oven used for? To Cook off resin that has cooled and hardend on the screws of the equipment.

What is the material that is being cooked off? Hardened plastic resin

Besides the natural gas being burned, is anything emitted from the actual material that is being cooked off? I assume the plastic that is on the screws emits some. I am not sure how to quantify this though as each use of the oven would be different. There would be no set amount on each screw.

What is the Cook Off Oven's design rate or capacity in BTU/hr? 240,000 Max BTU/hr 50,000 Min BTU/hr

Does it operate continuously (8760 hours/year)? If not provide an estimate of how many hours per year it operates. The cook off oven is run approximately 12 hrs per day.

5.) Please provide all other requested info that is outstanding from the initial set of questions if not covered above, and specify which baghouse (Baghouse 1 or Baghouse 2) is being used for each Insignificant Activity. Resin dumps and Feeds for line K-01 go to the Donaldson Torit baghouse, Resin dump and Feeds for K-02 and K-03 go to the Dacron baghouse.

Please share this with appropriate members of your team so we can finish this permit this week.
Thanks,
Johnson