Commonwealth of Kentucky
Division for Air Quality

STATEMENT OF BASIS / SUMMARY

Title V, Operating
PERMIT ID: V-24-036
Safety-Kleen Systems, Inc. - Smithfield Recycle Center
3700 LaGrange Road
Smithfield, KY 40068

December 4, 2024
Durga Patil, Permit Review Branch

Source ID: 21-103-00005
Agency Interest #: 1854
Activity ID: APE20220001

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SECTION 1 - SOURCE DESCRIPTION

SIC Code and description: 4953, Refuse Systems (hazardous waste treatment and disposal).

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

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

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Henry
Nonattainment Area ☒ N/A ☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ Ozone ☐ Lead
If yes, list Classification:

PTE* greater than 100 tpy for any criteria air pollutant ☐ Yes ☒ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☐ Yes ☒ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☒ Yes ☐ No
If yes, list which pollutant(s): acetaldehyde and vinyl chloride

PTE* greater than 25 tpy for combined HAP ☒ Yes ☐ No

*PTE does not include self-imposed emission limitations.

Description of Facility:
Safety-Kleen Systems, Inc. Smithfield Recycle Center is a solvent and organic chemical fuel blending plant designed to receive, store and process spent organic solvent from Safety-Kleen service centers and from commercial and industrial generators. In addition, the facility blends solvents with little or no recyclable value, along with other high heat content (high Btu) materials into a supplemental fuel. The facility also stores material for subsequent shipment offsite.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: V-24-036 Activity: APE20220001
Application Received: 12/6/2022 Application Complete: 12/3/2024

Permit Action: ☐Initial ☒Renewal ☐Significant Rev. ☐Minor Rev. ☐Administrative

Construction/Modification Requested? ☐ Yes ☒ No NSR Applicable? ☐ Yes ☒ No

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

Description of Action:
No changes since the last permit issued V-17-045.

V-24-036 Emission Summary		
Pollutant	2023 Actual (tpy)	PTE V-24-036 (tpy)
CO	3.143	9.60
NOx	3.78	13.89
PT	0.287	0.98
PM_{10}	0.287	0.98
$PM_{2.5}$	0.287	0.98
SO_2	0.025	0.21
VOC	32.87	64.88*
Lead	1.87 E-5	5.39 E-5
Greenhouse Gases (GHGs)		
Carbon Dioxide	4,478	13,039
Methane	0.086	0.52
Nitrous Oxide	0.082	0.24
CO_2 Equivalent (CO_2e)		13,123
Hazardous Air Pollutants (HAPs)		
1,2-Dichloroethane	0.557	0.804
1,2-Epoxybutane	0.988	1.616
2-Butoxy Ethanol	0.0147	0.075
2-Butoxyethyl Acetate	0.056	0.285
2-Butyl Alcohol	0.011	0.056
Acetaldehyde	4.41	6.762
Acetone	0.029	0.386
Acetonitrile	0.001	0.083
Acrolein	1.5 E-6	0.001
Amyl Acetate	0.013	0.064
Benzene	0.0248	0.063
Butyl Acetate	0.032	0.165
Carbon Tetrachloride	0.803	1.157
Chloroform	1.427	2.058
Dichloromethane	0.656	0.953

V-24-036 Emission Summary		
Pollutant	2023 Actual (tpy)	PTE V-24-036 (tpy)
Ethyl Benzene	00007	0.013
Formaldehyde	0.003	0.020
Hexane; N-Hexane	0.529	0.885
Isopropanol	0.012	0.090
Methanol	0.28	0.414
Methyl Ethyl Ketone	0.67	1.265
Methyl Isobutyl Ketone	0.010	0.053
Methyl N-Amyl Ketone	0.02	0.103
Naphthalene	9.0 E-7	0.000
Propionaldehyde	1.388	2.206
Tetrahydrofuran	0.001	0.082
Toluene	0.92	1.894
Trichloroethylene	0.020	0.050
Vinyl Acetate	0.028	0.072
Vinyl Chloride	12.74	20.476
Xylenes (Total)	0.142	0.351
Combined HAPs:	--	42.50

* emissions of VOC inherently limited by complying with 40 CFR 63, Subpart DD

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit #2 & #3 Boilers				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
PM	001: 0.56 lb/mmBtu 018: 0.45 lb/mmBtu	401 KAR 59:015 Section 4(1)(a) 401 KAR 59:015 Section 4(1)(c)	AP-42, Table 1.4-2	Assumed to be in compliance based on combustion of natural gas or fuel oil
	< 20% opacity	401 KAR 59:015 Section 4(2)	N/A	Assumed in compliance based on combustion of natural gas, monthly visual observation while burning fuel oil
SO_2	001: 3.0 lb/mmBtu 018: 2.06 lb/mmBtu	401 KAR 59:015, Section 5(1)(a) 401 KAR 59:015, Section 5(1)(c)	AP-42, Table 1.4-2	Assumed compliance while burning natural gas, sulfur content used for compliance while burning fuel oil

Initial Construction Date: 001: October 7, 1982; 018: September 1, 1987

Process Description:
Boiler (B02) Cleaver Brooks Model 800-200
Installation Date: October 7, 1982
Fuel Capacity rated @ 8.369 mmBtu/hr
Primary Fuel: Natural Gas
Secondary Fuel: Fuel Oil #2 (Diesel)

Boiler (B01) Cleaver Brooks Model CB 655 400, 400 HP, 150 lb Steam Boiler
Installation Date: September 1, 1987
Fuel Capacity rated @ 16.707 mmBtu/hr
Primary Fuel: Natural Gas
Secondary Fuel: Fuel Oil #2 (Diesel)

Applicable Regulation:
401 KAR 59:015, New Indirect Heat Exchangers. This regulation is applicable to each indirect heat exchanger having a heat input capacity greater than one (1) million BTU per hour (mmBtu/hr).

401 KAR 63:002, Section 2(4)(iiii), 40 C.F.R. 63.7480 through 63.7575, Tables 1 through 13 (Subpart DDDDD), National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This regulation applies to boilers located at major sources of HAPs.

Comments:
401 KAR 60:005 Section 2(2)(d), 40 C.F>R. 60.40c through 60.48c (Subpart Dc), Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989

Emission Unit #2 & #3 Boilers

and that has a maximum design heat input capacity of 100 million British thermal units per hour (mmBtu/hr) or less, but greater than or equal to 10 mmBtu/hr. Both boilers were manufactured before the commencement date; therefore, this subpart does not apply.

For EP 001, the permittee must complete biennial tune-up as specified in 40 CFR 63.7540(a)(11).
For EP 018, the permittee must complete biennial tune-up as specified in 40 CFR 63.7540(a)(11).

Emission factor for both units for natural gas combustion are from AP-42, Chapter 1.4, Table 1.4-2 and Tale 1.4-3 for HAPs. The permittee has satisfied the one-time energy assessment of Table 3, item 4 to 40 CFR 63, Subpart DDDDD.

Emission Unit 030 Main Fire Pump and 031 Boiler Backup Generator

Initial Construction Date: 030: September 22, 1989; 031: November 1, 2009

Process Description:
030: Main Fire Pump
Caterpillar Model 3306B
Installation Date: September 22, 1989
Power Output rated @ 287 HP
Primary Fuel: Fuel Oil #2

031: Boiler Backup Generator
General Motors, Industrial Powertrain Vortec 5.7 L, 4-Cycle Lean-Burned
Installation Date: November 1, 2009
Power Output rated @ 105 HP
Primary Fuel: Natural Gas

Applicable Regulation:
401 KAR 60:005, Section 2(2)(eeee), 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (Subpart JJJJ), Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. Applies to EP 031.

401 KAR 63:002, Section 2(4)(eeee), 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ), National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Applies to both EP 030 and EP 031.

Comments:
401 KAR 60:005 Section 2(2)(dddd), 40 C.F.R. 63.4200 through 63.4219, Tables 1 through 8 (Subpart IIII) Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. Pursuant to 40 CFR 60.4200, Subpart IIII applies to compression ignition internal combustion engines: 1) with a model year of 2007 or later, 2) constructed after July 11, 2005 and manufactured after April 1, 2006, or 3) modified or reconstructed after July 11, 2005. EP030 is a CI engine with a construction date prior to 2005 while EP031 is a SI engine; therefore, this subpart does not apply to either of the engines.

Emission Unit 030 Main Fire Pump and 031 Boiler Backup Generator

For EP 031, the permittee must comply with the emission standards in Table 1 of 40 CFR 60, Subpart JJJJ: [40 CFR 60.4233(e)] as follows: 10 g/hp-hr NO_X + HC and 387 g/hp-hr CO

For EP 030, the permittee is subject to the work practice standards in Item 1 in Table 2c to 40 CFR 63, Subpart ZZZZ. [40 CFR 63.6602]

Emission Unit 022: Pipeline Equipment

Initial Construction Date: February 22, 1991

Process Description:
Flanges (346), Valves (1026), Pumps (22) and Open Ended Lines (314)
Also includes conservation vents and emergency vent associated with each tank
Control Device: Leak Detection and Repair Program (LDAR)

Applicable Regulation:
401 KAR 57:002, Section 2, 40 C.F.R. 61 (Subpart V), National Emission Standard for Equipment Leaks (Fugitive Emission Sources).

401 KAR 63:002, Section 2(4)(u), 40 C.F.R. 63.680 through 63.698, Tables 1 through 5 (Subpart DD), National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.

Comments:
Emission factors are from EPA-453/R-95-017, Table 2-1 SOCMI average emission factors with speciation for HAPs. Though the uncontrolled SOCMI emission factor provides a PTE of 58.96 tpy of VOC, the fugitive components are subject to LDAR and so the controlled emission factor is reduced by 84% for valves and 69% for pumps and tank agitator seals, making the site wide PTE of VOC less than major source threshold as defined in 401 KAR 59:001.

Emission Unit 025: Container Loading and Unloading

Initial Construction Date: January 1988

Process Description:
Container Loading and Unloading
Four (4) Tanker Loading/Off-Loading (only one (1) loaded at a time)
Two (2) Drip Pans Accumulating Drainage
Twenty-eight (28) Hoppers Accumulating Solids
Fourteen (14) Dump Trailers Accumulating Solids (only one (1) loaded at a time)
Five (5) 55-Gallon Drums:
- Two (2) Tank Load-Out Area
- One (1) Maintenance Area
- One (1) Hold Room
- One (1) Accumulating Solids Containing Liquids from ADDS Unit

Emission Unit 025: Container Loading and Unloading

One (1) Vacuum Tank that removes the liquids from the Drip Pans
Three (3) Dump Trailers for Clean Scrap Metal
Control Device: Regenerative Thermal Oxidizer (RTO)

Applicable Regulation:
401 KAR 63:002, Section 2(4)(u), 40 C.F.R. 63.680 through 63.698, Tables 1 through 5 (Subpart DD), National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.

401 KAR 63:002, Section 2(4)(ff), 40 C.F.R. 63.920 through 63.929 (Subpart PP), National Emission Standards for Containers.

Comments:
401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to each affected facility which emits or may emit potentially hazardous matter or toxic substances, provided that such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division. The requirements for 401 KAR 63:020 do not apply to EP025 because such emissions are subject to standards of 40 CFR Part 63. [State-Origin Requirement]

401 KAR 63:002 Section 2(4)(llll), 40 C.F.R. 63.7880 through 63.7957, Tables 1 through 3 (Subpart GGGGG), National Emission Standards for Hazardous Air Pollutants: Site Remediation. The provisions of this subpart apply to a source that conducts a site remediation, as defined in 40 CFR 63.7957. Pursuant to 40 CFR 63.7881(b)(3) the source is not subject to 40 CFR 63 Subpart GGGGG if the site remediation will be performed under a Resource Conservation and Recovery Act (RCRA) corrective action conducted at a treatment, storage and disposal facility (TSDF) that is either required by its permit issued by either the U.S. Environmental Protection Agency (EPA) or a State program authorized by the EPA under RCRA section 3006; required by orders authorized under RCRA; or required by orders authorized under RCRA section 7003. Safety-Kleen is a TSDF facility that is under RCRA corrective action; therefore, this regulation does not apply.

Emission Unit 021: Automatic Drum Decant System (ADDS)/ Shredder
Emission Unit 023: Drum Shredder, N2 purge, Shaker Screen, Hydrapulper
Emission Unit 024: Solids Separator (Screw Press, Squeezer System)

Initial Construction Date: Various, see below.

Process Description:
021: ADDS/ Shredder (MP02)
The ADDS system is a completely enclosed automated drum processing system that is monitored and controlled by a computer system. The ADDS is utilized to process those materials that are in a liquid or semi-solid matrix. The totally enclosed unit is purged with nitrogen to ensure that the oxygen level is always maintained below 5%. Installation Date: March 1, 1991; Control Device: Thermal Oxidizer

023: Drum Shredder, N2 purge, Shaker Screen, Hydrapulper (MP01, MP03)
Drums containing both liquid and solid material may be shredded, conveyed into a hydrapulper (mixing vessel), blended into fuel, and pumped to a tank for offsite shipment. The Shredding System is also

Emission Unit 021: Automatic Drum Decant System (ADDS)/ Shredder
Emission Unit 023: Drum Shredder, N2 purge, Shaker Screen, Hydrapulper
Emission Unit 024: Solids Separator (Screw Press, Squeezer System)

utilized to shred drums consisting entirely of solid material. The Shredder System is a completely automated and totally enclosed unit purged with nitrogen to ensure that the oxygen level inside the system always remains below 5%. Installation Date: September 11, 1991; Control Device: Thermal Oxidizer

024: Solids Separator (Screw Press, Squeezer System)
The Squeezer System is utilized to process solid materials from the Shredder System that contain absorbed liquids. The Squeezer equipment consists of an enclosed nitrogen purge system.

Installation Date: March 1, 1996; Control Device: Thermal Oxidizer.

Applicable Regulation:
401 KAR 63:002, Section 2(4)(u), 40 C.F.R. 63.680 through 63.698, Tables 1 to 5 (Subpart DD), National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.

Comments:
401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to each affected facility which emits or may emit potentially hazardous matter or toxic substances, provided that such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division. The requirements for 401 KAR 63:020 do not apply to EP021, 023 and 024 because such emissions are subject to standards of 40 CFR Part 63. [State-Origin Requirement]

401 KAR 63:002 Section 2(4)(llll), 40 CFR 63.7880 through 63.7957, Tables 1 through 3 (Subpart GGGGG), National Emission Standards for Hazardous Air Pollutants: Site Remediation. The provisions of this subpart apply to a source that conducts a site remediation, as defined in 40 CFR 63.7957. Pursuant to 40 CFR 63.7881(b)(3) the source is not subject to 40 CFR 63 Subpart GGGGG if the site remediation will be performed under a Resource Conservation and Recovery Act (RCRA) corrective action conducted at a treatment, storage and disposal facility (TSDF) that is either required by its permit issued by either the U.S. Environmental Protection Agency (EPA) or a State program authorized by the EPA under RCRA section 3006; required by orders authorized under RCRA; or required by orders authorized under RCRA section 7003. Safety-Kleen is a TSDF facility that is under RCRA corrective action; therefore, this regulation does not apply.

The unonctrolled emissions of VOC from EP 021, EP023 and EP 024 are 137.7, 137.5 and 57.3 tpy, however the emissions of HAPs from these units are subject to 40 CFR 63, Subpart DD which requires the emissions to be captured by a closed vent system and to a control device. Hence the PTE of VOC emissions from these units is the controlled emissions from the thermal oxidizer.

Emission Unit 005: (NF1 – NF10) Ten 18,500 Gallon Fixed Roof Waste Organic Solvent Storage Tanks
Emission Unit 006: (S1 – S14) Fourteen Fixed Roof Waste Organic Solvent Storage Tanks
Emission Unit 007: (D1 – D7) Seven 7,500 Gallon Fixed Roof Waste Organic Solvent Storage Tanks
Emission Unit 008: (R6 – R11) Six 6,500 Gallon Fixed Roof Organic Solvent Storage Tanks
Emission Unit 011: (V1 – V5) Two 20,000, Three 15,000 Gallon Fixed Roof Waste Organic Solvent Storage Tanks
Emission Unit 020: (HPV-1, HPV-2) Two 15,000 Gallon Homogenizing Process Vessels

Initial Construction Date: Various, see below.

Process Description:

EP005 Waste Organic Solvent Storage Tanks (NF1 – NF10)
Ten (10) 18,500 gallon Fixed Roof Tanks
Maximum Fill Rate: 12,000 gal/hr
Maximum Annual Throughput: 16,800,000 gallons
Installation Date: February 1, 1976
Control Device: Fixed Roof Tanks w/ Closure Device

EP006 Waste Organic Solvent Storage Tanks (S1 – S14)
Fourteen (14) Fixed Roof Tanks
Maximum Fill Rate: 12,000 gal/hr
Maximum Annual Throughput: 13,950,000 gallons
One (1) 20,000 gallon (Constructed June 1971)
One (1) 16,000 gallon (Constructed June 1979)
Eight (8) 15,000 gallon (Constructed September 1982)
Four (4) 8,000 gallon (Three Constructed June 1973 and One (1) Constructed June 1976)
Control Device: Fixed Roof Tanks w/ Closure Device

EP007 Waste Organic Solvent Storage Tanks (D1 – D7)
Seven (7) 7,500 gallon Fixed Roof Tanks
Maximum Fill Rate: 12,000 gal/hr
Maximum Annual Throughput: 1,500,000 gallons
Installation Date: September 1984
Control Device: Fixed Roof Tanks w/ Closure Device

EP008 Organic Solvent Storage Tanks (R6 – R11)
Six (6) 6,500 gallon Fixed Roof Tanks
Maximum Fill Rate: 12,000 gal/hr
Maximum Annual Throughput: 1,782,000 gallons
Installation Date: September 1985
Control Device: Fixed Roof Tanks w/ Closure Device

EP011 Waste Organic Solvent Storage Tanks (V1 – V5)
Two (2) 20,000 gallon Fixed Roof Tanks
(Subject to 40 CFR 60 Subpart Kb)
Three 15,000 gallon Fixed Roof Tanks
Maximum Fill Rate: 12,000 gal/hr
Maximum Annual Throughput: 15,150,000 gallons
Installation Date: January 1986
Control Device: Fixed Roof Tanks w/ Closure Device

Emission Unit 005: (NF1 – NF10) Ten 18,500 Gallon Fixed Roof Waste Organic Solvent Storage Tanks
Emission Unit 006: (S1 – S14) Fourteen Fixed Roof Waste Organic Solvent Storage Tanks
Emission Unit 007: (D1 – D7) Seven 7,500 Gallon Fixed Roof Waste Organic Solvent Storage Tanks
Emission Unit 008: (R6 – R11) Six 6,500 Gallon Fixed Roof Organic Solvent Storage Tanks
Emission Unit 011: (V1 – V5) Two 20,000, Three 15,000 Gallon Fixed Roof Waste Organic Solvent Storage Tanks
Emission Unit 020: (HPV-1, HPV-2) Two 15,000 Gallon Homogenizing Process Vessels

EP020 Homogenizing Process Vessels (HPV-1, HPV-2)
Two (2) 15,000 gallon Homogenizing Process Vessels
Maximum Fill Rate: 12,000 gal/hr
Maximum Annual Throughput: 15,000,000 gallons
Installation Date: January 1986

Applicable Regulation:
401 KAR 60:005, Section 2(2)(r), 40 C.F.R. 60.110b through 60.117b (Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

401 KAR 63:002, Section 2(4)(u), 40 C.F.R. 63.680 through 63.698, Tables 1 to 5 (Subpart DD), National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.

401 KAR 63:002, Section 2(4)(ee), 40 C.F.R. 63.900 through 63.908 (Subpart OO), National Emission Standards for Tanks - Level 1.

Comments:
401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to each affected facility which emits or may emit potentially hazardous matter or toxic substances, provided that such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division. The requirements for 401 KAR 63:020 do not apply to EP005 – EP008, EP011 and EP020 because such emissions are subject to standards of 40 CFR Part 63. [State-Origin Requirement]

401 KAR 63:002 Section 2(4)(llll), 40 CFR 63.7880 through 63.7957, Tables 1 through 3 (Subpart GGGGG), National Emission Standards for Hazardous Air Pollutants: Site Remediation. The provisions of this subpart apply to a source that conducts a site remediation, as defined in 40 CFR 63.7957. Pursuant to 40 CFR 63.7881(b)(3) the source is not subject to 40 CFR 63 Subpart GGGGG if the site remediation will be performed under a Resource Conservation and Recovery Act (RCRA) corrective action conducted at a treatment, storage and disposal facility (TSDF) that is either required by its permit issued by either the U.S. Environmental Protection Agency (EPA) or a State program authorized by the EPA under RCRA section 3006; required by orders authorized under RCRA; or required by orders authorized under RCRA section 7003. Safety-Kleen is a TSDF facility that is under RCRA corrective action; therefore, this regulation does not apply.

Insignificant Activity 027, 028 and 032: Parts Washer Model No. 81

Initial Construction Date: 2011

Process Description:
EP027, 028, 032
Agitating cold-cleaning parts washer w/ liquid capacity of 80 gallons;
Maximum Annual Usage: 520 gallons

Comments:
401 KAR 59:185, *New solvent metal cleaning equipment*. This administrative regulation shall apply to each affected facility commenced on or after June 29, 1979 that is part of a major source located in a county or portion of a county designated attainment or marginal nonattainment for ozone in 401 KAR 51:010. Affected facilities are cold cleaners, open top vapor degreasers, and conveyor-type degreasers that utilize VOCs to remove soluble impurities from metal surfaces. EP027, EP028 and EP032 are cold cleaners, but because Safety-Kleen is a major source for HAPs and not the pollutants listed under the definition of a "major source" in 401 KAR 59:001, this regulation does not apply

401 KAR 63:002 Section 2(4)(m), 40 CFR 63.460 through 63.471, Appendices A through B (Subpart T), National Emission Standards for Halogenated Solvent Cleaning. The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart. Safety-Kleen has cold cleaners that use mineral spirits as a cleaning solvent and not any of the halogenated HAP solvents listed under the provisions of 40 CFR 63.460(a). Therefore, 40 CFR 63 Subpart T does not apply to the source.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit	Test Result	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
021, 023, 024	RTO #1	DRE	NSPS	Initial, every 5 years	Method 25A	N/A	96.4%	EP # 21, ADDS (52.67 drums /hr), EP# 23,Shredder (42 Containers/hr) EP# 24, Squeezer (5148.67 lbs/hr	CMN20120003	6/13/2012
021, 023, 024	RTO #1	DRE	NSPS	Initial and every 5 years	Method 25A	N/A	96.5%	EP # 21 ADDS (54 drums/hr) EP# 23, Shredder (61 drums/hr) EP# 24, Squeezer (3741lb/hr)	CMN20170002	9/20/2017
021, 023, 024	RTO #1	DRE	NSPS	Initial and every 5 years	Method 25A	N/A	92.9%	EP # 21 ADDS (36 drums/hr) EP# 23, Shredder (42 drums/hr) EP# 24, Dehydrator (2.3 hoppers/hr)	CMN20220001	8/31/2022
021, 023, 024	RTO #1	DRE	NSPS	Initial and every 5 years	Method 25A	N/A	95.3%	EP # 21 ADDS (27 drums/hr) EP# 23, Shredder (43 drums/hr) EP# 24, Dehydrator (28 hoppers/hr)	CMN20220002	10/11/2022

Footnotes: The ADDS and Shredder room enclosures were evaluated as a permanent total enclosure (PTE) using procedures in Method 204

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

N/A

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:015, New Indirect Heat Exchangers	001, 018
401 KAR 60:005 Section 2(2)(r), 40 C.F.R 60.110b through 60.117b (Subpart Kb) Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984	011
401 KAR 60:005 Section 2(2)(eeee), 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (Subpart JJJJ), Standards for Stationary Spark Ignition Internal Combustion Engines	031
40 CFR 61, Subpart V, National Emission Standards for Equipment Leaks (Fugitive Emission Sources).	022
401 KAR 63:002 Section 2(4)(u), 40 C.F.R. 63.680 to 63.698, Tables 1 through 5 (Subpart DD), National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations	005-008, 011, 020, 021, 023, 024, 025
401 KAR 63:002 Section 2(4)(ee), 40 C.F.R. 63.900 through 63.908 (Subpart OO), National Emission Standards for Tanks - Level 1	005-008, 011
401 KAR 63:002 Section 2(4)(ff), 40 C.F.R. 63.920 to 63.929 (Subpart PP), National Emission Standards for Containers	025
401 KAR 63:002 Section 2(4)(eeee), 40 C.F.R. 63.6580 through 63.6675, Tables 1a to 8, and Appendix A (Subpart ZZZZ) National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	031, 031
401 KAR 63:002 Section 2(4)(iiii), 40 C.F.R. 63.7480 through 63.7575, Tables 1 through 13 (Subpart DDDDD), National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	001, 008

Table C - Summary of Precluded Regulations:

N/A

Table D - Summary of Non Applicable Regulations:

N/A

Air Toxic Analysis

N/A

Single Source Determination

N/A

SECTION 5 - PERMITTING HISTORY

Permit	Permit Type	Activity#	Complete Date	Issuance Date	Summary of Action	PSD/ Syn Minor
V-05-060	Renewal	APE20040001	3/8/2004	7/12/2006	Renewal	N/A
V-12-008	Renewal	APE20110001	10/7/2011	3/15/2013	Renewal and addition of MACT standards	N/A
V-17-045	Renewal	APE20170003	11/30/2017	6/10/2018	Renewal	N/A

SECTION 6 – PERMIT APPLICATION HISTORY:

None.

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS – Ambient Air Quality Standards
BACT – Best Available Control Technology
Btu – British thermal unit
CAM – Compliance Assurance Monitoring
CO – Carbon Monoxide
Division – Kentucky Division for Air Quality
ESP – Electrostatic Precipitator
GHG – Greenhouse Gas
HAP – Hazardous Air Pollutant
HF – Hydrogen Fluoride (Gaseous)
MSDS – Material Safety Data Sheets
mmHg – Millimeter of mercury column height
NAAQS – National Ambient Air Quality Standards
NESHAP – National Emissions Standards for Hazardous Air Pollutants
NO_x – Nitrogen Oxides
NSR – New Source Review
PM – Particulate Matter
PM_{10} – Particulate Matter equal to or smaller than 10 micrometers
$PM_{2.5}$ – Particulate Matter equal to or smaller than 2.5 micrometers
PSD – Prevention of Significant Deterioration
PTE – Potential to Emit
SO_2 – Sulfur Dioxide
TF – Total Fluoride (Particulate & Gaseous)
VOC – Volatile Organic Compounds