Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

September 10, 2019

Federally Enforceable District Origin Operating Permit Statement of Basis

Owner: Arkema, Inc.

Source: Altuglas Division of Arkema, Inc.

Plant Location: 4350 Camp Ground Road, Louisville, Kentucky 40216

Date Application Received: 01/20/2015

Public Comment Date: 08/08/2019

District Engineer: Chris Gerstle **Permit No:** O-1294-19-F

Plant ID: 1294 **SIC Code:** 2821 **NAICS**: 325211

Introduction:

This permit will be issued pursuant to District Regulation 2.17- *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

This permit is being issued to renew the operating permit for this source.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO_2), carbon monoxide (CO), 1 hr and 8 hr ozone (O_3), and particulate matter less than 10 microns (PM_{10}); and is a non-attainment area for the 1997 standard for particulate matter less than 2.5 microns ($PM_{2.5}$), unclassifiable for the 2012 standard for particulate matter less than 2.5 microns ($PM_{2.5}$) and partial non-attainment area for sulfur dioxide (SO_2).

Application Type/Permit Activity:
[ ] Initial Issuance
[ ] Permit Revision
  [ ] Administrative
  [ ] Minor
  [ ] Significant
[X] Permit Renewal

Compliance Summary:
[ ] Compliance certification signed
[ ] Source is out of compliance
[ ] Compliance schedule included
[X] Source is operating in compliance

I. Source Information

1. **Product Description:** Arkema manufactures acrylic sheet and pellets.

2. **Process Description:** The source is a chemical manufacturing plant that produces acrylic molding powder and pellets.

3. **Site Determination:** There are no other facilities that are contiguous or adjacent to this facility.

4. **Emission Unit Summary:**
   - Bulk Loading/Shipping System
   - KM Extruder System
   - KM Packout System
   - KS Polymer Sheet System
   - Parts Washer

5. **Fugitive Sources:** Equipment leaks from pumps, valves, compressors, agitators, pressure relief devices, open-ended valves or lines, flanges, connectors, and instrumentation systems that operate in organic hazardous air pollutant (OHAP) service 300 hours or more during the calendar year.

6. **Permit Revisions**:

Revision No. / Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
40-06-F	08/03/06	06/19/06	Initial	Entire Permit	Initial Issuance
40-06-F (R1)	08/31/06	N/A	Administrative	S2.ix., S2.xii., S2.xiii., and S3.c.ii.1)	Correct the identification numbers for the Clr-Load and Red-Load Filters. Correct the pressure drop range of 18-108. Change gallons to pounds of product, since it is dry.
40-06-F (R2)	04/26/10	03/14/10	Renewal	Entire Permit	Renewal, RO Change, Modify pressure drop
O-1294-19-F	08/08/19	09/10/19	Renewal	Entire Permit	Renewal and incorporation of construction permits 29794-10-C and 35262-12-C(R3)[1]

1 Permit 352626-12-C replaced the conditions of the Bagging Emission Sources unit (pg. 38-42) of the FEDOOP 40-06-F(R2). This permit also replaced the conditions of some repurposed equipment from the Bulk Loading System Emission Sources unit (pg. 8-14) as listed in the equipment table. This permit replaced the TAC limits from the Extruder Die System Emission Sources unit (S1.f.ii. pg. 20), and replaces the baghouse (16-328) pressure drop limit from permit 29794-10-C (S2.a.ii.2)(b)).

7. Construction Permit History:

Permit No.	Issue Date	Description
29794-10-C	12/1/10	One (1) Premier Pneumatics Inc Baghouse (16-328; U-KM-KM2Rework), controlling emissions from the KM-2 Rework System (Rework Process Cyclone (16-331) and DR Process Cyclone (16-348)
35262-12-C, (R1), (R2), (R3)	6/6/2012 12/13/2012 3/6/2013 3/6/2014	Sheet extrusion lines 10 and 11 with fourteen new pellet drying units, feed hoppers, one new pellet receiver, one new dryer system feed hopper, two new silos, two new grinders, three saws and three new baghouses. Repurposed existing equipment includes three storage silos, one pellet receiver, one dryer system feed hopper, and four dust collectors.

8. Emission Summary:

Pollutant	District Calculated Actual Emissions (ton/year) 2016 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	0.61	No
NO_x	0.72	No
PM_{10}	10.73	Yes
SO_2	0.004	No
VOC	5.50	Yes
Total HAPs	5.01	Yes
Single HAP (methyl methacrylate)	4.78	Yes

Construction Permit revision R1 was to include the following process modifications: re-purposing of an additional existing Silo Process Collector (16-650) into the Sheet Line at an hourly capacity of 16 tons of pellets / hour, increasing the maximum hourly capacity of the other existing Silo Process Collector (16-655) to 16 tons of pellets / hour, increasing the maximum annual throughput of Silo 1 and 2 (10-161 and 11-161) to 10 million pounds / year each, equipping the two grinders (10-164 and 11-164) with a baghouse, and a new masking saw (11-500).
Construction Permit revision R2 was for the installation of a Dust Collector with Filter Bag Assembly as C-10-206 in place of the originally permitted baghouse.
Construction Permit revision R3 revised the maximum production rates for Line 10 (EP 10-120-004, 10-122) to 4,500 lb/hr and for Line 11 (11-120-002, 11-122) to 4,300 lb/hr and lowered abatement efficiency of baghouses B-04 and B-05 from 99% to 95% which control Line 10 and 11 trim saws (EP 10-163, 11-163). Line 10 and 11 extruder feed hoppers (EP 11-120-002, 11-172) was vented to baghouse 18-520 to decrease PM released into the plant air which creates a new emissions source, but is insignificant. There was also an increase in the maximum rate for grinders (EP 10-164, 11-164) to 7,000 lb/hr. Existing silo (EP 12-645) was repurposed to the KS line at capacity of 18 tons of pellets / hour. Tank 16-115 was modified to be used in monomer service with operational flexibility, used as a holding space during quality testing and vented to the Thermal Oxidizer when in service. Two new insignificant activity miter saws were added to cut corrugated cardboard.

9. Applicable Requirements:

[ ] PSD	[ ] 40 CFR 60	[X] SIP	[X] 40 CFR 63
[ ] NSR	[ ] 40 CFR 61	[X] District-Origin	[ ] Other

10. Referenced MACT Federal Regulations: None

11. Referenced non-MACT Federal Regulations:

40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

12. Non-Applicable Regulations:

40 CFR Part 60 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* does not apply because the capacity of each storage vessel is less than 75 m^3 (19,812 gal) per 40 CFR 60.110b(b).

40 CFR Part 60 Subpart VV, *Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry* does not apply because the facility is not classified as a SOCMI facility and does not produce as products or intermediates any of the chemicals listed in 40 CFR 60.489.

40 CFR Part 60, Subpart DDD, *Standards of Performance for Volatiles Organic Compound Emissions from the Polymer Manufacturing Industry* only applies to affected SOCMI facilities involved in the manufacture of polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate).

40 CFR Part 60, Subpart III, *Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) Air Oxidation Unit Processes*, does not apply because the facility is not classified as a SOCMI facility, does not use air oxidation unit processes, and none of the listed chemicals are manufactured by it.

40 CFR Part 60, Subpart NNN, *Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) Distillation Operations,* does not apply because the facility is not classified as a SOCMI facility and none of the listed chemicals are manufactured by it.

40 CFR Part 60, Subpart RRR, *Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacture Industry (SOCMI) Reactor Processes,* only applies to SOCMI manufacturers of specific listed chemicals and PMMA is not listed.

40 CFR Part 63, Subparts F, G, H, I (HON), do not apply because PMAA is not a listed chemical product per Table 1 or listed in 63.100(b)(ii)(A) or (B).

40 CFR Part 63, Subpart VVVVVV, does not apply because no Table 1 HAPs are present at the facility.

II. Regulatory Analysis

1. **Acid Rain Requirements**: The source is not subject to the Acid Rain Program.

2. **Stratospheric Ozone Protection Requirements**: Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. The source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

3. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.

4. **40 CFR Part 64 Applicability Determination:** The source is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*.

5. **Basis of Regulation Applicability**

   a. **Plant-wide**

   The source is a potential major source for the pollutants PM_{10}, VOC, single HAP and total HAP. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

   Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards.

   Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an Annual Compliance Report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

b. **Equipment**

Bulk Loading/Shipping System

EP ID ("E-KM-")	Description	Applicable Regulation(s)	Control Device ("C-KM-")
Clear Silos (U-KM-Silos1)			
16-630	Clear Storage Silo, 50,000 lb/hr (1973)	6.09	16-671
16-635	Clear Storage Silo, 50,000 lb/hr (1973)		
16-640	Clear Storage Silo, 50,000 lb/hr (1985)	7.08	
16-645	Clear Storage Silo, 50,000 lb/hr (1985)		
16-690	Blend Tank, 36,000 lb/hr (1974)	6.09	
RCV-16-630-007	Silo Rotary Valve, 50,000 lb/hr (1973)	6.09	16-644
RCV-16-635-007	Silo Rotary Valve, 50,000 lb/hr (1973)		
RCV-16-640-007	Silo Rotary Valve, 50,000 lb/hr (1985)	7.08	
RCV-16-645-007	Silo Rotary Valve, 50,000 lb/hr (1985)		
Clear Silo DCL System (U-KM-CLR_DCL)			
12-614	DCL Head Station 1, 30,000 lb/hr (2001)	7.08	12-613
12-615	DCL Head Station 2, 30,000 lb/hr (2001)		
12-616	DCL Head Station 3, 30,000 lb/hr (2001)		
12-617	DCL Head Station 4, 30,000 lb/hr (2001)		
12-376	Railcar Unloading Filter, 24,000 lb/hr (2008)		
12-377	Railcar Unloading Process Cyclone, 24,000 lb/hr (2008)		
Color Silos (U-KM-Silos2)			
12-380	Red Storage Silos, 50,000 lb/hr (1989)	7.08	12-390
12-385	Red Storage Silos, 50,000 lb/hr (1989)		
12-338	Red Bulk Loading, 50,000 lb/hr (1989)	7.08	12-338

KM Extruder System

EP ID ("E-KM-")	Description	Applicable Regulation(s)	Control Device ("C-KM-")
KM Die and Die Ventilation Systems (U-KM-Die)			
12-162	KM1 Die Head, 12,000 lb/hr; (1967)	STAR, 6.09, 6.24	16-547
16-162	KM2 Die Head, 12,000 lb/hr; (1974)		
12-701	Chemical Sewer Tank, 1,500 gal (2000)	7.12	N/A
KM Extruder System (U-KM-Extruders)			
12-367	KM1 Hub Seal, 12,000 lb/hr (1967)	STAR, 6.24	12-199
12-105	KM1 Recycle Tank, 4,800 gal (1967)	STAR, 6.24	12-199
12-110	TVM Testing Tank, 4,800 gal (1967)	STAR, 6.24	12-199
12-115	EA Tank, 4,800 gal (1967)	STAR, 6.24	12-199
12-140	KM1 Reactor, 950 gal (1967)	STAR, 6.24	12-199
12-150	KM1 Dump Tank, 2,000 gal (1967)	STAR, 6.24	12-199
12-160	KM1 Extruder, 20,000 lb/hr (1967)	STAR, 6.24	12-199
12-190	Rundown Tank, 700 gal (1967)	STAR, 6.24	12-199
16-367	KM2 Hub Seal, 12,000 lb/hr (1974)	STAR, 6.24	12-199
16-105	KM2 Recycle Tank, 4,800 gal (1974)	STAR, 6.24	12-199
16-110	MMA Tank, 4,800 gal (1974)	STAR, 6.24	12-199
16-115	TVM Holding Tank, 4,800 gal (1974)	STAR, 6.24	12-199
16-140	KM2 Reactor, 750 gal (1974)	STAR, 6.24	12-199
16-150	KM2 Dump Tank, 2,500 gal (1974)	STAR, 6.24	12-199
16-160	KM2 Extruder, 20,000 lb/hr (1974)	STAR, 6.24	12-199
12-458	nDDM Tank, 1,080 gal (2000)	STAR, 7.25 BACT	12-199
12-118	nDDM Weigh Tank, 20 gal (1997) [IA]	1.02, 7.25 BACT	12-199
12-465	KM Reactor Feed Tank #1, 200 gal (2001) [IA]		12-199
16-465	KM Reactor Feed Tank #2, 200 gal (2001) [IA]		12-199
12-455	DtDDS Tank, 100 gal (2000) [IA]		12-199
12-461	DTAC Tank, 110 gal (2000) [IA]	1.02, 7.25	NA
Beringer Pyrolysis Oven			
Oven	Pyrolysis Oven, 1,000 lb/hr	1992	STAR, 7.08, 7.25

EP ID ("E-KM-")	Description	Applicable Regulation(s)	Control Device ("C-KM-")
KM-1 Additive System (U-KM-KM1Add)			
12-127	KM1 Methyl Salicylate Tank, 150 gal (2001) [IA]	1.02, 7.25 BACT	12-199
12-155	KM1 "Color" Additive Tank, 150 gal (1986) [IA]		12-199
12-156	KM1 "Color" Additive Tank, 150 gal (1986) [IA]		12-199
12-165	KM1 "Clear" Additive Tank, 150 gal (1986) [IA]	1.02, 7.25 BACT	12-199
12-166	KM1 "Clear" Additive Tank, 150 gal (1986) [IA]		12-199
KM-2 Additive System (U-KM-KM2Add)			
16-127	KM2 Methyl Salicylate Tank, 150 gal (1974) [IA]	1.02, 6.24	12-199
16-155	KM2 "Color" Additive Tank, 150 gal (1974) [IA]	1.02, 6.24	12-199
16-156	KM2 "Color" Additive Tank, 150 gal (1974) [IA]	1.02, 6.24	12-199
16-165	KM2 "Clear" Additive Tank, 150 gal (1974) [IA]	1.02, 6.24	12-199
16-166	KM2 "Clear" Additive Tank, 150 gal (1974) [IA]	1.02, 6.24	12-199
KM1 Rework Feed System (U-KM-KM1Rework)			
12-256	KM1 Rework Process Cyclone, 3,000 lb/hr (1995)	7.08	12-257
KM2 Rework Feed System (U-KM-KM2Rework)			
16-331	KM2 Rework Process Cyclone, 3,000 lb/hr (1974)	6.09	16-328
16-348	KM2 DR Process Cyclone, 3,000 lb/hr (1995)	7.08	

KM Packout System

EP ID ("E-KM-")	Description	Applicable Regulation(s)	Control Device ("C-KM-")
KM-1 Product Screening (U-KM-KM1Screen)			
12-267	KM1 Witte Screener, 12,500 lb/hr (1989)	7.08	12-270
KM-1 Product Transfer System (U-KM-KM1Transf)			

EP ID ("E-KM-")	Description	Applicable Regulation(s)	Control Device ("C-KM-")
12-363	KM1 Pellet Transfer Process Cyclone, 12,500 lb/hr (1995)	7.08	12-362
KM-2 Product Screening (U-KM-KM2Screen)			
16-272	KM2 Witte Screener, 12,500 lb/hr (1970)	6.09	16-275
KM-2 Product Transfer System (U-KM-KM2Transf)			
16-330	KM2 Pellet Transfer Process Cyclone, 12,500 lb/hr (1995)	7.08	16-329
Miscellaneous (U-KM-Misc)			
12-087	Packout House Vacuum, 1,000 lb/hr (1974)	6.09	12-087
12-369	Pelletron, 12,500 lb/hr (1999)	7.08	12-371
Packout System Emission Point (U-KM-Pack)			
12-343	KM1 Fill Station, 15,000 lb/hr (1995)	7.08	16-286
16-303	KM2 Fill Station, 15,000 lb/hr (1995)		
Common Screen System (U-KM-KM3-Screen)			
16-337	3rd Witte Screener, 20,000 lb/hr (1994)	7.08	16-338

KS Polymer Sheet System

EP ID ("E-KS-")	Description	Applicable Regulation(s)	Control Device ("C-KM-")
Pellet Receiving, Storage, Handling and Grinding			
10-108	Storage Silo, 36,000 lb/hr (1974)	6.09	10-116
10-109	Storage Silo, 36,000 lb/hr (1974)	6.09	10-116
16-650	Clear Storage Silo, 36,000 lb/hr (1986)	7.08	16-671
16-655	Clear Storage Silo, 36,000 lb/hr (1986)	7.08	16-671
RCV-16-650-007	Silo Rotary Valve, 36,000 lb/hr (1986)	7.08	16-644
RCV-16-655-007	Silo Rotary Valve, 36,000 lb/hr (1986)	7.08	16-644
10-106	Silo 1, 15,000 lb/hr (2013) [IA]	1.02, 7.08	None
10-107	Silo 2, 15,000 lb/hr (2013) [IA]	1.02, 7.08	None
10-101	Bag Tote Dumper , 30,000 lb/hr (1991)	7.08	10-520
10-546	Pellet Receiver, 10,000 lb/hr (1991)	7.08	10-520
10-545	Pellet Hopper, 10,000 lb/hr (1991)	7.08	10-520
10-555	Pellet Receiver, 36,000 lb/hr (2013)	7.08	10-520

EP ID ("E-KS-")	Description	Applicable Regulation(s)	Control Device ("C-KM-")
10-553	Pellet Hopper, 36,000 lb/hr (2013)	7.08	10-520
10-041	Grinder 1, 5,000 lb/hr (2013)	7.08	10-043
10-045	Grinder 2, 5,000 lb/hr (2013)	7.08	10-043
10-525	Bagging House Vacuum, 900 lb/hr (2013) [IA]	1.02, 7.08	10-525
Pellet Drying			
10-001 through 10-006	Dryers 13-18 Silos Process Collectors, 4,500 lb/hr combined (2013) [IA]	1.02, 7.08	None
11-007 through 11-014	Dryers 19-26 Silos Process Collectors, 4,500 lb/hr combined (2013) [IA]	1.02, 7.08	None
Line 10 Pellet Feed Transfer Hoppers			
10-060	Tote Unload Unit 4 Process Collectors 10-A, 750 lb/hr (2013) [IA]	1.02, 7.08	None
10-061	Tote Unload Unit 4 Process Collectors 10-B, 750 lb/hr (2013) [IA]	1.02, 7.08	None
10-066	Waste Tote Process Collector 10-C, 750 lb/hr (2013) [IA]	1.02, 7.08	None
10-062	Process Collector 10-RG-1, 750 lb/hr (2013) [IA]	1.02, 7.08	None
10-063	Process Collector 10-RG-2, 750 lb/hr (2013) [IA]	1.02, 7.08	None
10-064	Process Collector 10-VN-1, 750 lb/hr (2013) [IA]	1.02, 7.08	None
Sheet Line 10			
10-120-004	Extruder 10 Feed Hopper, 4,500 lb/hr (2013)	7.08	10-520
10-120	Extruder 10, 4,500 lb/hr (2013)	STAR & 7.25 (non-BACT)	10-320
10-122	Extruder 10 Die Head, 4,500 lb/hr (2013)	STAR, 7.08 & 7.25 (non-BACT)	10-400
Line 11 Pellet Feed Transfer Hoppers			
11-060	Tote Unload Unit 01 Process Collectors 11-A, 563 lb/hr (2013) [IA]	1.02, 7.08	None
11-061	Tote Unload Unit 01 Process Collectors 11-B, 563 lb/hr (2013) [IA]	1.02, 7.08	None
11-066	Waste Tote Process Collector 11-C, 563 lb/hr (2013) [IA]	1.02, 7.08	None

EP ID ("E-KS-")	Description	Applicable Regulation(s)	Control Device ("C-KM-")
11-062	Process Collector 11-RG-1, 563 lb/hr (2013) [IA]	1.02, 7.08	None
11-06	Process Collector 11-RG-2, 563 lb/hr (2013) [IA]	1.02, 7.08	None
11-064	Process Collector 11-VN-1, 563 lb/hr (2013) [IA]	1.02, 7.08	None
11-105	Co-Extruder 11-A Pellet Feed Hopper, 563 lb/hr (2013) [IA]	1.02, 7.08	None
11-115	Co-Extruder 11-C Pellet Feed Hopper, 563 lb/hr (2013) [IA]	1.02, 7.08	None
Sheet Line 11			
11-120-002	Extruder 11 Feed Hopper, 4,500 lb/hr (2013)	7.08	10-520
11-120	Extruder 11, 4,500 lb/hr (2013)	STAR & 7.25 (non-BACT)	10-320
11-122	Extruder 11 Die Head, 4,500 lb/hr (2013)	STAR, 7.08 & 7.25 (non-BACT)	10-400
Sawing			
10-270	Masking Saw, 920 lb/hr (2013) [IA]	1.02, 7.08	10-260
10-173	Miter Saw 1, 60 lb/hr (2013) [IA]	1.02, 7.08	None
11-173	Miter Saw 2, 60 lb/hr (2013) [IA]	1.02, 7.08	None
10-163[2]	Line 10 Trim Saw Room, 4,500 lb/hr (2013)	7.08	10-184
11-163[3]	Line 11 Trim Saw Room, 4,500 lb/hr (2013)	7.08	11-184
10-250	Off-Line Trim Saw, 900 lb/hr (2013) [IA]	1.02, 7.08	10-206

Parts Washer

EP ID	Description	Applicable Regulation(s)	Control Device
KM-washer 1	KM parts washer in maintenance shop (2000)	6.18	None

2 Contains Line 10 Trim Saws 1-4 and Cross Cut Saw
3 Contains Line 11 Trim Saws 1-4 and Cross Cut Saw

Emergency Generators

EP ID	Description	Applicable Regulation(s)	Control Device
EG1	One (1) propane fueled emergency generator rated at 88 HP, make Ford, model 12-580 (1966)	40 CFR 63 Subpart ZZZZ	None
EG2	One (1) propane fueled emergency generator rated at 88 HP, make Ford, model 16-580 (1966)		None

c. **Basis for Applicability**

Applicable Regulation	Basis for Applicability
STAR	Applicable to process equipment emitting a TAC
1.02	Defines insignificant activities
6.09	Applicable to process operations that commenced construction on or before September 1, 1976
6.18	Applicable to solvent metal cleaning equipment that use VOCs
6.24	Applicable to any affected facility using any organic materials which was in being prior to June 13, 1979
7.08	Applicable to process operations that commenced construction after September 1, 1976
7.12	Applicable to VOC storage tanks with a storage capacity greater than 250 gallons that commenced construction or medication on or after April 19, 1972
7.25	Applicable to any affected facility which uses VOCs that commenced construction after June 13, 1979
40 CFR 63 Subpart ZZZZ	Applicable to stationary RICE located at area source of HAP emissions

i. **Standards/Operating Limits**

1) **PM/PM_{10}**

(a) Regulation 6.09, section 3.2 establishes PM standards. The PM standard is calculated using the following equation:
$E = 4.10\ (\text{Process Weight Rate tons/hr})^{0.67}$

(b) Regulation 7.08, section 3.1.2 establishes PM standards. The PM standard is calculated using the following equation:
$E = 3.59\ (\text{Process Weight Rate tons/hr})^{0.62}$

2) **Opacity**

Regulations 6.09, section 3.1 and 7.08, section 3.1 establishes opacity standards.

3) **VOC**

(a) Regulation 7.12 requires a submerged fill pipe if the storage tank contents vapor pressure is greater than 1.5 psia.

(b) Regulation 7.25 establishes a plant-wide VOC limit of 5 tons per year for all affected facilities, unless Best Available Control Technology (BACT) level of control is utilized to reduce the VOC emissions.

(c) Regulation 6.24 limits the pound per hour and pound per day emissions of Class II and Class III solvents, unless the emissions are reduced by at least 85%.

4) **HAP (LDAR)**

(a) The permit contains LDAR standards that apply to pumps, valves, compressors, agitators, pressure relief devices, open-ended valves or lines, flanges, connectors, and instrumentation systems that operate in organic hazardous air pollutant (OHAP) service 300 hours or more during the calendar year.

(b) Regulation 40 CFR 63.6590 and 6640 establishes unit operation requirements for emergency generators.

III. Other Requirements

1. Temporary Sources: The source did not request to operate any temporary facilities.

2. Short Term Activities: The source did not report any short term activities.

3. Emissions Trading: N/A

4. Operational Flexibility: The source did not request any operation flexibility.

5. Compliance History:

Incid. #	Date	Regulation Violated	Settlement
02188	08/09/2000	Reg. 2.03, section 5, Failure to comply with District permit	Board ($65,000)
06800	11/29/2016	Reg. 2.17, failure to repair leaking equipment and failed to perform all monitoring required by District permit	Board ($14,625)

6. Calculation Methodology or Other Approved Method:

District approved emission factors shall be used, as provided in the original FEDOOP application received February 28, 2003.

7. Insignificant Activities

Description	Quantity	Basis
Internal Combustion Engines, Fixed or Mobile	20	Regulation 1.02, Appendix A
Plastics molding	4	
Processes used exclusively for extruding metals, minerals, or wood	1	
Lab Ventilating and Exhausting Systems, Non-radioactive materials	1	
Soil or Groundwater Contamination Remediation, Passive or total removal	1	
EP 10-(001-006) Dryers 13-26 Silos, Process Collectors	7	
EP 11-(007-014) Dryers 13-26 Silos, Process Collectors	7	
EP 10-060 Tote Unload Unit 4, Process Collectors 10-A	1	
EP 10-061 Tote Unload Unit 4, Process Collectors 10-B	1	
EP 10-066 Waste Tote Process Collector 10-C	1	
EP 10-162 Process Collector 10-RG-1	1	
EP 10-163 Process Collector 10-RG-2	1	
EP 10-164 Process Collector 10-VN-1	1	
EP 11-105 Co-Extruder 11-A Pellet Feed Hopper	1	
EP 11-115 Co-Extruder 11-C Pellet Feed Hopper	1	
EP 11-060 Tote Unload Unit 01, Process Collectors 11-A	1	
EP 11-061 Tote Unload Unit 01, Process Collectors 11-B	1	
EP 11-066 Waste Tote Process Collector 11-C	1	
EP 11-162 Process Collector 11-RG-1	1	
EP 11-163 Process Collector 11-RG-2	1	
EP 11-164 Process Collector 11-VN-1	1	
Portable Diesel/Gasoline Storage Tanks (<500 gal)	2	Regulation 2.16, section 1.23.1.2
VOC Storage Vessels < 250 gal	29	
Direct-Fired Space Heaters (<10 MMBtu/hr)	4	
Emergency Generators (88 hp each, propane fired, 1966)	2	
EP 10-106 Silo 1	1	
EP 10-107 Silo 2	1	
EP 10-041 Grinder 1	1	
EP 10-045 Grinder 2	1	
EP 10-173 Miter Saw 1	1	
EP 10-173 Miter Saw 2	1	
EP 10-120-004 Extruder 10 Feed Hopper	1	

Description	Quantity	Basis
EP 11-120-002 Extruder 11 Feed Hopper	1	

1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.

2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.

3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.

4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.

6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.