



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0631-19-F(R1)

Plant ID: 0631

Effective Date: 06/11/2019

Expiration Date: 06/30/2024

Revision Date: 06/10/2021

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

<p>Source: Superior Industrial Solutions, Inc. 4211 Bramers Lane Louisville, KY 40216</p>	<p>Owner: Superior Industrial Solutions, Inc. 1402 N Capitol Ave, Suite 100 Indianapolis, IN 46202</p>
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The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.


Emission limitations to qualify for non-major status:

Pollutant:	VOC	Single HAP	Total HAP
Tons/year:	< 25	< 5	< 12.5

Application No.: See **Application and Related Documents** table.

Public Notice Date: 05/03/2019

Permit writer: Shannon Hosey

DocuSigned by:

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Air Pollution Control Officer
 6/10/2021

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FEDOOP Permit Revisions/Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
380-03-F	12/21/2003	03/01/2004	Initial	Initial Permit Issuance
380-03-F (R1)	01/30/2014	03/12/2014	Renewal	Permit Renewal
O-0631-15-F	12/23/2015	NA	Admin.	Incorporated Construction Permit C-0631-1000-14-F and renamed the emission units for improved organization
O-0631-19-F	05/03/2019	06/11/2019	Renewal	Permit Renewal
O-0631-19-F(R1)	NA	06/10/2021	Admin.	Company name change

Construction Permit Summary

Permit No.	Issue Date	Description
C-0631-1000-14-F	10/10/2014	One (1) cargo tank/tote dryer system, two (2) 7,000 gallon blend tanks (Tanks S-1 & S-2), one (1) 2,000 gallon blend tank (Tank 40), one (1) 3,700 gallon blend tank (Tank 41), one (1) 1,200 gallon blend tank (Tank 42), one (1) 500 gallon blend tank (Tank 43) and eight (8) 10,000 gallon storage tanks
C-0631-1001-19-F	03/19/2019	Storage Tank 26, 10,465 Gallons ¹ Swing Tank 19, 1,200 Gallons ² Swing Tank 20, 1,200 Gallons ³ Swing Tank 21, 6,800 Gallons ⁴ Blend Tank 44, 61 Gallons (IA) ⁵

Application and Related Documents

Document Number	Date	Description
96563	12/20/2018	FEDOOP renewal application with construction application for new tanks
201187	03/17/2021	Administrative Information Form AP-100A; request company name change (KY Secretary of State Organization Number 0156467)

¹ Replaced Tank 26.² Replaced Tank 19.³ Replaced Tank 20.⁴ Installed Tank 21.⁵ Installed Tank 44 (IA).

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
(M)SDS	- (Material) Safety Data Sheet
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-annual reports demonstrating compliance with the emission limitations specified. The reports shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
 - The signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

- G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.04	Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)
2.05	Prevention of Significant Deterioration
2.06	Permit Requirements – Other Sources
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.

G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137***

Plantwide Requirements

Plantwide Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.14	Hazardous Air Pollutants and Source Categories	1, 2

Plantwide Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. HAP

- i. The owner or operator shall not allow or cause the plantwide emissions of any single HAP to exceed 5 tons during any consecutive 12-month period.⁶
[Regulation 5.00, section 1.13.5.2]
- ii. The owner or operator shall not allow or cause the plantwide total HAP emissions to exceed 12.5 tons during any consecutive 12-month period.⁶
[Regulation 5.00, section 1.13.5.3]

b. VOC

The owner or operator shall not allow or cause total plantwide VOC emissions to equal or exceed 25 tons during any consecutive 12-month period.⁶
[Regulation 5.00, section 1.13.5.1]

S2. Monitoring and Record Keeping

(Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. HAP/VOC

The owner or operator shall, monthly, calculate and record the monthly and 12-consecutive month plantwide total emissions for VOC, single HAP and total HAP for each month in the reporting period.

S3. Reporting

(Regulation 2.17, section 5.2)

The owner or operator shall report the following information, as required by General Condition G12:

⁶ On 10/25/13, Superior Industrial Solutions, Inc. requested the limits of the criteria pollutant VOC < 25 tpy, total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as a FEDOOP source exempt from STAR, as defined by Regulation 5.00, section 1.13.5.

a. HAP/VOC

The owner or operator shall report the plantwide monthly and 12-consecutive month total emissions for VOC, single HAP and total HAP for each month in the reporting period.

Emission Unit UA: Storage Tanks**UA Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 7 & 8
40 CFR 60 Subpart Kb	Federal New Source Performance Standards for VOC Liquid Storage Vessels	§§60.116(b) and 60.116(c)

UA Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
A1	Storage Tank 1, 19,500 Gallons	1978	7.12	NA	Fugitive
A2	Storage Tank 2, 19,500 Gallons	1978	7.12	NA	Fugitive
A3	Storage Tank 3, 19,500 Gallons	1978	7.12	NA	Fugitive
A4	Storage Tank 4, 19,500 Gallons	1978	7.12	NA	Fugitive
A5	Storage Tank 5, 19,500 Gallons	1978	7.12	NA	Fugitive
A6	Storage Tank 6, 19,500 Gallons	1978	7.12	NA	Fugitive
A7	Storage Tank 7, 9,500 Gallons	1978	7.12	NA	Fugitive
A8	Storage Tank 8, 9,500 Gallons	1978	7.12	NA	Fugitive
A9	Storage Tank 9, 9,500 Gallons	1978	7.12	NA	Fugitive
A10	Storage Tank 10, 9,500 Gallons	1978	7.12	NA	Fugitive
A11	Storage Tank 11, 6,500 Gallons	1978	7.12	NA	Fugitive
A13	Storage Tank 13, 30,000 Gallons	1990	7.12, 40 CFR 60 Subpart Kb	NA	Fugitive
A14	Storage Tank 14, 30,000 Gallons	1990		NA	Fugitive
A17	Storage Tank 17, 10,000 Gallons	2000	7.12	NA	Fugitive
A18	Storage Tank 18, 10,000 Gallons	2000	7.12	NA	Fugitive
A19 ⁷	Swing Tank 19, 1,200 Gallons	2019	7.12	NA	Fugitive

⁷ Tank 12 has been removed, Tank 19 and Tank 20 have been replaced with 1,200 gallon swing tanks, Tank 26 has been replaced with a 10,465 gallon storage tank, and Tank 21, a 6,800 gallon swing tank, has been installed. The swing tanks are regulated under Regulation 7.12 and not Regulation 7.25, because they serve as storage tanks; Regulation 7.25 only applies if not regulated elsewhere in Regulation 7 as to emissions of VOCs.

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
A20 ⁷	Swing Tank 20, 1,200 Gallons	2019	7.12	NA	Fugitive
A21 ⁷	Swing Tank 21, 6,800 Gallons	2019	7.12	NA	Fugitive
A23	Storage Tank 23, 10,000 Gallons	2000	7.12	NA	Fugitive
A25	Storage Tank 25, 10,000 Gallons	1997	7.12	NA	Fugitive
A26 ⁷	Storage Tank 26, 10,465 Gallons	2019	7.12	NA	Fugitive
A27	Storage Tank 27, 10,000 Gallons	1997	7.12	NA	Fugitive
A28	Storage Tank 28, 10,000 Gallons	1997	7.12	NA	Fugitive
A36	Storage Tank 36, 10,000 Gallons	2003	7.12	NA	Fugitive
A37	Storage Tank 37, 10,000 Gallons	2003	7.12	NA	Fugitive
A44	Storage Tank 44, 10,000 Gallons	2014	7.12	NA	Fugitive
A45	Storage Tank 45, 10,000 Gallons	2014	7.12	NA	Fugitive
A46	Storage Tank 46, 10,000 Gallons	2014	7.12	NA	Fugitive
A47	Storage Tank 47, 10,000 Gallons	2014	7.12	NA	Fugitive
A48	Storage Tank 48, 10,000 Gallons	2014	7.12	NA	Fugitive
A49	Storage Tank 49, 10,000 Gallons	2014	7.12	NA	Fugitive
A50	Storage Tank 50, 10,000 Gallons	2014	7.12	NA	Fugitive
A51	Storage Tank 51, 10,000 Gallons	2014	7.12	NA	Fugitive
A52	Swing Tank S-1, 7,000 Gallons	2014	7.12	NA	Fugitive
A53	Swing Tank S-2, 7,000 Gallons	2014	7.12	NA	Fugitive

UA Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. HAP

See Plantwide HAP Standards.

b. VOC

- i. The owner or operator shall equip the storage vessels with a permanent submerged fill pipe.^{8,9} [Regulation 7.12, section 3.3]
- ii. See Plantwide VOC Standards.

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. HAP

See Plantwide HAP Monitoring and Record Keeping.

b. VOC

- i. The owner or operator of the storage vessel(s) shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the date of the change, and the new vapor pressure.
- ii. The owner or operator shall keep a record that shows that the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.

⁸ Except for Emission Points A13 and A14, 40 CFR 60 Subpart K, 40 CFR 60 Subpart Ka and 40 CFR 60 Subpart Kb are not applicable due to the size of the tanks. Emission Points E13 and E14 are only applicable to Subpart Kb. Subpart K and Subpart Ka only apply to tanks larger than 40,000 gallons and Subpart Kb applies only to tanks larger than 75 cubic meters (19,813 gallons).

⁹ The tanks are equipped with submerged fill.

- iii. For Emission Points A13 and A14:
 - (1) The owner or operator of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)]
 - (2) The owner or operator of each storage vessel with a design capacity greater than or equal to 75 m³ (19,813 gallons) but less than 151 m³ (39,890 gallons) storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa (2.18 psia) shall maintain a record of the VOL¹⁰ stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.¹¹ [40 CFR 60.116b(c)]
- iv. See Plantwide VOC Monitoring and Record Keeping.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. HAP

See Plantwide HAP/VOC Reporting.

b. VOC

See Plantwide HAP/VOC Reporting.

¹⁰ Volatile Organic Liquid

¹¹ Tanks A13 and A14 have capacities of 113.56 m³ and are storing liquids with vapor pressures greater than or equal to 15 kPa.

Emission Unit UB: Blend Tanks**UB Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

UB Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
B30	Blend Tank 30, 6,000 Gallons	1995	7.25	NA	Fugitive
B31	Blend Tank 31, 500 Gallons	1995	7.25	NA	Fugitive
B32	Blend Tank 32, 500 Gallons	1995	7.25	NA	Fugitive
B39	Blend Tank 39, 200 Gallons	1995	7.25	NA	Fugitive
B41	Blend Tank 41, 3,700 Gallons	2014	7.25	NA	Fugitive
B42	Blend Tank 42, 1,200 Gallons	2014	7.25	NA	Fugitive
B43	Blend Tank 43, 500 Gallons	2014	7.25	NA	Fugitive
B44	Blend Tank 44, 61 Gallons (IA)	2019	7.25	NA	Fugitive

UB Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. HAP

See Plantwide HAP Standards.

b. VOC

i. For Emission Points B30, B31, B32, B39, B41, B42, B43, B44, and E1, the owner or operator shall limit the total VOC emissions from emission points subject to Regulation 7.25 to less than 5 tons per 12 consecutive months, unless a BACT is submitted and approved by the District. [Regulation 7.25, Section 3]

ii. See Plantwide VOC Standards.

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. HAP

See Plantwide HAP Monitoring and Record Keeping.

b. VOC

i. For Emission Points B30, B31, B32, B39, B41, B42, B43, B44, and E1, the owner or operator shall maintain the following records to demonstrate ongoing compliance with Regulation 7.25, Section 3:

- (1) Monthly records of the quantity (in gallons) of each VOC material processed;
- (2) Records of the composition of each material processed during the month; and
- (3) Calculations and records of the VOC emissions for each month of the 12 consecutive month period.

ii. See Plantwide VOC Monitoring and Record Keeping.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. HAP

See Plantwide HAP Reporting.

b. VOC

- i. The emission unit ID and emission point ID; and
- ii. The total plantwide 12 consecutive month VOC emissions subject to Regulation 7.25 for each month in the reporting period.¹²
- iii. See Plantwide VOC Reporting.

¹² Emission Points B30, B31, B32, B39, B41, B42, B43, B44, and E1 are subject to Regulation 7.25.

Emission Unit UC: Container Filling Operation**UC Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5

UC Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
C1	Container Filling Operation	1998	6.24	NA	Fugitive

UC Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. HAP

See Plantwide HAP Standards.

b. VOC

- i. The owner or operator shall not discharge into the atmosphere more than forty (40) pounds of VOC in any one day, nor more than eight (8) pounds in any one hour, from any existing affected facility in which any Class II solvent is used.¹³ [Regulation 6.24, section 3.2]
- ii. The owner or operator shall not discharge into the atmosphere more than three thousand (3,000) pounds of VOC in any one day, nor more than four hundred fifty (450) pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied.¹³ [Regulation 6.24, section 3.3]
- iii. See Plantwide VOC Standards.

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. HAP

See Plantwide HAP Monitoring and Record Keeping.

b. VOC

- i. The owner or operator shall maintain the following records to demonstrate ongoing compliance with Regulation 6.24, Section 3:
 - (1) The hours of operation of the equipment for each day;
 - (2) The daily amount used in gallons of each Class II solvent, cleaner, etc; and

¹³ The District has determined that the Class III VOC potential emissions cannot exceed the standard uncontrolled, but the Class II VOC standards can be exceed uncontrolled; therefore, the company will have to calculate and record Class II VOC emissions.

(3) Monthly calculations showing the average hourly and daily VOC emissions for each month.

ii. See Plantwide VOC Monitoring and Record Keeping.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. HAP

See Plantwide HAP Reporting.

b. VOC

See Plantwide VOC Reporting.

Emission Unit UD: Loading Rack**UD Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.22	Standard of Performance for New Volatile Organic Materials Loading Facilities	1 through 3

UD Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
D1	Loading Rack	1986	7.22	NA	Fugitive

UD Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. HAP

See Plantwide HAP Standards.

b. VOC

- i. The owner or operator shall not load more than 20,000 gallons per day of volatile organic materials into any tank, truck, trailer, or railcar. [Regulation 7.22, section 3.1]
- ii. All loading shall be accomplished by submerged fill, bottom fill, or equivalent methods. Volatile organic material is defined as “any volatile organic compound which has a true vapor pressure of 1.5 psia or greater under actual storage conditions.” [Regulation 7.22, section 3.1]
- iii. See Plantwide VOC Standards.

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. HAP

See Plantwide HAP Monitoring and Record Keeping.

b. VOC

- i. The owner or operator shall maintain daily records of the total throughput (in gallons) of each VOM material, as defined in Regulation 7.22, to demonstrate continued compliance with the 20,000 gallon per day throughput limit.
- ii. See Plantwide VOC Monitoring and Record Keeping.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. HAP

See Plantwide HAP Reporting.

b. VOC

See Plantwide VOC Reporting.

Emission Unit UE: Cargo Tank/Tote Dryer**UE Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.25	Standard of Performance for New Volatile Organic Materials Loading Facilities	1 through 3

UE Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E1	Cargo Tank/Tote Dryer, Grain Systems, Inc. 3 HP, silo fan, 6,200 cfm	2014	7.25	NA	Fugitive

UE Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. HAP

See Plantwide HAP Standards.

b. VOC

i. For Emission Points B30, B31, B32, B39, B41, B42, B43, B44, and E1, the owner or operator shall limit the total VOC emissions from emission points subject to Regulation 7.25 to less than 5 tons per 12 consecutive months, unless a BACT is submitted and approved by the District. [Regulation 7.25, Section 3]

ii. See Plantwide VOC Standards.

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. HAP

See Plantwide HAP Monitoring and Record Keeping.

b. VOC

i. For Emission Points B30, B31, B32, B39, B41, B42, B43, B44, and E1, the owner or operator shall maintain the following records to demonstrate ongoing compliance with Regulation 7.25, Section 3:

- (1) Monthly records of the quantity (in gallons) of each VOC material processed;
- (2) Records of the composition of each material processed during the month; and
- (3) Calculations and records of the VOC emissions for each month of the 12 consecutive month period

ii. See Plantwide VOC Monitoring and Record Keeping.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. HAP

See Plantwide HAP Reporting.

b. VOC

- i. The emission unit ID and emission point ID; and
- ii. The total plantwide 12 consecutive month VOC emissions subject to Regulation 7.25 for each month in the reporting period.¹⁴
- iii. See Plantwide VOC Reporting.

¹⁴ Emission Points B30, B31, B32, B39, B41, B42, B43, B44, and E1 are subject to Regulation 7.25.

Insignificant Activities

Equipment	Qty.	PTE (tpy)	Regulation Basis
Diesel fuel storage tank #35 with flexible hose for refueling diesel trucks	1	VOC = 0.001	Regulation 1.02, section 3.25
Laboratory support activities; including, sample collection for Quality Assurance	2	VOC = 0.0007	Regulation 1.02, section 3.27
Laboratory ventilating and exhausting systems which are not used for radioactive air contaminants	2	VOC = 0.0007	Regulation 1.02, section 3.11
Natural gas water heaters; 0.84 ¹⁵ mmBTU/hr and 0.70 ¹⁵ mmBTU/hr	2	NO _x = 0.361 and 0.301	Regulation 1.02, section 2

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, recordkeeping, 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.

¹⁵ The heat input capacity for each water heater is less than 1.0 MMBtu/hr; therefore, it is not subject to District Regulation 7.06.