



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



November 8, 2021

**Title V
 Statement of Basis**

Source: Texas Gas Transmission, LLC
 Jeffersontown Compressor Station
 13027 Gaslight Way
 Louisville, KY 40299

Owner: Texas Gas Transmission, LLC
 P.O. Box 8288
 Longview, TX 75607

Application Documents: See Table I-9 Administratively Complete: January 27, 2021
 Draft Permit: September 16, 2021
 Permitting Engineer: Shannon Hosey Permit Number: O-0223-21-V
 Plant ID: 0223 SIC: 4922 NAICS: 486210

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

This permit is to renew the operating permit for a five year term.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), and sulfur dioxide (SO₂). Jefferson County is classified as a nonattainment area for ozone (O₃).

Permit Application Type:

- Initial issuance
- Permit Revision
 - Administrative
 - Minor
 - Significant
- Permit renewal

Compliance Summary:

- Compliance certification signed
- Compliance schedule included
- Source is out of compliance
- Source is operating in compliance

I Source Information**1. Product Description:**

The company recompresses pipeline natural gas to maintain pipeline pressure.

2. Process Description:

The Texas Gas Transmission, LLC, Jeffersontown, KY transmission station consists of nine natural gas fueled, 2-stroke reciprocating engines and one natural gas-fired turbine, all used to drive compressors for pipeline natural gas. Other equipment includes one natural gas-fired 4-stroke engine driving a standby electrical generator, one natural gas-fired 4-stroke engine driving an auxiliary air compressor, two parts washers, and a number of insignificant activities, all related to the primary task on pipeline natural gas re-pressurization and transmission.

3. Site Determination:

There are no other facilities that are contiguous or adjacent to this facility.

4. Emission Unit Summary:

| Emission Unit | Equipment Description |
|----------------------|--|
| U1 | Six compressor engines, Cooper-Bessemer natural gas-fueled, 2-stroke, 1,500 bhp. Model GMW-6TFC |
| U2 | Three compressor engines, Cooper-Bessemer natural gas-fueled, 2-stroke, 1,500 bhp. Model GMWA-6C |
| U20 | Standby generator engine, Waukesha natural gas-fueled, 4-stroke, 800 bhp. Model L36GL (VGF) |
| U21 | Compressor engine, Solar natural gas-fired turbine, 14,491 bhp. Model Mars 100-T-15000S |
| U25 | One cold solvent parts cleaner, 225 gallon capacity |
| U26 | Auxiliary air compressor engine: Wisconsin, natural gas-fueled, 4-cylinder, 4-stroke reciprocating, 35 bhp. Model W41770 |
| U28 | Two natural gas-fired boilers: <ul style="list-style-type: none"> • “Turbine” boiler, LAARS, model PH1670; 1.67 MMBtu/hr • “Recip” boiler, Peerless, model 211A-12-SP-1-LHL; 2.31 MMBtu/hr |

5. Fugitive Sources:

There are minor fugitive emissions of VOC from the equipment leaks in the natural gas piping.

6. Permit Revisions:

| Permit No. | Public Notice Date | Issue Date | Change Type | Description/Scope |
|---------------|--------------------------|------------|-------------|---|
| 92-97-TV | 03/12/2000 | 01/23/2001 | Initial | Initial Permit Issuance |
| 92-97-TV (R1) | 03/12/2000 | 01/23/2001 | Admin | Corrected Expiration Date |
| 92-97-TV (R2) | 02/05/2010 | 04/26/2010 | Renewal | <ul style="list-style-type: none"> • Renewal, NO_x Amendment #2, Change RO • Insignificant Activities Paragraphs • Revised Pollutant Columns |
| O-0223-16-V | 02/14/2016 05/28/2016 | 06/29/2016 | Renewal | Permit Renewal |
| O-0223-21-V | 09/16/2021 | 11/08/2021 | Renewal | Permit Renewal |

7. Application and Related Documents

| Document Number | Date | Description |
|-----------------|------------|-----------------------------------|
| 180958 | 12/26/2020 | Renewal Application |
| 184071 | 01/27/2021 | Administratively complete letter |
| 216591 | 05/03/2021 | Additional Information Requested |
| 222548 | 05/05/2021 | NO _x Limit Calculation |
| 222549 | 05/25/2021 | NO _x RACT Plan |

8. Emission Summary

| Pollutant (ton/yr) | CO | NO _x | SO ₂ | PM ₁₀ | VOC | Total HAP | Single HAP |
|-------------------------------------|-------|-----------------|-----------------|------------------|------|-----------|------------|
| Actual Emissions 2019 | 0.840 | 0.890 | 0.006 | 0.001 | 1.39 | 0.056 | 0.03 |
| Major source trigger (based on PTE) | Yes | Yes | No | No | No | Yes | Yes |

9. Applicable Requirements

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> 40 CFR 60 | <input checked="" type="checkbox"/> SIP | <input checked="" type="checkbox"/> 40 CFR 63 |
| <input type="checkbox"/> 40 CFR 61 | <input type="checkbox"/> District Origin | <input type="checkbox"/> Other |

10. Referenced Federal Regulations:

40 CFR Part 60 Subpart GG - *Standards of Performance for Stationary Gas Turbines*

40 CFR Part 63 Subpart YYYY - *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines*

40 CFR Part 63 Subpart ZZZZ - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

40 CFR Part 63, Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

11. Non-Applicable Regulations:

None

II Regulatory Analysis

1. Acid Rain Requirements:

Texas Gas Transmissions, LLC 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. Texas Gas Transmissions, LLC 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):

Texas Gas Transmissions, LLC 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:

Texas Gas Transmissions, LLC is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring*.

5. Basis of Regulation Applicability

a. Applicable Regulations

| Regulation | Title | Basis |
|-------------------------|--|--|
| 6.18 | Standards of Performance for Solvent Metal Cleaning Equipment | Applicable to all solvent-based metal-cleaning equipment. |
| 6.42 | Reasonable Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities | Applicable to all major NO _x -emitting facilities not subject to PSD regulation. |
| 7.06 | Standards of Performance for New Indirect Heat Exchangers | Applicable to all indirect heat exchangers with heat input capacity greater than one-million Btu per hour. |
| 40 CFR 60 Subpart GG | Standards of Performance for Stationary Gas Turbines | Applicable to all stationary gas turbines with peak-load heat input greater than 10 MMBtu/hour. |
| 40 CFR 63 Subpart YYYY | National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines | Applicable to stationary combustion turbines located at major HAP sources. |
| 40 CFR 63 subpart ZZZZ | National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines | Applicable to stationary reciprocating internal combustion engines located at major HAP sources. |
| 40 CFR 63 Subpart DDDDD | National Emissions Standards for Hazardous Air Pollutants for Industrial Boilers and Process Heaters | Applicable to industrial boilers located at major HAP sources. |

b. Plantwide

- i. Texas Gas Transmissions, LLC is a major source for NO_x, CO, Total HAP, and Formaldehyde. Regulation 2.16 - *Title V Operating Permits* establishes requirements for major sources.
- ii. Regulations 5.00 5.20, 5.21, and 5.23 (STAR Program) establish requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. The TAC emissions from the combustion of natural gas are considered *de minimis* by the District.

This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas.

- iii. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require 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.
- iv. Regulation 2.16, section 4.3.5, requires stationary sources for which a Title V is issued shall submit an annual compliance certification by April 15 of the following calendar year. In addition, as required by Regulation 2.16, section 4.1.9.3, the source shall submit compliance reports at least every six months to show compliance with the permit. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.16, section 3.5.11.

c. Emission Unit U1 – Compressor Engines #1 - 6 and U2 -Compressor Engines #7 - 9

| EU | EP | Description | Applicable Regulations |
|----|----|---|---|
| U1 | E1 | Natural Gas Compressor Engine #1, Cooper-Bessemer GMW-6TFC, 1,500 bhp | STAR, 6.42, 40 CFR 63 Subpart ZZZZ ¹ |
| | E2 | Natural Gas Compressor Engine #2, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E3 | Natural Gas Compressor Engine #3, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E4 | Natural Gas Compressor Engine #4, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E5 | Natural Gas Compressor Engine #5, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E6 | Natural Gas Compressor Engine #6, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| U2 | E7 | Natural Gas Compressor Engine #7, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E8 | Natural Gas Compressor Engine #8, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E9 | Natural Gas Compressor Engine #9, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |

¹ Existing spark ignition 2 stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions do not have to meet the requirements of 40 CFR 63, Subpart ZZZZ. [40 CFR 63.6590(b)(3)(i)]

i. Standards

(1) HAP

Emission Units U1 and U2

These reciprocating engines are exempt from HAP emission standards under 40 CFR 63, Subpart ZZZZ because they meet the exemption definition in 40 CFR 63.6590(b)(3)(i).

(2) NO_x

Emission Unit U1 and U2

The NO_x emission standard for these emission points is based on the characteristics of the reciprocating engines that comprise these emission units and the Lean Emission Combustion packages that were added to engines E6-E9 in 2001 and engines E1-E5 in 2002. The emission limits were developed for the NO_x RACT Plan required by Regulation 6.42, Section 4.3.1. The original Plan was approved by the Air Pollution Control Board on November 11, 1999. The current version (Amendment 3) was approved on May 18, 2016.

d. Emission Unit U20 – Emergency Generator

| EP | Description | Applicable Regulations |
|------------------|---|---|
| E21 ² | Natural Gas Emergency Generator Waukesha L36GL 800 bhp | STAR, 6.42, 40 CFR 63 Subpart ZZZZ ³ |

i. Standards

(1) HAP

This reciprocating engine is exempt from HAP emission standards under 40 CFR 63, Subpart ZZZZ because it meets the exemption definition in 40 CFR 63.6590(b)(3)(i).

(2) NO_x

The NO_x emission standard for the sole emission point in this Emission Unit is based on the characteristics of the reciprocating engine described in this emission unit. The emission limits were developed for the revised NO_x RACT.

² This engine is equipped with NO_x emission equipment that limit NO_x emissions to less than 2.6 g/bhp-hr, per manufacturer’s guarantee, based on a thirty day rolling average period.

³ Existing spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions do not have to meet the requirements of 40 CFR 63, Subpart ZZZZ. [40 CFR 63.6590(b)(3)(i)]

e. **Emission Unit U21 – Compressor Turbine T-2**

| EP | Description | Applicable Regulations |
|-----|---|---|
| E22 | Solar brand 14,491 bhp output, 7742 BTU/HP-hr natural gas-fueled stationary turbine engine, model Mars 100-T-15000S | 6.42, 40 CFR 60 Subpart GG, 40 CFR Subpart YYYY |

i. Standards

(1) HAP

The company was required to submit an Initial Notification, which was done on October 12, 2005, within the time-frame set forth in 40 CFR 63, Subpart YYYY. All other provisions of this regulation have been stayed for turbine engines of this class.

(2) NO_x

The NO_x emission standard for the sole emission point in this Emission Unit is based on the characteristics of the reciprocating engine described in this emission unit. The emission limits were developed for the revised NO_x RACT.⁴

$$STD = 0.0150 \frac{(14.4)}{Y} + F$$

where:

STD = allowable ISO corrected (if required as given in §60.335(b)(1)) NO_x emission concentration (percent by volume at 15 percent oxygen and on a dry basis),

Y = 10.95 = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour, and

F = 0 = NO_x emission allowance for fuel-bound nitrogen as defined in §60.332(a)(4).

(3) SO₂

40 CFR 60, Subpart GG provides several options for the company to provide proof that the quality of the natural gas burned in this turbine is such that the SO₂ emission standard will, with reasonable assurance, be met.

⁴ The standard is calculated utilizing the manufacturer's rated heat rate of 7742 BTU/bhp-hr and a fuel-bound nitrogen allowance of zero since there is no fuel-bound nitrogen in the gas transported by Texas Gas.

f. Emission Unit U25 – Cold Solvent Parts Cleaner (IA)

| EP | Description | Applicable Regulations |
|-----------|--|-------------------------------|
| E26 | Graymills, model PL36-A, nonhalogenated cold solvent parts cleaner, fifteen gallon capacity reservoir (IA) | 6.18 |

i. Standards**VOC**

The parts washers under this unit meet the definition of insignificant activities per Regulation 2.16, section 1.23. However, Regulation 6.18 applies to each cold cleaner that use VOC to remove soluble impurities from metal surfaces. Regulation 6.18 establishes standards for cold cleaner that use VOCs to remove soluble impurities from metal surfaces.

g. Emission Unit U26 – Auxiliary Air Compressor

| EP | Description | Applicable Regulations |
|-----------|---|---------------------------------|
| E28 | Auxiliary Air Compressor Wisconsin W41770 35 bhp | 6.42, 40 CFR 63 Subpart ZZZZ |

i. Standards**NO_x**

The NO_x emission standard for the sole emission point in this Emission Unit is based on the characteristics of the reciprocating engine described in this emission unit and review of emission factors established in AP42 and manufacturer's data. The emission and operating hour limits from information supplied by the company in their renewal application. These limits have been incorporated in a revised NO_x RACT Plan, as required by Regulation 6.42, Section 4.3.1. This engine has been considered an insignificant activity prior to this permit, and is covered in the NO_x RACT plan for the first time with the approval of Amendment 3, approved by the APC Board on May 18, 2016.

h. Emission Unit U28 – Natural Gas-Fired Boilers

| EP | Description | Applicable Regulations |
|-----------|--|-------------------------------|
| E29 | “Turbine” boiler, to heat fuel gas for turbine compressor. Model PH1670 by LAARS; 1.67 MMBtu/hr | 7.06, 40 CFR 63 Subpart DDDDD |
| E30 | “Recip” boiler, to heat fuel gas for RICE engines, Model 211A-12-SP-I-LHL by Peerless; 2.31 MMBtu/hr | 7.06, 40 CFR 63 Subpart DDDDD |

i. Standards

(1) HAP

40 CFR 63.7500 establish emission limits, work practice standards, and operating limits for new and existing boilers.

(2) Opacity

Regulation 7.06, section 4.2 establishes opacity standards for the boilers.

(3) PM

In accordance with Regulation 7.06, section 4, the PM emission standard for each boiler is 0.56 lb/MMBtu.

(4) SO₂

In accordance with Regulation 7.06, section 5, the emission standard for each boiler for SO₂ is 1.0 lb/MMBtu.

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:

The source is not subject to emission trading.

4. Alternative Operating Scenarios:

The source did not request any alternative operating scenarios.

5. Compliance History:

There are no records of any violations since the issuance of the most recent TV.

6. Calculation Methodology or Other Approved Method:

The emission calculations for the various pieces of equipment are derived from stack test results, AP-42 emission factors, EPA guidance documents, mass balances and engineering judgments.

Table 1 - Unit U1 and U2: Compressor Engines #1 - 9

| EU | Emission Point | Equipment | Emission Factor |
|----|----------------|---|--|
| U1 | E1 | Natural Gas Compressor Engine #1, Cooper-Bessemer GMW-6TFC, 1,500 bhp | PM ₁₀ , SO ₂ , HAPs are taken from AP-42, Table 3.2-1 NO _x , CO and VOC are based on manufacturer's guarantees |
| | E2 | Natural Gas Compressor Engine #2, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E3 | Natural Gas Compressor Engine #3, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E4 | Natural Gas Compressor Engine #4, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E5 | Natural Gas Compressor Engine #5, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E6 | Natural Gas Compressor Engine #6, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| U2 | E7 | Natural Gas Compressor Engine #7, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E8 | Natural Gas Compressor Engine #8, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |
| | E9 | Natural Gas Compressor Engine #9, Cooper-Bessemer GMW-6TFC, 1,500 bhp | |

Table 2 - Unit U20: Emergency Generator

| Emission Point | Equipment | Emission Factor |
|----------------|--|--|
| E21 | Natural Gas Emergency Generator Waukesha L36GL 800 bhp | PM ₁₀ , SO ₂ , HAPs are taken from AP-42, Table 3.2-2 NO _x , CO and VOC are based on manufacturer's guarantees |

Table 3 - Unit U21: Compressor Turbine T-2

| Emission Point | Equipment | Emission Factor |
|-----------------------|---|---|
| E22 | Solar brand 14,491 bhp, natural gas-fueled stationary turbine engine, model Mars 100-T-15000S | PM ₁₀ , SO ₂ , HAPs are taken from AP-42 Section 3.1 NO _x , CO and VOC are based on manufacturer's guarantees |

Table 4 - Unit U25: Cold Solvent Parts Cleaner (IA)

| Emission Point | Equipment | Emission Factor |
|-----------------------|--|------------------------|
| E26 | Graymills, model PL36-A, nonhalogenated cold solvent parts cleaner, fifteen gallon capacity reservoir (IA) | Mass Balance |

Table 5 - Unit U26: Auxiliary Air Compressor

| Emission Point | Equipment | Emission Factor |
|-----------------------|--|------------------------|
| E28 | Auxiliary Air Compressor Wisconsin W41770 35 bhp | AP-42, Table 3.2-3 |

Table 6 - Unit U28: Natural Gas-Fired Boilers

| Emission Point | Equipment | Emission Factor |
|-----------------------|--|------------------------|
| E29 | “Turbine” boiler, to heat fuel gas for turbine compressor. Model PH1670 by LAARS; 1.67 MMBtu/hr | AP-42, Section 1.4 |
| E30 | “Recip” boiler, to heat fuel gas for RICE engines, Model 211A-12-SP-I-LHL by Peerless; 2.31 MMBtu/hr | |

7. Insignificant Activities

| Equipment | Qty | PTE (ton/yr) | Regulation Basis |
|-------------------------------|------------|-----------------------------|-----------------------------------|
| Brazing, soldering or welding | Several | PM/PM ₁₀ : 0.006 | Regulation 1.02, Appendix A, 3.4 |
| Emergency relief vents | Several | Note #8 | Regulation 1.02, Appendix A, 3.10 |

| Equipment | Qty | PTE (ton/yr) | Regulation Basis |
|---|------------|--------------------------------|---------------------------------------|
| Gasoline storage tank < 250 gal (TK09, 220 gal, installed 1979) | 1 | VOC: 0.1454 | Regulation 1.02, Appendix A, 3.24 |
| Pipeline distillate storage tank, (TK15, 4,400 gal, installed 1996) [Formerly U16-E20] | 1 | VOC: 0.0282 | Regulation 1.02, Appendix A, 3.9.2 |
| Combustion sources < 1 MMbtu/hr Heaters for offices, break rooms and warehouse, etc. | 18 | CO: 0.43 NOx: 0.86 | Regulation 1.02, Appendix A, 1.1 |
| Fugitive emissions from pipeline fittings | NA | VOC: 0.77 | Regulation 2.16, section 1.23.1.2 |
| Brazing, soldering or welding | Several | PM/PM ₁₀ : 0.006 | Regulation 1.02, Appendix A, 3.9.2 |
| Emergency relief vents | Several | Note #8 | Regulation 1.02, Appendix A, 3.9.2 |
| Gasoline storage tank < 250 gal (TK09, 220 gal, installed 1979) | 1 | VOC: 0.1454 | Regulation 1.02, Appendix A, 3.9.2 |
| Lubricating Oil Storage Tank (TK01, 12,363 gal, installed 1950) | 1 | VOC: 2×10^{-5} | Regulation 1.02, Appendix A, 3.9.2 |
| Mixed Lube Oil/Water Storage Tank (TK02, 6,253 gal, installed 1969) | 1 | VOC: 2×10^{-5} | Regulation 1.02, Appendix A, 3.9.2 |
| Mixed Lube Oil/Water Storage Tank (TK05, 2,727 gal, installed 1969) | 1 | VOC: 5×10^{-6} | Regulation 1.02, Appendix A, 3.9.2 |
| Diesel Fuel Storage Tank (TK07, 300 gal, installed 1974) | 1 | VOC: 9×10^{-5} | Regulation 1.02, Appendix A, 3.9.2 |
| Waste Lube Oil Storage Tank (TK12, 575 gal) | 1 | VOC: 5×10^{-6} | Regulation 1.02, 1.38.1.1 |
| Lubricating Oil Recovery Tank (TK14, 1,615 gal, installed 1953) | 1 | VOC: 5×10^{-6} | Regulation 1.02, Appendix A, 3.24 |
| Mixed Lube Oil/Water Tank (TK16, 6,496 gal, installed 1998) | 1 | VOC: 1.5×10^{-5} | Regulation 1.02, 1.38.1.1 |
| Ethylene Glycol Storage Tank, split tank, 1/2 pure ethylene glycol and 1/2 mixed ethylene glycol (TK20, 4,314 gal, installed 1999) [Formerly U16-E17] | 1 | VOC: 4×10^{-5} | Regulation 1.02, 1.38.1.1 |
| Mixed Glycol/Lube Oil/Water Storage Tank (TK21, 134 gal, installed 1953) | 1 | VOC: 5×10^{-6} | Regulation 1.02, Appendix A, 3.24 |
| Mixed Ethylene Glycol Overflow Storage Tank for RICE surge tanks (TK22, 264 gal, installed 1953) [Formerly U16-E18] | 1 | VOC: 5×10^{-6} | Regulation 1.02, Appendix A, 3.9.2 |

| Equipment | Qty | PTE (ton/yr) | Regulation Basis |
|--|-----|----------------------------|-----------------------------------|
| Ethylene Glycol Maintenance Storage Tank (TK23, 957 gal, installed 1953) [Formerly U16-E19] | 1 | VOC: 5×10^{-6} | Regulation 1.02, Appendix A, 3.4 |
| Portable Diesel Fuel Storage Tank (TK24, 120 gal) | 1 | VOC: 9×10^{-5} | Regulation 1.02, Appendix A, 3.10 |
| Waste Lube Oil Storage Tank (TK25, 300 gal) | 1 | VOC: 5×10^{-6} | Regulation 1.02, Appendix A, 3.24 |

- Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.
- Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4.
- The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16, section 4.3.5.3.6.
- 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) to be reported on the annual emission inventory.
- The District has determined pursuant to Regulation 2.16, section 4.1.9.4 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) Basis of Regulation Applicability for IA units.
- Emissions from emergency relief valve releases shall be treated as an Upset Condition and notification of the condition and the resulting emissions shall be reported to District as required by Regulation 1.07 and in the annual emissions inventory.