

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
October 14, 2014

Federally Enforceable District Origin Operating Permit
Statement of Basis

Company: Louisville and Jefferson County Riverport Authority

Plant Location: 6900 Riverport Drive, Louisville, Kentucky 40268

Date Application Received: 04/14/2008

Date of Draft Permit: 10/14/2014

Date of Public Notice: 10/14/2014

District Engineer: Shannon Hosey

Permit No: O-0296-14-F

Plant ID: 296

SIC Code: 5052

NAICS: 42152

AFS: 00296

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.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}); and partial non-attainment area for sulfur dioxide (SO₂).

Application Type/Permit Activity:

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 Louisville and Jefferson County Riverport Authority (LJCRA) operates a dry bulk material transfer facility.
2. **Process Description:** Coal and Grain Handling
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	Railcar Unloading Hopper C1/C2 or C1/C4 Belt Transfer C2 Loading Spout Transfer Barge Loading Spout C4/C5 of C4/C6 Belt Transfer C5 and C6 Stacker Discharges Storage Pile Fugitives Reclaim Hopper

5. **Fugitive Sources:** Fugitive PM emissions from the storage and handling of coal.
6. **Permit Revisions:**

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
206-03-F	09/30/2014	08/10/2014	Initial	Entire Permit	Initial Issuance
O-0296-14-F	xx/xx/20xx	10/14/2014	Renewal	Entire Permit	Permit Renewal

7. **Emission Summary:**

Pollutant	Company Actual Emissions (tn/yr) 2013 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	0	No
NO _x	0	No
SO ₂	0	No
PM/PM ₁₀	0.72	Yes

Pollutant	Company Actual Emissions (tn/yr) 2013 Data	Pollutant that triggered Major Source Status (based on PTE)
VOC	0	No
GHG – CO _{2e}	0	No
Single HAPs	0	No
Total HAP	0	No

8. Applicable Requirements:

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

9. MACT Requirements: The source has no future MACT requirements.

10. Referenced Federal Regulations in Permit: None

11. Non-applicable Regulation: 40 CFR 60 Subpart Y - Standards of Performance for Coal Preparation and Processing Plants does not apply because Louisville and Jefferson County Riverport Authority does not prepare and process coal.

II. Regulatory Analysis

- 1. Acid Rain Requirements:** Louisville and Jefferson County Riverport Authority 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. Louisville and Jefferson County Riverport Authority 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):** Louisville and Jefferson County Riverport Authority 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:** Louisville and Jefferson County Riverport Authority is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*.

5. Basis of Regulation Applicability

Regulation	Basis for Applicability	Type
2.17	Federally Enforceable District Origin Operating Permits	SIP
5.00	Regulation 5.00 establishes emission limits for exempt “stationary sources” that would otherwise be subject to the STAR Program environmental acceptability goals.	SIP
7.08	Regulation 7.08 establishes the requirements for PM emission from new processes that commences construction after September 1, 1976.	SIP

a. Plant-wide

Louisville and Jefferson County Riverport Authority is a potential major source for the pollutant PM. 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. Per Regulation 2.17, section 5.1, plant-wide PM emissions are limited to 100 tons during any consecutive 12-month period.

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 shall 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. STAR Program

Regulations 5.00, 5.01, 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.

c. **Emission Unit U1 – Dry Bulk Transfer Facility**

i. **Equipment:**

EU	Emission Point	Description Make/Model	Install Date	Applicable Regulation
U1	E1	Railcar Unloading Hopper	1989	7.08
	E2	C1/C2 or C1/C4 Belt Transfer	1989	
	E3	C2 Loading Spout Transfer	1989	
	E4	Barge Loading Spout	1989	
	E5	C4/C5 of C4/C6 Belt Transfer	1991	
	E6	C5 and C6 Stacker Discharges	1991	
	E7	Storage Pile Fugitives	1991	
	E8	Reclaim Hopper	1991	

ii. **Standards/Operating Limits**

1) **PM/PM₁₀**

- i. Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. The source has requested a synthetic limit of less than 100 tons of PM/PM₁₀ in a 12 consecutive month period.
- ii. For equipment subject to Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2. The equation to calculate the hourly PM emission limit is $E = 3.59 * P^{0.62}$, where E is the allowable lb/hr PM emission limit and P is the process weight rate expressed in tons/hr.

2) **Opacity**

- i. Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.
- ii. Regulation 1.14 prohibits the discharge of fugitive emissions beyond the property line.

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	Result
06648	04/03/2014	Reg. 2.17, section 7, Reporting and Record Keeping Requirements	Agreement with fine

6. **Calculation Methodology or Other Approved Method:**

The emission calculations are derived from tracking monthly throughput of material and AP-42 emission factors.

7. **Insignificant Activities:** None