



Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, Kentucky 40204-1745



## Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0461-14-F

Plant ID: 0461

Effective Date: xx/xx/2015

Expiration Date: xx/xx/2020

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:

Mizkan Americas Inc.  
3290 South Seventh Road  
Louisville, KY 40216

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  
Tons/year: <100 tpy

Permit Writer: Shannon Hosey

Public Notice Date: 12/06/2014

{manager1}  
Air Pollution Control Officer  
{date1}

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**FEDOOP Permit Revisions/Changes**

<b>Permit No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Scope</b>	<b>Description</b>
59-97-F	05/30/2003	04/13/2003	Initial	Entire Permit	Initial Permit Issuance
4/22/1997	04/04/2000	03/05/2000	Administrative	General Conditions Pages 2-4	Incorporate revisions to General Conditions #4, #11, #12, and #13; New General Conditions #13 and #14
59-97-F (R2)	03/31/2006	12/04/2005	Significant	Entire Permit	Scheduled Permit Renewal
O-0461-14-F	xx/xx/20xx	12/06/2014	Renewal	Entire Permit	Permit Renewal

### 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
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
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- 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
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- 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

### General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. 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.
3. 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.
4. 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 9440-0](#).
5. 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.
6. 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.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. 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 an anticipated noncompliance shall not alter any permit requirement.
9. 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.
10. 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, sulfur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, nitrogen oxides, lead, gaseous fluorides, or Volatile Organic Compounds (VOC) as listed in District Regulation 3.04; any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO<sub>2</sub>-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)).

Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. 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.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report 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 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 report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. 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, Emissions 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
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
2.07	Public Notification for Title V, PSD, and 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
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement 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)

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

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.01	General Provisions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
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

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. 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.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District***  
***Room 205***  
***850 Barret Ave***  
***Louisville, KY 40204-1745***

**Emission Unit U1****U1 Unit Description:** Wine Fermentation, Wine Processing/Fortifying and Wine Generators**U1 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
7.25	Standards of Performance for Existing Process Operations	1 through 3
40 CFR 60, Subpart VV	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry	60.480(d) and 60.486(i)

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	All
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation of National Emission Standards for Hazardous Air Pollutants	1, 3, 4 and 5
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U1 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E1 <sup>1</sup>	32,985 Gallon Wine Fermenter #1	7.25 and 40 CFR 60, Subpart VV	N/A
E2 <sup>1</sup>	32,985 Gallon Wine Fermenter #2		
E3 <sup>1</sup>	32,985 Gallon Wine Fermenter #3		
E4 <sup>1</sup>	32,985 Gallon Wine Fermenter #4		
E5 <sup>1</sup>	32,985 Gallon Wine Fermenter #5		
E14 <sup>1</sup>	12,408 Gallon Wine Fermenter #14 (1994)		
E18 <sup>1</sup>	10,640 Gallon Wine Fermenter #18 (1994)		
E6	32,985 Gallon Wine Processing Tank #6	7.25	
E7	32,985 Gallon Wine Processing Tank #7		
E8	12,408 Gallon Wine Processing Tank #8 (1994)		
E9	12,408 Gallon Wine Processing Tank #9 (1994)		
E10	6,000 Gallon Wine Processing Tank #10 (1994)		
E11	6,131 Gallon Wine Processing Tank #11 (1994)		
E12	12,483 Gallon Wine Processing Tank #12 (1994)		
E13	12,408 Gallon Wine Processing Tank #13 (1994)		
E15	12,408 Gallon Wine Processing Tank #15 (1994)		
E16	12,483 Gallon Wine Processing Tank #16 (1994)		
E17	12,408 Gallon Wine Processing Tank #17 (1994)		
E23	61,803 Gallon Wine Processing Tank #23 (1994)		
E24	3,252 Gallon Wine Processing Tank #24 (1994)		
E25	14,784 Gallon Wine Processing Tank #25 (2000)		
E26	6,944 Gallon Wine Processing Tank #26 (2000)		
E27	6,953 Gallon Wine Processing Tank #27 (2000)		
E28	6,949 Gallon Wine Processing Tank #28 (2000)		
E29	6,257 Gallon Wine Processing Tank #29 (2000)		
E30	6,937 Gallon Wine Processing Tank #30 (2000)		

<sup>1</sup> 40 CFR 60.480(d) exempts certain affected facilities from the specific equipment leak standards found at 40 CFR 60.482-1 through 60.482-10, including affected facilities that produce beverage alcohol, and affected facilities that are designed to produce less than 1,102 tons per year of a listed SOCOMI chemical. The fermenters produce beverage alcohol, and the acetators have a design capacity of less than 1,102 tons acetic acid per year.

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E31	12,236 Gallon Wine Processing Tank #31 (2000)	7.25	N/A
E32	12,236 Gallon Wine Processing Tank #32 (2000)		
E33	12,774 Gallon Wine Processing Tank #33 (2000)		
E34	12,774 Gallon Wine Processing Tank #34 (2000)		
E35	12,774 Gallon Wine Processing Tank #35 (2000)		
E36	12,774 Gallon Wine Processing Tank #36 (2000)		
V11	17,000 Gallon Wine Processing Tank #V11 (1994)		
V12	17,000 Gallon Wine Processing Tank #V12 (1994)		
V13	17,000 Gallon Wine Processing Tank #V13 (1994)		
V14	17,000 Gallon Wine Processing Tank #V14 (1994)		
800/1 <sup>2</sup>	8000 Gallon Vinegar Generator #800/1 with One-Stage Process Condenser (acetator production capacity less than 1,102 tons acetic acid per year) (1994)	7.25 and 40 CFR 60, Subpart VV	C1
1200/1 <sup>2</sup>	12,000 Gallon Vinegar Generator #1200/1 with One-Stage Process Condenser (acetator production capacity less than 1,102 tons acetic acid per year) (1994)		
1200/2 <sup>2</sup>	12,000 Gallon Vinegar Generator #1200/2 with One-Stage Process Condenser (acetator production capacity less than 1,102 tons acetic acid per year) (1997)		
800/2 <sup>2</sup>	8000 Gallon Vinegar Generator #800/2 with One-Stage Process Condenser (acetator production capacity less than 1,102 tons acetic acid per year) (1995)	7.25 and 40 CFR 60, Subpart VV	C2

**U1 Control Devices:**

<b>Control Device ID</b>	<b>Description Make/Model</b>	<b>Pollutant Controlled</b>	<b>Control Efficiency</b>	<b>Stack ID</b>
C1	Wet Scrubber A, Fring	VOC	80	S52
C2	Wet Scrubber B, Fring		60	S53

<sup>2</sup> 40 CFR 480(d) exempts certain affected facilities from the specific equipment leak standards found at 40 CFR 482-1 through 482-10, including affected facilities that produce beverage alcohol, and affected facilities that are designed to produce less than 1,102 tons per year of a listed SOCOMI chemical. The fermenters produce beverage alcohol, and the acetators have a design capacity of less than 1,102 tons acetic acid per year.

## U1 Specific Conditions

### S1. Standards (Regulation 2.17, section 5.2)

#### a. VOC

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 100 tons during any consecutive 12-month period<sup>3</sup>. (Regulation 2.17, section 5.1)
- ii. For Emission Points E1, E2, E3, E4, E5, E14 and E18, the owner or operator shall not allow or cause the combined VOC emissions to exceed 3.24 tons during any consecutive 12-month period. (Regulation 7.25, section 3)(BACT)
- iii. For Emission Points E6, E7, E8, E9, E10, E11, E12, E13, E15, E16, E17, E23, E24, E25, E26, E27, E28, E29, E30, E31, E32, E33, E34, E35, E36, V11, V12, V13 and V14, the owner or operator shall not allow or cause the combined VOC emissions to exceed 11.75 tons during any consecutive 12-month period. (Regulation 7.25, section 3)(BACT)
- iv. For Emission Points 800/1, 1200/1, 800/2 and 1200/2, the owner or operator shall not allow or cause the combined VOC emissions to exceed 9.30 tons during any consecutive 12-month period<sup>3</sup>. (Regulation 7.25, section 3)(BACT)
- v. For Emission Points 800/1, 1200/1, 800/2 and 1200/2, the owner or operator shall operate and maintain Scrubber A (C1) and Scrubber B (C2) at all time the process is in operation.

#### b. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21)

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<sup>3</sup> Mizkan America's, Inc is a major source for VOC only. Air Quality Systems conducted a Method 25A test on November 12, 2002 to determine the control efficiency and mass VOC emission rate from the two Frings wet scrubbers used to control VOCs released from the vinegar production process. Scrubber A (C1) controls the emissions from two 12,000 gallon acetators (1200/1 and 1200/2) and one 8,000 gallon acetator (800/1) . Scrubber B (C2) controls the emissions from one 8,000 gallon acetator (800/2). The total controlled VOC emissions from the two wet scrubbers are 1.02 lbs per hour and 4.48 tons per year.

**S2. Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

**a. VOC**

- i. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.
- ii. For Emission Points E1, E2, E3, E4, E5, E14 and E18, the owner or operator shall monthly calculate and record the monthly and consecutive 12-month VOC emissions to demonstrate compliance with Specific Condition S1.a.ii.
- iii. For Emission Points E6, E7, E8, E9, E10, E11, E12, E13, E15, E16, E17, E23, E24, E25, E26, E27, E28, E29, E30, E31, E32, E33, E34, E35, E36, V11, V12, V13 and V14, the owner or operator shall monthly calculate and record the monthly and consecutive 12-month VOC emissions to demonstrate compliance with Specific Condition S1.a.iii.
- iv. For Emission Points 800/1, 1200/1, 800/2 and 1200/2, the owner or operator shall monthly calculate and record the monthly and consecutive 12-month VOC emissions to demonstrate compliance with Specific Condition S1.a.iv.
- v. For Scrubber A (C1), the owner or operator shall monitor and record the water flow rate at least once during each operating day to ensure it is maintained above 21 gallons per hour. For Scrubber B (C2), the owner or operator shall monitor and record the water flow rate at least once during each operating day to ensure it is maintained above 7.9 gallons per hour to assure ongoing compliance with the VOC emission limits specified for Specific Condition S1.a.iv.
- vi. The owner or operator shall maintain the outlet temperature of the wet scrubbers between 64° F and 81° F. The owner or operator shall monitor and record the outlet temperature for each Scrubber A and B at least once per operating day.
- vii. The owner or operator shall operate and maintain the water flow rate at a minimum of 80 liters per hour to Scrubber A and 30 liter per hour to Scrubber B through each condenser. The owner or operator shall monitor and record the water flow rate for each Scrubber A and B at least once per operating day.

- viii. For Emission Points E1, E2, E3, E4, E5, E14, E18, 800/1, 1200/1, 800/2 and 1200/2, the owner or operator shall record the following information in a log that is kept in a readily accessible location for use in determining exemptions as provide in §60.480(d): (40 CFR 60.486(i))
- 1) An analysis demonstrating the design capacity of the affected facility, (40 CFR 60.486(i)(1))
  - 2) A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol, and (40 CFR 60.486(i)(2))
  - 3) An analysis demonstrating that equipment is not in VOC service. (40 CFR 60.486(i)(3))

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above de minimis at the time of the change.

**S3. Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified in accordance with General Condition 12.

**a. VOC**

- i. The emission unit ID numbers and emission point ID numbers;
- ii. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- iii. Identification of all periods of exceedance of the VOC emissions limits, or an excursion of the water flowrate or the outlet temperature; and
- iv. A description of corrective actions taken for each exceedance or excursion.

**b. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that

operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in S2.b.ii.

**Emission Unit U2**

**U2 Unit Description:** Wine Storage Tanks, Ethanol Tanks and Vinegar Storage Tanks

**U2 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1 through 8
40 CFR 60 Subpart Kb	Federal New Source Performance Standards for VOC Liquid Storage Vessels	N/A

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	All
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation of National Emission Standards for Hazardous Air Pollutants	1, 3, 4 and 5
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U2 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E20	30,300 Gallon Wine Storage Tank #20 (1995)	7.12	N/A
E21	30,300 Gallon Wine Storage Tank #21 (1995)		
E22	30,300 Gallon Wine Storage Tank #22 (1995)		
E37	25,444 Gallon Wine Storage Tank #37 (2000)		
E38	25,444 Gallon Wine Storage Tank #38 (2000)		

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E39	25,444 Gallon Wine Storage Tank #39 (2000)	7.12	N/A
W46	64,335 Gallon Wine Storage Tank #W46 (2000)		
W47	64,335 Gallon Wine Storage Tank #W47 (2000)		
E48	64,335 Gallon Wine Storage Tank #48 (2000)		
E40	64,335 Gallon Ethanol Tank #40 (2000)		
E41	53,984 Gallon Ethanol Tank #41 (1983)		
E42	20,453 Gallon Ethanol Tank #42 (1983)		
E43	39,930 Gallon Ethanol Tank #43 (1983)		
E44	13,286 Gallon Ethanol Tank #44 (1994)		
E45a	3,120 Gallon Ethanol Tank #45a (1994)		
E45	13,320 Gallon Ethanol Tank #45 (1994)		
E46	13,320 Gallon Ethanol Tank #46 (1994)		
E47	13,320 Gallon Ethanol Tank #47 (1994)		
V1	7,000 Gallon Vinegar Storage Tank #V1 (1994)		
V2	7,000 Gallon Vinegar Storage Tank #V2 (1994)		
V3	10,000 Gallon Vinegar Storage Tank #V3 (1994)		
V4	10,000 Gallon Vinegar Storage Tank #V4 (1994)		
V5	10,000 Gallon Vinegar Storage Tank #V5 (1994)		
V6	17,180 Gallon Vinegar Storage Tank #V6 (1994)		
V7	17,180 Gallon Vinegar Storage Tank #V7 (1994)		
V8	17,180 Gallon Vinegar Storage Tank #V8 (1994)		
V9	17,180 Gallon Vinegar Storage Tank #V9 (1994)		
V10	17,180 Gallon Vinegar Storage Tank #V10 (1994)		
V15	61,535 Gallon Vinegar Storage Tank #V15 (1994)	7.12 and 40 CFR 60 Subpart Kb	
V16	61,535 Gallon Vinegar Storage Tank #V16 (1994)		
V17	20,006 Gallon Vinegar Storage Tank #V17 (1997)		
V18	20,006 Gallon Vinegar Storage Tank #V18 (1997)		
V19	19,886 Gallon Vinegar Storage Tank #V19 (1997)		
V20	27,925 Gallon Vinegar Storage Tank #V20 (1994)		
V21	27,925 Gallon Vinegar Storage Tank #V21 (1994)		
V22	61,535 Gallon Vinegar Storage Tank #V22 (1997)		

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
V23	36,473 Gallon Vinegar Storage Tank #V23 (1995)	7.12 and 40 CFR 60 Subpart Kb	N/A
V24	36,473 Gallon Vinegar Storage Tank #V24 (1995)		
V25	42,632 Gallon Vinegar Storage Tank #V25 (1983)		
V26	42,632 Gallon Vinegar Storage Tank #V26 (1983)		
V27	14,000 Gallon Vinegar Storage Tank #V27 (2000)		
V28	14,000 Gallon Vinegar Storage Tank #V28 (2000)		

**U2 Control Devices:**

There are no control devices associated with Emission Unit U2.

## U2 Specific Conditions

### S1. Standards (Regulation 2.17, section 5.2)

#### a. VOC

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 100 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)
- ii. The owner or operator shall not store VOC materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe<sup>4,5,6</sup>. (Regulation 7.12, section 3.3)

#### b. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21)

### S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

#### a. 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

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<sup>4</sup> For Emission Points E20, E21, E22, E37, E38, E39, W46, W47, E40, E41, E42, E43, E44, E45a, E45, E46, E47 and E48, 40 CFR Part 60, Subpart Kb, does not apply to storage vessels used to store beverage alcohol.

<sup>5</sup> For Storage vessel subject to the requirements of Regulation 7.12, the regulation applies due to the size of the tanks. The as-stored vapor pressure is less than 1.5 psia; therefore, no emission or equipment standards are applicable. The vapor pressure of vinegar (10% acetic acid) is 0.01 psia and the vapor pressure of fortified wine (20% alcohol) is 0.104 psia.

<sup>6</sup> Emission Points V17, V18, V19, V20, V21, V23, V24, V27 and V28 are greater than 19,812 gallons; therefore, subject to the requirements of 40 CFR 60 Subpart Kb. The regulation applies due to the size of the tanks, however, the as-stored vapor pressure is less than 4.0 psia; therefore, no emission or equipment standards are applicable. Emission Points V15, V16, V22, V25 and V26 are greater than 39,889 gallons and subject to the requirements of 40 CFR 60 Subpart Kb, however, the as-stored vapor pressure is less than 0.75 psia; therefore, no emission or equipment standards are applicable.

new contents, the new vapor pressure, and the date of the change in order to demonstrate compliance with Specific Condition S1.

- ii. For Storage Tanks V15, V16, V17, V18, V19, V20, V21, V22, V23, V24, V25, V26, V27 and V28:
  - 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 either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. (40 CFR 60.116b(c))
- iii. The owner or operator shall, monthly, calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above de minimis at the time of the change.

**S3. Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified in accordance with General Condition 12.

**a. VOC**

- i. The emission unit ID numbers and emission point ID numbers;
- ii. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- iii. Identification of all periods of exceedance of the VOC emissions limits; and

iv. A description of corrective actions taken for each exceedance.

**b. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in S2.b.ii.

**Emission Unit U3**

**U3 Unit Description:** Wine Loading and Vinegar Loading into Rail Cars or Truck Tankers

**U3 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
7.22	Standard of Performance for New Volatile Organic Materials Loading Facilities	1 through 3

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	All
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation of National Emission Standards for Hazardous Air Pollutants	1, 3, 4 and 5
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U3 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
TL1	Truck Loading 350 gpm	7.22	N/A
RL1	Rail Car Loading 300 gpm		
DTL1	Drum/Tote Loading 160 gpm		

**U3 Control Devices:**

There are no control devices associated with Emission Unit U3.

### U3 Specific Conditions

#### S1. Standards (Regulation 2.17, section 5.2)

##### a. VOC

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 100 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)
- ii. The owner or operator shall not load more than 20,000 gallons per day of volatile organic materials (VOM) into any tank, truck, trailer, or railroad car. All loading shall be accomplished by submerged fill, bottom loading, or equivalent methods approved by the District. Pneumatic, hydraulic or other mechanical means shall be provided to prevent liquid organic compounds drainage from the loading device when it is removed from the hatch, or to accomplish complete drainage before such removal<sup>7</sup>. (Regulation 7.22, section 3.1)

##### b. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21)

#### S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

##### a. VOC

- i. The owner or operator shall maintain daily records of the total throughput (in gallons) of each VOM material to demonstrate continued compliance with the gallon per day throughput limits specified in Specific Condition S1.a.ii.
- ii. The owner or operator shall, monthly, calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.

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<sup>7</sup> For Regulation 7.22, there are no VOC control requirements if less than 200 gallons of volatile organic materials are loading per day. "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."

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above de minimis at the time of the change.

**S3. Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified in accordance with General Condition 12.

**a. VOC**

- i. The emission unit ID numbers and emission point ID numbers;
- ii. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- iii. Identification of all periods of exceedance of the VOM throughput limits or the VOC emissions limits; and
- iv. A description of corrective actions taken for each exceedance.

**b. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in S2.b.ii.

**Emission Unit IA1**

**IA1 Unit Description:** Emergency Generator<sup>8</sup>

**IA1 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	63.6603(a), 63.6604(b), 63.6605(a)(b), 63.6590, 63.6640, 63.6625 and 63.6655

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	All
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation of National Emission Standards for Hazardous Air Pollutants	1, 3, 4 and 5
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**IA1 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
EG	Diesel-fired (RICE) Emergency Generator	40 CFR 63, Subpart ZZZZ	N/A

**IA1 Control Devices:**

There are no control devices associated with Emission Unit IA1.

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<sup>8</sup> This operation is subject to 40 CFR 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, because it involves a stationary reciprocating internal combustion engine (RICE) located at an area source of HAP emissions.

**IA1 Specific Conditions****S1. Standards (Regulation 2.17, section 5.2)****a. HAP**

- i. Beginning January 1, 2015, if you own or operate an existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. (40 CFR 63.6604(b))
- ii. The owner or operator of an existing stationary RICE located at an area source of HAP emissions shall comply with the requirements Table 2(d) to this subpart: (40 CFR 63.6603(a))
  - 1) The owner or operator shall change the oil and filter every 500 hours of operation or annually, whichever comes first. The owner or operator has the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart. (40 CFR 63, Subpart ZZZZ, Table 2d.(4)(a))
  - 2) The owner or operator shall inspect the air cleaners every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63. Subpart ZZZZ, Table 2d.(4)(b))
  - 3) The owner or operator shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63. Subpart ZZZZ, Table 2d.(4)(c))
- iii. General requirements for complying with 40 CFR 63, Subpart ZZZZ:
  - 1) The owner or operator shall be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to the RICE at all times. (40 CFR 63.6605(a))
  - 2) At all times the owner or operator shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of

whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.6605(b))

- iv. The owner or operator shall demonstrate continuous compliance with each emission limitation, operating limitation, and other applicable requirements in Tables 2d to this subpart. (40 CFR 63.6640(a))
- v. The owner or operator shall report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in § 63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE. (40 CFR 63.6640(b))
- vi. The owner or operator shall operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If the owner or operator does not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. (40 CFR 63.6640(f))
  - 1) There is no time limit on the use of the emergency stationary RICE in emergency situations. (40 CFR 63.6640(f)(1))
  - 2) The owner or operator may operate the emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2). (40 CFR 63.6640(f)(2))

- (a) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. (40 CFR 63.6640(f)(2)(i))
  - (b) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. (40 CFR 63.6640(f)(2)(ii))
  - (c) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. (40 CFR 63.6640(f)(2)(iii))
- 3) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 63.6640(f)(4))
- (a) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as

part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system. (40 CFR 63.6640(f)(4)(i))

- (b) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: (40 CFR 63.6640(f)(4)(ii))
  - (i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. (40 CFR 63.6640(f)(4)(ii)(A))
  - (ii) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. (40 CFR 63.6640(f)(4)(ii)(B))
  - (iii) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. (40 CFR 63.6640(f)(4)(ii)(C))
  - (iv) The power is provided only to the facility itself or to support the local transmission and distribution system. (40 CFR 63.6640(f)(4)(ii)(D))
  - (v) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. (40 CFR 63.6640(f)(4)(ii)(E))

## S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

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

a. **HAP**

- i. Monitoring, installation, collection, operation, and maintenance requirements: (40 CFR 63.6625)
  - 1) The owner or operator shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e))
  - 2) The owner or operator shall install a non-resettable hour meter if one is not already installed. (40 CFR 63.6625(f))
  - 3) The owner or operator shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup. (40 CFR 63.6625(h))
  - 4) The owner or operator has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (40 CFR 63.6625(i))

- ii. Recordkeeping requirements: (40 CFR 63.6655)
- 1) The owner or operator shall keep the following records that apply to your RICD: (40 CFR 63.6655(a))
    - (a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.6655(a)(1))
    - (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.6655(a)(2))
    - (c) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii). (40 CFR 63.6655(a)(3))
    - (d) Records of all required maintenance performed on the air pollution control and monitoring equipment. (40 CFR 63.6655(a)(4))
    - (e) Records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.6655(a)(5))
  - 2) The owner or operator shall keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to the RICE. (40 CFR 63.6655(d))
  - 3) The owner or operator shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. (40 CFR 63.6655(e))
  - 4) The owner or operator shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency

operation. If the engine is used for the purposes specified in 40 CFR 63.6640(f)(2)(ii) or (iii) or 40 CFR 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. (40 CFR 63.6655(f))

**S3. Reporting (Regulation 2.16, section 4.1.9.3 Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports.

**a. HAP**

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. (40 CFR 63, Subpart ZZZZ, Footnote 2 of Table 2d)

**Insignificant Activities**

Description	Quantity	Basis
Natural Gas Boiler < 10 MMBTU/hr	1	Regulation 1.02, Appendix A, section 1.1
Brazing, soldering or welding equipment	1	Regulation 1.02, Appendix A, section 3.4
Containers, reservoirs, or tanks used exclusively for: Storage of lubricating oils or fuel oils with a vapor pressure of less than 10 mm Hg at conditions of 20° C and 760 mm of Hg,	1	Regulation 1.02, Appendix A, section 3.9.2
Internal combustion engines, whether fixed or mobile, and vehicles used for transport of passengers or freight, except as may be provided for in subsequent regulations	4	Regulation 1.02, Appendix A, 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) Activities identified in regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 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) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE), as the annual emission for each piece of equipment, since the emissions from the source’s Insignificant Activities are very minor in comparison to the plant wide emissions.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.