

**Minutes
Public Hearing
of the
Louisville Metro Air Pollution Control Board**

May 18, 2016

A public hearing of the Louisville Metro Air Pollution Control Board was called to order on May 18, 2016, at 10:00 a.m. in the First Floor Conference Room at 701 W. Ormsby, Louisville, Kentucky, by the Chairman, Dr. Robert Powell.

General Statement, Rules and Purpose

The Chairman read the opening announcements, rules and purpose of the public hearing, which was to review the following matters:

1. Agreed Board Order with Texas Gas Transmission, LLC – NOx RACT Plan Amendment No. 3

Mr. Paul Aud, Industrial Permitting Manager, asked the Board to consider and adopt a proposed Board Order with Texas Gas Transmission, LLC - NOx RACT Plan Amendment 3 requiring the establishment and implementation of RACT for certain affected facilities that emit oxides of nitrogen (NOx).

The Clean Air Act requires major emitters of oxides of nitrogen (or NOx) to utilize reasonably available control technology (or RACT) to control NOx emissions. The Texas Gas facility currently operates nine natural-gas compressors, an emergency generator, and an auxiliary air compressor, all operated by natural gas-fueled reciprocating engines; a natural gas-fueled compressor turbine; and two natural gas-fired boilers. The company is currently subject to a Title V operating permit issued by the District and a NOx RACT plan that was originally approved by the Board in November of 1999 and amended in November 2000 for clarification. The NOx RACT plan was again amended in June of 2009 to incorporate emission requirements for the addition of Lean Emission Combustion (LEC) packages to nine internal-combustion reciprocating engines, and issue requirements for a newly-installed turbine compressor. Amendment No. 3 addresses several issues: (1) Since the last issuance of Texas Gas's operating permit, 40 CFR 63 Subpart ZZZZ (4Z) has been revised, bringing reciprocating engines under federal regulation and therefore into the NOx RACT plan; (2) Testing history of the compressor engines and the compressor turbine has shown that the emission levels are significantly less than regulatory limits; (3) The requirements for the emission points covered by the NOx RACT plan were not clearly presented.

The amendment introduces the emission limits and work-practice standards for the reciprocating engine as specified in 40 CFR 63 Subpart 4Z; modifies the emission testing schedule for the compressor engines and the compressor turbine based on past performance; and clearly specifies the emission limits and testing, recordkeeping, and reporting requirements for each of the covered sources.

Statements

No statements were made.

2. Agreed Board Order with BYK Additives Inc.

Mr. Matt King, Compliance and Enforcement Manager, asked the Board to consider and adopt a proposed Agreed Board Order with BYK Additives Inc. (BYK).

BYK manufactures chemical additives pursuant to a federally enforceable operating permit at its 13th St. facility.

On December 29, 2015 the company submitted a correction to past reports. BYK failed to monitor pressure drop, a performance indicator, for eight dust collectors for the period of July 1, 2013 through December 2015. The company began monitoring and recording these pressure drop readings on January 4, 2016 and operators have since been trained on permit requirements relating to the required pressure drop readings.

The District assessed a penalty of \$6000 for this violation. The company agreed to the terms of the Order.

Statements

Dr. Powell asked Mr. King to define pressure drops, clarify why they should be recorded and explain the potential harm for not recording them. Mr. King explained that APCD works with companies to set a pressure drop range for dust control filters as a measure of proper performance.

In response to a question from Mr. Jacob, Mr. King explained that a car filter was a good comparison and stated that, if there is little pressure drop, too many particles pass through to enter the engine. If the pressure drop is too large, the filter is clogged, and it will not allow air to pass through to the engine.

3. Agreed Board Order with American Synthetic Rubber Company

Mr. King asked the Board to consider and adopt a proposed Agreed Board Order with American Synthetic Rubber Company (ASRC).

ASRC manufactures synthetic rubber pursuant to a Title V operating Permit at its Camp Ground Rd. facility.

The Strategic Toxic Air (STAR) Program established hazard risk goals for companies as well as a process for companies that cannot meet the goals to request a modification. ASRC has submitted a request for modification, which the District is currently evaluating. As part of its request, the company must apply the best available control for toxics or T-BAT as part of the process for modifying the STAR Program's environmental acceptability goals.

The proposed agreement is not the modification itself. The agreement makes binding additional measures in order to reduce emissions while the modification request process continues.

This agreement follows the federal Leak Detection and Repair (LDAR) program but requires more frequent checks along with a lower leak threshold requiring action for fugitive emissions, the primary reason for the requested modification.

ASRC agreed to the terms of the Order.

Statements

Ms. Kathy Cameron, Environmental Manager at ASRC, stated that ASRC has implemented specific controls for leaks and consistent monitoring. In answer to a question from Board Member Carl Hilton regarding responsibility for the leak detection monitoring system, Ms. Cameron reported that ASRC is using a third party leak detection agency.

4. Regulation 6.40 – *Standard of Performance for Gasoline Transfer to Motor Vehicles (Stage II Vapor Recovery and Control), Version 4*

Ms. Rachael Hamilton, Assistant Director, asked the Board to consider and adopt a revision to Regulation 6.40 to discontinue the requirements to install and maintain Stage II systems in Regulation 6.40, *Standards of Performance for Gasoline Transfer to Motor Vehicle (Stage II Vapor Recovery and Control Systems)*, at new and existing gasoline dispensing facilities. The proposed draft removes the requirement that Stage II vapor recovery technology be installed in new gasoline dispensing facilities; authorizes existing gasoline dispensing facilities to begin decommissioning their Stage II controls; and establishes requirements and procedures for decommissioning existing Stage II controls by December 31, 2018.

Using guidance from the EPA, the District has demonstrated that the use of ORVR is in widespread use within the Jefferson County fleet as of January 2016. The proposed revisions are necessary to avoid increases in VOC emissions that result from the incompatibility between the ORVR technology and Stage II systems as new cars equipped with ORVR continue to enter the Jefferson County fleet.

Statements

No statements were made.

Adjourn

The public hearing adjourned at 10:26 a.m.

Robert W. Powell
Chairman

Rachael Hamilton
Secretary-Treasurer