



Regulation 1.07

*Excess Emissions During
Startups, Shutdowns, and
Upset Conditions*

Air Pollution Control District
January 15, 2020



Regulation 1.07

Excess Emission Reporting

Each month, the District publishes an **Excess Emissions Events Report** that lists notifications received from regulated sources during the prior month.

Louisville Metro Air Pollution Control District			
Excess Emission Event Reports			
December 1, 2019 to December 31, 2019			
Plant 11: American Synthetic Rubber Co, Div Michelin North A, 4500 CAMP GROUND RD (Accela Record #O-0011)			
Inspection #: 17092702	Started: 12/5/2019 21:00 PM	Stopped: 12/6/2019 16:15 PM	Logged: 12/9/2019
Problem Description: Lost power to powerhouse spray reactor disk which locked up causing entire powerhouse to lose power. Emissions unknown, but was not out of spec before	Pollutant: SULFUR DIOXIDE, SO2		
Reported: 12/5/2019	Status: Passed		
Engineer Review:			
Problem Type: Upset Condition			
APCD Engineer: Stephen Holley			
1 events reported for plant 11			
Plant 28: Hexion, Inc., 6200 CAMP GROUND RD (Accela Record #O-0028)			
Inspection #: 17090429	Started: 12/4/2019 09:35 AM	Stopped: 12/4/2019 10:24 AM	Logged: 12/4/2019
Problem Description: Silver Plant Boiler is down for planned maintenance to clean the flame arrestor eyes. The Silver process remains in operation while the Silver Boiler is down	Pollutant: VOLATILE ORGANIC COMPOUNDS, VOC		
Reported: 12/4/2019	Status: Passed		
Engineer Review:			
Problem Type: No Problem			
APCD Engineer: Stephen Holley			
2 events reported for plant 28			

Regulation 1.07

Key Terms

- ***Upset condition***" means the sudden failure of a process to operate in a normal manner that causes, or is likely to cause, emissions that exceed an applicable emission standard and that results from a malfunction or a preventable upset condition.
- ***“Excess emissions”*** are emissions that exceed an applicable “emission standard.”
- ***“Emission standard”*** is an enforceable requirement that limits the quantity, rate, concentration, or opacity of the emission of an air contaminant on a continuous basis, including any requirement related to the operation or maintenance of a process or process equipment to assure continuous emission reduction, and any design, equipment, work practice, or operational standard.

Regulation 1.07

What Does It Do?

Regulation 1.07 establishes the notification, reporting, and operational requirements for the owner or operator of a stationary source when excess emissions occur as a result of a startup, shutdown, preventable upset condition, or malfunction.

Regulation 1.07

How does it work?

Companies must file a series of reports:

- An initial report within one hour to APCD or 911,
- A report once the upset condition has stopped, and
- A follow-up report within 15 calendar days of the end of the event.

The image shows three overlapping forms from the Louisville Air Pollution Control District. The top form is titled "Notice of Excess Emission During Upset Conditions" and includes fields for Company Name, Plant ID, Address, City, State, ZIP, Phone, and Fax. It also has a section for "Please note the addition of information in the following report sections" with checkboxes for Initial Notification Report, Excess Emission Completion Report, No Excess Emission Report, Follow-Up Report, and General Information. Below this is a section for "For No Excess Emissions and Follow-Up Reports" and a signature line. The middle form is titled "Initial Notification Report - Section A1" and includes a table with 6 rows for reporting details. The bottom form is titled "Follow-Up Report - Section D1" and includes a table for reporting details. All forms have a revision date of December 4, 2019.

Regulation 1.07

What Information Is Required?

Initial Reports include:

- Identification of the equipment involved in the event,
- Information about the pollutants being released, including their estimated quantities and concentration,
- The known or suspected cause of the upset condition,
- The reason why the equipment will not be shutdown immediately, if applicable, and
- An estimate of how long the event may last.

Regulation 1.07

What Information Is Required?

Reports once the event ends include:

- Identification of the equipment involved in the event, and
- The date and time the event ended.

Regulation 1.07

What Information Is Required?

Follow-up Reports include:

- A report that no excess emissions occurred, or
- Calculations and methodology verifying the quantity and concentrations of pollutants released during the event,
- Identification of the emission standard that was exceeded, and
- An analysis of the cause of the upset condition and the steps that will be taken to prevent or minimize similar occurrences.

Regulation 1.07

What Happens Next?

Next steps may include:

- Requesting additional information;
- Sharing information with Louisville first responders, including periodic meetings with the Emergency Management Agency (EMA) and the members of the Local Emergency Planning Commission (LEPC),
- Verifying that additional reporting requirements and permit conditions have been met, or
- Referring the matter for enforcement.

Questions?



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