

**Louisville Metro Air Pollution Control District**  
**850 Barret Ave., Louisville, Kentucky 40204**  
**17 September 2013**

**Title V Statement of Basis**

**Company:** GE Consumer & Industrial

**Plant Location:** Appliance Park, Louisville, Kentucky 40225

**Date Application Received:** 21 April 1997

**Date Admin Complete:** 12 June 1997

**Date of Draft Permit:** N/A

**District Engineer:** Shannon Hosey

**Permit No:** 155-97-TV (R2)

**Plant ID:** 0870

**SIC Code:** 3639

**NAICS:** 33522

**AFS:** 00870

**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.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), and particulate matter less than 10 microns (PM<sub>10</sub>); and is a non-attainment area for particulate matter less than 2.5 microns (PM<sub>2.5</sub>).

**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 source manufactures home laundry appliances, dishwashers and refrigerators.
2. **Process Description:** The source receives raw steel sheet, coated steel sheet, tubing, drives, motors, and other assorted paint, chemicals, and hardware from which it manufactures and assembles major home appliances.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

<b>Emission Unit</b>	<b>Equipment Description</b>
Plantwide	All NOx and VOC emitting equipment
U01 (AP1)	Powder Paint Bake Oven
U04 (AP2)	E-Coat Prime
U30 (AP2)	Powder Paint Ovens
U200 (AP2)	High Efficiency Water Heater Line Powder Coating Operations
U210 (AP2)	High Efficiency Water Heater Line Touch-Up Paint and Adhesives
U220 (AP2)	High Efficiency Water Heater Line Natural Gas Furnace
U230 (AP2)	Grit Blast and Enamel Booths
U40 (AP3)	Rack Prime Dip
U42 (AP3)	Fluid Bed Rack Coater (Powder Coating)
U311 (AP3)	Adhesive for End Caps on Dishwasher Racks
U310 (AP3)	Nylon Rack Fluidized Bed Coating
U81 and U82 (AP20)	Gas-fired Boiler 6 and the Standby Boiler 8
U87	Gasoline Storage Tanks
U89	VOC Storage Tank installed before September 1, 1976
U100 - U103 (AP5)	ABS Extruders
U500 (AP5)	Touch-Up Paint, Adhesives and Lubricating the Spine Fin Evaporator Bottom Mount Freezer Refrigerator Line
U510 (AP5)	Bottom Mount Freezer Refrigerator Line
U104 - U107 (AP2)	Steel Parts Fabrication
U108 (AP2)	Stainless Steel Dishwasher Tub Line
U109 (AP2)	Abrasive Blasting (Hanger Paint Stripping Process)
U111	Emergency Generators
Solvent Metal Cleaning Equipment	Thirty (30) cold solvent parts cleaners are equipped with secondary reservoirs. Twelve (12) cold solvent parts cleaners are not equipped with secondary reservoirs
Combustion Sources	Combustion Sources less than 10 MMBtu per hour
Miscellaneous	Miscellaneous chemical use in assembly/packing operations; paint touch-up activities; drawing compound and lubricant use in hydraulic presses and other fabrication operations; and plastics handling, grinding, and regrind storage.

**5. Permit Revisions:**

Revision No.	Date of Issuance	Public Notice Date	Type	Emission Unit/Page No.	Description
Initial	01/22/2010	9/7/2009	Initial	Entire permit	Initial issuance of the permit
R1	01/22/2010	NA	Administrative	U01, U04, U30, U42, Combustion Sources <10 MMBtu/hr, and Miscellaneous	Incorporate construction permits # 72-89-C(R1), 73-89-C(R1), 19-91-C (R1), 145-98-C(R1), 201-01-C(R1), 216-93-C(R1), 405-92-C(R1), 334-92-C, 22-91-C(R1), 494-08-C (R1), 129-09-C (R1), and 652-08-C (R1)
R2	09/17/2013	NA	Administrative	U01, U200 AP2, U210 AP2, U220 AP2, U230 AP2, U311 AP3, U310 AP3, U500 AP5, U510 AP5, Combustion Sources <10 MMBtu/hr and Insignificant Activities	<p>Incorporate construction permits # 34677-12-C, 33733-11-C, 33371-11-C, 33029-11-C, 33262-11-C, 33667-11-C, 36340-12-C, 29161-10-C(R3), 33022-11-C, 32675-11-C, 207-09-C(R1), 33318-11-C, 33671-11-C, 33373-11-C(R1), and 34823-12-C. Updated TAC Language and the Insignificant Activities List. Updated Boiler #6 (U81) description to reflect 1998 boiler modification.</p> <p>Removed U90 as equipment has been removed                      Removed U101, U102, and U103 from emission Unit U100 – 103, as equipment has been removed, and renamed emission unit to U100                      Removed Regulations 7.08 and 7.09 from emission unit U111 as the District has determined these were not applicable regulations for emergency generators                      Removed emission points 176-00 and 73-87 from emission unit U-Miscellaneous as the equipment has been removed</p>

**6. Fugitive Sources:** Fugitive emissions of dust from any part of the plant are subject to Regulation 1.14, Control of Fugitive Particulate Emissions

**7. Emission Summary:**

Pollutant	Actual Emissions (tpy) 2011 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	17.19	Yes
NO <sub>x</sub>	26.04	Yes
SO <sub>2</sub>	1.12	No
PM <sub>10</sub>	7.94	No
VOC	6.86	Yes
Single HAP > 1 tpy		
Total HAPs	2.78	Yes

**8. Applicable Requirements:**

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

**9. Referenced Federal Regulations in Permit:**

40 CFR 60 Subpart A	General Provisions
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60 Subpart SS	Standards of Performance for Industrial Surface Coating: Large Appliances
40 CFR 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances

**II. Regulatory Analysis**

- 1. Acid Rain Requirements:** The source 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. This source 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, and commercial refrigerators. Additionally, in 1995, the source voluntarily substituted a high ozone depleting with a low ozone depleting compound in its refrigerator foaming operation under a "pollution control project" which received formal EPA approval on May 1, 1995.
- 3. Prevention of Accidental Releases 112(r):** The source 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. If the source becomes subject to 40 CFR 68 and Regulation 5.15, the source shall comply with the Risk Management Program and Regulation 5.15 and submit a Risk Management Plan to:

RMP Reporting Center  
 P.O. Box 3346  
 Merrifield, VA 22116-3346

**4. Basis of Regulation Applicability**

**a. Plant-wide**

GE Consumer Products is a major source for CO, NOx, VOC and Total HAPs. Regulation 2.16 - *Title V Operating Permits* establishes requirements for major sources. Greenhouse Gas emissions were not evaluated for this administrative revision to the Title V operating permit, they will be addressed in the significant revision or renewal, whichever is processed first. Since this is an Administrative Revision the Boiler MACT (40 CFR 63 Subpart DDDDD) and the Engine MACT (40 CFR 63 Subpart ZZZZZZ) requirements have not been included in this revision, they will be addressed in the significant revision or renewal, whichever is processed first.

**b. Star Program**

Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23 (STAR Program) establishes 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 or methane (including landfill gas) are considered to be “de minimis emissions” 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.

The TAC emissions from Insignificant Activities are considered to be “de minimis emissions”, as defined in Regulation 2.16, by the District.

The TAC emissions from fueling or refueling motor vehicles are considered to be “de minimis emissions” by the District.

**c. Applicable Regulations**

Regulation	Title	Type
1.09	Prohibition of Air Pollution	SIP
2.05	Prevention of Significant Deterioration of Air Quality	SIP
2.12	Emissions Trading (Including Banking and Bubble Rules)	SIP
2.16	Title V Operating Permits	SIP

<b>Regulation</b>	<b>Title</b>	<b>Type</b>
5.00	Standards for Toxic Air Contaminants and Hazardous air Pollutants, Definitions	Local
5.01	General Provisions	Local
5.02	Adoption and Incorporation by Reference of National Emissions Standards for Hazardous Air Pollutants	Local
5.14	Hazardous Air Pollutants and Source Categories	Local
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	Local
5.21	Environmental Acceptability for Toxic Air Contaminants	Local
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	Local
5.23	Categories of Toxic Air Contaminants	Local
6.07	Standards of Performance for Existing Indirect Heat Exchangers	SIP
6.09	Standards of Performance for Existing Process Operations	SIP
6.13	Standards of Performance for Existing Storage Vessels for Volatile Organic Compounds	SIP
6.16	Standards of Performance for Existing Large Appliance Surface coating Operations	SIP
6.18	Solvent Metal Cleaning Equipment	SIP
6.24	Standard of Performance for Existing Sources Using Organic Materials	SIP
6.40	Standard of Performance for Gasoline Transfer to Motor Vehicles (Stage II Vapor Recovery and Control)	SIP
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	SIP
7.02	Adoption of Federal New Source Performance Standards	SIP
7.06	Standards of Performance for New Indirect Heat Exchangers	SIP
7.08	Standards of Performance for New Process Operations	SIP
7.09	Standards of Performance for New Process Gas Streams	SIP
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	SIP
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)	SIP
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	SIP
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	SIP
40 CFR 60	General Provisions	Federal

Regulation	Title	Type
Subpart A		
40 CFR 63 Subpart A	General Provisions	Federal
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Federal
40 CFR 60 Subpart SS	Standards of Performance for Industrial Surface Coating: Large Appliances	Federal
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	Federal
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Federal
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Federal

**d. Basis for Applicability**

Regulation	Basis for Applicability
1.09	Prohibition of Air Pollution
2.05	VOC emissions are limited to less than 250 tons per 12 consecutive month period in order to avoid PSD/Non-attainment NSR per Regulation 2.05.
2.12	Emissions Trading (Including Banking and Bubble Rules)
2.16	Title V source
5.01	Established the requirements for Environmental Acceptability for TACs. T
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.21	Establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
6.07	Applies to each indirect heat exchanger of 1 million or more BTR per hour heat input which was in being or under construction before April 19, 1972.
6.09	Applies to each process operation that is the affected facility not otherwise regulated by any other portion of Regulation 6 and that was in existence or had a construction permit issued by the District on or before September 1, 1976.
6.16	Applies to each affected facility which was in being or had a construction permit issued before May 15, 1991. Any source that is ever subject to this regulation shall always be subject to it unless the source changes its process to one not covered by this regulation.
6.18	Applies to each cold cleaners, open top vapor degreasers, and conveyORIZED degreasers that use volatile organic compounds (VOCs) to remove soluble impurities from metal surfaces.
6.24	Any affected facility using any organic materials which was in being prior to June 13, 1979.

Regulation	Basis for Applicability
6.40	Applies to the refueling of motor vehicles at a gasoline dispensing facility
6.42	Applies to the VOC and NOx emissions from all VOC and NOx -emitting facilities located at all major VOC and NOx -emitting stationary sources
7.02	Adoption of Federal New Source Performance Standards
7.06	Establishes emission standards for indirect heat exchangers constructed after April 9, 1972 with a heat input capacity of less than 250 MMBtu/hr.
7.08	Applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.
7.09	Applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after April 19, 1976.
7.12	VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
7.15	Applies to the transfer of VOC from transport tanks into storage tanks constructed after June 13, 1979
7.25	Affected facility constructed after June 13, 1979 for VOC. The core winders use an adhesive which contains VOC, therefore is subject to Regulation 7.25.
7.59	Applies to each affected facility commenced on or after May 20, 1981.
40 CFR 60 Subpart A	General Provisions
40 CFR 60 Subpart Dc	Applies to facilities with Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60 SS	Applies to each surface coating operation in a large appliance surface coating line.
40 CFR 63 Subpart NNNN	Applies to facilities that coat large appliances
40 CFR 63 Subpart DDDDD	Applies to facilities with Industrial, Commercial, and Institutional Boilers and Process Heaters located at a major source
40 CFR 63 Subpart ZZZZ	Applies to facilities with Stationary Reciprocating Internal Combustion Engines

e. **Plantwide Limits**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
All emission Points	Entire Plant	2.05

ii. **Standards/Operating Limits**

1) **VOC**

Plantwide VOC emissions are limited to less than 250 tons per 12 consecutive month period in order to avoid PSD/Non-attainment NSR per Regulation 2.05. The VOC emission limit was taken in Construction Permit 33318-11-C.

2) **NOx**

Plantwide NOx emissions are limited to less than 100 tons per 12 consecutive month period in order to avoid PSD/Non-attainment NSR per Regulation 2.05 and NOx RACT per Regulation 6.42. The NOx emission limit was taken in Construction Permit 33318-11-C.

iii. **Monitoring and Record Keeping**1) **VOC**

(a) Regulation 2.16, section 4.1.9.1.2 establishes monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

(b) Emissions Calculation Methodology: VOC emissions will be calculated using material balance.

2) **NOx**

(a) Regulation 2.16, section 4.1.9.1.2 establishes monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

(b) Emissions Calculation Methodology: NOx emissions will be calculated based on the amount of natural gas and landfill gas used during the reporting period.

iv. **Reporting**1) **VOC**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any exceedances of the VOC standards in their semi-annual compliance report.

2) **NOx**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit. The source is required to report any exceedances of the NOx standards in their semi-annual compliance report.

**Emission Unit U01 – Powder Paint Bake Oven (AP1)**

**i. Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
100A	Electrostatic Application of Powder Paint consisting of two (2) powder coating operations each equipped with a reclamation system consisting of a cyclone and dust collector with twelve filters.	5.00, 5.01, 5.20, 5.21, 5.22, 5.23
		7.08
		40 CFR 63 Subpart NNNN
100B	100 Electric Bake Oven	7.59
		40 CFR 63 Subpart NNNN
100C	9-stage phosphator	N/A

**ii. Standards/Operating Limits**

**1) VOC**

Regulation 7.59 limits VOC emissions from equipment to less than five (5) tons, plantwide, during and consecutive 12-month period unless a compliant coating is used. The compliant coating VOC emission rates are listed in Regulation 7.59, section 3.

**2) PM**

(a) Regulation 7.08, section 3.1.2, Table 1, limits the PM emission for this equipment to 2.34 lb/hr based on process weight rate of less than 1000 lb/hr.

(b) Powder paints are exempt from 40 CFR 60 Subpart SS.

(c) A one-time PM compliance demonstration for the powder coating operation has been performed and the emission standards for PM cannot be exceeded when the reclamation system is in operation.

**3) Opacity**

Visible emissions are limited to 20% opacity per Regulation 7.08, section 3.1.1.

**4) HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and is required to comply with section 63.4090(a).

5) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.22, 5.21. 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) When coating metal parts, the source is required to meet the monitoring and record keeping requirements in accordance with Regulation 7.59, section 6. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

(b) Emissions Calculation Methodology: The emission calculations are based upon the material usage rate and a percentage of VOC content in the material.

2) **PM**

Regulation 7.08 does not require specific monitoring and record keeping requirements for PM, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. A one-time PM compliance demonstration for this equipment was performed on 4/23/2007 and the lb/hr standard cannot be exceeded uncontrolled when the reclamation system is in operation. The monthly through-put records and the daily records of the hours of operation are required to determine the PM emission (lb/hr) based on a monthly average during any by-pass of the reclamation unit. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the reclamation unit.

3) **Opacity**

Regulation 7.08 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16,

sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term and conditions of the permit.

4) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

5) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit. The MSDS for the powder paint used show that they contain no TACs.

iv. **Reporting**

1) **VOC**

Regulation 7.59 does not require any specific reporting requirements for VOC; however, Regulation 2.16, section 4.1.9.3 requires sufficient reporting to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the VOC standards in their semi-annual compliance report.

2) **PM**

Regulation 7.08 does not require any specific reporting requirements for PM, however, Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the PM emission standards in their semi-annual compliance report.

3) **Opacity**

Regulation 7.08 does not require specific reporting requirements for Opacity, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the Opacity emission standards in their semi-annual compliance report.

4) **HAP**

The source is required to comply with applicable reporting

requirements of 40 CFR 63, Subpart NNNN.

5) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

f. **Emission Unit U04 – E-Coat Prime (AP2)**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
EP 210A	Dip Tank - 0.90 kg VOCs/liter applied coating solids	40 CFR 63 Subpart NNNN 40 CFR 60 Subpart SS
EP 210B	Post-Rinse Spray - 0.90 kg VOCs/liter applied coating solids	
EP 206	Dehydrator - 0.90 kg VOCs/liter applied coating solids	
EP 207	Bake Oven - 0.90 kg VOCs/liter applied coating solids	
EP 208	Cooling/Drip Tunnel - 0.90 kg VOCs/liter applied coating solids	
EP 209	Cooling/Drip Tunnel - 0.90 kg VOCs/liter applied coating solids	

ii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 40 CFR 60 Subpart SS requires the source to not discharge VOC emissions that exceed 0.90 kilogram of VOCs per liter of applied coating solids from any surface coating operation on a large appliance surface coating line.
- (b) The potential VOC emissions for Emission Unit U04 were 20.75 tpy, which was below the significant level of 40 tpy for PSD/Nonattainment NSR.
- (c) Regulation 2.12 and Construction Permit 405-92-C(R1) limits the combined VOC emissions from EP 210A and EP 210B to less than or equal to 58.3 tons per 12 consecutive month period.

2) **HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and is required to comply with section 63.4090(a).

3) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23 TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Regulation 40 CFR 60 Subpart SS does not contain specific monitoring and record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

(b) Emissions Calculation Methodology: The emission calculations are based upon the material usage rate.

2) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 40 CFR 60 Subpart SS does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires sufficient reporting to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the VOC standards in their semi-annual compliance report.

2) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

h. **Emission Unit U30 – Powder Paint Ovens (AP2)**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
EP 213	Paint Curing Oven #1 for Black, natural gas-fired	7.59
EP 214	Paint Curing Oven #2 for Colors, natural gas-fired	40 CFR Part 63 Subpart NNNN
EP 214B	Double tunnel phosphator	N/A
EP 214C	Electrostatic Application of Powder Paint consisting of two (2) powder coating operations each equipped with a reclamation system consisting of a cyclone and dust collector with twelve filters.	7.08 40 CFR Part 63 Subpart NNNN

ii. **Standards/Operating Limits**

1) **VOC**

(a) Regulation 7.59 limits VOC emissions from equipment to less than five (5) tons, plantwide, during and consecutive 12-month period unless a compliant coating is used. The compliant coating VOC emission rates are listed in Regulation 7.59, section 3.

(b) Regulation 2.12 and Construction Permit 334-92-C limits the combined VOC emissions from emission points EP213, EP214, EP214B and EP214C to less than or equal to 18 tons per 12 consecutive month period.

- 2) **PM**
  - (a) Regulation 7.08, section 3.1.2, Table 1, limits the PM emission for this equipment to 2.34 lb/hr based on process weight rate of less than 1000 lb/hr.
  - (b) Powder paints are exempt from 40 CFR 60 Subpart SS.
  - (c) A one-time PM compliance demonstration for the powder coating operation has been performed and the emission standards for PM cannot be exceeded when the reclamation system is in operation.

- 3) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 7.08, section 3.1.1.

- 4) **HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and are required to comply with section 63.4090(a).

- 5) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

- iii. **Monitoring and Record Keeping**

- 1) **VOC**

- (a) When coating metal parts, the source is required to meet the monitoring and record keeping requirements in accordance with Regulation 7.59, section 6. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

- (b) Emissions Calculation Methodology: The emission calculations are based upon the material usage rate.

- 2) **PM**

Regulation 7.08 does not require specific monitoring and record keeping requirements for PM, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. A one-time PM compliance demonstration for this equipment was performed on 4/23/2007 and the lb/hr standard cannot be exceeded uncontrolled when the reclamation system is in operation. The monthly through-put records and the daily records of the hours of operation are required to determine the PM emission (lb/hr) based on a monthly average during any by-pass of the reclamation unit. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the reclamation unit.

3) **Opacity**

Regulation 7.08 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term and conditions of the permit.

4) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

5) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 7.59 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires sufficient reporting to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the VOC standards in their semi-annual compliance report.

2) **PM**

Regulation 7.08 does not contain specific reporting

requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the PM emission standards in their semi-annual compliance report.

3) **Opacity**

Regulation 7.08 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the Opacity emission standards in their semi-annual compliance report.

4) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart NNNN.

5) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

i. **Emission Unit U200 – High Efficiency Water Heater Line Powder Coating Operations (AP2)**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
AP2-200	Pretreatment/Cleaning Dry-Off Oven (Electric)	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.08, 7.25
AP2-201-	Powder Paint Cure Oven (Infrared)	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.08, 7.59
AP2-202	Electrostatic Application of Powder Paint consisting of two (2) powder coating operations each equipped with a reclamation system consisting of a cyclone and dust collector with twelve filters	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.08, 7.59

ii. **Standards/Operating Limits**

1) **VOC**

(a) Pretreatment Cleaner:

Regulation 7.25, section 3 limits VOC emissions to

less than 15.29 tons per any consecutive 12-month period; cleaner shall be contained in closed containers; operate an air blow-off chamber to reduce the amount of cleaner on the parts; and recover/reuse cleaner by specially designed paint racks and drip chambers; as detailed in the BACT analysis and Construction Permit 33733-11-C.

(b) Powder Coating Ovens:

Regulation 7.59 limits VOC emissions from equipment to less than five (5) tons, plantwide, during and consecutive 12-month period unless a compliant coating is used. The compliant coating VOC emission rates are listed in Regulation 7.59, section 3.

2) **PM**

(a) Regulation 7.08, section 3.1.2, Table 1, limits the PM emission for this equipment to 2.34 lb/hr based on process weight rate of less than 1000 lb/hr.

(b) Powder paints are exempt from 40 CFR 60 Subpart SS.

(c) A one-time PM compliance demonstration for the powder coating operation has been performed and the emission standards for PM cannot be exceeded uncontrolled.

3) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 7.08, section 3.1.1.

4) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23 TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Pretreatment Cleaner:

i) Regulation 7.25 does not contain specific monitoring or record keeping requirements for VOC emissions, however, Regulation

2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

- ii) The amount of cleaner recovered and reused from the paint racks and drip chambers to assure good management practices are followed per the BACT.
  - iii) The VOC limit of 15.29 tons per year is based upon a BACT for Regulation 7.25. The potential for the pretreatment cleaning is 24.55 tpy VOC. If the company wishes to increase the VOC limit for this process either a new BACT must be submitted or the entire VOC limit must be taken from the bank. The company originally submitted the BACT on October 14, 2011 and the District requested the company revise the requested VOC limit. The company then submitted a revised BACT on October 24, 2011 and the District approved the revised BACT on that same day. The good management practices are included in the BACT.
  - iv) Emissions Calculation Methodology: The emission calculations are based upon amount of cleaner used and the VOC content of formulation.
- (b) Powder Coating Ovens:
- i) When coating metal parts, the source is required to comply with the monitoring and record keeping requirements in accordance with Regulation 7.59, section 6. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.
  - ii) Emissions Calculation Methodology: The emission calculations are based upon the material usage rate and a percentage of VOC content in the material.

2) **PM**

Regulation 7.08 does not require specific monitoring and record keeping requirements for PM, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. A

one-time PM compliance demonstration for this equipment was performed on 10/7/2011 and the lb/hr standard cannot be exceeded uncontrolled.

3) **Opacity**

Regulation 7.08 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term and conditions of the permit.

4) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

(a) Pretreatment Cleaner:

Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance report.

(b) Powder Coating Ovens:

Regulation 7.59 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance report.

2) **PM**

Regulation 7.08 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

3) **Opacity**

Regulation 7.08 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

4) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the

source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

**j. Emission Unit U210 – High Efficiency Water Heater Line Touch-Up Paint and Adhesives (AP2)**

**i. Equipment:**

Emission Point	P/PE	Applicable Regulation
AP2-210	HEWH Touch-Up Paints and Adhesives	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25 40 CFR 63 Subpart NNNN

**ii. Standards/Operating Limits**

**1) VOC**

Regulation 7.25 limits the plantwide VOC emissions from equipment that does not have a BACT analysis to less than five (5) tons, during any consecutive 12-month period.

**2) HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and are required to comply with section 63.4090(a).

**3) TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23 TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

**iii. Monitoring and Record Keeping**

**1) VOC**

(a) Regulation 7.25 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit. The equipment subject to the combined less than five (5) tons per year VOC emission limit are U149 touch-up painting, U150 touch-up painting, touch-up paint booths (320-92-C(R1)),

Bottom Mount Freezer Refrigerator touch-up painting, High Efficiency Hot Water Heater touch-up painting and Insignificant Activities that emit VOCs.

- (b) Emissions Calculation Methodology: The emission calculations are based upon amount of touch-up paint/adhesive material used and the VOC content of each material formulation

2) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report plantwide VOC emissions and any exceedances in their semi-annual compliance reports.

2) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

k. **Emission Unit U220 – High Efficiency Water Heater Line Natural Gas Furnace (AP2)**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
AP2-220	One (1) Natural Gas Fired Enameling Furnace rated at 3.1 MMBtu/hr	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.08, 7.09

ii. **Standards/Operating Limits**

1) **NO<sub>x</sub>**

Regulation 7.08, section 4, limits the NO<sub>x</sub> fumes discharged to the atmosphere to be less than 300 ppm by volume expressed at NO<sub>2</sub>.

2) **CO**

Regulation 7.09, section 5.1, limits the carbon monoxide gases by requiring that the gases shall be burned at 1,300°F for 0.5 seconds or greater in a direct flame afterburner or equivalent device equipped with an indicating pyrometer that is positioned in the working area at the operator's eye level.

3) **SO<sub>2</sub>**

Regulation 7.09, section 4, limits the affected facility emissions of the pollutant SO<sub>2</sub> to less than 40 tons during any twelve consecutive month period or limits the release of a process gas stream containing sulfur dioxide with a concentration greater than 28.63 grains per 100 dscf at 0% excess oxygen.

4) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23 TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

5) **PM**

Regulation 7.08, section 3.1.2, Table 1, limits the PM emission for this equipment to 2.34 lb/hr based on process weight rate of less than 1000 lb/hr.

6) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 7.08, section 3.1.1.

iii. **Monitoring and Record Keeping**

1) **NO<sub>x</sub>**

There are no monitoring or record keeping requirements for NO<sub>x</sub> compliance. A one-time NO<sub>x</sub> compliance demonstration has been performed using AP-42 emission factors and combusting natural gas, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO<sub>x</sub> emission limits.

2) **CO**

There are no monitoring or record keeping requirements for CO compliance. The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000°F, exceeds the 1,300°F temperature requirement of 7.09, section 5.1.

3) **SO<sub>2</sub>**

A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the ton per year emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to the ton per year SO<sub>2</sub> emission limit. However, if the ton per year SO<sub>2</sub> emission standard is exceeded the source shall determine the process gas stream concentration for SO<sub>2</sub>.

4) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

5) **PM**

There are no monitoring or record keeping requirements for PM compliance. A one-time compliance demonstration has been performed and the lb/hr PM emission standard can not be exceeded uncontrolled

6) **Opacity**

There are no monitoring or record keeping requirements for Opacity compliance. The District has determined that no periodic visible emissions surveys are required for this emission unit.

iv. **Reporting**1) **NO<sub>x</sub>**

There are no compliance reporting requirements for this equipment.

2) **CO**

There are no compliance reporting requirements for this equipment.

3) **SO<sub>2</sub>**

A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the ton per year SO<sub>2</sub> emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits. However if the ton per year SO<sub>2</sub> emission limit is exceeded the source shall determine what the process gas stream concentration is for SO<sub>2</sub> and report that in the semi-annual reporting as required by Regulation 2.16, section 4.1.9.3.

4) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

5) **PM**

There are no compliance reporting requirements for this equipment.

6) **Opacity**

There are no compliance reporting requirements for this equipment.

1. **Emission Unit U230 – Grit Blast and Enamel Booths (AP2)**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
AP2-231	Tank Shell Dry Grit Blasting 3969 lb/hr with process baghouse	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.08
AP2-232	Tank Bottom Dry Grit Blasting 2775 lb/hr with process baghouse	
AP2-233	Tank Shell Enamel Booth 413 lb/hr with process baghouse	
AP2-234	Tank Bottom Enamel Booth 141 lb/hr with process baghouse	

ii. **Standards/Operating Limits**

1) **PM**

- (a) Regulation 7.08, section 3.1.2, Table 1, limits the PM emissions for the 3969 lb/hr grit blast booth to 5.49 lb/hr based on the process weight rate of 3969 lb/hr per the equation for less than 60,000 lb/hr.
- (b) Regulation 7.08, section 3.1.2, Table 1, limits the PM emissions for the 2775 lb/hr grit blast booth to 4.40 lb/hr based on the process weight rate of 2775 lb/hr per the equation for less than 60,000 lb/hr.
- (c) Regulation 7.08, section 3.1.2, Table 1, limits the PM emissions to 2.34 lb/hr for each of the 413 lb/hr and 141 lb/hr enamel coating booths based on the process rate of less than 1000 lb/hr.

2) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 7.08, section 3.1.1.

3) **TAC**

- (a) The company demonstrated that the controlled TAC emissions are environmentally acceptable (de minimis) for Manganese, Cobalt and Nickel. Therefore, the source will need to run the material recovery device at all times the grit blasting booths and the enamel coating booths are in operation per Regulation 5.21, section 4.3.
- (b) Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23 TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**1) **PM**

Regulation 7.08 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit. A one-time PM compliance demonstration for this equipment was performed and the lb/hr standard cannot be exceeded uncontrolled when the process baghouses in operation. The monthly through-put records and the daily records of the hours of operation are required to determine the PM emission (lb/hr) based on a monthly average during any by-pass of the reclamation unit. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the process baghouses.

2) **Opacity**

Regulation 7.08 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term and conditions of the permit.

3) **TAC**

- (a) Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

- (b) Emissions Calculation Methodology: for the enameling operations, the calculated emissions will be based upon the raw material usage rate of frit, the transfer efficiency of the equipment, the overall material recovery efficiency of the equipment, and the indoor drop-out factor for airborne particulate matter.
- (c) Emissions Calculation Methodology: for the grit blast operations, the calculated emissions will be based upon the application rate of grit, the overall material recovery efficiency of the equipment, and the indoor drop-out factor for airborne particulate matter.

iv. **Reporting**

1) **PM**

Regulation 7.08 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the PM emission standards in their semi-annual compliance report.

2) **Opacity**

Regulation 7.08 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the Opacity emission standards in their semi-annual compliance report.

3) **TAC**

- (a) Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.
- (b) Regulation 5.21 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source will be required to report bypasses of the material recovery devices.

m. **Emission Unit U40 – Rack Prime Dip (AP3)**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
EP 304	Rack Prime Dip Tank	6.16 40 CFR 63 Subpart NNNN
EP 305	Rack Prime Preheat Oven; natural gas-fired	
EP 306	Fluid Bed Prime Drip Chamber	

ii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 6.16 limits the VOC content of the coatings of the affected facility to less than 0.34 kilograms per liter of coating (2.8 pounds per gallon) (excluding water and exempt solvents) or limits the discharge of VOC emission to no more than 15% by weight unless source has qualified for an exemption per section 5.
- (b) Revision 1 of the Title V operating permit limited the VOC emissions to less than 0.97 tons per 12 consecutive month period for emission point EP305.

2) **HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and are required to comply with section 63.4090(a).

3) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

- (a) When coating metal parts, the source is required to meet the monitoring and record keeping requirements in accordance with Regulation 6.16, section 6. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms

and conditions of the permit.

- (b) Emissions Calculation Methodology: The emission calculations are based upon the material usage rate and a percentage of VOC content in the material.

2) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 6.16 does not contain specific compliance reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report plantwide VOC emissions and any exceedances in their semi-annual compliance reports.

2) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

n. **Emission Unit U42 – Fluid Bed Rack Coater (AP3) (Powder Coating)**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
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<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
EP 309	Fluid Bed PVC Rack Coater	6.09
EP 310	One (1) Natural Gas Fired Post Heat Eclipse Oven rated at 3.5 MMBtu/hr	2.12, 6.16, 7.08, 7.09, 40 CFR 63 Subpart NNNN

ii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 6.16 limits the VOC content of the coatings of the affected facility to less than 0.34 kilograms per liter of coating (2.8 pounds per gallon) (excluding water and exempt solvents) or limits the discharge of VOC emission to no more than 15% by weight unless source has qualified for an exemption per section 5.
- (b) Regulation 2.12 and Construction Permit 22-91-C(R1) limits the combined VOC emissions from emission points (EP 309 and EP310) to less than 4.82 tons per 12 consecutive month period.

The VOC emission limit is from the combination of the following permits 22-91, 23-91, 24-91, 25-91, and 11-95 including the following banking references:

Banking Ledger	Date	VOC Emissions
43104-045	7/30/1991	2.5 tpy
43104-048	7/30/1991	0.25 tpy
43104-049	7/30/1991	0.75 tpy
43104-080	1/9/1995	1.32 tpy
Total		4.82 tpy

2) **PM**

- (a) Regulation 6.09, section 3.2, Table 1, limits the PM emissions to 2.58 lb/hr for the Rack Coater based on the process rate of less than 1000 lb/hr.
- (b) A one-time PM compliance demonstration has been performed on 4/23/2007 and the emission standards for PM cannot be exceeded controlled, therefore the source is required to utilize a control device.

3) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 6.09, section 3.1.

4) **HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and are required to comply with section 63.4090(a).

5) **NO<sub>x</sub>**

Regulation 7.08 limits the NO<sub>x</sub> emissions to 300 ppm by volume. A one-time NO<sub>x</sub> compliance demonstration has been performed using AP-42 emission factors and combusting natural gas and the standard can not be exceeded.

6) **CO**

Regulation 7.09 requires that CO gases be burned at 1,300°F or greater. The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000°F, exceeds the 1,300°F temperature requirement of 7.09, section 5.1, therefore the District has determined that this will be equivalent to a direct flame afterburner.

7) **SO<sub>2</sub>**

Regulation 7.09 limits SO<sub>2</sub> emissions to 40 tons/yr or less or the concentration to 28.63 grains per 100 dscf at 0% excess oxygen. A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits.

8) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**1) **VOC**

(a) When coating metal parts, the source is required to meet the monitoring and record keeping requirements in accordance with Regulation 6.16, section 6. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record

keeping assuring ongoing compliance with the terms and conditions of the permit.

- (b) Emissions Calculation Methodology: The emission calculations are based upon the material usage rate and a percentage of VOC content in the material.

2) **PM**

Regulation 6.09 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit. The monthly through-put records and the daily records of the hours of operation are required to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the control device. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the two rotoclones (C32 and C33).

3) **Opacity**

Regulation 6.09 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

4) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

5) **NO<sub>x</sub>**

Regulation 7.08 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

6) **CO**

Regulation 7.09 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

7) **SO<sub>2</sub>**

Regulation 7.09 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

8) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**1) **VOC**

Regulation 6.16 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report plantwide VOC emissions and any exceedances in their semi-annual compliance reports.

2) **PM**

Regulation 6.09 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the PM emission standards in their semi-annual compliance report.

3) **Opacity**

Regulation 6.09 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the Opacity emission standards in their semi-annual compliance report.

4) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart NNNN.

5) **NOx**

Regulation 7.08 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

6) **CO**

Regulation 7.09 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

7) **SO<sub>2</sub>**

Regulation 7.09 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

8) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

o. **Emission Unit U311 – Adhesive for End Caps on Dishwasher Racks (AP3)**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
AP3-311	Nylon Rack End Cap Adhesive	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25 40 CFR 63 Subpart NNNN

ii. **Standards/Operating Limits**

1) **VOC**

Regulation 7.25 limits the plantwide VOC emissions from equipment that does not have a BACT analysis to less than five (5) tons, during any consecutive 12-month period.

2) **HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and are required to comply with section 63.4090(a).

3) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

- (a) Regulation 7.25 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit. The equipment subject to the combined less than five (5) tons per year VOC emission limit are U149 touch-up painting, U150 touch-up painting, touch-up paint booths (320-92-C(R1)), Bottom Mount Freezer Refrigerator touch-up painting, High Efficiency Hot Water Heater touch-up painting and Insignificant Activities that emit VOCs.
- (b) Emissions Calculation Methodology: The emission calculations are based upon amount of touch-up paint/adhesive material used and the VOC content of each material formulation

2) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

- (a) Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.
- (b) The potential uncontrolled TAC emissions are found to be de minimis.

iv. **Reporting**

1) **VOC**

Regulation 7.25 does not contain specific reporting

requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance report.

2) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

p. **Emission Unit U310 – Nylon Rack Fluidized Bed Coating (AP3)**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
AP3-310	Nylon Rack Coater Preheat Oven 4.5 MMBtu/hr	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.09
AP3-310a	Nylon Rack Coater 353 lb/hr Fluidized Bed	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.08, 7.59 40 CFR 63 Subpart NNNN
AP3-310b	Nylon Rack Coater Postheat Oven 1.5 MMBtu/hr	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.09

ii. **Standards/Operating Limits**

1) **VOC**

Regulation 7.59 limits VOC emissions from equipment to less than five (5) tons, plantwide, during and consecutive 12-month period unless a compliant coating is used. The compliant coating VOC emission rates are listed in Regulation 7.59, section 3.

2) **PM**

Regulation 7.08, section 3.1.2, Table 1, limits the PM emissions to 2.34 lb/hr for the 353 lb/hr fluidized bed based on the process rate of less than 1000 lb/hr

3) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 7.08, section 3.1.1.

4) **HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and are required to comply with section 63.4090(a).

5) **NO<sub>x</sub>**

Regulation 7.08, section 4 limits the NO<sub>x</sub> fumes discharged to the atmosphere to less than 300 ppm by volume expressed as NO<sub>2</sub>.

6) **CO**

Regulation 7.09, section 5.1, limits the carbon monoxide gases that can be emitted unless they are burned at 1,300°F for 0.5 seconds or greater in a direct flame afterburner or equivalent device equipped with an indicating pyrometer that is positioned in the working area at the operator's eye level.

7) **SO<sub>2</sub>**

Regulation 7.09, section 4, limits the SO<sub>2</sub> emissions to less than exceed 40 tons during any twelve consecutive month period or limit the release of a process gas stream containing sulfur dioxide with a concentration greater than 28.63 grains per 100 dscf at 0% excess oxygen.

8) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**1) **VOC**

(a) When coating metal parts, the source is required to comply with the monitoring and record keeping requirements in accordance with Regulation 7.59, section 6. Regulation 2.16, section 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

- (b) Emissions Calculation Methodology: The emission calculations are based upon the material usage rate and a percentage of VOC content in the material.

2) **PM**

A one-time PM compliance demonstration was performed on 9/23/2011 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements.

3) **Opacity**

The District has determined that no periodic visible emissions surveys are required for this emission unit.

4) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

5) **NO<sub>x</sub>**

A one-time NO<sub>x</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO<sub>x</sub> emission limits.

6) **CO**

The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000°F, exceeds the 1,300°F temperature requirement of 7.09, section 5.1, therefore the District has determined that this will be equivalent to a direct flame afterburner.

7) **SO<sub>2</sub>**

A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the ton per year emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to the ton per year SO<sub>2</sub> emission limit. However, if the ton per year SO<sub>2</sub> emission standard is exceeded the source shall determine the process gas stream concentration for SO<sub>2</sub>.

8) **TAC**

- (a) Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.
- (b) The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” 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.

iv. **Reporting**1) **VOC**

Regulation 7.59 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance report.

2) **PM**

A one-time PM compliance demonstration was performed on 9/23/2011 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements for this equipment.

3) **Opacity**

The District has determined that no periodic visible emissions surveys are required for this emission unit. Therefore, there are no reporting requirements for this equipment.

4) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart NNNN.

5) **NO<sub>x</sub>**

A one-time NO<sub>x</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO<sub>x</sub> emission limits for this equipment.

6) **CO**

The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000°F, exceeds the 1,300°F temperature requirement of 7.09, section 5.1, therefore the District has determined that this will be equivalent to a direct flame afterburner. Therefore, there are no reporting requirements for this equipment.

7) **SO<sub>2</sub>**

A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the ton per year SO<sub>2</sub> emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits. However if the ton per year SO<sub>2</sub> emission limit is exceeded the source shall determine what the process gas stream concentration is for SO<sub>2</sub> and report that in the semi-annual reporting as required by Regulation 2.16, section 4.1.9.3.

8) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

q. **Emission Unit U81 and U82 – Gas-fired Boiler 6 and Boiler 8 (AP20)**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
EP 908	Boiler # 6 rated at 180 MM Btu/hr while combusting both natural gas and landfill gas; however, only 90.8 MM Btu/hr while solely combusting natural gas; equipped with low NO <sub>x</sub> burners	6.07 6.42

Emission Point	P/PE	Applicable Regulation
EP 909	Natural gas fired boiler #8 rated at 60.9 MM Btu/hr with landfill gas as backup	7.06 40 CFR 60 Subpart Dc

ii. **Standards/Operating Limits**

1) **PM**

- (a) Regulation 6.07, section 3.1, limits PM emissions to 0.28 lb/MMBTU on a 24 hour average basis for Boiler #6 based on total heat input of 180 MMBtu/hr utilizing the equation for Table 1:

$$Y = 0.9634 (X^{-0.2356})$$

Where Y = Allowable PM emissions in lb/MMBtu heat input, and

X = MMBtu/hr heat input

- (b) Regulation 7.06, section 4.1.4, limits PM emissions to 0.21 lb/MMBTU on a 24 hour average basis for Boiler #8 based on total heat input of 60.9 MMBtu/hr utilizing the equation:

$$Y = 1.919 (X^{-0.535})$$

Where Y = Allowable PM emissions in lb/MMBtu heat input, and

X = MMBtu/hr heat input

2) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 6.07, sections 3.2 and 3.3; and Regulation 7.06, section 4.2

3) **NO<sub>x</sub>**

In accordance with Regulation 6.42, section 4, the source shall comply with the NO<sub>x</sub> RACT Plan.

4) **SO<sub>2</sub>**

- (a) Regulation 6.07, section 4.1, limits emissions of gases which contain sulfur dioxide to 0.92 lb/MMBTU on a 24 hour average basis for Boiler #6 based on total heat input of 180 MMBtu/hr utilizing the equation for Table 2:

$$Y = 7.722 (X^{-0.4106})$$

Where Y = Allowable SO<sub>2</sub> emissions in lb/MMBtu heat input, and

X = MMBtu/hr heat input

- (b) Regulation 7.06, section 5.1.1, limits emissions of gases which contain sulfur dioxide to less than 1 lb/MM BTU actual total heat input for combustion of gaseous fuels for Boiler #8 based on total heat input of 60.9 MMBtu/hr.

5) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **PM**

A one-time PM compliance demonstration was performed for the standby boiler #8 on 5/14/2007 and for the remaining boilers (including boiler #6 and the small boilers) on 4/3/2007, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements.

2) **Opacity**

The District has determined that no periodic visible emissions surveys are required for this emission unit since they are natural gas and landfill gas boilers.

3) **NO<sub>x</sub>**

In accordance with Regulation 6.42, section 4, the source shall comply with the NO<sub>x</sub> RACT Plan.

4) **SO<sub>2</sub>**

- (a) A one-time SO<sub>2</sub> compliance demonstration was performed for the standby boiler #8 on 5/14/2007 and for the remaining boilers (including boiler #6 and the small boilers) on 4/3/2007, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded. Therefore,

there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits.

- (b) 40 CFR 60 Subpart Dc requires, for the Standby Boiler #8, records of the amount of each fuel combusted during each month. (40 CFR 60.48c(g))

5) **TAC**

- (a) Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.
- (b) Regulation 5.21, section 2.7 defines “de minimis emissions” as the TAC emissions from the combustion of natural gas. 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.

iv. **Reporting**

1) **PM**

A one-time PM compliance demonstration was performed on 9/23/2011 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements for this equipment.

2) **Opacity**

The District has determined that no periodic visible emissions surveys are required for this equipment.

3) **NO<sub>x</sub>**

A one-time NO<sub>x</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO<sub>x</sub> emission limits for this equipment.

4) **SO<sub>2</sub>**

A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits for this equipment.

5) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

r. **Emission Unit U87 – Gasoline Storage Tanks**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
Tank No. 900	Underground Gasoline Storage Tank, AP26; 6000 gal	6.40, 7.15

ii. **Standards/Operating Limits**

1) **VOC**

(a) Regulation 7.15 requires the source to shall install, maintain, and operate the following devices on the storage tank: submerged fill pipe, vent line restrictions, vapor balance system, and vapor tight connections, seals and covers.

(b) Regulation 6.40 requires the source to limit the amount of gasoline dispensed in a month to less than 10,000 gallons, in order to be exempted from operating standards of Regulation 6.40.

2) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

- (a) Regulation 7.15 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.
- (b) Regulation 6.40 requires that the owner or operator shall keep a record of the amount of throughput of gasoline per month to determine compliance with limits.
- (c) Emissions Calculation Methodology: The VOC fueling/refueling emissions are based upon the AP-42 emission factors and the amount of material throughput.

2) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit. Emissions from motor vehicle fueling or refueling are “de minimis” as defined in Regulation 5.21, section 2.6.

iv. **Reporting**

1) **VOC**

- (a) Regulation 7.15 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit.
- (b) Regulation 6.40 requires that the owner or operator shall submit a report by April 15<sup>th</sup> every year showing that they are still exempt from Regulation 6.40.

2) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

s. **Emission Unit U89 – VOC Storage Tank installed before September 1, 1976**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
Tank No. 307	Primer Holding Tank; 1200 gal	6.13

ii. **Standards/Operating Limits**

1) **VOC**

Regulation 6.13 requires Emission Point 307 to be equipped with a permanent submerged fill pipe.

2) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Regulation 6.13 does not contain specific monitoring and record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

(b) Emissions Calculation Methodology: The VOC storage tank emissions are based upon the VOC content of the stored material and the amount of material in the tank.

2) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 6.13 does not contain specific reporting

requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit.

2) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

t. **Emission Unit U100 – ABS Extruder (AP5)**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
U100, EP 540	Cabinet Liner Extruder	7.25

ii. **Standards/Operating Limits**

1) **VOC**

Regulation 7.25 and Construction permit 210-01-C limits VOC emissions to 3.54 tpy or less for emission point U100, at the time of construction this was determined to meet BACT as required in section 3 of Regulation 7.25.

2) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Regulation 7.25 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

(b) Emissions Calculation Methodology: The emission calculations are based upon the material usage rate

and a percentage of VOC content in the material.

2) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance reports.

2) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

u. **Emission Unit U500 – Touch-Up Paint, Adhesives and Lubricating the Spine Fin Evaporator Bottom Mount Freezer Refrigerator Line (AP5)**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
EP-500	Touch-Up Paint, Adhesives and Lubricating the Spine Fin Evaporator	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25 40 CFR 63 Subpart NNNN

ii. **Standards/Operating Limits**

1) **VOC**

(a) Regulation 7.25, the associated BACT, and Construction permit 33373-11-C(R1) limits VOC emissions to less than 26.9 tons per any consecutive 12-month period, requires the lubricant to be stored in closed containers to reduce the evaporate losses, limits the amount of lubricant by requiring the spray pattern to be concentrated directly at the mandrel and maximizing the number of bends made per spray.

Additionally, the BACT required the per unit usage of lubricant to not exceed 1.05 oz per evaporator.

- (b) Regulation 7.25 limits the plantwide VOC emissions from equipment that does not have a BACT analysis to less than five (5) tons, during any consecutive 12-month period.

2) **HAP**

Per Regulation 5.02, the source is subject to 40 CFR 63, Subpart NNNN and are required to comply with section 63.4090(a).

3) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

- (a) Regulation 7.25 does not contain specific monitoring or record keeping requirement, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.
- (b) The VOC limit of 26.9 tons per year is based upon a BACT for Regulation 7.25.
- (c) Emissions Calculation Methodology: the amount of lubricant used and the number of units manufactured, weekly, will be used to demonstrate the concentration of the spray pattern directly at the mandrel and maximizing the number of bends per spray.
- (d) The company originally submitted the BACT on August 31, 2011 and the District requested clarification on several issues in the BACT. The company then submitted a response to the District's concerns on September 7, 2011 and the District approved the revised BACT on September 8, 2011.
- (e) The BACT states that the Cindol usage rate is 0.6

ounces per unit or less. The source determined a site-specific amount of lubricant used per unit emission limit of 1.05 oz per evaporator. This is based off of maximum equipment capacity and a 5% addition for wear.

- (f) Regulation 7.25 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit. The equipment subject to the combined less than five (5) tons per year VOC emission limit are U149 touch-up painting, U150 touch-up painting, touch-up paint booths (320-92-C(R1)), Bottom Mount Freezer Refrigerator touch-up painting, High Efficiency Hot Water Heater touch-up painting and Insignificant Activities that emit VOCs.
- (g) Emissions Calculation Methodology: The emission calculations are based upon amount of touch-up paint/adhesive material used and the VOC content of each material formulation.

2) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

- (a) Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance reports to assure compliance with the 26.9 tpy VOC limit.

Also, the source is required to identify all periods of exceeding the concentration of the spray pattern directly at the mandrel and maximizing the number of bends per spray. A negative declaration shall be included if there are no instances of exceedance.

- (b) Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report plantwide VOC emissions and any exceedances in their semi-annual compliance reports to demonstrate compliance with the less than 5 tons per 12 consecutive month period.

2) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63, Subpart NNNN.

3) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

v. **Emission Unit U510 – Bottom Mount Freezer Refrigerator Line (AP5)**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
EP-510	Insulating Foam Line (IFL-1)	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25
EP-511	Bottom Mount Freezer Refrigerator Main Extruder Line (3,000 lb/hr)	2.12, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25
EP-512	Bottom Mount Freezer Refrigerator Small Extruder Line (800 lb/hr)	2.12, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25

ii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 7.25, the associated BACT, and Construction Permit 33318-11-C limits VOC emissions to less than 32.4 tons per any 12 consecutive month period for the Insulating Foam Line (IFL-1) as required by section 3.1 of Regulation

7.25. Additionally, the BACT requires the source to follow the equipment manufacturer's recommendations for the maintenance of the critical foam system equipment.

- (b) Regulations, 2.12, 7.25, associated BACT, and Construction Permit 33671-11-C limits the combined VOC emissions from the extruders to less than 3.84 tons per any 12 consecutive month period for the Extruder Lines as required by section 3 of Regulation 7.25.

2) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

- (a) Regulation 7.25 does not contain specific monitoring or record keeping requirement, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit. The VOC limit of 32.4 tons per year is BACT for Regulation 7.25 as required by section 3.1.
- (b) The company originally submitted the BACT on August 8, 2011 and the District requested clarification on several issues in the BACT. The company then submitted the revised BACT on August 19, 2011 and the District approved the revised BACT on August 22, 2011 for the foam line.
- (c) The maintenance recommendations for the maintenance of the critical foam system equipment are also included in the BACT and shall be kept on record at the source. Also, records shall be maintained that demonstrate the maintenance is being performed in accordance with the manufacturer's recommendations.
- (d) Emissions Calculation Methodology: The emission calculations are based upon throughput of foam creating materials and the VOC content of each

material formulation.

- (e) The company requested removal of emissions from the bank on October 14, 2011 to set a VOC limit of 3.84 tpy for this extrusion equipment. These requested emissions were removed from banking permit 12-02-B in order to avoid submitting a BACT analysis for Regulation 7.25 as required by section 3.1.
- (f) Emissions Calculation Methodology: Emissions will be calculated for the extrusion equipment using emission factors from the Journal of the Air & Waste Management Association publication from September 1995 and the amount of material used.

## 2) TAC

- (a) Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.
- (b) The company performed a STAR Environmental Acceptability Demonstration for Acrylonitrile (Category 1 TAC), Ethyl benzene (Category 4 TAC) and Styrene (Category 4 TAC) emissions. It was shown that the emissions exceeded the De Minimis level for these three TACS. A SCREEN3 Model was used to calculate a MAC based on site specific and default dispersion parameters and meteorological data. This was then used with BAC to determine the risk. For Acrylonitrile the risk was determined to be  $0.825 \times 10^{-6}$ , for Ethyl benzene the risk was determined to be  $0.057 \times 10^{-6}$  and for Styrene the risk was determined to be  $0.150 \times 10^{-6}$ . These are each below the maximum allowable risk of  $1.0 \times 10^{-6}$  for this project. The combined TAC risk is  $1.032 \times 10^{-6}$  which is below the maximum allowable risk of  $3.8 \times 10^{-6}$ . The current plantwide total risk is  $3.26 \times 10^{-6}$  so by adding the new risk the new plantwide total risk is  $4.29 \times 10^{-6}$ , which is still less than  $7.5 \times 10^{-6}$ . The STAR Environmental Acceptability for this plant has been demonstrated. The STAR EA Demonstration has been accepted by the District. The following TACs were De Minimis uncontrolled: Acetophenone, Cumene, MDI and Polymeric diphenylmethane diisocyanate.

## iv. Reporting

1) **VOC**

- (a) Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance reports to assure compliance with the 3.84 tpy VOC limit.
- (b) Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance reports to assure compliance with the 32.4 tpy VOC limit.

2) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

w. **Emission Unit U104 – U107 – Steel Parts Fabrication (AP2)**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
EP 224	Lubricator for Door Panel Press #25001	7.25
EP 225	Lubricator for Door Panel Press #25002	
EP 226	Lubricator for Toe Panel Press #25378	
EP 227	Lubricator for Access Panel Press #58737	

ii. **Standards/Operating Limits**

1) **VOC**

Regulation 7.25 and Construction Permit 185-01-C limit VOC emissions to less than 3 tons per any 12 consecutive month period.

2) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally

acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Regulation 7.25 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

(b) The potential combined VOC emissions for emission points (U104-U107) is below the 3 tpy VOC emission limit, based on one-time compliance demonstrations dated December 2, 2002 and April 28, 2003. Therefore, there are no monitoring, recordkeeping, or reporting requirements for this equipment.

2) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit. The potential combined VOC emissions for emission points (U104-U107) is below the 3 tpy VOC emission limit, based on one-time compliance demonstrations dated December 2, 2002 and April 28, 2003. Therefore, there are no reporting requirements for this equipment.

2) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable

(EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

x. **Emission Unit U108 – Stainless Steel Dishwater Tub Line (AP2)**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
EP 230	Three tub wrap presses	2.05, 7.25
EP 231	Tub wrap mastic station	
EP 232	Bake oven for tub wrap	
EP 233	Tub top and bottom mastic station	
EP 234	Bake oven for tub top and bottom	
EP 235	Tub top and bottom silicone station	
EP 236	Tub assembly gasket retainer silicone station	

ii. **Standards/Operating Limits**

1) **VOC**

Regulations 2.05, 7.25, and Construction Permit 263-01-C, limit the VOC emissions to less than 38 tons per any 12 consecutive month period for all emission points combined in U108 and, also, limit the production of tubs to less than 726,500 per 12 consecutive month period, in order to avoid PSD. The VOC limit of 38 tons per year is BACT as required by section 3.1 of Regulation 7.25.

2) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Regulation 7.25 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

(b) Emissions Calculation Methodology: The source is

required to track the amount of material used and the number of tubs produced monthly, then using this information calculate the VOC emissions based on the % of VOC contained in the material.

2) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 7.25 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report plantwide VOC emissions and any exceedances in their semi-annual compliance reports.

2) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

y. **Emission Unit U109 – Abrasive Blasting (Hanger Paint Stripping Process (AP2))**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
EP 239	One (1) abrasive blasting unit by Blastec utilizing steel shot rated at 320,000 lbs blast media/hr.	7.08

ii. **Standards/Operating Limits**

1) **PM**

(a) Regulation 7.08, section 3.1.2, Table 1, limits the PM emission for this equipment to 38.99 lb/hr based on process weight rate of more than 60,000 lb/hr using the equation from Table 1:

$$E = 17.31 (P^{0.16}) \text{ where:}$$

E = rate of emission in lb/hr

P= process weight rate in tons/hr

- (b) A one-time PM compliance demonstration on 4/23/2007 has been performed and the emission standards for PM cannot be exceeded controlled.

2) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 7.08, section 3.1.1.

3) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **PM**

Regulation 7.08 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. A one-time PM compliance demonstration was performed on 4/23/2007 and the lb/hr standard cannot be exceeded controlled. The monthly through-put records and the daily records of the hours of operation are required to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the control device. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the reclamation unit.

2) **Opacity**

Regulation 7.08 does not contain specific monitoring or record keeping requirements, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

3) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain

adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **PM**

Regulation 7.08 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the PM emission standards in their semi-annual compliance report.

2) **Opacity**

Regulation 7.08 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the Opacity emission standards in their semi-annual compliance report.

3) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

z. **Emission Unit U111 – Emergency Generators**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
EP U111a	One (1) Cummins emergency generator, model 1500 DFLE, rated at 2220 bhp.	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 40 CFR 63 Subpart ZZZZ
EP DC#1 & DC#2	Two (2) Kohler Diesel Generator Sets emergency generators, models 2500REOZDB, 24.54 MMBTU/hr	

ii. **Standards/Operating Limits**

1) **Unit Operations**

Construction Permits 396-05-C and 207-09-C(R1) limit the emissions for these pieces of equipment by limiting the hours of operation to 500 hours per 12 consecutive month period.

2) **HAP**

This operation is subject to 40 CFR Part 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) with a site-rating of more than 500 brake horsepower located at a major source of HAP emissions. (The emergency generator is powered by a stationary RICE with a power rating of 2220 brake horsepower, and GE Consumer and Industrial is a major source of HAP emissions.) This stationary RICE meets the definition in 40 CFR 63.6675 of an emergency stationary RICE, which, per 40 CFR 63.6590(b) (1) (ii), does not have to meet the requirements of 40 CFR Part 63 Subpart ZZZZ and of 40 CFR Part 63 Subpart A except for the initial notification requirements of 40 CFR 63.6645(d).

3) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**1) **Unit Operation**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Construction Permits 396-05-C and 207-09-C(R1) require the source to track the hours the equipment is operated every month.

2) **HAP**

There are no compliance monitoring or record keeping requirements for this equipment.

3) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **Unit Operation**

Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit. Construction Permits 396-05-C and 207-09-C(R1) required the source to report any permit deviations or exceedances of the operational limit of 500 hours per year in their semi-annual compliance report

2) **HAP**

There are no routine compliance reporting requirements for this equipment.

3) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

aa. **Emission Unit – Solvent Metal Cleaning Equipment**

i. **Equipment:**

Emission Point	P/PE	Applicable Regulation
Solvent Metal Cleaning Equipment (Secondary Reservoirs)	Thirty (30) cold solvent parts cleaners are equipped with secondary reservoirs.	6.18
Solvent Metal Cleaning Equipment (No Secondary Reservoirs)	Twelve (12) cold solvent parts cleaners are not equipped with secondary reservoirs	

ii. **Standards/Operating Limits**

1) **VOC**

Regulation 6.18, section 4 establishes the requirements to install, maintain, and operate the parts washers.

2) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by

modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Regulation 6.18, section 4 does contain specific monitoring or record keeping requirements. Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

(b) **Emissions Calculation Methodology:** The emissions are based upon the VOC content of the stored material and the amount of material in the tank.

2) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulation 6.18 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires sufficient reporting requirements to assure compliance with the terms and conditions of the permit.

2) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

bb. **Emission Unit – Combustion Sources less than 10 MMBtu per hour**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
HV 03-01	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.06, 7.08
HV 03-02	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	
HV 03-03	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	
HV 03-04	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
HV 03-05	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-06	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-07	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-08	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-09	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	
HV 03-10	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-11	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-12	Make Cambridge, Model M-136 rated at 5.887 MMBtu/hr	
HV 03-13	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-14	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-15	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 03-16	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-01	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-02	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-03	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-04	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-05	Make Cambridge, Model S1200 rated at 1.2 MMBtu/hr	
HV 02-06	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-07	Make Cambridge, Model M-136 rated at 5.887 MMBtu/hr	
HV 02-08	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-09	Make Cambridge, Model S1200 rated at 1.2 MMBtu/hr	
HV 02-10	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-11	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 02-12	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	
HV 02-13	Make Cambridge, Model S1200 rated at 1.2 MMBtu/hr	
HV 06-01	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 01-01	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 01-02	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 01-03	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 01-04	Make Cambridge, Model S1600 rated at 1.46 MMBtu/hr	
HV 01-05	Make Cambridge, Model M-136 rated at 5.887 MMBtu/hr	
HV 01-06	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 01-07	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	
HV 01-08	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	
HV 01-09	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 01-10	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	
HV 01-11	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	
HV 01-12	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	
HV-001	S2200 rated at 2.2 MMBtu/hr (H6+10)	
HV-002	S2200 rated at 2.2 MMBtu/hr (H14+10)	
HV-004	M136 rated at 5.887 MMBtu/hr	
HV-005	S3200 rated at 3.052 MMBtu/hr (H50+10)	
HV-006	S3200 rated at 3.052 MMBtu/hr (G51-3)	
HV-007	S3200 rated at 3.052 MMBtu/hr (F51+10)	
HV-008	S1600 rated at 1.473 MMBtu/hr (Swall DE51)	

Emission Point	P/PE	Applicable Regulation
HV-009	S3200 rated at 3.052 MMBtu/hr (C51+34)	
HV-010	S3200 rated at 3.052 MMBtu/hr (Z51-10)	
HV-011	M136 rated at 5.887 MMBtu/hr (X49-7)	
HV-012	S3200 rated at 3.052 MMBtu/hr (X31+6)	
HV-014	S1600 rated at 1.473 MMBtu/hr (A3+3)	
HV-015	S1200 rated at 1.2 MMBtu/hr located on roof (X43)	
HV-016	S1200 rated at 1.2 MMBtu/hr located on roof (X38)	
HV-018	S2200 rated at 2.2 MMBtu/hr (A5/A6)	
HV-019	S3200 rated at 3.052 MMBtu/hr located on roof (H26+5)	
AP4 S2200	Rated at 2.2 MMBtu/hr	
AP4 S3200	Rated at 3.052 MMBtu/hr	
AP4 S3200	Rated at 3.052 MMBtu/hr	
AP4 S3200	Rated at 3.052 MMBtu/hr	
AP4 S3200	Rated at 3.052 MMBtu/hr	
AP4 S3200	Rated at 3.052 MMBtu/hr	
AP4 S3200	Rated at 3.052 MMBtu/hr	
AP4 S3200	Rated at 3.052 MMBtu/hr	
AP4 S3200	Rated at 3.052 MMBtu/hr	
One (1) natural gas dryoff oven; 7 MM Btu/hr located prior to the application system located in emission unit U01. (Indirect Unit)		
325	Boiler #1, 5 MMBtu/hr, make Cleaver Brooks, model FLEX500	
326	Boiler #2, 5 MMBtu/hr, make Cleaver Brooks, model FLEX500	
AP1BM1	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-1)	
AP1BM2	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-1)	
AP1BM3	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-1)	
AP2BM1	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-2)	
AP2BM2	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-2)	
AP2BM3	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-2)	
AP3BM1	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-3)	
AP3BM2	Wash System for Stainless Steel Washer and Dryer Baskets that consists of a heated bath that has a natural gas fired burner for heating. The Immersion Heater is an Eclipse ImmersoPak IP-010 3.2 MMBtu/hr	

ii. **Standards/Operating Limits**1) **PM**

- (a) Regulation 7.08, section 3.1.2, Table 1, limits the PM emissions for the direct fired units to 2.34 lb/hr based on process weight rate of less than 1000 lb/hr.
- (b) Regulation 7.06, section 4.1.2, limits the PM emissions to 0.10 lb/MMBTU actual total heat input for the nine (9) 2 MMBtu/hr natural gas fired hot water boilers and the Immersion heater. The limit was determined using the total heat input for all indirect heat exchangers subject to Regulation 7.06 which totals more than 250 MMBtu/hr.
- (c) Regulation 7.06, section 4.1.4, limits PM emissions to 0.28 lb/MMBTU on a 24 hour average basis for all the indirect fired units excluding the nine (9) 2 MMBtu/hr natural gas fired hot water boilers and the Immersion heater based on total heat input utilizing the equation:

$$Y = 1.919 (X^{-0.535})$$

Where Y = Allowable PM emissions in lb/MMBTU heat input, and

X = MMBtu/hr heat input

- (d) A one-time PM, SO<sub>2</sub>, and NO<sub>x</sub> compliance demonstration for the natural gas fired units combined, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded.

2) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 6.07, sections 3.2 and 3.3; Regulation 7.06, section 4.2, and Regulation 7.08, section 3.1.1.

3) **SO<sub>2</sub>**

Regulation 7.06, section 5.1.2, limits SO<sub>2</sub> emissions to less than 0.8 lb/MMBTU actual total heat input for combustion of gaseous fuels. The limit was determined using the total heat input for all indirect heat exchangers subject to Regulation 7.06 which totals more than 250 MMBtu/hr.

4) **NO<sub>x</sub>**

Regulation 7.08, section 4.1, limits the NO<sub>x</sub> emissions to less than 300 ppm for the direct fired equipment.

5) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**1) **PM**

A one-time PM compliance demonstration for the boiler and the heater, using AP-42 emission factors and combusting natural gas, has shown that the pounds per million BTU emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for this boiler and this heater with respect to PM emission limits.

2) **Opacity**

The District has determined that using a natural gas fired boiler and heater will inherently meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.

3) **SO<sub>2</sub>**

A one-time SO<sub>2</sub> compliance demonstration for the boiler and the heater, using AP-42 emission factors and combusting natural gas, has shown that the pounds per million BTU emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for this boiler with respect to SO<sub>2</sub> emission limits.

4) **NO<sub>x</sub>**

A one-time NO<sub>x</sub> compliance demonstration for the direct fired equipment, using AP-42 emission factors and combusting natural gas, has shown that the ppm emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for this equipment with respect to NO<sub>x</sub> emission limits.

5) **TAC**

(a) Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

(b) The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” 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.

iv. **Reporting**1) **PM**

A one-time PM compliance demonstration for the boiler and the heater, using AP-42 emission factors and combusting natural gas, has shown that the pounds per million BTU emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for this boiler with respect to PM emission limits.

2) **Opacity**

The District has determined that using a natural gas fired boiler and heater will inherently meet the 20% opacity standard. Therefore, this equipment is not required to report to show ongoing compliance with the opacity standard.

3) **SO<sub>2</sub>**

A one-time SO<sub>2</sub> compliance demonstration for the boiler and the heater, using AP-42 emission factors and combusting natural gas, has shown that the pounds per million BTU emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for this boiler with respect to SO<sub>2</sub> emission limits.

4) **NO<sub>x</sub>**

A one-time NO<sub>x</sub> compliance demonstration for the direct fired equipment, using AP-42 emission factors and combusting natural gas, has shown that the ppm emission standard cannot be exceeded. Therefore, there are no

monitoring, record keeping, and reporting requirements for this equipment with respect to NO<sub>x</sub> emission limits.

5) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

cc. **Emission Unit – Miscellaneous**

i. **Equipment:**

<b>Emission Point</b>	<b>P/PE</b>	<b>Applicable Regulation</b>
32675-11	AP-1 Basket Re-Grinder and AP-1 Tub Re-Grinder 4,000 lb/hr each installed in 1974	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.09
176-93	Miscellaneous chemical use in assembly/packing operations in the manufacture of refrigerators.	7.25
178-93	Miscellaneous chemical use in assembly/packing operations in the manufacture of dishwashers.	7.25
483-92	Miscellaneous chemical use in assembly/packing operations for assembly line usage of various adhesives and solvents used on washers and dryers.	6.24
479-94	Sealant to reseal appliance cartons prior to shipment from Building #10	7.25
35-04	Maintenance Paint Booth (Insignificant Activity)	7.25
583-92	Washer and dryer paint touch-up	7.25
471-94	One (1) Dishwasher rack repair station.	7.25
585-91	Drawing compound and lubricant use in hydraulic presses and other fabrication operations.	7.25
U149	Pedestal Touch-up Painting on washers/dryers	7.25
U150	Touch-up Painting on dishwashers	7.25

ii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 7.25, section 3 and Construction Permit 176-93-C, limits VOC emissions to less than 4.4 tpy for miscellaneous chemical use in assembly/packing operations in the manufacture of refrigerators.
- (b) Regulation 7.25, section 3 and Construction Permit

178-93-C, limits VOC emissions to less than 4.9 tpy for miscellaneous chemical use in assembly/packing operations in the manufacture of dishwashers.

- (c) Regulation 7.25, section 3 and Construction Permit 749-94-C, limits VOC emissions to less than 0.0048 tpy for sealant to reseal appliance cartons prior to shipment from Building 10.
- (d) Regulation 7.25, section 3 and Construction Permit 585-91-C, limits VOC emissions to less than 2.8 tpy for drawing compound and lubricant use in hydraulic presses and other fabrication operations.
- (e) Regulation 7.25, section 3 and Construction Permit 583-92-C, limits VOC emissions to less than 0.55 tpy for washer and dryer paint touch-up.
- (f) Regulation 7.25, section 3 and Construction Permit 471-94-C, limits VOC emissions to less than 0.67 tpy for one dishwasher rack repair station.
- (g) Regulation 7.25, section 3 and Construction Permit 35-04-C/92-05-O, limits VOC emissions to less than 4.9 tpy for maintenance paint booth.
- (h) Regulation 7.25 limits the plantwide VOC emissions from equipment that does not have a BACT analysis to less than five (5) tons, during any consecutive 12-month period.
- (i) Regulation 6.24, section 3, limits VOC emissions from Emission Points (483-92) to less than 40 lbs/day and 8 lbs/hr for Class II solvents and less than 3000 lbs/day and 450 lbs/hr for Class III solvents, unless the emissions are reduced by at least 85%.
- (j) Construction Permit 483-92-C limits VOC emissions to 29.5 tpy or less for miscellaneous chemical use in assembly/packing operations for assembly line usage of various adhesives and solvents used on washers and dryers subject to Regulation 6.24. Additionally, Maximum permitted capacity is 70,000 units per week, but total annual production may not exceed 2,300,000 units.

2) **PM**

Regulation 6.09, section 3.2, Table 1 and Construction Permit 32675-11-C, limits PM emissions to less than 6.52 lb/hr for each of the 4,000 lb/hr grinders based on a process

weight rate of 4,000 lb/hr. A one-time PM compliance demonstration for this equipment was performed on 5/19/2011 and the lb/hr standard cannot be exceeded uncontrolled.

3) **Opacity**

Visible emissions are limited to 20% opacity per Regulation 6.09, section 3.1.

4) **TAC**

Pursuant to Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23, TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Regulations 6.24 and 7.25 do not contain specific monitoring or record keeping requirement, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

(b) Emissions Calculation Methodology: The source is required to track VOC material usage monthly and calculate VOC emission to demonstration compliance with the various VOC emission limits.

2) **PM**

A one-time PM compliance demonstration for this equipment was performed on 5/19/2011 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM emission limits.

3) **Opacity**

Regulation 6.09 does not contain specific monitoring or record keeping requirement, however, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit. The visual inspection of the mechanical and structural integrity of the grinder and

cyclone unit will assure the opacity standard is not exceeded.

4) **TAC**

Regulation 5.21, section 4.10 requires the permit to contain adequate monitoring and record keeping requirements to assure ongoing compliance with the terms and conditions of the permit.

iv. **Reporting**

1) **VOC**

Regulations 6.24 and 7.25 do not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report VOC emissions and any exceedances in their semi-annual compliance reports.

2) **PM**

There are no compliance reporting requirements for this equipment.

3) **Opacity**

Regulation 6.09 does not contain specific reporting requirements, however, Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with all the terms and conditions of the permit. The source is required to report any permit deviations or exceedances of the opacity standard in their semi-annual compliance reports.

4) **TAC**

Regulation 5.21, section 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration with each construction application, permit renewal, or within 6 months of making a change.

### 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. **Alternative Operating Scenarios:** The source did not request an alternative operating scenario in its Title V application.

5. **Compliance History**

Incident Date(s)	Regulation Violated	Result
12/23/1989	6.16, Section 3 Appliance Coatings	Board Order 5-90
11/21/1990	5.04, Section 6 Standard for Demolition and Renovation; 5.13, Section 4(1), 6, 11, 14, 15 Work Practice	Agreement A-2-92
1/7/1991	2.03, Section 1.a Permit Requirements; 7.25, Section 1.b Performance Standards of Performance For New Sources Using Volatile Organic Compounds	Board Order 2-91
10/31/1991	6.16, Section 5.1 Excess VOC Emissions	Agreement A-14-92
10/30/1992	1.09 Prohibition of Air Pollution	Agreement A-79-92
4/1/1999	1.09 Prohibition of Air Pollution	Settled

6. **Insignificant Activities**

Insignificant Activities		
Description	Quantity	Basis
Fuel or lubricating oils; VP <10 mm Hg	11	Regulation 2.02, section 2.3.9.2
Fuel oil or diesel tanks; annual turnover < 2 times capacity	6	Regulation 2.02, section 2.3.25
Brazing, soldering, or welding equipment	Various	Regulation 2.02, section 2.3.4
Woodworking, except for conveying, hogging, or burning wood/sawdust	Various	Regulation 2.02, section 2.3.5
Resin curing ovens	Various	Regulation 2.02, section 2.3.7
Plastics compression or injection molding	Various	Regulation 2.02, section 2.3.8
Dipping operations - oils, waxes, or grease	Various	Regulation 2.02, section 2.3.9.1
Emergency relief vents - non- regulated process	Various	Regulation 2.02, section 2.3.10
Lab venting and exhausting	7	Regulation 2.02, section 2.3.11
Vent systems restaurants and bakeries	Various	Regulation 2.02, section 2.3.12
Blast cleaning - abrasives in water	Various	Regulation 2.02, section 2.3.13
Heat treating, soaking or case hardening	Various	Regulation 2.02, section 2.3.14
Residential/domestic equipment	Various	Regulation 2.02, section 2.3.16
Use of peanut, sunflower, canola, or cottonseed oils	1	Regulation 2.02, section 2.3.19

<b>Insignificant Activities</b>			
<b>Description</b>		<b>Quantity</b>	<b>Basis</b>
Soil or groundwater remediation		1	Regulation 2.02, section 2.3.20
Maintenance Paint Booth (Previously Permit 35-04) (See Miscellaneous emission unit for standards, monitoring, recordkeeping, and reporting requirements.)		1	Regulation 2.16, section 1.22.1.2.
R & D facilities		7	Regulation 2.02, section 2.3.27
GUH 03-02	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-03	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-04	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-05	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-06	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-07	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-08	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-09	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-10	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-11	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-12	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-14	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-15	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-16	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-17	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-18	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-19	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-20	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-21	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-22	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-23	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1

<b>Insignificant Activities</b>			
<b>Description</b>		<b>Quantity</b>	<b>Basis</b>
GUH 01-13	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-14	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-15	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-16	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-17	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-18	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-19	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-20	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-21	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-22	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
EUH 01-23	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
EUH 01-24	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
EUH 01-25	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
GUH 01-26	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-27	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-28	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-29	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-30	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-31	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-32	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-33	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-34	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-35	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-36	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-37	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1

<b>Insignificant Activities</b>			
<b>Description</b>		<b>Quantity</b>	<b>Basis</b>
GUH 01-38	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-39	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-003	S800 rated at 0.73 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-013	S400 rated at 0.365 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-017	S800 rated at 0.73 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-001	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-002	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-003	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-004	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-005	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-006	Rated at 0.3 MMBtu/hr located in the paint room (A15)	1	Regulation 2.02, section 2.1.1
UH-007	Rated at 0.3 MMBtu/hr located in the maintenance shop (A21)	1	Regulation 2.02, section 2.1.1
UH-008	Rated at 0.3 MMBtu/hr located in the maintenance shop (A19)	1	Regulation 2.02, section 2.1.1
UH-009	Rated at 0.3 MMBtu/hr located in the oil room (west wall)	1	Regulation 2.02, section 2.1.1
UH-010	Rated at 0.3 MMBtu/hr located at the dock door (H34)	1	Regulation 2.02, section 2.1.1
UH-011	Rated at 0.3 MMBtu/hr located in the foam room (A6)	1	Regulation 2.02, section 2.1.1
UH-012	Rated at 0.3 MMBtu/hr located at the lab dock (H2)	1	Regulation 2.02, section 2.1.1
UH-013	Rated at 0.3 MMBtu/hr located at the lab dock (H3)	1	Regulation 2.02, section 2.1.1
AP4 250000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 75000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 75000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 250000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP3 Nylon Heater	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 150000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
Waste water treatment plant consisting of two (2) clarifiers, two filter presses, and a skimmer.		1	Regulation 2.16, Section 1.22

<b>Insignificant Activities</b>		
<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
Cooling towers: AP-1 Front Tower AP-2 Rear Tower AP-2 Front Tower AP-2 Outlying Tower AP-3 North Tower AP-4 South Tower AP-4 Front Tower AP-4 Plastics Tower AP-5 Plastics Tower AP-5 Front Tower AP-20 Tower AP-32 Tower AP-33 Tower	13	Regulation 2.16, Section 1.22
Two Infrared Surface-stabilization Electric Heaters located prior to the application of powder paint. (EP 214A)	1	No applicable regulation.
One dishwasher rack pretreatment tunnel to prepare wire racks for vinyl coating. (Previously Permit 255-96)	1	No applicable regulation.
Washing System (Previously Permit 226-03)	1	No applicable regulation.
MDI Bulk Storage Tank 27,000 Gallons	1	Regulation 2.02 Section 2.3.26
Polyol Bulk Storage Tank 27,000 Gallons	1	Regulation 2.02 Section 2.3.26
Cyclopentane Bulk Storage Tank 12,000 Gallons	1	Regulation 2.02 Section 2.3.26
Case Mixer Tank 5,600 Gallons	1	Regulation 2.02 Section 2.3.26
Door Mixer Tank 5,600 Gallons	1	Regulation 2.02 Section 2.3.26
Case Poly Blend Hold Tanks 5,300 Gallons	2	Regulation 2.02 Section 2.3.26
Door Poly Blend Hold Tank 5,300 Gallons	1	Regulation 2.02 Section 2.3.26
Polycat Bulk Storage Tank 3,700 Gallons	1	Regulation 2.02 Section 2.3.26
Additive Tanks 250 Gallons	2	Regulation 2.02 Section 2.3.24
Day Tanks < 250 Gallons Each	8	Regulation 2.02 Section 2.3.24
Pedestal Plastic Regrinder	1	Regulation 2.02 Section 2.3.21
Cleaner and Lubricant Use for new Bottom Mount Assembly Operation	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Brazing, Soldering or Welding on HEWH Line	1	Regulation 2.02 Section 2.3.4
Frit Unloading for HEWH Enamel	1	Regulation 2.16, Section 1.23.1.1
Natural Gas Fired Dryer 0.683 MMBtu/hr for HEWH Line	1	Regulation 2.02 Section 2.3.17
Day Tank Storage of MDI 100 Gallons	1	Regulation 2.02 Section 2.3.24/26
Day Tank Storage of Polyol and Blowing Agent 100 Gallons	1	Regulation 2.02 Section 2.3.24/26
Compressor Oil Process Tank 70 Gallons	1	Regulation 2.02 Section 2.3.9.2
Compressor Oil Clean Reservoir Tank 150 Gallons	1	Regulation 2.02 Section 2.3.9.2

<b>Insignificant Activities</b>		
<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
Assembly Lubrication for new HEWH Line	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Laser Cutting	1	Regulation 2.16, Section 1.23.1.1
Brazing, Soldering or Welding on Nylon Wire Rack Line	1	Regulation 2.02 Section 2.3.4
Nylon powder transfer/clean-up activities	1	Regulation 2.16, Section 1.23.1.1
Dishwasher Door Mastic Application	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Tub Top and Bottom Mastic Application	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Tub Wrap Mastic Application	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Stainless Steel Tub Assembly	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Pad Printing	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Water Heater Tank Top Cleaning	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Small Freezer Door Foaming Operation	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)

<b>Insignificant Activities</b>		
<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
AP1 RTV Silicone Station	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
AP1 Make Up Air Heater, Maxon 2.0 APX Line Burner, 2.0 MMBTU/Hr	1	Per APCD Email dated 12/14/12 regarding Comfort/Space heating under 10MMBTU/Hr
Bradford White 1.99 mmbtu/hr hot water heater in the Park Athletic Club	1	Regulation 2.02, section 2.1.1
Pellet Grinder and process cyclone make Granutee G3030	1	Regulation 2.16, Section 1.23.1.1
Grinding operation for the AP-3 Ash White Tub Re-grinder	1	Regulation 2.16, Section 1.23.1.1
Unloading, Conveyance and Storage of Plastic Pellets in AP5	1	Regulation 2.16, Section 1.23.1.1
Small Regrinders in AP5 used to recycle plastic	1	Regulation 2.16, Section 1.23.1.1

- 1) Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- 2) Activities identified in District Regulation 2.02, Section 2, 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.
- 3) For all insignificant activities that emit regulated air pollutants for which the company has accepted a plant-wide limit, the company shall maintain sufficient records to calculate the emissions and report those emissions in the quarterly compliance reports and the annual emissions inventory report.
- 4) The Insignificant Activities table is correct as of the date the permit was proposed for review by the USEPA, Region 4. The company shall submit an updated list of insignificant activities annually with the Title V compliance certification pursuant to District Regulation 2.16, section 4.3.5.3.6.
- 5) This equipment has an applicable regulation, but meets the definition of an insignificant activity in Regulation 2.16, section 2.1.1. Regulation 7.08 applies, with standards in sections 4.1.
- 6) This equipment has an applicable regulation, but meets the definition of an insignificant activity in Regulation 2.16, section 1.23.1.2. Regulation 6.18 applies, with standards in sections 4.1.1 through 4.1.4, 4.1.6, 4.1.8; 4.2.1 through 4.2.7 and 4.3.2. Record keeping requirements are in sections 4.4.2 and 4.4.3.

- 7) In lieu of recording annual throughputs for each Insignificant Activity, the owner or operator may elect to report the Potential To Emit quantity listed in the Insignificant Activities table as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are minor.