

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
18 December 2012

Title V Statement of Basis

Company: Louisville Gas & Electric, Paddy's Run Station

Plant Location: 4600 Bells Lane, Louisville, Kentucky 40211

Date Application Received: 6-15-2004 **Date Admin Complete:** 8-15-2004

Date of Draft Permit: 01 November 2012 **Date of Proposed Permit:** 01 November 2012

District Engineer: Bob Wesely **Permit No:** 130-97-TV (R1)

Plant ID: 0125 **SIC Code:** 4911 **NAICS:** 221112 **AFS:** 00125

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, (3) Title IV, and (4) 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 (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}).

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:** Electrical power generation.
2. **Process Description:** The Louisville Gas & Electric, Paddy's Run Station, Louisville, KY is a peak load electrical generating station consisting of two (2) natural gas fueled combustion turbines, both with a diesel fueled compression ignition reciprocating internal combustion engine (CI RICE) cranking engine, and one (1) natural gas fueled combustion turbine that powers a peak load generator.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	One (1) generator engine, General Electric turbine, natural gas fueled, 19,500 kW capacity, with a 300 hp diesel cranking CI RICE. One (1) generator engine, Westinghouse turbine, natural gas fueled, 29,000 kW capacity, with a 750 hp diesel cranking CI RICE.
U2	One (1) generator engine, Siemens Westinghouse turbine, natural gas fueled (only), 175 MW capacity. No cranking engine.

5. **Fugitive Sources:** There are no fugitive emissions at this source.
6. **Permit Revisions:**

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
N/A	1/23/2001	3/12/2000	Initial	Entire Permit	Initial Permit Issuance
R1	12/18/2012	11/01/2012	Renewal	Entire permit	Regular renewal, Incorporated permit 48-00-C

7. Emission Summary:

Pollutant	District Calculated Actual Emissions (tn/yr) 2011 Data	Pollutant that triggered TV Major Source Status (based on PTE)
CO	14.56	Yes
NO_x	16.72	Yes
SO₂	0.12	No
PM	1.17	No
PM₁₀	0.34	No
PM_{2.5}	0.34	No
VOC	0.38	No
GHG CO₂	20,747	Yes
GHG CO₂e	20,767	
Single HAP	0	No
Total HAPs	0.18	No

8. Applicable Requirements:

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

9. MACT Requirements:

40 CFR 63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

10. Referenced Federal Regulations in Permit:

40 CFR Part 60 Subpart A General Provisions
 40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines
 40 CFR Part 72 Subpart A Acid Rain General Provisions
 40 CFR Part 72 Subpart G Acid Rain Phase II Implementation
 40 CFR Part 73 Subpart B Allowance Allocations (SO₂)
 40 CFR Part 75 Appendix E Optional NO_x Emissions Estimation Protocol for Gas-Fired Peaking Units and Oil-Fired Peaking Units
 40 CFR Part 77 Excess Emissions

II. Regulatory Analysis

1. **Acid Rain Requirements:** The source is subject to the Acid Rain Program. Appendix A, Phase II Acid Rain Requirements, is attached to the Title V permit. None applicable regulations include 40 CFR Part 76, Acid Rain Nitrogen Oxides Emission Reduction Program because the regulation is for coal fired units, and 40 CFR Part 78, Appeal Procedures for Acid Rain Program, because it applies only to appeal procedures 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.
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. Source stated in letter that a Risk Management Plan (RMP) is not required for this facility.
4. **40 CFR Part 64 Applicability Determination:** Louisville Gas & Electric, Paddy's Run Station is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*, because the source does not have any control devices on any of their equipment.
5. **Basis of Regulation Applicability**

- a. **Plant-wide**

Paddy's Run Station is a potential major source for NO_x, CO, and Greenhouse Gases emissions. The source elected to have a plant-wide limit of less than 100 tn/yr of NO_x to avoid a NO_x RACT plan. Regulation 2.16 - *Title V Operating Permits* establishes requirements for major sources.

The source is subject to a plant-wide NO_x limit of less than 100 tons during any twelve (12) consecutive month period

Regulations 5.01, 5.21, 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. An EA Technical Evaluation for Category 1 & 2 TACs was performed by District on 10/6/08, for Louisville Gas and Electric, Paddy's

Run Station and the source meets the de minimis levels for Category 1 & 2 TACs.

The owner or operator shall not allow any TAC emissions to exceed environmentally acceptable levels, whether specifically established by modeling or derived from default de minimis levels provided by the District. The owner or operator shall not increase the TAC content in a raw material, or substitute any raw materials with additional TACs, for those identified in the initial permit application for this process or equipment, if such increase or substitution would result in an increase in the emission of any TAC above the de minimis levels, without prior notification to, and approval by, the District. (Regulation 5.01, section 3.)

b. Emission Unit U1 – Turbine generator engines GT11 and GT12

i. Equipment:

P/PE	Capacity	Installation Date	Applicable Regulation	Basis for Applicability
GT11 generator turbine engine, natural gas fueled only, with 300 hp diesel crank engine	19,500 kW	Installed 1968	5.21	Regulation 5.21 is applicable to any process or process equipment at a stationary source that emits a TAC.
GT12 generator turbine engine natural gas fueled only, with 750 hp diesel crank engine	29,000 kw	Installed 1968	6.42	Stationary engines emitting large amounts of NO _x are subject to Regulation 6.42 for major nitrogen oxides emitting
			40 CFR 63 Part ZZZZ	Existing black start RICE engines that emit HAPs at area sources are subject to 40 CFR 63 Subpart ZZZZ.

ii. Standards/Operating Limits

1) NO_x

- (a) The Source elected to have a less than 100 tn/yr limit plantwide for NO_x, to avoid establishing a NO_x RACT Plan per Regulation 6.42 that establishes the RACT requirements for NO_x emitting facilities.
- (b) The emission standards of 40 CFR 60 Subpart GG are not applicable, because the unit was existing prior to October 3, 1977.

2) **HAP**

- (a) 40 CFR 63 Subpart ZZZZ requires minimum maintenance to be performed on black start RICEs and the RICEs must be configured according to the manufacturer's specifications
- (b) 40 CFR 63 Subpart YYYY is not applicable, because the engines are classified as existing combustion turbines and therefore do not have to meet the requirements of the subpart.

3) **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. Regulation 5.21, section 2.7 states that District considers TAC emissions from the combustion of natural gas to be "de minimis." The diesel fired cracking engines are "de minimis" based on potential to emit.

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

- (a) Monthly records of the types and amounts of fuel combusted in each of the four (4) engines shall be recorded, and the NO_x emissions from each engine calculated, and recorded monthly, to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.
- (b) The emissions for the pollutant NO_x from the gas turbines GT11 and GT12, while combusting natural gas, shall be calculated using the following formula, with the emission factor from AP-42, table 3.1-1, to determine the NO_x emissions for the twelve (12) consecutive month period standard, to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.:

$$E_{\text{NO}_x} = (0.32 \text{ lb/MMbtu})(1,020 \text{ MMbtu/MMcf})(X)(1 \text{ tn}/2000 \text{ lb})$$

Where:

E_{NO_x} = NO_x emissions (tons) during a consecutive 12-month period

X = the amount of natural gas (MMcf) combusted during a consecutive 12-month period

- (c) The emissions of the pollutant NO_x from the 300 hp diesel cranking engine while combusting diesel fuel, shall be calculated using the following formula, with the emission factor from AP-42, table 3.3-1 for Gasoline and Diesel Industrial Engines (less than 600hp), to determine the NO_x emissions for the twelve (12) consecutive month period standard, to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.

$$E_{NO_x} = (4.41 \text{ lb/MMbtu})(0.139 \text{ MMbtu/gal})(X)(1 \text{ tn}/2000 \text{ lb})$$

Where:

E_{NO_x} = NO_x emissions (tons) during a consecutive 12-month period

X = the amount of diesel fuel (gal) combusted during a consecutive 12-month period

- (d) The emissions of the pollutant NO_x from the 750 hp diesel cranking engine while combusting diesel fuel, shall be calculated using the following formula, with the emission factor from AP-42, table 3.4-1 for Gaseous Emission Factors for Large Stationary Diesel and All Stationary Dual-Fuel Engines (diesel engines greater than 600 hp), to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.

$$E_{NO_x} = (3.2 \text{ lb/MMbtu})(0.139 \text{ MMbtu/gal})(X)(1 \text{ tn}/2000 \text{ lb})$$

Where:

E_{NO_x} = NO_x emissions (tons) during a consecutive 12-month period

X = the amount of diesel fuel (gal) combusted during a consecutive 12-month period

2) HAPs

Monitoring and recording of maintenance performed on emergency and black start engines is required to show

compliance with Regulation 40 CFR 63 Part ZZZZ §63.6603(a).

3) **TAC**

- (a) Regulation 5.21 does not require any specific monitoring or record keeping requirements for TACs, however to show compliance, monitoring and recordkeeping is required by Regulation 2.16, section 4.1.9.
- (b) The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to Material Safety Data Sheet (MSDS), analysis of emissions, and calculations, per Regulation 5.21, section 4.10. These records shall be available to the District upon request.

iv. **Reporting**

Semi-annual compliance reports that include the information listed below shall be submitted semi-annually to show compliance with limits of permit. Compliance reports shall clearly identify any deviations from any permit requirement. Compliance reports shall be postmarked within 60 days following the end of each reporting period. Compliance reports shall be signed by a responsible official and shall include a certification statement per Regulation 2.16, section 3.5.11.

1) **NO_x** (Regulation 2.16, section 4.1.9.

- (a) Emission unit ID number and emission point ID number
- (b) Beginning and end date of the reporting period.
- (c) Identification of all periods of exceedances of the NO_x standard for the entire plant including the quantity of excess emissions.
- (d) Report the monthly totals and the monthly twelve (12) consecutive month totals of the pollutant NO_x emitted to insure the plantwide limit of less than 100 tn/yr is not exceeded.
- (e) Description of any corrective action taken for the exceedance.

2) **HAP**

There are no reporting requirements for this pollutant.

3) **TAC**

Regulation 5.21, sections 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration within 6 months of making a change that impacts the demonstration of environmental acceptability.

c. Emission Unit U2 – Turbine generator engine GT13

i. Equipment:

P/PE	Capacity	Installation Date	Applicable Regulation	Basis for Applicability
GT13 generator turbine engine, natural gas fueled	175 MW	Installed 2001	5.21	Regulation 5.21 is applicable to any process or process equipment at a stationary source that emits a TAC.
			6.42	Stationary engines emitting large amounts of NO _x are subject to Regulation 6.42 for major nitrogen oxides emitting facilities.
			6.47	A new electrical generating unit that emits SO ₂ is subject to Regulation 6.47, Acid Rain Program
			40 CFR 60 Subpart A	General provisions for CFR 60 that defines testing and definitions
			40 CFR 60 Subpart GG	Subpart that provides NO _x and SO ₂ standards for new combustion turbines.
			40 CFR 72 Subpart A	Subpart that defines a peaking units and provides acid rain program general provisions
			40 CFR 73	Subpart addressing acid rain allowances for NO _x and SO ₂
			40 CFR 75 Appendix D	Subpart addressing SO ₂ acid rain allowances.
			40 CFR 75 E	Subpart that addresses alternate method of calculating NO _x emissions from peaking units
			40 CFR 77	Subpart that addresses the procedures for reporting excess SO ₂ emissions

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

- (a) Regulation 6.42 establishes the RACT requirements for NO_x emitting facilities.
- (b) Emissions of the pollutant NO_x from the unit shall not equal or exceed a ninety (90) tons per twelve (12) consecutive month period limit, as part of the plantwide limit of less than 100 tons per twelve consecutive month period limit. Source requested plantwide limit of less than 100 tn/yr for NO_x, to avoid establishing a NO_x RACT Plan per Regulation 6.42 that establishes the RACT requirements for NO_x emitting facilities.
- (c) The alternate method of calculating NO_x emissions, as allowed by 40 CFR 75 Appendix E shall be used, so long as the unit's annual production does not exceed the limits of the peaking unit definition in 40 CFR 72 Subpart A .
- (d) If the generating unit exceeds the limits by of a peaking unit, a certified NO_x – diluent continuous emission monitoring system shall be installed by Dec. 31 of the following year, per 40 CFR 75 Appendix E and the CEMs data shall be used to calculate the NO_x emissions.
- (e) The emission standards of 40 CFR 60 Subpart KKKK are not applicable, because the unit was existing prior to February 18, 2005.

2) SO₂

- (a) Regulation 40 CFR 60 Subpart GG, section 60.333(a) requires that no gases be discharged into the atmosphere from a combustion turbine which contains sulfur dioxide in excess of 0.015 percent by volume at 15% O₂ and on a dry basis.
- (b) Regulation 40 CFR 60 Subpart GG, section 60.333(b) requires that any fuel used in the combustion turbine shall not contain sulfur in

excess of eight tenths of a percent (0.8%) by weight.

- (c) Appendix A, Phase II Acid Rain Requirements is attached to the Title V permit and is required because the unit is a new unit and SO₂ emission allowances were not assigned to the unit when Regulation 40 CFR 73.10(b) Phase II sulfur dioxide allowance allocations became effective.

3) **TAC**

Regulation 5.21, section 2.7 states that District considers TAC emissions from the combustion of natural gas to be “de minimis.”

iii. **Monitoring and Record Keeping**

1) **NO_x**

- (a) Regulation 2.16, section 4.1.9, requires monitoring or record keeping to show compliance.
- (b) The monthly total and twelve (12) consecutive month period total of natural gas fuel combusted by the unit shall be monitored and recorded monthly to be used for calculating NO_x emissions, to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.
- (c) Monthly totals and twelve (12) consecutive month period totals for the amount of NO_x emitted shall be calculated and recorded to insure the NO_x standard for the emission unit is not exceeded, to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.
- (d) The amount of electrical power generated each month shall be monitored and recorded and used to determine the annual three year rolling block capacity factor of the unit to ensure the unit meets the definition of a peaking unit, to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.

- (e) The emissions of the pollutant NO_x from the GT13 while combusting natural gas, shall be calculated utilizing fuel consumption quantity along with the emission factor obtained from the NO_x Heat Rate Curve/CEM Data sheet submitted with latest stack test received by District and the below formula to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.

$$E_{\text{NO}_x} = (\text{EF})(1,020 \text{ MMbtu/MMcf})(X)(1 \text{ tn}/2000 \text{ lb})$$

Where:

E_{NO_x} = NO_x emissions (tons) during a consecutive 12-month period

EF = NO_x stack test emission factor in lb NO_x/MMbtu

X = the amount of natural gas (MMcf) combusted during a consecutive 12-month period

- (f) The NO_x – diluent CEMS data shall be used to calculate NO_x emissions, if GT13 exceeds the limits of the definition of a peaking unit and the alternate method of calculating NO_x per Appendix E of Subpart 75 cannot be used, to show compliance with the emission limiting standard, as required by Regulation 2.16 section 4.1.9.
- (g) There are no compliance monitoring requirements for NO_x emitted concentration, because stack test data showed the NO_x emitted from the unit to be 17.7 ppmV at 15% O_2 on a dry basis, approximately one tenth of the standard of 158 ppmV at 15% O_2 on a dry basis, per regulation 40 CFR §60.332(a)(1).

2) **SO_2**

- (a) SO_2 allowances shall be monitored and transferred as required by Appendix A, Phase II Acid Rain Requirements and 40 CFR 73, Subpart D.
- (b) There are no compliance monitoring requirements because the percentage of sulfur in the natural gas fuel tested is less than the 0.8% standard in regulation 40 CFR 60.333(b).

- (c) Turbine startup is accomplished with a combination starter/generator, therefore there is no black start CI RICE that emits SO₂.

3) **TAC**

No monitoring or recordkeeping is required for this pollutant, because the TAC emissions from the combustion of natural gas are considered de minimis per Regulation 5.21, section 7.1.

iv. **Reporting**

1) **NO_x**

Written notification shall be submitted to the District, within 60 calendar days of the unit exceeding the limits of the definition to be a peaking unit, so that District is aware of the deadline for the installation of certified CEMS as required by 40 CFR 75 Appendix E and the method to be used for the calculation of annual NO_x emissions.

2) **SO₂**

- (a) There are no compliance reporting requirements for this pollutant, because the sulfur content is less than the limit of 40 CFR §60.333(b).

- (b) SO₂ allowances shall be monitored and transferred as required by Appendix A, Phase II Acid Rain Requirements and 40 CFR 73, Subpart D.

- (c) Emissions that exceed the transferred allowances shall be addressed as required by 40 CFR Part 77, Excess Emissions.

3) **TAC**

Regulation 5.21, sections 4.22, 4.23, and 4.24 require the source to submit a re-evaluated environmentally acceptable (EA) demonstration within 6 months of making a change that impacts the demonstration of environmental acceptability.

v. **Testing****NO_x**

- 1) The required EPA reference method performance test to determine a NO_x emissions factor shall be performed at a frequency of at least once every 20 calendar quarters, or as required by the current regulations, to be used in the alternate method for calculating NO_x emissions as allowed by 40 CFR 75 Appendix E.
- 2) The performance test shall be performed with the unit operating at a minimum of 90% of the nameplate capacity of the unit.
- 3) The Protocol Checklist for Performance Test is attached to the Title V permit and shall be used to determine as a minimum the performance test information required to be submitted to the District for review and approval.
- 4) EPA test methods that require audit samples now require the source, not the regulatory agency, to obtain audit samples from accredited audit sample suppliers.

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 requested approval to perform the Alternative Operating Scenarios listed below without notification to District. Some of the alternative Operating Scenarios were denied in the Title V permit, as listed below.
 - a. Relocation of equipment within the facility.
 - b. Replacement or installation of new machines. Change of materials used in emission units.
 - c. Utilization of new coolants and additives in the coolant systems.
 - d. Utilization of new cleaning agents and additives in parts washers.
 - e. Replacement or installation of additional emergency generators.
 - f. Change of materials stored in storage tanks.
 - g. Utilization of new materials.

h. Replacement or installation of additional machines, welding, spray painting, sawing, sandblasting, etc. stations in maintenance shops.

Alternative Operating Scenarios b, e, and h are denied. Proper permits shall be obtained from the District, per the applicable regulations pertaining to pollutant emitting additional equipment.

Alternative Operating Scenarios d, f, and g shall continue to be regulated by applicable regulations.

5. **Compliance History:** Paddy's Run Station is required to submit their annual Compliance Certification to the District on or before April 15th of each calendar year. As of the effective date of Permit 130-97-TV (R1), there are no compliance schedules in effect or progress reports required.
6. **Calculation Methodology:** The following emission factors shall be used unless more accurate District approved emission factors become available.

Equipment	Product	Emission Factor	EF Source
GT11 and GT12	Natural gas fuel	0.32 lb NO _x /MMbtu	AP-42, table 3.1-1
One (1) 300 hp, diesel cranking engine at GT11	Diesel fuel	4.41 lb NO _x /MMbtu	AP-42, table 3.3-1
One (1) 750 hp, diesel cranking engine at GT12	Diesel fuel	3.2 lb NO _x /MMbtu	AP-42, table 3.3-1
GT13	Natural gas fuel	NO _x emission factor per latest stack test	Latest stack test.

Note: The actual NO_x emissions for GT13 are allowed to be calculated using the NO_x emission factor determined by the latest stack test, per the alternate method in 40 CFR 75 Appendix E, so long as the unit qualifies as a peaking unit per the definition of a peaking unit in 40 CFR 72.2.

7. Insignificant Activities

Equipment	Quantity	PTE (tn/yr)	Basis for Exemption
Brazing, soldering or welding, plant maintenance use only	1 portable	N/A	Regulation 2.16, sec. 1.43, trivial activity, footnote 7
Emergency relief vents	1	N/A	Regulation 2.02, sec. 2.3.10

Equipment	Quantity	PTE (tn/yr)	Basis for Exemption
Diesel Fuel Storage tank, 150 gal	1	8×10^{-4} VOC	Regulation 2.02, sec. 2.3.9.2
Diesel Fuel Storage tank, 500 gal	1	6×10^{-4} VOC	Regulation 2.02, Sec 2.3.9.2
50/50 Glycol-water tank, 1,238 gal, pressurized	1	N/A	Regulation 2.02, Sec 2.3.26
Lube Oil tank, 4,630 gal	1	5×10^{-5} VOC	Regulation 2.02, Sec 2.3.9.2
Lube Oil tank, 1,730 gal	1	2×10^{-5} VOC	Regulation 2.02, Sec 2.3.9.2
Lube Oil tank, 1,500 gal	1	2×10^{-5} VOC	Regulation 2.02, Sec 2.3.9.2
Lube Oil tank, 245 gal	1	5×10^{-6} VOC	Regulation 2.02, Sec 2.3.9.2

- 1) Insignificant Activities identified in District Regulation 2.02, section 2, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 2.02, section 2, shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4
- 3) The District has determined pursuant to Regulation 2.16, section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed.
- 4) Emissions from Insignificant Activities shall be reported with the annual Emission Inventory, submitted to District on or before April 15 of the following year.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential Emit (PTE) 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 very minor in comparison to the plant wide emissions.
- 6) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 7) The company shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16, section 4.3.5.3.6.

- 8) Title V Listing of “Trivial Activities” footnote #3: “..... Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.”