



Louisville Metro Air Pollution Control District
 701 West Ormsby Avenue, Suite 303
 Louisville, Kentucky 40203-3137



06/28/2018

Title V Statement of Basis

Source: Kentucky Trailer
 7201 Logistics Drive
 7070 International Drive
 Louisville, KY 40258

Owner: R.C. Tway Company, LLC
 7201 Logistics Drive
 Louisville, KY 40258

Application Documents:	See Table 8	Administratively Complete:	07/13/2017
Draft Permit:	04/28/2018	Proposed Permit:	04/28/2018
Permitting Engineer:	Aaron DeWitt	Permit Number:	O-1734-18-V
Plant ID:	1734	SIC:	3715
		NAICS:	336212

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.

This is a standard Title V permit renewal.

Jefferson County is classified as an attainment area for lead (Pb), 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 the 1997 standard for particulate matter less than 2.5 microns (PM_{2.5}), unclassifiable for the 2012 standard for particulate matter less than 2.5 microns (PM_{2.5}) and partial non-attainment area for sulfur dioxide (SO₂).

Permit Application Type:

- | | | |
|-------------------------------------------|------------------------------------------|----------------------------------------------------|
| <input type="checkbox"/> Initial issuance | <input type="checkbox"/> Permit Revision | <input checked="" type="checkbox"/> Permit renewal |
| | <input type="checkbox"/> Administrative | |
| | <input type="checkbox"/> Minor | |
| | <input type="checkbox"/> Significant | |

Compliance Summary:

- | | |
|---------------------------------------------------------------------|------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Compliance certification signed | <input checked="" type="checkbox"/> Compliance schedule included |
| <input type="checkbox"/> Source is out of compliance | <input type="checkbox"/> Source is operating in compliance |

I. Source Information

- 1. **Product Description:** The source manufactures large, open and closed trailers for over the road hauling via semi-tractor/trailer rigs.
- 2. **Process Description:** Each trailer goes through a coating process. The paint booth at the International Drive location consists of touch-up, prime, topcoat, and repass processes. The paint booth at the Logistics Drive location consists of an undercoat process. Both locations also have a floor coating and optional roof coating, which are both rolled on in a room.
- 3. **Site Determination:** The facility includes one building on Logistics Drive and one building on International Drive. It has been determined that these buildings are adjacent and contiguous and constitute a single site for permitting purposes, as described in letter to the District dated June 29, 2010.

4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	Coating Operation
U2	Parts Washer
U3	Direct-Gas Fired Heaters
IA1	Metal and Wood Cutting Equipment

- 5. **Fugitive Sources:** There are fugitive emissions from the natural gas-fired heaters, adhesive application, and floor coating operation of the coating operations. There are also fugitive emissions from the parts washer and direct gas-fired heaters.

6. Permit Revisions:

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	28557-12-TV	10/30/2012	07/18/2012	Initial	Entire Permit	Initial Permit Issuance This permit incorporated the construction permits 29996-10-C, 29997-10-C, 50-10-C, and 51-10-C
N/A	0-1734-18-V	06/28/2018	04/28/2018	Renewal	Entire Permit	Permit Renewal. This renewal incorporates the following changes:
Permit Changes: <ol style="list-style-type: none"> 1. Updated to newest format. 2. Emission Units U2 Parts Washers and U3 Direct Gas Fired Heaters are now considered Insignificant Activities. 3. Added District Regulation 7.06 requirements for IA heat exchangers in U1. 4. Added IA Emission Unit for Metal and Wood Cutting Equipment Subject to Regulation 7.08. 5. Stack height proposal for stack reconfiguration and cumene limit. 						

7. Construction Permit History:

There have not been any construction permits issued since last Title V Renewal

8. Permit Renewal-Related Documents

Document Number	Date Received	Description
35527	1/31/2012	Application to incorporate Construction Permits into Title V permit
80136	10/24/2016	Notification to Company of Regulation 5.21 BAC Changes
80634	11/30/2016	STAR Environmental Acceptability Review – Response Required by April 10, 2017
81715	2/6/2017	STAR Questions from KY Trailer
83410	4/10/2017	EA Demo submitted by company

Document Number	Date Received	Description
83745	4/20/2017	District Response to EA Demo Submitted by KY Trailer
84470	5/30/2017	Title V Permit Renewal Application
84512	6/1/2017	Request for additional applications for application to be complete
85019	6/28/2017	Requested Supplemental Title V Permit Renewal Applications
85231	7/13/2017	Certificate of Existence
85232	7/13/2017	Administratively Complete Checklist
85233	7/13/2017	Correspondence with company about Administrative Completeness
85922	8/15/2017	District request for any (M)SDS that were changed since last permit revision
85949	8/15/2017	Response to District request for any (M)SDS that were changed since last permit revision
86677	8/31/2017	District request for Reichold floor coating (M)SDS
87155	9/12/2017	Response to District request for Reichold floor coating (M)SDS
87218	9/14/2017	District request for information: (1) material coated in paint booth E1 (2) progress report for stack reconfiguration
87497	9/22/2017	Response to District request for information from 9/14/2017
87518	9/27/2017	District request for information: stack reconfiguration date clarification
87519	9/27/2017	Response to District request for information from 9/27/2017
87592	9/28/2017	District request for site visit
89108	11/9/2017	Company correspondence of stack configuration and modeling details
89107	11/16/2017	District review of stack configuration modeling background information. Informed company that an Agreed Board Order (ABO) may be required.
89168	11/20/2017	District clarification of reason for ABO
90021	11/21/2017	Company request to alter stack configuration

Document Number	Date Received	Description
89195	11/21/2017	District response to request to alter stack
90023	11/29/2017	Company information on reconfigured stack cap
89399	12/5/2017	District letter requiring action before January 5, 2018 for new stack configuration modeling, updated EA Demo and updated stack height proposal
89957 & 90024	1/5/2018	Company response to District letter from 12/5/2017
90143	1/22/2018	District request for Initial Notice and Notification of Compliance Status with 40 CFR 63, Subpart M MMM
90229	1/29/2018	Company response to request for Initial Notice and Notification of Compliance Status with 40 CFR 63, Subpart M MMM
90280	1/31/2018	District request for Initial Notice and Notification of Compliance Status with 40 CFR 63, Subpart M MMM
90638	2/12/2018	Company response to request for Initial Notice and Notification of Compliance Status with 40 CFR 63, Subpart M MMM
90647	2/12/2018	District request for information of treatment, storage, and disposal facility
90655	2/12/2018	Company response to request for information of treatment, storage, and disposal facility usage
90683	2/14/2018	Company response to request for RO update
90684	2/14/2018	District request for RO updated 100a form
90701	2/14/2018	Company electronic submission of RO updated 100a form
90892	2/28/2018	District request for diisocyanate emission factor used in company submitted application PTE
90895	2/28/2018	Meeting follow-up regarding incorporation of new stack reconfiguration for U1 E1 into new permit
90938	3/1/2018	Company questioned if work should continue on the new stack for U1 E1, or wait till new permit was complete. District instructed to continue work.
91080	3/8/2018	Company response to request for diisocyanate emission factor
91081	3/8/2018	Emission factor for isocyanates
91144	3/13/2018	District approved PTE

9. Emission Summary:

Pollutant	District Calculated Actual Emissions (tpy) 2016 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	0.33	No
NO _x	0.40	No
SO ₂	0.002	No
PM ₁₀	0.09	Yes
VOC	34.77	Yes
Total HAPs	11.19	Yes
Single HAP > 1 tpy		
Xylene	7.08	Yes
MIBK	3.90	No

10. Applicable Requirements:

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

11. Referenced MACT Federal Regulations: The source is subject to 40 CFR 63, Subpart M – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*.

12. Referenced non-MACT Federal Regulations: There are no referenced non-MACT Federal Regulations.

II. Regulatory Analysis

1. Acid Rain Requirements: Kentucky Trailer Manufacturing 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. Kentucky Trailer Manufacturing 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):** Kentucky Trailer Manufacturing 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.
4. **40 CFR Part 64 Applicability Determination:** Kentucky Trailer Manufacturing is not subject to 40 CFR Part 64 – *Compliance Assurance Monitoring for Major Stationary Sources*.
5. **Basis of Regulation Applicability**

- a. **Plantwide**

Kentucky Trailer is a major source for VOC, PM₁₀, single HAPs (Xylene), and total HAPs. Regulation 2.16 – *Title V Operating Permits* establishes requirements for major sources.

The 250 ton 12-month rolling total VOC emission limit is to preclude applicability of District Regulation 2.05 – *Prevention of Significant Deterioration of Air Quality*.

Regulations 5.00, 5.01, 5.20, 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. Kentucky Trailer submitted the TAC Environmental Acceptability (EA) Demonstration on April 10, 2017 and January 5, 2018 along with a stack height proposal. Screen3 dispersion modeling was performed for each emission unit that has the potential to emit non-*de minimis* TAC emissions. In order to meet the EA Goals, the owner or operator shall not allow cumene emissions to exceed 103 lbs per 12 consecutive month period with current downturned gooseneck rain guards installed. Once the stack height proposal to install vertical rain caps is completed, the owner or operator shall not allow cumene emissions to exceed 635 lbs per 12 consecutive month period. Compliance will be achieved by October 2018, according to the stack height proposal submitted with the January 2018 EA demonstration. To ensure that the company is emitting TAC pollutants at environmentally acceptable levels, the company must keep records, which include hours of operation, usage and calculations, to show compliance.

Regulation 2.16, section 4.1.9.1 and 4.1.9.2 requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the District upon request.

Regulation 2.16, section 4.3.5, requires stationary sources for which a Title V is issued shall submit an annual compliance certification by April 15 of the following calendar year. In addition, as required by Regulation 2.16, section 4.1.9.3, the source shall submit compliance reports at least every six months to show compliance with the permit. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.16, section 3.5.11.

b. **Emission Unit U1 – Coating Operations**

i. **Equipment:**

Emission Point	Description	Applicable Regulations	Basis for Applicability
E1	One (1) coating operation located at 707 International Drive. Installed in January 2011	STAR, 7.08, 7.25, 7.59, and 40 CFR 63 Subpart MMMM	Regulation 5.00, 5.01, 5.02, 5.14, 5.20, 5.21, 5.22, 5.23 establishes the requirements for Environmental Acceptability for TACs. The source has requested to be below de minimis for all applicable TACs.
E2a	One (1) Natural Gas-Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr	STAR, 7.06, 7.59, 40 CFR 63 Subpart MMMM	Regulation 7.06 establishes the PM, SO ₂ , and Opacity requirements for indirect heat exchangers.
E2b	One (1) Natural Gas-Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr		Regulation 7.08 establishes the requirements for PM emissions for new processes that commenced construction after September 1, 1976.
E2c	One (1) Natural Gas-Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr		Regulation 7.25 establishes the requirements for VOC emissions, apply to a process not elsewhere regulated in District Regulation 7, and apply to new processes commenced after June 13, 1979.
E2d	One (1) Natural Gas-Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr		
E3	One (1) coating operation located at 7201 Logistics Drive. Installed in January 2011	STAR, 7.08, 7.25, 7.59, and 40 CFR 63 Subpart MMMM	Regulation 7.59 establishes the requirements for VOC emissions from facilities that apply coating onto substrates. The process must commence on or after May 20, 1981.
E4	One (1) adhesive application operation located at each of the surface coating operations. Installed in January 2011	STAR, 7.25, 40 CFR 63 Subpart MMMM	Subpart MMMM applies to miscellaneous metal parts and products surface coating facilities which uses 250 gallon or more HAP containing coatings and is located at a major source of HAP emissions.
E5	One (1) floor coating operation located at each of the surface coating operations. Installed in January 2011	STAR, 7.25	

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

- (a) Regulation 40 CFR 63 Subpart Mmmm establishes requirements for surface coating of miscellaneous parts and products.
- (b) All coatings used at this plant are classified as general use coatings, as defined under 40 CFR 63, 63.3881(a).

2) **Opacity**

- (a) The paint booths and heaters are subject to an opacity standard in accordance with Regulation 7.08, section 3.1.1 and Regulation 7.06, section 5.1.1, respectively.

3) **PM**

- (a) Regulation 7.08, Table 1 establishes the PM emission limits for each spray booth of 2.34 lb/hr each for process throughput of 1000 lb/hr or less.
- (b) The PM emissions limit from heater E2a, E2b, E2c and E2d of 0.56 lb/MM Btu actual heat input is from Regulation 7.06, section 4.1.2.

4) **SO₂**

- (a) For heaters E2a, E2b, E2c and E2d, when combusting liquid and gaseous fuels, per Regulation 7.06, section 5.1.1, the 1.0 lbs/MM Btu actual heat input limit is based on a 30-day rolling average.

5) **TAC**

- (a) See Plantwide section above.

6) **VOC**

- (a) The facility cannot coat more than 34 vehicles or trailers per day in order to be exempt from Regulation 7.59, as specified in section 5.1.3 of that regulation.
- (b) Regulation 7.25 requires for the following emission points E1, E3, and E4 that the combined emissions are limited to 5.0 tons

per 12-consecutive month as a BACT analysis has not be submitted.

- (c) As required by District Regulation 7.25, section 3.1, a BACT analysis for the floor coating operation (E5) was submitted on October 24, 1997 and established a VOC limit of 36.06 tons.

iii. **Monitoring and Recordkeeping**

1) **HAP**

- (a) Regulation 40 CFR 63, Subpart Mmmm establishes specific monitoring and record keeping requirements.

iv. **Reporting**

1) **HAP**

- (a) Regulation 40 CFR Part 63, Subpart Mmmm establishes specific reporting requirements.

c. **Emission Unit U2 – Parts Washer**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E6	One (1) cold solvent metal parts washer. Installed in April 2010	STAR, 6.18	Regulation 5.00, 5.01, 5.02, 5.14, 5.20, 5.21, 5.22, 5.23 establishes the requirements for Environmental Acceptability for TACs. The source has requested to be below de minimis for all applicable TACs. Regulation 6.18 applies to each cold cleaner that uses VOCs to remove soluble impurities from metal surface.

ii. **Standards/Operating Limits**

1) **TAC**

- (a) See Plantwide section above.

2) **VOC**

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

iii. **Monitoring and Record Keeping**

1) **VOC**

(a) Regulation 6.18 establishes specific monitoring and record keeping requirements.

d. **Emission Unit U3 – Direct Gas-Fired Heaters**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E7	One (1) direct gas-fired heater. Capacity: 1.85 MMBtu/hr Installed in April 2010	STAR	Regulation 5.00, 5.01, 5.02, 5.14, 5.20, 5.21, 5.22, 5.23 establishes the requirements for Environmental Acceptability for TACs. The source has requested to be below de minimis for all applicable TACs.
E8	One (1) direct gas-fired heater. Capacity: 1.85 MMBtu/hr Installed in April 2010		
E9	One (1) direct gas-fired heater. Capacity: 1.85 MMBtu/hr Installed in April 2010		
E10	One (1) direct gas-fired heater. Capacity: 1.85 MMBtu/hr Installed in April 2010		

ii. **Standards/Operating Limits**

1) **TAC**

(a) See Plantwide TAC Standards.

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. **Operational Flexibility:** The source did not request operational flexibility.
5. **Compliance History:** There were no notices of violation issued to this facility.
6. **Calculation Methodology or Other Approved Method:**
 Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc.) or hours of operation of the equipment by the appropriate emission factor and accounting for any control device unless another method is approved in writing by the District.

Table 1 U1 Coating Operation			
Emission Point ID	Description	Control Device	Acceptable Emission Factor Sources and Calculation Methodology
E1	Miscellaneous metal parts spray-applied surface coating operation (Interior Paint Booth)	Particulate Filter (C1)	Mass Balance Method based on coating material usage and pollutant contents per MSDS of the coating material
E2a	Natural Gas-Fired Heater Capacity: 1.26 MMBtu/hr (Insignificant Activity)	N/A	Emission Factors from AP-42, Chapter 1.4-1, 1.4-2 and 1.4-3
E2b	Natural Gas-Fired Heater Capacity: 1.26 MMBtu/hr (Insignificant Activity)	N/A	
E2c	Natural Gas-Fired Heater Capacity: 1.26 MMBtu/hr (Insignificant Activity)	N/A	
E2d	Natural Gas-Fired Heater (Manufacturer: Power Flame Inc., Model: JR30-A-12-PB). Capacity: 1.26 MMBtu/hr (Insignificant Activity)	N/A	
E3	Miscellaneous metal parts spray-applied surface coating operation (Undercoat Paint Booth)	Particulate Filter (C2)	Mass Balance Method based on coating material usage and pollutant contents per MSDS of the coating material
E4	Adhesive application operation	N/A	Mass Balance Method based on coating material usage and pollutant contents per MSDS of the coating material
E5	Floor coating operation	N/A	Mass Balance Method based on coating material usage and pollutant contents per MSDS of the coating material

Table 2 U2 Parts Washer			
Emission Point ID	Description	Control Device	Acceptable Emission Factor Sources and Calculation Methodology
E6	20-gallon parts washer that has a drain opening diameter of 4 inches to the secondary reservoir	N/A	VOC Emissions (tpy) = amount of solvent used (gallons) × VOC Content (6.8 lb/gal) × (1 ton/2000 lb)

Table 3 U3 Direct-Fired Heat Exchangers			
Emission Point ID	Description	Control Device	Acceptable Emission Factor Sources and Calculation Methodology
E7	Direct gas-fired heater (Rated Capacity: 1.85 MMBtu/hr)	N/A	Emission Factors from AP-42, Chapter 1.4-1, 1.4-2 and 1.4-3
E8	Direct gas-fired heater (Rated Capacity: 1.85 MMBtu/hr)		
E9	Direct gas-fired heater (Rated Capacity: 1.85 MMBtu/hr)		
E10	Direct gas-fired heater (Rated Capacity: 1.85 MMBtu/hr)		

Table 4 IA1 Metal and Wood Cutting Equipment			
Emission Point ID	Description	Control Device	Acceptable Emission Factor Sources and Calculation Methodology
E-IA1	Four (4) Table Saws and Radial Saws (Wood Cutting)	N/A	PM Emission Factor = 0.35 lbs PM/ton wood processed (from Minnesota Pollution Control Agency, Dec 2008)
E-IA2	Seventy-Two (72) Welders, Electric Arc, Mig & Stick		Various Emission Factors for various types of wire used, from either AP-42 or SDAPCD
E-IA3	Ten (10) Hand Held Plasma Cutters (Metal Cutting)		PM Emissions (tpy) = Material Removed (lb/hr) × (8760 hr/year) × Building Drop Out (1 - 0.7)
			HAP Emissions (tpy) = PM Emissions (tpy) × HAP Content (%) (Emission of fume, nitrogen oxide, and noise in plasma cutting of stainless and mild steel, Bernt von Bromssen et al. 1994)
E-IA4	One (1) Double Head Chop Saw (Metal Cutting)		PM Emission Factor = 0.007 lbs PM/ton metal chips (from Alcoa's Lafayette Operations and accepted by Indiana Department of Environmental Management)
E-IA5	Two (2) Abrasive Chop Saw (Metal Cutting)		
E-IA6	Two (2) Milter Saw Cold Cut (Metal Cutting)		
E-IA7	Two (2) Band Saw (Metal	PM Emissions (tpy) = total lbs	

Table 4 IA1 Metal and Wood Cutting Equipment			
Emission Point ID	Description	Control Device	Acceptable Emission Factor Sources and Calculation Methodology
	Cutting)		$\text{chips/year} \times (1\text{ton}/2000\text{ lbs}) \times \text{PM Emission Factor (0.007 lbs/ton metal chips)} \times (1\text{ton}/2000\text{lbs})$ $\text{HAP Emissions} = \text{PM Emissions (tpy)} \times \text{HAP Content (\%)}$
E-IA8	One (1) Laser Cutting (Metal Cutting) with Integral Dust Collector		$\text{PM Emissions (tpy)} = \text{Material Removed (lb/hr)} \times \text{Material Removed that become fumes (7\%)} \times (8760\text{ hr/year}) \times \text{Integral Dust Collector Control (1 - 0.995)} \times \text{Building Drop Out (1 - 0.7)}$ $\text{HAP Emissions (tpy)} = \text{PM Emissions (tpy)} \times \text{HAP Content (\%)}$ <p>(Emission of fume, nitrogen oxide, and noise in plasma cutting of stainless and mild steel, Bernt von Bromssen et al. 1994)</p>

7. Insignificant Activities

Equipment	Quan.	PTE (tpy)	Regulation Basis
Parts Washer (Emission Unit U2)	1	0.01 VOC	Regulation 2.16, Section 1.23
Direct Gas-Fired Heat Exchangers (Emission Unit U3)	4	3.18 NOx	Regulation 2.16, Section 1.23
Table Saw and Radial Saws (Wood Cutting) (Emission Unit IA1)	4	5.04 PM total	Regulation 2.16, Section 1.23
Welders, Electric Arc, Mig & Stick (Emission Unit IA1)	72	0.34 PM total	Regulation 2.16, Section 1.23
Hand Held Plasma Cutters (Metal Cutting) (Emission Unit IA1)	10	0.92 PM total	Regulation 2.16, Section 1.23
Double Head Chop Saw (Metal Cutting) (Emission Unit IA1)	1	0.25 PM	Regulation 2.16, Section 1.23
Abrasive Chop Saw (Metal Cutting) (Emission Unit IA1)	2	0.25 PM each	Regulation 2.16, Section 1.23
Militer Saw Cold Cut (Metal Cutting) (Emission Unit IA1)	2	0.25 PM each	Regulation 2.16, Section 1.23
Band Saw (Metal Cutting) (Emission Unit IA1)	2	0.25 PM each	Regulation 2.16, Section 1.23
Laser Cutting (Metal Cutting) (Emission Unit IA1)	1	0.001 PM	Regulation 2.16, Section 1.23

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, 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 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.
- 3) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emission of the facility as required by the District.
- 6) The owner or operator 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.
- 6) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) to be reported on the annual emission inventory.
- 7) 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, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

8. Basis of Regulation Applicability for IA units

a. Emission Unit IA1: Metal and Wood Cutting Equipment

i. Equipment

Emission Point	Description	Applicable Regulation	Basis for Applicability
E-IA1	Four (4) Table Saws and Radial Saws (Wood Cutting)	STAR, 7.08	Regulation 5.00, 5.01, 5.02, 5.14, 5.20, 5.21, 5.22, 5.23 establishes the requirements for Environmental Acceptability for TACs. The source has requested to be below de minimis for all applicable TACs. Regulation 7.08 establishes the requirements for PM and NOx emissions from new processes that commence construction after September 1, 1976.
E-IA2	Seventy-Two (72) Welders, Electric Arc, Mig & Stick		
E-IA3	Ten (10) Hand Held Plasma Cutters (Metal Cutting)		
E-IA4	One (1) Double Head Chop Saw (Metal Cutting)		
E-IA5	Two (2) Abrasive Chop Saw (Metal Cutting)		
E-IA6	Two (2) Milter Saw Cold Cut (Metal Cutting)		
E-IA7	Two (2) Band Saw (Metal Cutting)		
E-IA8	One (1) Laser Cutting (Metal Cutting) with Integral Dust Collector		

ii. Standards/Operating Limits

1) Opacity

(a) Regulation 7.08 establishes Opacity standards.

2) PM

(a) Regulation 7.08, Table 1 establishes the PM emission limits of each IA equipment is 2.34 lb/hr each for process throughput of 1000 lb/hr or less.

3) TAC

(a) See Plantwide section above.