



Louisville Metro Air Pollution Control District
 850 Barret Avenue
 Louisville, Kentucky 40204-1745



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0182-14-F

Plant ID: 0182

Effective Date: [Click here to enter a date.](#)

Expiration Date: [Click here to enter a date.](#)

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

IMI South, LLC - Selinda
 1440 Selinda Avenue
 Louisville, KY 40213

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM₁₀
 Tons/year: 25

Application No.: 9164
 62973

Application Received: 2/15/2008
 3/6/2014

Permit Writer: Bob Wesely

Public Notice Date: 1/16/2015

{manager1}
 Air Pollution Control Officer
 {date1}

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Permit Revisions/Changes

Revision No.	Issue Date	Public Notice Date	Type	Page No.	Description
Initial	02/__/2015	01/16/2015	Initial	Entire Permit	Initial Permit Issuance

Acronyms and Abbreviations

AP-42	- AP-42, Compilation of Air Pollutant Emission Factors, published by USEPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mm _{Hg}	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- any period of twelve consecutive months, unless "calendar year" is specified
yr	- year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of applicable fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.

9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)). Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting

Regulation	Title
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

*Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745*

Emission Unit U1**U1 (Hansen ID: 27667)****U1 Unit Description: Concrete Batch Plant**

One (1) Erie-Strayer central (wet) mix ready-mix concrete batch, model #7265, maximum rated capacity of 250 yd³/hr, with two (2) cement silos/bins, two (2) flyash silos/bins, two (2) outside conveyors, in series, for filling overhead bins, overhead aggregate/sand bins, aggregate/sand weigh hopper, batch transfer conveyor, cement/flyash weigh hopper, central mixer, one (1) 3.3 mmbtu/hr hot water heater, one (1) Stephens baghouse, model SOS6100, central dust collector system.¹

U1 Applicable Regulations

Regulation	Title	Applicable Sections
1.14	Control of Fugitive Particulate Emissions	All
2.17	Federally Enforceable District Origin Operating Permit	All
6.09	Standards of Performance for Existing Process Operations	1, 2, and 3
7.08	Standards of Performance for New Process Operations	1, 2, and 3

U1 Equipment

Emission Point ID	Description Make/Model	Maximum Capacity	Applicable Regulation	Control ID	Stack ID	Application Date
E1	Cement Silo #001	100 tn	1.14 2.17 7.08	C1	S1	7/11/03
E2	Cement Silo #002	100 tn		C1	S1	
E3	Flyash Silo #003	100 tn		C1	S1	
E4	Flyash Silo #004	100 tn		C1	S1	
E5	Aggregate/sand Weigh Hopper	412 tn/hr	1.14 2.17 6.09	C1	S1	1973
E6	Cement/Flyash Weigh Hopper	70.5 tn/hr		C1	S1	
E7	Mixer loading	500 tn/hr		C1	S1	
E8	Aggregate Stockpiles	NA		None	Fugitive	
E9	Sand Stockpiles	NA		None	Fugitive	
E10	Aggregate/sand Handling	NA		None	Fugitive	

¹ Central mix concrete ready mix batch plant equipment was previously permitted under permit 43-76-O and dust collection system under permit 554-08-O. Equipment for unloading materials from railroad cars been removed from the plant site and permit 221-06-C has been voided.

Emission Point ID	Description Make/Model	Maximum Capacity	Applicable Regulation	Control ID	Stack ID	Application Date
E11	Agg/sand Transfer Conveyor	412 tn/hr	1.14 2.17 6.09	None	Fugitive	1973
E12	Agg/sand Bins	412 tn/hr		None	Fugitive	
E13	Roads & Yard	NA		None	Fugitive	
E14	Two agg/sand Bins Loading Conveyors	240 tn/hr each		None	Fugitive	
E15	Agg/sand Conveyor Loading Hoppers (5)	240 tn/hr		None	Fugitive	

U1 Controls

Control ID	Description	Make/Model	Maximum Capacity	Pollutant Controlled	Application Date
C1	Central Dust Collection System	Stephens, model SOS6100 baghouse	8,000 cfm	PM/PM ₁₀	7/11/03

One (1) Stephens baghouse model SOS6100, central dust collection system that controls the PM/PM₁₀ emissions of all silos, weigh hoppers, aggregates bin and central mixer loading.²

One 250 yd³/hr central mix (wet) ready-mix concrete batch plant, that includes the below listed equipment:

Five (5) exterior aggregate/sand handling conveyor loading hoppers

Two (2) exterior aggregate/sand handling conveyors, operating in series, 240 tn/hr capacity each for filling overhead aggregate/sand bins.

Two (2) process cement silos/bins, 100 tn capacity, with a 80 tn/hr fill rate

Two (2) process flyash silos/bins, 100 tn capacity, with a 80 tn/hr fill rate

² Information received from source 9/30/14.

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. PM/PM₁₀

- i. The owner or operator shall not allow the total plant-wide emissions of the pollutant PM₁₀ to equal or exceed twenty-five (25.0) tons per twelve (12) consecutive month period.^{3,4} (Reg. 2.17, section 5.1)
- ii. The owner or operator shall not allow or cause the particulate emissions to exceed the permitted limitation of 32.52 pounds per hour for the concrete batch plant. (Construction Permit 264-03-C, effective 7/30/2003)
- iii. The owner or operator shall not allow any materials to be handled, transported or stored; or access roads to and from the plant site, roads on the plant site property and the on-site work areas of the plant site, to be used without taking reasonable precautions to prevent particulate matter from becoming airborne beyond the work site. (Reg. 1.14, section 2.1)
- iv. The owner or operator shall not allow the emissions of the pollutant PM emitted from the aggregate/sand bin loading conveyor fill hopper, emission point E15, to equal or exceed 60.50 lb/hr, based on actual operating hours on a calendar day.⁵ (Reg. 6.09, section 3.2)
- v. The owner or operator shall not allow the emissions of the pollutant PM emitted from the aggregate/sand bin loading conveyor, emission point E14, to equal or exceed 60.50 lb/hr, based on actual operating hours on a calendar day.⁵ (Reg. 6.09, section 3.2)
- vi. The owner or operator shall not allow the emissions of the pollutant PM emitted from the aggregate/sand weigh hopper, emission point E5, to equal or exceed 66.66 lb/hr, based on actual operating hours on a calendar day.⁵ (Reg. 6.09, section 3.2)
- vii. The owner or operator shall not allow the emissions of the pollutant PM emitted from the cement/flyash weigh hopper, emission point E6, to equal or exceed 47.77 lb/hr, based on actual operating hours on a calendar day.⁵ (Reg. 6.09, section 3.2)
- viii. The owner or operator shall not allow the emissions of the pollutant PM emitted from the aggregate/sand transfer conveyor, emission point E11, to equal or exceed 66.66 lb/hr, based on actual operating hours on a calendar day.⁵ (Reg. 6.09, section 3.2)
- ix. The owner or operator shall operate the controls at all times that a process cement silo filling operation is performed, so that the emissions of the

³ The source requested the total plantwide limits of the criteria pollutants PM₁₀ < 25 tn/yr, VOC < 25 tn/yr, Total HAPs < 12.5 tn/yr and largest single HAP < 5.0 tn/yr to be a FEDOOP STAR Exempt source as defined by Regulation 5.00, section 1.13.5, on 3/14/14.

⁴ The source is not major for Green House Gases.

⁵ Emissions calculations used emission factors from AP-42, table 11.12-2 and table 11.12-8. Uncontrolled emissions for the pollutant PM do not exceed the standard.

pollutant PM emitted from each of the process cement silos/bins, emission points E1 and E2, does not equal or exceed 34.90 lb/hr, based on actual operating hours on a calendar day.⁶ (Reg. 7.08, section 3)

- x. The owner or operator shall not allow the emissions of the pollutant PM emitted from the each process flyash silos/bins, emission points E3 and E4, to equal or exceed 34.90 lb/hr, based on actual operating hours on a calendar day.⁷(Reg. 7.08, section 3)
- xi. The owner or operator shall not allow the emissions of the pollutant PM emitted from the central mixer loading, emission point E7, to equal or exceed 69.03 lb/hr, based on actual operating hours on a calendar day.⁷ (Reg. 6.09, section 3.2)

b. Opacity

- i. The owner or operator shall not allow visible emissions to equal or exceed twenty percent (20%) opacity for processes in existence or having a construction permit issued before September 1, 1976. (Reg. 6.09, section 3.1)
- ii. The owner or operator shall not allow visible emissions to equal or exceed twenty percent (20%) opacity for processes that commenced construction after September 1, 1976. (Reg. 7.08, section 3.1.1)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain, at the facility, the required records for a minimum of five (5) years and make the records readily available to the District upon request.

a. PM/PM₁₀

- i. The owner or operator shall monthly, perform a visual inspection of the structural and mechanical integrity of the process equipment for signs of damage, air leakage, corrosion, etc. and repair shall be performed as needed. The emissions points to be surveyed shall include, but not be limited to, the emission points listed below:
 - 1) Aggregate/sand bin loading conveyor fill hopper
 - 2) Aggregate/sand bin loading conveyor
 - 3) Aggregate/sand weigh hopper
 - 4) Aggregate/sand transfer conveyor
 - 5) Cement/flyash weigh hopper
 - 6) Cement silo filling
 - 7) Flyash silo filling

⁶ Uncontrolled emissions of the pollutant PM can exceed the PM lb/hr standard of Reg. 7.08.

⁷ Emissions calculations used emission factors from AP-42, table 11.12-2 and table 11.12-8. Uncontrolled emissions for the pollutant PM do not exceed the standard.

- 8) Central mixer loading
 - ii. The owner or operator shall keep records, monthly of the visual inspection of the structural and mechanical integrity of the process equipment.
 - iii. The owner or operator shall maintain records monthly of the below listed items:
 - 1) The monthly and the monthly twelve (12) consecutive month period totals of cubic yards of concrete produced.
 - 2) The owner or operator shall calculate and record, during the first thirty calendar days of the following month, the monthly twelve (12) consecutive month plant-wide total emissions of the pollutant PM₁₀. All totals shall include PM₁₀ emitted during control bypasses.
 - 3) The owner or operator shall use the below listed AP-42, Concrete Batching, emission factors when calculating the controlled plant-wide emissions for the pollutant PM₁₀, or other emission factors that become available, as approved by District.⁸

Equipment	AP-42 Emission Factor, Controlled lb PM₁₀/tn	Controlled PM₁₀ Emission Factor converted to lb PM₁₀/yd³ dry concrete
Aggregate Transfer	0.0033	0.0031
Sand Transfer	0.00099	0.0007
Weight hopper (Agg+Sand) ^a	0.00014	0.00023
Mixer loading (cement+flyash) ^b	0.0055	0.0016
Cement silo filling	0.00034	0.00008
Flyash silo filling	0.0049	0.0002
Aggregate ground storage	NA	0.0031
Sand ground storage	NA	0.0007
Aggregate hopper loading	NA	0.0031
Sand hopper loading	NA	0.0007

- 4) The owner or operator shall use the below listed AP-42, Concrete Batching, emission factors when calculating the uncontrolled plant-wide emissions for the pollutant PM₁₀, or other emission factors that become available, as approved by District.⁹

⁸ The PM/PM₁₀ emissions factors are from or were derived from AP-42, Chapter 11.12, Concrete Batching, tables 11.12-2 and 11.12-8, and the standard concrete mix proportions listed in AP-42, chapter 11.12.

⁹ The PM/PM₁₀ emissions factors are from or were derived from AP-42, Chapter 11.12, Concrete Batching, tables 11.12-2 and 11.12-8, and the standard concrete mix proportions listed in AP-42, chapter 11.12.

Equipment	AP-42 Emission Factor Uncontrolled (lb PM₁₀/tn)	Uncontrolled PM₁₀ Emission Factor converted to lb PM₁₀/yd³ dry concrete mix
Aggregate Transfer	0.0033	0.0031
Sand Transfer	0.00099	0.0007
Weight hopper (Agg+Sand) ^a	0.0028	0.0046
Mixer loading (cement+flyash) ^b	0.156	0.044
Cement silo filling	0.47	0.1152
Flyash silo filling	1.10	0.0402
Aggregate ground storage	NA	0.0031
Sand ground storage	NA	0.0007
Aggregate hopper loading	NA	0.0031
Sand hopper loading	NA	0.0007

^aThe unit for weigh hopper emission factor is lb of pollutant per ton of aggregate and sand, AP-42, table 11.12-2, footnote e.

^bThe unit for central mixer loading emission factor is lb of pollutant per ton of cement and flyash, AP-42, table 11.12-2, footnote f.

- iv. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.
- v. For emission points E1 and E2, if there is any time that the control devices are bypassed or not in operation when the process is operating, the owner or operator shall keep a record of the following for each bypass event:
 - 1) Date;
 - 2) Start time and stop time;
 - 3) Throughput at emission points E1 and E2 during the hours their respective controls are bypassed;
 - 4) Identification of the control device and the uncontrolled emission point(s);
 - 5) PM emissions in lb/hr during the bypass;
 - 6) Summary of the cause or reason for each bypass event;
 - 7) Corrective action taken to minimize the extent or duration of the bypass event; and
 - 8) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

b. Opacity

- i. The owner or operator shall conduct a monthly 1-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is

inside an enclosure. The emission points to be surveyed shall include, but not be limited to, the emissions points listed below:

- 1) Aggregate/sand bin loading conveyor fill hopper
 - 2) Aggregate/sand bin loading conveyor
 - 3) Aggregate/sand weigh hopper
 - 4) Aggregate/sand transfer conveyor
 - 5) Cement/flyash weigh hopper
 - 6) Cement silo
 - 7) Flyash silo
 - 8) Central mixer loading
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 test, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what, if any, corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.17, section 3.5.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete.”
- Signature and title of the responsible official of the company.

The Annual Compliance Report is due on or before the following date of each calendar year:¹⁰

¹⁰ The Annual Compliance Report is due each year and shall include all emissions and throughput data required to be reported by the permit to show compliance with the standards of the permit.

Reporting Period
January 1st through December 31st

Report Due Date
March 1st

The Annual Compliance Certification is due on or before the following date of each calendar year:¹¹

Reporting Period
January 1st through December 31st

Report Due Date
April 15th

If a change in the “Responsible Official” (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days following the date a change in the designated RO occurs for this facility.

a. **PM/PM₁₀**

- i. The owner or operator shall report the monthly twelve (12) consecutive month period totals of plant-wide emissions of the pollutant PM₁₀. All totals shall include PM₁₀ emitted during control bypasses.
- ii. The owner or operator shall report the following information regarding each emission points’, E1 and E2, PM By-Pass Activity in the annual compliance reports:
 - 1) Emission point at which the by-pass occurred;
 - 2) Date and duration (including the start and stop time) during which a bypass occurred;
 - 3) The average PM lb/hr emitted at each emission point during the bypass;
 - 4) Summary information on the cause or reason for the by-pass activity
 - 5) Corrective action taken to minimize the extent and duration of each bypass event;
 - 6) Measures implemented to prevent reoccurrence of the situation that resulted in by-pass emissions; or
 - 7) If no deviations occur during the annual reporting period, the report shall contain a negative declaration.

b. **Opacity**

- i. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration.

¹¹ The Annual Compliance Certification is due each year and shall include the information required in the FEDOOP Annual Compliance Certification form 9440-O.

- ii. The date, time and results of each Method 9 test conducted. If there were no Method 9 tests performed during the reporting, the owner or operator may submit a negative declaration.
- iii. Description of any corrective action taken for each exceedance of the opacity standard.

Insignificant Activities

Equipment	Quantity	Location	PTE (tn/yr)	Basis for Exemption
Tanks for storage of lubricating oils or fuel oils, with vapor pressure less than 10 mm of Hg at conditions of 26°C and 760 mm Hg. Includes 19,000 gal diesel fuel tank.	4	Plant wide	0.03 VOC	Regulation 1.02, Appendix A
3.3 mmbtu natural gas fueled water heater	1	Plant wide	1.42 NO _x	Regulation 1.02 ^{12,13,14,15,16,17,18,19}
Brazing, soldering or welding equipment	1	Plant wide	0.41 PM	Regulation 1.02, Appendix A
Waste oil heater	1	Plant wide	0.38 SO ₂	Regulation 1.02
Four (4) VOC storage tanks, each with a maximum capacity of 250 gallons or less, for storing engine oil, gear oil, hydraulic oil, and transmission fluid are deleted from the Insignificant Activities list due to their trivial emissions.				

¹² Insignificant activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.

¹³ Insignificant activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.

¹⁴ Activities identified in Regulation 1.02, Appendix A, 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 and must be included in the permit.

¹⁵ Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

¹⁶ In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE) quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment.

¹⁷ The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.

¹⁸ The owner or operator shall submit an updated list of Insignificant Activities whenever changes in equipment located at the facility occur that cause changes to the plant wide emissions.

¹⁹ The source is not major for Greenhouse Gases.

FEDOOP Fee Comment

On May 15, 2013, the Board approved revisions to Regulation 2.08, which implemented a new fee structure. As a result, IMI South, LLC - Selinda will be required to pay the initial issuance fee as well as annual fees.

The initial issuance fee for a FEDOOP is \$2,542.40 in accordance with the Schedule of Fees table, Regulation 2.08, section 12.9.6. This fee shall be paid to the District prior to the issuance of the permit.

Protocol Checklist for a Performance Test

A completed protocol should include the following information:

- 1. Facility name, location, and ID #;
- 2. Responsible Official and environmental contact names;
- 3. Permit numbers that are requiring the test to be conducted;
- 4. Test methods to be used (i.e. EPA Method 1, 2, 3, 4, and 5);
- 5. Alternative test methods or description of modifications to the test methods to be used;
- 6. Purpose of the test including equipment and pollutant to be tested; the purpose may be described in the permit that requires the test to be conducted or may be to show compliance with a federal regulation or emission standard;
- 7. Tentative test dates (These may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation.);
- 8. Maximum rated production capacity of the system;
- 9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate, based on limits);
- 10. Method to be used for determining rate of production during the performance test;
- 11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance;
- 12. Description of normal operation cycles;
- 13. Discussion of operating conditions that tend to cause worse case emissions; it is especially important to clarify this if worst case emissions do not come from the maximum production rate;
- 14. Process flow diagram;
- 15. The type and manufacturer of the control equipment, if any;
- 16. The control equipment (baghouse, scrubber, condenser, etc.) parameter to be monitored and recorded during the performance test. Note that this data will be used to ensure representative operation during subsequent operations. These parameters can include pressure drops, flow rates, pH, and temperature. The values achieved during the test may be required during subsequent operations to describe what pressure drops, etcetera, are indicative of good operating performance; and
- 17. How quality assurance and accuracy of the data will be maintained, including;
 - Sample identification and chain-of-custody procedures
 - If audit samples are required for this test method, audit sample provider and number of audit samples to be used
- 18. Pipe, duct, stack, or flue diameter to be tested;
- 19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet;
- 20. Determine number of traverse points to be tested for outlet and additionally for inlet if required using Appendix A-1 to 40 CFR Part 60;
 - Method 1 if stack diameter is >12"
 - Method 1a if stack diameter is greater than or equal to 4" and less than 12"
 - Alternate method of determination for <4"
 - If a sample location at least two stack or duct diameters downstream and half a diameter upstream from any flow disturbance is not available then an alternative procedure is available for determining the acceptability of a measurement location. This procedure described in Method 1, Section 11.5 allows for the determination of gas flow angles at the sampling points and comparison of the measured results with acceptability criteria.
- 21. The Stack Test Review fee shall be submitted with each stack test protocol.