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**Permit Revisions/Changes**

<b>Permit</b>	<b>Revision No.</b>	<b>Issue Date</b>	<b>Type</b>	<b>Page No.</b>	<b>Description</b>
O-0740-15-F	1	Xx/xx/xx	Renewal	Entire permit	Permit Renewal
312-03-F	NA	01/31/04	Initial	Entire permit	Initial issuance

### Acronyms and Abbreviations

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
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
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- 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
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- 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 annual 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 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, PM<sub>10</sub>, PM<sub>2.5</sub>, 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 CO<sub>2</sub>-equivalent, as defined in 40 CFR 98). 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:

<b>Regulation</b>	<b>Title</b>
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
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

<b>Regulation</b>	<b>Title</b>
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:

<b>Regulation</b>	<b>Title</b>
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 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*

### Plant-Wide Specific Conditions

#### S1. Standards (Regulation 2.17, section 5.1)

##### a. VOC

The owner or operator shall not allow *plant-wide* VOC emissions to exceed 25 tons per consecutive 12-month period.<sup>1</sup>

##### b. HAP<sup>2</sup>

i. The owner or operator shall not allow *plant-wide* single HAP emissions to exceed 5 tons per consecutive 12-month period for each HAP.<sup>1</sup>

ii. The owner or operator shall not allow *plant-wide* total HAP emissions to exceed 12.5 tons per consecutive 12-month period.<sup>1</sup>

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

##### a. VOC

The owner or operator shall maintain records, including calculations, of the plant-wide consecutive 12-month VOC emissions, for each month in the reporting period.

##### b. HAP

i. The owner or operator shall maintain a copy of the Safety Data Sheet (SDS) for each HAP-containing material.

ii. The owner or operator shall monthly monitor and maintain records of the monthly throughput of each HAP-containing raw material, the HAP content, and the consecutive 12-month throughput of each HAP-containing raw material.

iii. The owner or operator shall maintain records, including calculations, of the *plant-wide* consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

iv. The source can use the total VOC emissions as a surrogate for demonstrating compliance with the single and total HAP emission limits. The source will maintain monthly records of the throughput for each HAP-containing material, in order to determine actual HAP emissions, if necessary. If the monthly or consecutive 12-month total emissions exceed the specified emission limits when estimated using the surrogate worst-case method, then the source must calculate the emissions for each single

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<sup>1</sup> On April 21, 2014, the source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

<sup>2</sup> This source no longer “splash blends” ethanol and gasoline. This source is not a gasoline dispensing facility; therefore, 40 CFR 63 Subpart CCCCCC does not apply. This source was issued a FEDOOP permit with synthetic minor limits for HAPs on January 31, 2004, prior to the compliance date of February 5, 2007, for 40 CFR 63 Subpart EEEE; therefore, 40 CFR 63 Subpart EEEE does not apply.

HAP based on the actual materials and chemical profile, and submit these to the District.

S3. **Reporting** (Regulation 2.17, section 5.2)

a. **VOC**

- i. The owner or operator shall report the *plant-wide* consecutive 12-month VOC emissions for each month in the reporting period.
- ii. The owner or operator shall report any deviations from monitoring and recordkeeping requirements, or a negative declaration if requirements were met.

b. **HAP**

- i. The owner or operator shall report the *plant-wide* consecutive 12-month emissions of each single HAP for each month in the reporting period.
- ii. The owner or operator shall report the *plant-wide* consecutive 12-month emissions of total HAP for each month in the reporting period.

**Emission Unit U1**

EU U1: Solvent storage tanks, vertical above ground

**EU U1 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 3.3 and 5
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards	1, 2, and 3
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.3, 5, 7 and 8
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	§§60.116(b) and (c)

**EU U1 Emission Points**

<b>EP ID</b>	<b>Description</b>	<b>Maximum Capacity</b>	<b>Construction Date</b>	<b>Applicable Regulation</b>	<b>Control Device</b>	<b>Stack ID</b>
E-1	Tank <sup>3</sup> , Toluene (Submerged Fill, Fixed Roof)	15,000 gal	1973	6.13	NA	Fugitive
E-2	Tank <sup>1</sup> , Texanol (Submerged Fill, Fixed Roof)	15,000 gal	1973	6.13	NA	Fugitive
E-3	Tank <sup>1</sup> , Propylene (Submerged Fill, Fixed Roof)	15,000 gal	1973	6.13	NA	Fugitive
E-4	Tank <sup>1</sup> , Xylene (Submerged Fill, Fixed Roof)	15,000 gal	1973	6.13	NA	Fugitive
E-6	Tank, Methanol (Submerged Fill, Fixed Roof)	19,500 gal	1992	7.12	NA	Fugitive
E-7	Tank <sup>1</sup> , MV&P (Submerged Fill, Fixed Roof)	19,500 gal	1992	7.12	NA	Fugitive
E-8	Tank <sup>1</sup> , Ethanol (Submerged Fill, Fixed Roof)	30,000 gal	1992	7.12, 40 CFR 60 Subpart Kb	VR1	Fugitive
E-9	Tank <sup>1</sup> , Ethanol (Submerged Fill, Fixed Roof)	30,000 gal	1992		VR2	Fugitive
E-10	Tank <sup>1</sup> , Rule 66 MIs (Submerged Fill, Fixed Roof)	30,000 gal	1992		NA	Fugitive
E-11	Tank, Hexane (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-12	Tank <sup>1</sup> , PM Acetate (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-13	Tank <sup>1</sup> , Isopropyl OH (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-14	Tank <sup>1</sup> , Methanol (Submerged Fill, Fixed Roof)	15,000 gal	1973	6.13	NA	Fugitive
E-15	Tank <sup>1</sup> , 100 Solvent (Submerged Fill, Fixed Roof)	15,000 gal	1973	6.13	NA	Fugitive

<sup>3</sup> Regulations 6.13/7.12 apply due to the size of the tanks (greater than 250 gallons), but the vapor pressure of the material stored in the tank is less than 1.5 psia. These tanks have submerged fill, but submerged fill is not required.

EP ID	Description	Maximum Capacity	Construction Date	Applicable Regulation	Control Device	Stack ID
E-16	Tank <sup>1</sup> , Methanol (Submerged Fill, Fixed Roof)	15,000 gal	1973	6.13	NA	Fugitive
E-17	Tank <sup>4</sup> , NB Acetate (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-18	Tank <sup>2</sup> , Isobutyl Isobutylate (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-20	Tank <sup>2</sup> , Reg. Min. Spirits (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-21	Tank <sup>2</sup> , Ethylene Glycol (Submerged Fill, Fixed Roof)	15,000 gal	1973	6.13	NA	Fugitive
E-22	Tank <sup>2</sup> , 150 Solvent (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-23	Tank <sup>2</sup> , 142 Solvent (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-24	Tank <sup>2</sup> , MEK (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-25	Tank <sup>2</sup> , E8 Solvent (Submerged Fill, Fixed Roof)	10,000 gal	1973	6.13	NA	Fugitive
E-26	Tank <sup>2</sup> , Isobutyl acetate (Submerged Fill, Fixed Roof)	4,000 gal	1973	6.13	NA	Fugitive
E-27	Tank, Isopropyl acetate (Submerged Fill, Fixed Roof)	4,000 gal	1973	6.13	NA	Fugitive
E-28	Tank <sup>2</sup> , Dup Fluid #5 (Submerged Fill, Fixed Roof)	4,000 gal	1973	6.13	NA	Fugitive
E-29	Tank <sup>2</sup> , Lacquer Diluent (Submerged Fill, Fixed Roof)	4,000 gal	1973	6.13	NA	Fugitive
E-30	Tank <sup>2</sup> , Heptane (Submerged Fill, Fixed Roof)	4,000 gal	1973	6.13	NA	Fugitive
E-31	Tank <sup>2</sup> , MIBK (Submerged Fill, Fixed Roof)	4,000 gal	1973	6.13	NA	Fugitive

**U1 Controls**

Control ID	Description	Control Device Efficiency	Stack ID
VR1	Vapor Balance Line Between the storage tank and the tanker truck. (U4, E35)	90%	Fugitive
VR2	Vapor Balance Line Between the storage tank and the tanker truck. (U4, E35)	90%	Fugitive

**U1 Equipment Not Regulated**

EP ID	Description	Maximum Capacity	Stack ID
E-5	Tank, Acetone (Submerged Fill) <sup>5</sup>	15,000 gal	Fugitive
E-19	Tank, Acetone (Submerged Fill)	10,000 gal	Fugitive

<sup>4</sup> Regulations 6.13/7.12 apply due to the size of the tanks (greater than 250 gallons), but the vapor pressure of the material stored in the tank is less than 1.5 psia. These tanks have submerged fill, but submerged fill is not required.

<sup>5</sup> Per Regulation 1.02, section 1.84.23 acetone has been determined to have negligible photochemical reactivity and is excluded from the definition of volatile organic compound. Regulations 6.13 and 7.12 apply to storage tanks greater than 250 gallons that contain volatile organic compounds.

## U1 Specific Conditions

### S1. Standards (Regulation 2.17, section 5.1)

#### a. VOC

- i. See Plant-Wide Specific Condition S1.a.i.
- ii. The owner or operator shall equip each storage tank with a permanent submerged fill pipe if the true vapor pressure of the material stored is equal to or greater than 1.5 psia. The true vapor pressure “as stored” shall be determined on an instantaneous basis under conditions representing worst-case conditions. (Regulations 6.13, section 3.3, and 7.12, section 3.3)
- iii. Storage tanks E-6, E-7, E-8, E-9, and E-10 shall be equipped with a pressure vacuum vent with 8 oz./in<sup>2</sup> pressure and -1 oz./in<sup>2</sup> vacuum. (Construction Permit 481-92-C, Additional Condition 1)
- iv. No tank of 75 cubic meters or larger (E-8, E-9, E-10) shall be used to store product with a vapor pressure of 27.6 kPa (4.0 psia) or greater unless controls per Federal Regulation 40 CFR 60 Subpart Kb are added and the approval of the District is obtained. (Construction Permit 481-92-C, Additional Condition 2)

#### b. HAP

See Plant-Wide Specific Condition S1.b.

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

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

#### a. VOC

- i. See Plant-Wide Specific Condition S2.a.
- ii. The owner or operator can monitor and record the throughput through each Tank E-1 through E-4, E-6, E-7 and E-10 through E-18, and E-20 through E-31 to ensure it does not exceed 2,000,000 gallons per consecutive 12-month period. If the throughput through each Tank E-1 through E-4, E-6, E-7 and E-10 through E-18, and E-20 through E-31 exceeds 2,000,000 gallons per consecutive 12-month period, the owner or operator shall calculate the VOC emissions during the 12 consecutive month period.<sup>6</sup>
- iii. The owner or operator can monitor and record the throughput through each Tank E-8 and E-9 to ensure it does not exceed 3,000,000 gallons per

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<sup>6</sup> The district believes that the 2,000,000 and 3,000,000 gallons, respectively, will ensure the VOC emissions are less than 25 tons during the 12 consecutive month period. Therefore in lieu of calculating VOC emissions, the company can monitor and record the throughput.

consecutive 12-month period. If the throughput through each Tank E-8 and E-9 exceeds 3,000,000 gallons per consecutive 12-month period, the owner or operator shall calculate the VOC emissions during the 12 consecutive month period. (Regulation 2.17, Section 5.1)<sup>6</sup>

- iv. The owner or operator shall monthly monitor and maintain records of monthly throughput of each product stored and the consecutive 12-month throughput of each product stored.
- v. For EP E-8, E-9, and E-10, the owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Records shall be kept for the life of the storage tanks. (40 CFR 60.116b(b))
- vi. For EP E-8, E-9, and E-10, the owner or operator shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. (40 CFR 60.116b(c))
- vii. The owner or operator shall monthly inspect storage tanks E-6, E-7, E-8, E-9, and E-10 to ensure the tanks are equipped with pressure vacuum vent with 8 oz./in<sup>2</sup> pressure and -1 oz./in<sup>2</sup> vacuum. The owner or operator shall monthly make a record of the date, time, person conducting the inspection, and the result of the inspection.

b. **HAP**

See Plant-wide Specific Condition S2.b.

S3. **Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **VOC**

- i. The owner or operator shall report any pressure excursions, including the information recorded in S2.a.vii. If there were no excursions during the reporting period, the owner or operator shall report a negative declaration.
- ii. For EP E-8, E-9, and E-10, the owner or operator shall report any failure to maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period or report a negative declaration.

b. **HAP**

See Plant-wide Specific Condition S3.b.

**U1 Comment**

- 1. The emission points were previously permitted under the following attachments.

<b>EP ID</b>	<b>Attachment</b>
Storage tanks 1-5, 11-31	197-73
Storage tanks 6-10	481-92

**Emission Unit U2**

**U2:** Drumming room; packaging of solvents from storage tanks

**U2 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
<u>7.25</u>	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4 and 5

**U2 Emission Points**

<b>EP ID</b>	<b>Description</b>	<b>Maximum Capacity</b>	<b>Construction Date</b>	<b>Applicable Regulation</b>	<b>Control Device</b>	<b>Stack ID</b>
E-33	Packaging of solvents into portable containers	2000 gph	1992	7.25	NA	Fugitive

**U2 Controls**

There are no control devices associated with Emission Unit U2.

## U2 Specific Conditions

### S1. **Standards** (Regulation 2.17, section 5.1)

#### a. **VOC**

- i. See Plant-wide Specific Condition S1.a.
- ii. For EP E-33, subject to Regulation 7.25, the owner or operator shall not allow or cause the total VOC emissions to exceed 5 tons during any consecutive 12-month period. (Regulation 7.25, section 3)

#### b. **HAP**

See Plant-wide Specific Condition S1.b.

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

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

#### a. **VOC**

- i. See Plant-Wide Specific Condition S2.a.
- ii. The owner or operator shall not allow the throughput from EP E-33 to exceed 250,000 gallons per consecutive 12-month period for each product (or other VOC-containing material). (Regulation 2.17, Section 5.1)
- iii. The owner or operator shall monthly monitor and maintain records of the throughput of each product processed during each calendar month and consecutive 12-month period.
- iv. The owner or operator shall monitor and maintain records, including calculations, of the consecutive 12-month VOC emissions from EP E-33, for each month in the reporting period.

#### b. **HAP**

See Plant-Wide Specific Condition S2.b.

### S3. **Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

#### a. **VOC**

- i. See Plant-Wide Specific Condition S3.a.
- ii. The owner or operator shall report the consecutive 12-month VOC emissions from EP E-33 for each month in the reporting period.

b. **HAP**

See Plant-Wide Specific Condition S3.b.

**U2 Comment**

1. The emission points were previously permitted under the following attachments.

<b>EP ID</b>	<b>Attachment</b>
Drum filling	455-93

### Emission Units U3 and U4

#### U3: Railcar Loading

#### U4: Loading racks; bulk truck loading from storage tanks and drumming room

#### U3 and U4 Applicable Regulations

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
<u>6.22</u>	Standard of Performance for Existing Volatile Organic Materials Loading Facilities	1, 2, 3 and 5
<u>7.22</u>	Standard of Performance for New Volatile Organic Materials Loading Facilities	1, 2 and 3

#### U3 and U4 Emission Points

EU ID	EP ID	Description	Maximum Capacity	Applicable Regulation	Control Device	Stack ID
U3	E-32	Railcar loading, 1992	7,000 gph, 20,000 gpd	6.22	NA	Fugitive
	E-34	Bulk truck loading rack (from drumming room), 1992	20,000 gpd	7.22	NA	Fugitive
U4	E-35	Ethanol loading rack with two loading arms (from Ethanol storage tanks E-8 & E-9), 2007	9,000 gph each arm	7.22	VR1/VR2	Fugitive

#### U3 and U4 Controls

Control ID	Description	Control Device Efficiency	Stack ID
VR1	Vapor Balance Line Between the storage tank and the tanker truck. (U4, E35)	90%	Fugitive
VR2	Vapor Balance Line Between the storage tank and the tanker truck. (U4, E35)	90%	Fugitive

### U3 and U4 Specific Conditions

#### S1. Standards (Regulation 2.17, section 5.1)

##### a. VOC

- i. See Plant-Wide Specific Condition S1.a.
- ii. From EP E-32 and E-34 when loading more than 200 gallons but less than 20,000 gallons of volatile organic materials in any one day into any tank, truck, trailer, or railroad car from any loading facility such loading shall be accomplished by submerged fill, bottom loading, or equivalent methods approved by the District. Pneumatic, hydraulic, or other mechanical means shall be provided to prevent liquid organic compounds drainage from the loading device when it is removed from the hatch, or to accomplish complete drainage before such removal. (Regulations 6.22, Section 3.1, and 7.22, Section 3.1)
- iii. From EP E-32 and E-34, the owner or operator shall not load 20,000 gallons or more of volatile organic materials in any one day into any tank, truck, trailer, or railroad car from any loading facility. (Regulations 6.22, Section 3.1, and 7.22, Section 3.2)<sup>7</sup>
- iv. From EP E-35, the owner or operator shall utilize vapor balancing during all periods of transferring VOC containing materials to tanker trucks at the loading rack, reducing the emissions of all hydrocarbon vapors and gases by at least 90% by weight, and keeping the controls properly installed, and in good working order. Loading shall be accomplished in such a manner that all displaced vapor and air will be vented only to the vapor recovery system. Measures shall be taken to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected. (Regulation 7.22, Section 3.2)<sup>8</sup>
- v. The owner or operator shall equip and maintain a submerged fill pipe and a pressure vacuum vent set at 8 oz./in<sup>2</sup> pressure and 4 oz./in<sup>2</sup> vacuum on each ethanol storage tank that is used to transfer ethanol to gasoline tanker trucks.

##### b. HAP

See Plant-wide Specific Condition S1.b.

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

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

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<sup>7</sup> For loading 20,000 gallons of volatile organic materials per day or more; Regulations 6.22/7.22, Section 3.2 require a device that reduces emissions of all hydrocarbon vapors and gases by at least 90% by weight. E-32 and E-34 are not equipped with a control device or vapor recovery system.

<sup>8</sup> The District determined that vapor balancing (VR1 & VR2) achieves the required 90% control efficiency in accordance with Regulation 7.22.

a. **VOC**

- i. See Plant-Wide Specific Condition S2.a.
- ii. From EP E-32, the owner or operator can monitor and record the amount of VOC-containing materials transferred to ensure it does not exceed 14,500,000 gallons of VOC-containing material per consecutive 12-month period. If the amount of VOC-containing materials transferred exceeds 14,500,000 gallons, the owner or operator shall calculate the VOC emissions during the 12 consecutive month period.<sup>9</sup>
- iii. From EP E-34, the owner or operator can monitor and record the amount of VOC-containing materials transferred to ensure it does not exceed 31,000,000 gallons of VOC-containing material per consecutive 12-month period. If the amount of VOC-containing materials transferred exceeds 31,000,000 gallons, the owner or operator shall calculate the VOC emissions during the 12 consecutive month period.<sup>9</sup>
- iv. From EP E-35, the owner or operator can monitor and record the amount of VOC-containing materials transferred to ensure it does not exceed 6,000,000 gallons of ethanol from tanks E-8 and E-9 per consecutive 12-month period. If the amount of ethanol transferred exceeds 6,000,000 gallons, the owner or operator shall calculate the VOC emissions during the 12 consecutive month period.<sup>9</sup>
- v. The owner or operator shall monthly monitor and maintain records of monthly throughput of each product processed through each loading rack and the consecutive 12-month throughput of each product stored.

b. **HAP**

See Plant-Wide Specific Condition S2.b.

S3. **Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **VOC**

See Plant-Wide Specific Condition S3.a.

b. **HAP**

See Plant-Wide Specific Condition S3.b.

### U3 and U4 Comments

1. The emission points were previously permitted under the following attachments/permits.

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<sup>9</sup> The district believes that the 14,500,000, 31,000,000 and 6,000,000 gallons, respectively, will ensure the VOC emissions are less than 25 tons during the 12 consecutive month period. Therefore in lieu of calculating VOC emissions, the company can monitor and record the throughput.

<b>EP ID</b>	<b>Attachment/Permit Number</b>
Railcar unloading	201-73
Truck loading rack	454-93
Ethanol loading rack	547-07