



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1173-15-F

Plant ID: 1173

Effective Date: 00/00/2015

Expiration Date: 00/00/2020

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:

Louisville Facility Koroseal Interior Products
 4700 Shepherdsville Road
 Louisville, Kentucky 40218

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: VOC
 Tons/year: <25

Application No.:	72197	Application Received:	09/15/2006
	72201		10/06/2006
	58442		08/14/2013
	63507		03/31/2014
	63774		04/08/2014

Permit Writer: Eva Addison

Date of Public Notice: 07/31/2015

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 Air Pollution Control Officer
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FEDOOP Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	304-02-F.	03/13/2003	02/09/2003	Initial	Entire Permit	Initial Permit Issuance
N/A	O-1173-15-F	0X/xx/2015	07/31/2015	Renewal	Entire Permit	Permit renewal; incorporation of equipment from construction permits 337-06-C; 338-06-C and 349-06-C

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
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 _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
RACT	- Reasonably Available Control Technology
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 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, 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. 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 following per Regulation 2.17, section 3.5.
 - A certification 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
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures

Regulation	Title
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 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: Printing and Laminating

U1 Description: Rotogravure printing presses and laminator

U1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
6.29	Standard of Performance for Graphic Arts Facilities Using Rotogravure or Flexographic Printing	All
7.08	Standards of Performance for New Process Operations	All
40 CFR 60 Subpart FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	60.580, 60.581, 60.582(a)(1), 60.583(b)

U1 Equipment

Emission Point ID	Description Make/Model	Maximum Capacity	Applicable Regulation	Control Device (Control ID)	Stack ID	Application Date
E1	#1 Laminator Liberty Machine	30 yds/min	6.29,7.08, 40 CFR 60 Subpart FFF	C1	S1	12/9/1994
E2	#4 Printer W&H/6425	40 yds/min	6.29, 40 CFR 60 Subpart FFF	N/A	F	2/8/2001
E3	#5 Printer Romotec/1625	50 yds/min	6.29, 40 CFR 60 Subpart FFF	N/A	F	9/15/2006

U1 Controls

Control ID	Description	Make/Model	Pollutant Controlled
C1	Doyle custom made Dust Collector	N/A	PM

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

- i. The owner or operator shall not allow or cause plant-wide VOC emissions to equal or exceed 25 tons during any 12-month consecutive period. (Regulation 2.17, sections 5.1 and 5.3)¹
- ii. A person shall not cause or allow the emission of VOC from any affected facility unless at least one of the following requirements is met: (Regulation 6.29, section 3.1)
 - 1) The volatile fraction of all inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 25% VOC by volume,
 - 2) The non-volatile fraction, minus water and exempt solvents, of all inks and coatings, as applied to the substrate, used on the affected facility shall be at least 60% by volume,
 - 3) All inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 0.5 pound of VOC per pound of solids, or
 - 4) The VOC emissions shall not exceed the following limit:
 - (a) For packaging rotogravure printing or specialty rotogravure printing, 35% by weight of the VOC net input into the affected facility, and

Compliance with the requirements shall be based upon the inks and coatings, as applied, used by the affected facility during a calendar-day averaging period. If more than one requirement would be applicable for a specific affected facility, then the least stringent requirement shall apply. (Regulation 6.29, section 3.2 and 3.3)

- iii. The owner or operator shall use inks with a weighted average VOC content less than 1 kilogram VOC per kilogram ink solids. (40 CFR 60 Subpart FFF, section 60.582(a)(1))²

¹ Louisville Facility Koroseal Interior Products is potentially a major source for VOC; however, the company has accepted synthetic minor source emission limits. The source remains subject to a plant-wide emission limit of less than 25 tpy for VOC in order to avoid being subject to the District STAR regulations.

² 40 CFR 60 Subpart FFF applies to any affected facility constructed after January 18, 1983 and applies to each rotogravure printing line used to print or coat flexible vinyl or urethane products.

b. **PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr based on actual operating hours on a calendar day, for Laminator #1. (Regulation 7.08, section 3.1.2)³

c. **Opacity**

The owner or operator shall not allow or cause visible emissions to exceed twenty percent (20%) opacity, for Laminator #1 (Regulation 7.08, section 3.1.1)⁴

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

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

a. **VOC**

i. The owner or operator shall, monthly, maintain records, including calculations, which show the total VOC emissions during each consecutive 12-month period.

ii. Uncontrolled VOC emissions from the laminator and printing presses shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)}$$

or

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{VOC content (lb/gal)}$$

iii. An owner or operator of an affected facility subject to this regulation shall maintain daily records of operations for the most recent five-year period. The records shall be made available to the District, the Cabinet, and the EPA upon request. The records shall include, but not be limited to, the following: (Regulation 6.29, section 6)

- 1) The regulation and section number applicable to the affected facility for which the records are being maintained,
- 2) The application method and substrate type (metal, plastic, etc.),
- 3) The amount and type of each ink, coating, and solvent used at each point of application, including exempt compounds, during the averaging period,

³ A one-time PM compliance demonstration for this equipment was performed on 10/25/2006 and the lb/hr standard could not be exceeded uncontrolled. Therefore there are not monitoring/record keeping or reporting required to show compliance with the lb/hr PM emission standard.

⁴

- 4) The VOC content as applied in each ink, coating and solvent,
 - 5) The date for each application of each ink, coating, and solvent, and
 - 6) Oven temperature.
- iv. The owner or operator shall calculate the weighted average mass of VOC per mass of coating solids applied using the following methodology, unless the District approves in writing an alternative method : (40 CFR 60 Subpart FFF, section 60.583(b))

$$G = \frac{\sum W_{oi}M_{ci}}{\sum W_{ci}M_{si}}$$

Where:

- G** the calculated weighted average mass (lb) of VOC per mass (lb) of coating solids applied during a calendar month
- M_{ci}** the total mass (lb) of each ink and coating (i) applied during a calendar month as determined from the coating manufacturer's formulation data
- W_{oi}** the weight fraction of VOC of each ink and coating (i) applied during the calendar month as determined from the coating manufacturer's formulation data
- W_{si}** the weight fraction of solids of each ink and coating (i) applied during the calendar month as determined from the coating manufacturer's formulation data

b. PM

There are no monitoring or record keeping requirements for Laminator #1.

c. Opacity

- i. The owner or operator shall perform a monthly visual inspection of Laminator #1 and the dust control device to check the structural and mechanical integrity of the system for signs of damage, air leakage, corrosion, or other equipment defects and repair as needed.⁵
- ii. The owner or operator shall maintain records, monthly, of the results of all visual inspections. Records of the results of any visual inspection shall include the date of the survey, the name of the person conducting the survey, whether or not damage was observed, and what, if any, corrective action was performed.

⁵ The visual inspection of the mechanical and structural integrity of Laminator #1 and dust collector will ensure the opacity standard is not exceeded.

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall include the following information in the annual report as required in General Condition 12.

a. VOC

- i. The total plant-wide consecutive 12-month VOC emissions for each month in the reporting period.
- ii. Identification of all periods of exceeding a VOC standard or limit specified in this permit. The report shall include the following:
 - 1) Date and time;
 - 2) Quantity of excess VOC emissions;
 - 3) Description of any corrective action taken for each exceedance including measures taken to minimize the extent and duration of excess emissions; and
 - 4) Measures implemented to prevent reoccurrence of the situation that resulted in excess emissions.
 - 5) If there are no periods of exceeding a VOC standard or limit specified in this permit during a reporting period, the owner or operator shall submit a negative declaration stating that no excess VOC emissions occurred during the reporting period.

b. PM

There are no reporting requirements for Laminator #1.

c. Opacity

- i. For Laminator #1: Any deviation from the requirement to perform and record the results of each monthly visual inspection; and
- ii. The date of each visual inspection where damage was observed and the corrective action that was taken.

Emission Unit U2: Mixer**U2 Description:** Mixing of Adhesive**U2 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
7.08	Standards of Performance for New Process Operations	All
7.25	Standards of Performance for New Source Using Volatile Organic Compounds	All

U2 Equipment

Emission Point ID	Description Make/Model	Maximum Capacity	Applicable Regulation	Control Device (Control ID)	Stack ID	Application Date
E4	Mixer; Littleford Daymax	200 gallons	7.08 and 7.25	C2	F	10/6/2006

U2 Controls

Control ID	Description	Make/Model	Pollutant Controlled
C2	Baghouse Dust Collector	American Air Filter/ Arrestall AV1200	PM

U2 Specific Conditions

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

a. **VOC**

- i. The owner or operator shall not allow or cause plant-wide VOC emissions to equal or exceed 25 tons during any 12-month consecutive period. (Regulation 2.17, sections 5.1 and 5.3)⁶
- ii. For the Adhesive Mixer and any new equipment installed, the owner or operator shall limit the VOC emissions to less than or equal to 5.0 tons per 12 consecutive month period total unless a BACT is approved. (Regulation 7.25, section 3.1)⁷

b. **PM**

- i. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr based on actual operating hours on a calendar day, for the mixer. (Regulation 7.08, section 3.1.2)⁸
- ii. The owner or operator shall operate and maintain the control device at all times the mixer is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards. (Regulation 2.17, section 5.1)

c. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

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

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

⁶ Louisville Facility Koroseal Interior Products is potentially a major source for VOC; however, the company has accepted synthetic minor source emission limits. The source remains subject to a plant-wide emission limit of less than 25 tpy for VOC.

⁷ The potential to emit for this equipment is 1.36 tons per year. Therefore monitoring, record keeping, and reporting are not required to demonstrate compliance with the <5 tpy limit from Regulation 7.25. But, the company will need to calculate the emissions to show compliance with the less than 25 tpy plant wide limit to avoid being subject to the STAR regulations.

⁸ A one-time PM compliance demonstration for this equipment was performed on 6/9/2014 and the lb/hr standard can be exceeded uncontrolled. Therefore, controls must be run to meet the PM lb/hr emission limits.

a. **VOC**

- i. The owner or operator shall monitor and maintain records of the quantity used and VOC content of each VOC containing material during each calendar month and consecutive 12-month period.
- ii. The owner or operator shall, monthly, maintain records, including calculations, which show the total VOC emissions during each consecutive 12-month period.
- iii. Uncontrolled VOC emissions from the mixer shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{VOC (lb)} = \text{Raw material used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)}$$

or

$$\text{VOC (lb)} = \text{Raw material used (gal)} \times \text{VOC content (lb/gal)}$$

b. **PM**

- i. The owner or operator shall, monthly, perform and keep records of a visual inspection of the structural and mechanical integrity of the control device for signs of damage, air leakage, corrosion, etc. and repair as needed.
- ii. The owner or operator shall maintain daily records that identify all periods of bypassing the control device while the mixer is in operation or a declaration entered into the records that the control device operated at all times the mixer was in operation for a given day. The record shall include the following:
 - 1) The date, duration (including start and stop time) of each bypass event;
 - 2) Identification of the control device and process equipment in operation;
 - 3) The total lb/hr of PM emissions during the bypass event;
 - 4) Summary information on the cause or reason for each control device bypass event;
 - 5) Corrective action taken to minimize the extent and duration of each bypass event; and
 - 6) Measures implemented to prevent reoccurrence of the situation that resulted in bypassing the control device.
- iii. Uncontrolled PM emission from the mixer shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{PM (lb)} = \text{solids per batch (770 lb/batch)} \times \text{emission factor (20 lb PM/ton)} \\ / (\text{2000 lb/ton}) \times \text{number of batches (\#batches)}$$

- iv. Controlled PM emission from the mixer shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{PM (lb)} = \text{solids per batch (770 lb/batch)} \times \text{emission factor (20 lb PM/ton)} \\ / (\text{2000 lb/ton}) \times \text{number of batches (\#batches)} \times \text{control efficiency (1 - 0.95)}$$

c. **Opacity**

- i. The owner or operator shall perform a monthly visual inspection of the mixer and baghouse to check the structural and mechanical integrity of the system for signs of damage, air leakage, corrosion, or other equipment defects and repair as needed.⁹
- ii. The owner or operator shall maintain records, monthly, of the results of all visual inspections. Records of the results of any visual inspection shall include the date of the survey, the name of the person conducting the survey, whether or not damage was observed, and what, if any, corrective action was performed.

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

The owner or operator shall include the following information in the annual report as required in General Condition 12.

a. **VOC**

The total plant-wide consecutive 12-month VOC emissions for each month in the reporting period.

b. **PM**

- i. The owner or operator shall identify all periods of exceeding PM lb/hr emission standards during a reporting period. The report shall include the following:
- 1) Emission point ID number;
 - 2) The date and duration (including the start and stop time) during which a deviation occurred;
 - 3) The quantity of excess emissions;

⁹ The visual inspection of the mechanical and structural integrity of the adhesive mixer and filters will ensure the opacity standard is not exceeded.

- 4) Summary information on the cause or reason for excess emissions;
 - 5) Corrective action taken to minimize the extent and duration of each excess emissions event;
 - 6) Measures implemented to prevent reoccurrence of the situation that resulted in excess PM emissions;
 - 7) If no deviations occur during a semi-annual reporting period, the report shall contain a negative declaration
- ii. The owner or operator shall report any deviation from the requirement of performing a monthly visual inspection of the structural and mechanical integrity of the control device.
- c. **Opacity**
- i. Any deviation from the requirement to perform and record the results of each monthly visual inspection; and
 - ii. The date of each visual inspection where damage was observed and the corrective action that was taken.

Fee Comment

On May 15, 2013, the Board approved revisions to Regulation 2.08, which implemented a new fee structure. As a result, Louisville Facility Koroseal Interior Products will be required to pay annual fees.