



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0016-15-F

Plant ID: 0016

Effective Date: 00/00/2014

Expiration Date: 00/00/2019

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:

Anderson Wood Products Company
1381 Beech Street
Louisville, Kentucky 40211

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.: 4744
42737; 64587

Application Received: 3/10/2008
9/9/2008; 4/30/2014

Permit Writer: Randy Schoenbaechler

Date of Public Notice: 09/01/2015

{Manager1}
Air Pollution Control Officer
{date1}

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FEDOOP Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	O-0016-15-F.	X/X/2015	9/01/2015	Initial	Entire Permit	Initial Permit Issuance

Construction Permit History

Permit No.	Issue Date	Description
454-74-C	8/28/1974	One (1) process cyclone (B)
456-74-C	8/28/1974	One (1) process cyclone (C)
458-74-C	8/28/1974	One (1) process cyclone (D)
459-74-C	8/28/1974	Baghouse, Carborundum P.C.D.,model #720 M10
460-74-C	8/28/1974	One (1) process cyclone (F)
620-75-C	11/17/1975	Kewanee Boiler, model #7L289, 15 mmbtu/hr
621-75-C	11/17/1975	Zurn Multiple Cyclone
622-75-C	11/17/1975	Wood Waste Silo
310-76-C	5/5/1976	One (1) truck loading operation to unload wood waste from the silo
189-88-C	12/16/1988	Fabric Filter, make Carter Day,model 72RJ84.
82-89-C	3/30/1989	Spray application of wood stabilizer

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 Plant-Wide**Plant-Wide Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	1 through 9

Plant-Wide Specific Conditions**S1. Standards** (Regulation 2.17, section 5.1)¹**a. PM₁₀**

The owner or operator shall not allow or cause the plant-wide PM₁₀ emissions to equal to exceed 25 tons during any consecutive 12-month period.

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. PM₁₀

The owner or operator shall each month calculate and record the 12 consecutive month plant-wide total PM₁₀ emissions from all emission points by calculating the sum of the 12 consecutive month emission from Unit 1, S2.a.ix; Unit 2, S2.b.v; and Unit 3, S2.a.v; assuming PM = PM₁₀ for Units 1 and 3 unless otherwise approved by the district in writing.

S3. Reporting (Regulation 2.17, section 5.2)

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

a. PM₁₀

The plant-wide 12 consecutive month PM₁₀ emissions for each month in the reporting period.

¹ The Company requested the Plant-Wide PM₁₀ emissions limit of less than 25 tpy to be STAR exempt.

Emission Unit U1: Pneumatic wood waste conveying system which includes four (4) process cyclones (B, C, D, and F) and wood waste storage silo.

U1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, and 5

U1 Equipment:²

Emission Process/ Point ID	Description Make/Model	Applicable Regulation	Control ID	Application Date
E1B	One (1) process cyclone (B)	6.09	C1 & C2	8/15/1974
E1C	One (1) process cyclone (C)	6.09	C1 & C2	8/15/1974
E1D	One (1) process cyclone (D)	6.09	C1 & C2	8/15/1974
E1F	One (1) process cyclone (F)	6.09	C1 & C2	8/15/1974
E1S	One (1) Wood Waste Silo	6.09	C2	11/3/1975

U1 Control Devices:

Control ID	Description	Pollutant Controlled	Performance Indicator
C1	Baghouse Carborundum P.C.D., model #720 M10	PM	VES & Integrity Checks
C2	Fabric Filter make Carter Day, model 72RJ84	PM	VES & Integrity Checks

² 282-08-O incorporated operating permit 451-74, 283-07-O incorporated operating permit 459-74, and 287-07-O incorporated operating permit 189-88.

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. PM/PM₁₀

- i. See Plant-Wide Unit.
- ii. The owner or operator shall not allow PM emissions to exceed 7.09 lb/hr per piece of equipment. (District Permit 189-88-C effective 12/16/88)³
- iii. The owner or operator shall not allow PM emissions to exceed 7.0 tons during any consecutive 12-month period from the conveyance of wood waste to the storage silo. (District Permit 189-88-C effective 12/16/88)

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1)

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.

a. PM/PM₁₀

- i. See Plant-Wide Unit.
- ii. The owner or operator shall each month record the hours of operation of the Carter day dust collector system during the previous month.
- iii. The owner or operator shall each month make a record of the amount in pounds of sawdust unloaded from the wood waste silo for the previous month.
- iv. The owner or operator shall each month calculate the combined controlled PM emissions from conveyance for the previous month using the following method unless an alternative method is approved in writing by the District:

Controlled PM Emissions (lbs) = Amount in pounds unloaded from the silo for the month * 0.000016 lb_{PM}/lb_{sawdust}

Where: 0.000016 equals the assumed PM emission loss based on AP-42, 10.9-7

- v. If there is any time that the control device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:
 - 1) Date;
 - 2) Start time and stop time;
 - 3) Identification of the control device and process equipment;

³ Based on compliance demonstration dated June 26, 2006 the PM lb/hr limit can be exceeded for the conveyance system without control.

- 4) PM emissions during the bypass in lb/hr;
 - 5) Summary of the cause or reason for each bypass event;
 - 6) Corrective action taken to minimize the extent or duration of the bypass event; and
Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.
- vi. If a bypass or malfunction of a baghouse occurs then the owner or operator shall calculate total and hourly uncontrolled emissions using the following methodology unless an alternative method is approved in writing by the District:
- 1) Determine the pound per hour controlled PM emissions by dividing the Controlled Emissions (S2.a.iv) by the hours of operation of the Carter day dust collector system (S2.a.ii) for that previous month.
 - 2) Determine the hourly uncontrolled PM emissions during bypass or malfunction by the following methodology unless an alternative method is approved in writing by the District:

$$\text{Hourly Uncontrolled PM Emissions lb/hr} = \text{Hourly Controlled PM Emissions lb/hr (S2.a.vi.1)} / (1-0.99)$$

Where: 99% is the assumed control efficiency used in AP-42, 10.9-7.
 - 3) Determine the total uncontrolled PM emissions during bypass or malfunction by using the following methodology unless an alternative method is approved in writing by the District:

$$\text{Total Uncontrolled PM Emissions (lbs)} = \text{Hourly Uncontrolled PM Emissions (lb/hr) (S2.a.vi.2)} * \text{duration of the bypass or malfunction (hours)}$$
- vii. The owner or operator shall calculate the Total PM emissions from controlled and uncontrolled emissions for each month.
- viii. The owner or operator shall each month calculate the previous 12 consecutive month rolling total emissions for the conveyance system using the results of the calculations from S2.a.vii.
- ix. The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of the conveying system and dust collectors for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

b. Opacity

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of all the emission points. No more than four emission processes/points shall be observed

simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

- ii. At emissions points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, 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 process/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 in accordance with General Condition 12.

a. PM/PM₁₀

- i. See Plant-Wide Unit.
- ii. The owner or operator shall clearly identify all deviations from permit requirements in the annual report and include the following information regarding the visual inspections of structural and mechanical integrity:
 - 1) Emission unit ID number and emission process/point ID number;
 - 2) The date and description of any actions taken to repair the structural and mechanical integrity; or
 - 3) A negative declaration if no repairs were needed.
- iii. The owner or operator shall report the following information regarding PM By-Pass Activity in the annual compliance reports.
 - 1) Number of times the PM vent stream by-passes the control device and is vented to the atmosphere;
 - 2) Duration of each by-pass to the atmosphere;
 - 3) Calculated pound per hour PM emissions for each by-pass; or
 - 4) A negative declaration if no by-passes occurred.
- iv. The owner or operator shall report the monthly tons and 12 consecutive months rolling totals for each month in the reporting period for PM₁₀ from the Unit 1 Pneumatic conveyance system in the annual report.

b. Opacity

- i. Identification of all times visible emissions were observed;

- ii. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- iii. Description of any corrective action taken for each exceedance.
- iv. A negative declaration if no deviation occurs during the reporting period.

Emission Unit U2: Wood-fired boiler

U2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.07	Standards of Performance for Existing Indirect Heat Exchangers	1 through 4
40 CFR 63 Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	63.11196, 63.11201, 63.11205, 63.11214, 63.11223, & 63.11225

U2 Equipment:⁴

Emission Process/ Point ID	Description Make/Model	Applicable Regulation	Control ID	Application Date
E2A	One (1) wood fired boiler 13.3 MMBtu/hr, make Kewanee, model 7L289	6.07 & 40 CFR 63 Subpart JJJJJ	C3	11/3/1975

U2 Control Devices:

Control ID	Description	Pollutant Controlled	Performance Indicator
C3	Multiple Cyclone Flow 8600 cfm, make Zurn, model MTSA-15-9CYT-STD	PM	VE & Integrity Checks

⁴ 284-07-O incorporated operating permit 620-75, and 285-07-O incorporated operating permit 621-75.

U2 Specific Conditions**S1. Standards** (Regulation 2.17, section 5.1)**a. SO₂**

The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 3.59 pounds per million BTU actual total heat input for combustion of liquid and gaseous fuels. (Regulation 6.07, section 4.1)⁵

b. PM/PM₁₀

i. See Plant-Wide Unit.

ii. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility particular matter in excess of 0.52 pounds per million BTU actual total heat input. (Regulation 6.07, Section 3.1)⁵

c. Opacity

The owner or operator shall not cause the emission into the open air of particulate matter from any indirect heat exchanger which is greater than 20% opacity except:

Emissions into the open air of particulate matter from any indirect heat exchanger during building a new fire, cleaning the fire box, or blowing soot for a period or periods aggregating not more than ten minutes in any 60 minutes which are less than 40% opacity. (Regulation 6.07, section 3.2 through 3.3.1)

d. HAP

i. In accordance with 40 CFR 63 Subpart JJJJJJ:

You must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. (40 CFR 63.11201(b))

ii. Table 2 to Subpart JJJJJJ of Part 63 —Work Practice Standards, Emission Reduction Measures, and Management Practices

As stated in 40 CFR 63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:

⁵ A one-time PM and SO₂ compliance demonstration was performed for the boiler, using AP-42 emission factors and combusting wood waste, and the emission standards cannot be exceeded.

If your boiler is in this subcategory . . .	You must meet the following . . .
6. Existing biomass-fired boilers that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in 40 CFR 63.11214, and conduct a tune-up of the boiler biennially as specified in 40 CFR 63.11223.
16. Existing coal-fired, biomass-fired, or oil-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limited-use boilers	<p>Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in 40 CFR 63.11237:</p> <p>(1) A visual inspection of the boiler system,</p> <p>(2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,</p> <p>(3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator,</p> <p>(4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,</p> <p>(5) A list of major energy conservation measures that are within the facility's control,</p> <p>(6) A list of the energy savings potential of the energy conservation measures identified, and</p> <p>(7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.</p>

- iii. At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for

minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.11205(a))

- iv. If you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, you must conduct a performance tune-up according to 40 CFR 63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler. (40 CFR 63.11214(b))
- v. If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014. (40 CFR 63.11196(a)(1)) (Agreed Board Order 15-05, to be adopted on 9/16/2015 requires Anderson Wood to complete the initial performance tune-up no later than September 30, 2015)
- vi. For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in 40 CFR 63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. (40 CFR 63.11223(a))
- vii. Except as specified in paragraphs (c) through (f) of this section, you must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this section. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler. (40 CFR 63.11223(b))
 - 1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.11223(b)(1))
 - 2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be

- consistent with the manufacturer's specifications, if available. (40 CFR 63.11223(b)(2))
- 3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.11223(b)(3))
 - 4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. (40 CFR 63.11223(b)(4))
 - 5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.11223(b)(5))
 - 6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section. (40 CFR 63.11223(b)(6))
 - (a) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. (40 CFR 63.11223(b)(6)(i))
 - (b) A description of any corrective actions taken as a part of the tune-up of the boiler. (40 CFR 63.11223(b)(6)(ii))
 - (c) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. (40 CFR 63.11223(b)(6)(iii))
 - 7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. (40 CFR 63.11223(b)(7))
- viii. If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, you must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to this subpart and is an accurate depiction of your facility. (40 CFR 63.11214(c))

- ix. If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014. (40 CFR 63.11196(a)(3)) (Agreed Board Order 15-05, to be adopted on 9/16/2015 requires Anderson Wood to complete the energy assessment no later than September 30, 2015)

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. **SO₂**

There are no monitoring requirements for SO₂ compliance.

b. **PM/PM₁₀**

i. See Plant-Wide Unit.

ii. The owner or operator shall monthly perform 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. The owner or operator shall maintain monthly records of the results.

iii. The owner or operator shall monthly record the hours of operation of the boiler for the previous month.

iv. The owner or operator shall monthly calculate the PM₁₀ emissions from the boiler using the following methodology:

$$\text{Boiler emissions (lbs of PM}_{10}\text{)} = \text{hours of operation} * 13.3 \text{ MMBtu/hr} * 0.36 \text{ lb/MMBtu} / 2000$$

Where 13.3 MMBtu/hr is the rating of the boiler,
2000 is the amount of pounds per ton, and
0.36 lb/MMBtu is the emission factor for PM₁₀ per AP-42

v. The owner or operator shall monthly calculate the previous 12 consecutive month rolling total for PM₁₀ using the results of S2.b.iv.

c. **Opacity**

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

ii. At emissions points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall

perform or cause to be performed a Method 9, 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 process/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.

d. **HAP**

- i. In accordance with 40 CFR 63 Subpart JJJJJ:

You must maintain the records specified in paragraphs (c)(1), (2), (4), and (5) of this section. (40 CFR 63.11225(c))

- 1) As required in 40 CFR 63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted. (40 CFR 63.11225(c)(1))
- 2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR 63.11214 and 40 CFR 63.11223 as specified in paragraphs (c)(2)(i) and (iii) of this section. (40 CFR 63.11225(c)(2))
 - (a) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. (40 CFR 63.11225(c)(2)(i))
 - (b) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report. (40 CFR 63.11225(c)(2)(iii))
- 3) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. (40 CFR 63.11225(c)(4))
- 4) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), including corrective

actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. (40 CFR 63.11225(c)(5))

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

a. **SO₂**

There are no reporting requirements for SO₂ compliance.

b. **PM/PM₁₀**

i. See Plant-Wide Unit.

ii. The owner or operator shall clearly identify all deviations from permit requirements in the annual report and include the following information regarding the visual inspections of structural and mechanical integrity:

- 1) Emission unit ID number and emission process/point ID number;
- 2) The date and description of any actions taken to repair the structural and mechanical integrity; or
- 3) A negative declaration if no repairs were needed.

c. **Opacity**

i. Identification of all times visible emissions were observed;

ii. The date, time, and results of each Method 9 that exceeded the opacity standard; and

iii. Description of any corrective action taken for each exceedance.

iv. A negative declaration if no deviation occurs during the reporting period.

d. **HAP**

i. In accordance with 40 CFR 63 Subpart JJJJJJ:

You must submit the notifications specified in paragraphs (a)(1) through (4) of this section to the administrator. 63.11225(a)

1) You must submit all of the notifications in 40 CFR 63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section. 63.11225(a)(1)

2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.⁶ 63.11225(a)(2)

3) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in 40

⁶ The initial notification was received on 3/23/2015.

CFR 63.11196 unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official. 63.11225(a)(4)

- (a) You must submit the information required in 40 CFR 63.9(h)(2), except the information listed in 40 CFR 63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in 40 CFR 63.13. 63.11225(a)(4)(i)
- (b) “This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler.” 63.11225(a)(4)(ii)
- (c) “This facility has had an energy assessment performed according to 40 CFR 63.11214(c).” 63.11225(a)(4)(iii)
- (d) For units that install bag leak detection systems: “This facility complies with the requirements in 40 CFR 63.11224(f).” 63.11225(a)(4)(iv)
- (e) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.” 63.11225(a)(4)(v)
- (f) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA’s Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13. 63.11225(a)(4)(vi)

EPA Region IV
 Director, Air, Pesticides and Toxics Management Division
 Atlanta Federal Center
 61 Forsyth Street
 Atlanta, GA 30303-3104
 63.13(a)

- ii. All information required to be submitted to the Administrator under this part also shall be submitted to the appropriate State agency of any State to which authority has been delegated under section 112(l) of the Act. The owner or operator of an affected source may contact the appropriate EPA Regional Office for the mailing addresses for those States whose delegation requests have been approved 63.13(b)⁷
- iii. You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to 40 CFR 63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section. 63.11225(b)
 - 1) Company name and address. 63.11225(b)(1)
 - 2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official: 63.11225(b)(2)
 - (A) “This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler.” 63.11225(b)(2)(i)
 - (B) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.” 63.11225(b)(2)(ii)
 - (C) “This facility complies with the requirement in 40 CFR 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups

⁷ The Louisville Metro APCD is the delegated authority to which the information should be sent in addition to the Region IV office in Atlanta Georgia.

and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available." 63.11225(b)(2)(iii)

- (ii) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. 63.11225(b)(3)

Emission Unit U3: One (1) truck loading operation to unload wood waste from the silo.

U3 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, and 5

U3 Equipment:

Emission Process/ Point ID	Description Make/Model	Applicable Regulation	Control ID	Application Date
E3A	One (1) Screw Conveyor	6.09	N/A	6/6/1975
E3B	One (1) Cleated Belt Conveyor	6.09	N/A	6/6/1975

U3 Control Device:

N/A

U3 Specific Conditions

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

a. **PM/PM₁₀**

- i. See Plant-Wide Unit.
- ii. The owner or operator shall not allow PM emissions to exceed 13.36 lb /hr for each emission point (E3A and E3B). (Regulation 6.09, section 3.2)⁸

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1)

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.

a. **PM/PM₁₀**

- i. See Plant-Wide Unit.
- ii. The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of conveyors E3A and E3B for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.
- iii. The owner or operator shall monthly record the amount in pounds of saw dust loaded in to trucks from the wood waste storage silo for the previous month.
- iv. The owner or operator shall monthly calculate the PM₁₀ emissions from the truck load out process using the following methodology unless an alternative method is approved by the District:

$$\text{Truck Loading emissions (lb PM}_{10}\text{/month)} = (\text{Saw dust loaded into trucks (lb/month)} / 2000 \text{ lb/ton}) * 0.034 \text{ lb/ton}$$

Where 2000 is the conversion factor for pounds to tons, and
0.034 lb/ton is the emission factor for PM₁₀ per AP-42, 9.9-1

- v. The owner or operator shall monthly calculate the previous 12 consecutive month rolling total of PM₁₀ using the results of S2.a.iv.

b. **Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the E3A and E3B emission

⁸ Based on a truck loading throughput of 5.83 ton/hr and AP-42, 9.9-1 emission factor of 0.061 lb/ton for PM the District Regulation 6.09 emission limit of 13.36 lb/hr cannot be exceeded uncontrolled.

points. No more than four emission processes/points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

- ii. At emissions points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, 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 process/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)

a. PM/PM₁₀

- i. See Plant-Wide Unit.
- ii. The owner or operator shall clearly identify all deviations from permit requirements in the annual report and include the following information regarding the visual inspections of structural and mechanical integrity:
 - 1) Emission unit ID number and emission process/point ID number;
 - 2) The date and description of any actions taken to repair the structural and mechanical integrity; or
 - 3) A negative declaration if no repairs were needed.

b. Opacity

- i. Identification of all times visible emissions were observed;
- ii. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- iii. Description of any corrective action taken for each exceedance.
- iv. A negative declaration if no deviation occurs during the reporting period.

Emission Unit U4: Spray application of wood stabilizer

U4 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.24	Standards of Performance for Existing Sources Using Organic Materials	1, 2.4, 3.3, and 4

U4 Equipment:⁹

Emission Process/ Point ID	Description Make/Model	Applicable Regulation	Control ID	Application Date
E4A	One (1) wood stabilizer spray	6.24	N/A	3/29/1989 ¹⁰

U4 Control Device:

N/A

⁹ 288-07-O incorporated operating permit 82-89.

¹⁰ The process began prior to June 1979 and is therefore subject to District Regulation 6.24.

U4 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

- i. The owner or operator shall neither discharge into the atmosphere more than three thousand (3000) pounds of organic materials in any one day, nor more than four hundred and fifty (450) pounds in any one hour. Unless the discharge has been reduced by at least 85% by weight, the owner or operator shall not exceed the daily and hourly limits for any Class III solvents of any material containing each such solvent that is employed or applied at this facility. (Regulation 6.24, Section 3.3)¹¹
- ii. The owner or operator shall not exceed 6.4 lbs of VOC per hour. (District Permit 82-89-C effective 3/30/89)¹²
- iii. The owner or operator shall not exceed 6.4 tons of VOC per year. (District Permit 82-89-C effective 3/30/89)¹³

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 of operator shall monthly record the volume of wood stabilizer sprayed.
- ii. If the owner or operator sprays more than 150 gallons of Wood stabilizer per month the owner shall calculate and record the monthly and 12 consecutive month rolling total of VOC emissions for each month from the spraying of wood stabilizer.

S3. Reporting (Regulation 2.17, section 5.2)

a. VOC

The owner or operator shall report the following information regarding the spray application of wood stabilizer:

- 1) Identification of any deviation from permit limits;
- 2) The total amount of emissions of VOC in tons for each month in the reporting period;
- 3) The total amount of emissions of VOC in tons of the 12 consecutive month period for each month in the reporting period;

¹¹ A one-time VOC compliance demonstration was performed for this equipment and the lb/hr and lb/day standard from District Regulation 6.24 cannot be exceeded uncontrolled.

¹² The VOC lb/hr limit from Construction Permit 82-89-C cannot be exceeded.

¹³ The VOC tpy limit from Construction Permit 82-89-C can be exceeded; therefore, monitoring, record keeping, and reporting are required.

- 4) The reason for any exceedance of any permit limits and corrective actions implemented to prevent the reoccurrence of any exceedance.

Emission Unit U5: Cold Solvent Vapor Degreaser not equipped with a secondary reservoir.

U5 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1 through 4

U5 Equipment:¹⁴

Emission Process/ Point ID	Description Make/Model	Applicable Regulation	Control ID	Application Date
E5A	One (1) cold solvent vapor degreaser not equipped with a secondary reservoir	6.18	N/A	8/30/2002

U5 Control Devices:

N/A

¹⁴ 289-07-O incorporated operating permit 219-02.

U5 Specific Conditions**S1. Standards** (Regulation 2.17, section 5.1)**a. VOC**

- i. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
 - 1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with one hand. (Regulation 6.18, section 4.1.1)
 - 2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
 - 3) A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.b. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
 - 4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
 - 5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)
 - 6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- ii. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)
 - 1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)

- 2) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)
 - 3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
 - 4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
 - 5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)
 - 6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)
 - 7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)
- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20 °C (68 °F). (Regulation 6.18, section 4.3.2)

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 conduct monthly inspections to verify compliance with the control and operational requirements specified in Specific Condition S1.
- ii. The owner or operator shall monthly maintain records of the results of the inspections specified in Specific Condition S2.i.
- iii. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)
 - 1) The name and address of the solvent supplier,
 - 2) The date of the purchase,
 - 3) The type of the solvent, and
 - 4) The vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

- iv. All records shall be retained for 5 years and made available to the District upon request. (Regulation 6.18, section 4.4.3)

S3. Reporting (Regulation 2.17, section 5.2)

a. **VOC**

- i. Emission Unit ID number and emission point ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Any deviation from the control and operational requirements specified in Specific Condition S1.
- iv. If no deviations occur during a semi-annual reporting period, the report shall contain a negative declaration.

Insignificant Activities

Description	Quantity	PTE	Basis																		
Internal combustion engines fixed or mobile	11	<table border="1"> <tr><td>NOx</td><td>0.45</td></tr> <tr><td>CO</td><td>0.09</td></tr> <tr><td>PM</td><td>0.06</td></tr> <tr><td>PM10</td><td>0.02</td></tr> <tr><td>SO2</td><td>1.48</td></tr> <tr><td>VOC</td><td>0.004</td></tr> <tr><td>Total HAP</td><td>0.003</td></tr> </table> <p>In tpy For largest 240 hp engine</p>	NOx	0.45	CO	0.09	PM	0.06	PM10	0.02	SO2	1.48	VOC	0.004	Total HAP	0.003	Regulation 1.02 Appendix A				
NOx	0.45																				
CO	0.09																				
PM	0.06																				
PM10	0.02																				
SO2	1.48																				
VOC	0.004																				
Total HAP	0.003																				
Brazing, Soldering, or Welding Equipment	2	<1 tpy material usage reported by company	Regulation 1.02 Appendix A																		
Woodworking except for conveying hogging or burning wood/sawdust	102	Accounted for in conveyance unit	Regulation 1.02 Appendix A																		
Emergency relief vents or ventilating systems (not otherwise regulated)	1	~ 0 tpy	Regulation 1.02 Appendix A																		
Diesel Storage Tank	1	<1 tpy	Regulation 1.02 Appendix A																		
Boiler (1.26 MMBTU Natural Gas)	1	<table border="1"> <tr><td>NOx</td><td>0.54</td></tr> <tr><td>CO</td><td>0.45</td></tr> <tr><td>PM</td><td>0.04</td></tr> <tr><td>PM10</td><td>0.04</td></tr> <tr><td>SO2</td><td>0.00</td></tr> <tr><td>VOC</td><td>0.03</td></tr> <tr><td>Lead</td><td>2.71E-06</td></tr> <tr><td>Ammonia (NH3)</td><td>0.02</td></tr> <tr><td>Total HAP</td><td>0.010</td></tr> </table> <p>tpy</p>	NOx	0.54	CO	0.45	PM	0.04	PM10	0.04	SO2	0.00	VOC	0.03	Lead	2.71E-06	Ammonia (NH3)	0.02	Total HAP	0.010	Regulation 1.02 Appendix A
NOx	0.54																				
CO	0.45																				
PM	0.04																				
PM10	0.04																				
SO2	0.00																				
VOC	0.03																				
Lead	2.71E-06																				
Ammonia (NH3)	0.02																				
Total HAP	0.010																				

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
- 3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

- 5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
- 6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Fee Comment

The initial permit issuance fee of \$3,099.10 is based on the Schedule of Fees table in Regulation 2.08, section 12: FEDOOP Initial Permit Issuance (\$2,582.58), and NESHAP Review (\$516.52).

Attachment A - 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.