

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
18 November 2015

Federally Enforceable District Origin Operating Permit
Statement of Basis

Company: Service Welding & Machine Co. LLC

Plant Location: 700 E. Main Street & 175 N. Wenzel Street; Louisville, Kentucky 40202 & 40206

Date Application Received: 04/21/2008; 09/16/2008; 02/16/2010; 04/03/2014

Date of Draft Permit: 18 November 2015

District Engineer: Eva Addison

Permit No: O-0481-15-F

Plant ID: 0481 **SIC Code:** 3443

NAICS: 33242

Introduction:

This permit will be issued pursuant to District Regulation 2.17- *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for the 1997 standard for particulate matter less than 2.5 microns (PM_{2.5}), unclassifiable for the 2012 standard for particulate matter less than 2.5 micron (PM_{2.5}) and partial non-attainment area for sulfur dioxide (SO₂).

Application Type/Permit Activity:

- Initial Issuance
- Permit Revision
 - Administrative
 - Minor
 - Significant
- Permit Renewal

Compliance Summary:

- Compliance certification signed
- Source is out of compliance
- Compliance schedule included
- Source is operating in compliance

I. Source Information

1. **Product Description:** Fabrication and surface coating of steel storage tanks.
2. **Process Description:** At the 700 E. Main Street location: Spray paint booth for surface coating steel storage tanks with primer, acrylic enamel, urethane, and epoxy coating. Abrasive cleaning using steel shot for blasting media. Welding and machining in the fabrication of the tanks. At the 175 N. Wenzel location: Surface coating of steel storage tanks with fiberglass resin using styrene as the monomer. Abrasive cleaning using coal slag (black beauty) for blasting media.
3. **Site Determination:** The District has determined that the two plants (700 E. Main Street and 175 N. Wenzel Street) are a single source for purposes of determining Major Source applicability based on the criteria established by the USEPA.

USEPA used the following criteria for single source determination for Major Sources. A source must meet all three criterial.

- Same Industrial Grouping (same first two digit SIC code) and,
- Common ownership or control, and
- Contiguous or Adjacent

Both plants meet all three criteria.

4. Emission Unit Summary:

Emission Unit	Equipment Description
U1	One (1) Venus HIS fiberglass chop spray system for coating exterior of steel tanks. System uses chopped fiberglass material with a polyester resin containing styrene monomer; One (1) ALC Sandy Jet sandblaster, model F-100-DM
U2	One (1) Paint Room with five (5) spray gun, Graco, for applying paint and epoxy to steel tanks; One (1) Abrasive Blast Room, Hoffman/ Schmidt, model # 0411-127-10, 6.5 cubic ft, two (2) nozzles using steel grit abrasive, for removing welding slag and surface rust from new steel.
U3	Twenty-three (23) Welding equipment; Ten (10) Machining equipment
U4	One (1) 500 gallon aboveground Diesel storage tank
U5	One (1) 550 gallon underground Gasoline storage tank with refueling pump

Emission Unit	Equipment Description
UIA-1	Two (2) Plasma Cutting Tables

- 5. **Fugitive Sources:** The fugitive sources identified by the source are welding and machining equipment.
- 6. **Permit Revisions:**

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	134-03-F.	07/30/2003	06/08/2003	Initial	Entire Permit	Initial Permit Issuance for Plant ID 481 (175 N. Wenzel St.)
Initial	136-03-F	07/30/2003	06/08/2006	Initial	Entire Permit	Initial Permit Issuance for Plant ID 707 (700 E. Main St)
N/A	O-0481-15-F	0x/0x/2015	11/18/2015	Renewal	Entire Permit	Scheduled permit renewal; Combining FEDOOP permits for ID 481 & 707 into one permit; and adding insignificant activities for ID 707

7. **Construction Permit History:**

Permit No.	Issue Date	Description
141-98-C(R1) for 175 N Wenzel Street	5/31/2010	One (1) Venus HIS fiberglass chop spray system for coating exterior of steel tanks. System uses chopped fiberglass material with a polyester resin containing styrene monomer
4-80-C(R1) for 700 E Main Street	5/31/2010	One (1) Paint Room with five (5) spray gun, Graco, for applying paint and epoxy to steel tanks

8. Emission Summary:

Pollutant	District Calculated Actual Emissions (tn/yr) 2009 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	0	No
NO_x	0	No
SO₂	0	No
PM₁₀	1.55	Yes
VOC	8.56	No
Total HAPs	6.65	Yes
Single HAP (Xylene)	2.775	Yes
Single HAP (Styrene)	3.61	Yes

9. Applicable Requirements:

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

10. MACT Requirements:

40 CFR 63 Subpart XXXXXX National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

11. Referenced Non-MACT Federal Regulations in Permit: None

II. Regulatory Analysis

- 1. Acid Rain Requirements:** Service Welding & Machine Co. LLC is not subject to the Acid Rain Program.
- 2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. Service Welding & Machine Co. LLC does not manufacture, sell, or distribute any of the listed chemicals. The source’s use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
- 3. Prevention of Accidental Releases 112(r):** Service Welding & Machine Co. LLC does not manufacture, process, use, store, or otherwise handle one or more of the

regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.

4. **40 CFR Part 64 Applicability Determination:** Service Welding & Machine Co. LLC is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*.

5. **Basis of Regulation Applicability**

- a. **Plant-wide**

Service Welding & Machine Co. LLC is a potential major source for the pollutant PM₁₀, total HAPs and single HAP. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements. The source requested limits of the criteria pollutants VOC <25 and PM₁₀ < 25 tn/yr, and Total HAPs < 12.5 tn/yr and largest single HAP < 5.0 tn/yr, to be a FEDOOP STAR Exempt source as defined by Regulation 5.00, section 1.13.5. The source is not major for Greenhouse Gases.

Regulations 5.00 5.20, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. Service Welding & Machine Co. LLC took the total plantwide limits of 25 tpy for criteria pollutants 12.5/5.0 tpy for Total HAPs and single HAP to be a FEDOOP STAR Exempt source

Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued shall submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an Annual Compliance Report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

- b. **Emission Unit U1** – One (1) Venus HIS fiberglass chop spray system and One (1) ALC Sandy Jet sandblaster

- i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E1: One (1) Venus HIS fiberglass chop spray system for coating exterior of steel tanks. System uses chopped fiberglass material with a polyester resin containing styrene monomer	426 lb/hr	1991	7.08 & 7.25	Regulation 7.08 establishes the requirements for PM emissions from new processes that commence construction after September 1, 1976. Regulation 7.25 provides for the control of emissions of volatile organic compounds from new (built after December 16, 1987) sources.
E2: One (1) ALC Sandy Jet sandblaster, model F-100-DM	100 lb/hr	1991	7.08 & 40 CFR63 Subpart 6X	Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the requirements for HAP emissions for a source primarily engaged in one of nine process categories.

- ii. **Standards/Operating Limits**

- 1) **PM/PM₁₀**

- (a) For emission points E1 and E2: The emission standard for PM for the equipment in this Emission Unit is determined in accordance with Regulation 7.08, Table 1. Since the capacity of the equipment is less than 1,000 lb/hr, the PM emission standard is 2.34 lb/hr.
 - (b) For emission point E2: The District has performed a one-time PM compliance demonstration and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

2) Opacity

- (a) For emission points E1 and E2: Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%, for processes that commenced construction after September 1, 1976.

3) VOC

- (a) For emission points E1: Per Regulation 7.25, VOC emissions from the mixer and any new equipment shall be limited to less than 5.0 tons per 12 consecutive month period. (A BACT determination is required to be performed for any future construction/modification subject to Regulation 7.25 for any emissions outside of the 5 tpy limit.)

4) HAP

- (a) For emission point E2: Regulation 40 CFR 63, subpart XXXXXX establishes management practices to be implemented by the source

iii. Monitoring and Recordkeeping**1) Opacity**

- (a) For emission point E2: Federal Regulation 40 CFR part 63, subpart XXXXXX includes the requirements to meet the opacity standards.

2) HAP

- (a) For emission point E2: Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the requirements that must be met to ensure compliance.

iv. Reporting**1) Opacity**

- (a) For emission point E2: Federal Regulation 40 CFR part 63, subpart XXXXXX includes the reporting requirements for opacity.

2) **HAP**

- (a) For emission point E2: Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the reporting requirements.

c. **Emission Unit U2 – One (1) Paint Room and One (1) Abrasive Blast Room**

i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E3: One (1) Paint Room with five (5) spray gun, Graco, for applying paint and epoxy to steel tanks	6 gal/hr	1980	6.09 & 6.31	Regulation 6.09 establishes the requirements for PM emissions from existing processes that commence construction before September 1, 1976. Regulation 6.31 establishes the requirements for VOC emissions from existing processes that commence construction before May 20, 1981
E4: One (1) Abrasive Blast Room, Hoffman/ Schmidt, model # 0411-127-10, 6.5 cubic ft, two (2) nozzles using steel grit abrasive, for removing welding slag and surface rust from new steel.	8000 lb/hr	1996	7.08 & 40 CFR63 Subpart 6X	Regulation 7.08 establishes the requirements for PM emissions from new processes that commence construction after September 1, 1976. Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the requirements for HAP emissions for a source primarily engaged in one of nine process categories.

ii. **Standards/Operating Limits**

1) **PM/PM₁₀**

- (a) The emission standard for PM for the paint room (E3) with a process throughput of less than 30 tons/hr is determined in accordance with Regulation 6.09, section 3.2 as follows:

$$PM \text{ lb/hr limit} = 4.10 * (\text{process weight tons/hr})^{0.67}$$

- (b) The emission standard for PM for the abrasive blast room (E4) with a process throughput of less than 30

tons/hr is determined in accordance with Regulation 7.08, section 3.1.2 as follows:

$$\text{PM lb/hr limit} = 3.59 * (\text{process weight tons/hr})^{0.62}$$

2) **Opacity**

- (a) For emission points E3 and E4: Regulations 6.09, section 3.1, and 7.08, section 3.1.1 establishes an opacity standard of less than 20%, for processes that commenced construction before and after September 1, 1976.

3) **VOC**

- (a) For emission point E3: Regulation 6.31, section 3.1 specifies VOC content limits for all coatings used in the paint booths.

4) **HAP**

- (a) For emission point E4: Regulation 40 CFR 63, subpart XXXXXX establishes management practices to be implemented by the source

iii. **Monitoring and Recordkeeping**

1) **Opacity**

- (a) For emission point E4: Federal Regulation 40 CFR part 63, subpart XXXXXX includes the requirements to perform visual determinations of fugitive emissions (Method 22).

2) **VOC**

- (a) For emission point E3: Regulation 6.31, section 6.1 and section 6.2 require the permit to include monitoring and recordkeeping requirements to ensure compliance with the terms and conditions of the permit. The owner or operator shall maintain records monthly of the required monitoring and recordkeeping.

3) **HAP**

- (a) For emission point E4: Regulation 40 CFR 63, subpart XXXXXX includes requirements to demonstrate compliance with the management practices.

iv. **Reporting**

1) **Opacity**

- (a) For emission point E4: Federal Regulation 40 CFR part 63, subpart XXXXXX includes the reporting requirements for opacity.

2) **HAP**

- (a) For emission point E4: Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the reporting requirements.

d. **Emission Unit U3 – Twenty-three (23) Welding equipment; Ten (10) Machining equipment**

i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E6: Twenty-three (23) Welding Machines	N/A	After 1976	7.08 & 40 CFR63 Subpart 6X	Regulation 7.08 establishes the requirements for PM emissions from new processes that commence construction after September 1, 1976.
E-7: Ten (10) Machining Equipment	N/A	After 1976		Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the requirements for HAP emissions for a source primarily engaged in one of nine process categories.

ii. **Standards/Operating Limits**

1) **PM/PM₁₀**

- (a) The emission standard for PM for the equipment in this Emission Unit is determined in accordance with Regulation 7.08, Table 1. Since the capacity of the

equipment is less than 1,000 lb/hr, the PM emission standard is 2.34 lb/hr.

- (b) The District has performed a one-time PM compliance demonstration and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

2) **Opacity**

- (a) Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%, for processes that commenced construction after September 1, 1976.

3) **HAP**

- (a) For emission points E6 and E7: Regulation 40 CFR 63, subpart XXXXXX establishes management practices to be implemented by the source

iii. **Monitoring and Recordkeeping**

1) **Opacity**

- (a) For emission points E6 and E7: Federal Regulation 40 CFR part 63, subpart XXXXXX includes the requirements to perform visual determinations of fugitive emissions (Method 22).

2) **HAP**

- (a) For emission points E6 and E7: Regulation 40 CFR 63, subpart XXXXXX includes requirements to demonstrate compliance with the management practices.

iv. **Reporting**

1) **Opacity**

- (a) For emission points E6 and E7: Federal Regulation 40 CFR part 63, subpart XXXXXX includes the reporting requirements for opacity.

2) **HAP**

- (a) For emission points E6 and E7: Federal Regulation 40 CFR part 63, subpart XXXXXX establishes the reporting requirements.

e. **Emission Unit U4** – One (1) 500 gallon aboveground Diesel storage tank

i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E8: One (1) 500 gallon aboveground Diesel storage tank	500 gallon	After 1972	7.12	Regulation 7.12 establishes the equipment requirements for VOC emissions from new processes that commence construction after April 19, 1972.

ii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 7.12, section 3 establishes VOC equipment requirements, for processes that commenced construction after April 19, 1976.

f. **Emission Unit U5** – One (1) 550 gallon underground Gasoline storage tank with refueling pump

i. **Equipment:**

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E9: One (1) 550 gallon underground Gasoline storage tank with refueling pump	550 gallon	After 1972	7.15	Regulation 7.15 establishes the equipment requirements for VOC emissions from new processes that commence construction after June 13, 1979.

ii. **Standards/Operating Limits**

1) **VOC**

- (a) Regulation 7.15, section 3 establishes VOC equipment requirements, for processes that commenced construction after June 13, 1979.

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request any operation flexibility.
5. **Compliance History:**

Incid. #	Date	Regulation Violated	Settlement
02072	7/29/1999	Reg. 1.14, section 2.1, Failure to control fugitive emissions of particulate matter that traveled beyond property boundaries.	Agreement with fine
06729	1/28/2015	Reg. 2.17, section 3.1. Failure to comply with FEDOOP Permit.	Agreement with Fine

6. Calculation Methodology or Other Approved Method:

a. For PM₁₀:

- i. The uncontrolled PM/PM₁₀ emissions during the bypass period shall be calculated using the following equations unless another method is approved in writing by the District:

(a) Paint booth (700 E. Main):

PM (ton) = (paint usage, gal) (paint density, lb/gal) (solid content, %) (1- transfer efficiency, 65%)/ (2000, lb/ton)

$$PM_{10} = PM$$

(b) Abrasive blast room (700 E. Main):

PM (ton) = (operating time, hr) (capacity, 11,760 lb abrasive/hr)(emission factor, 6.48 lb/ 1000 lb abrasive)/ (2000, lb/ton)

PM₁₀ (ton) = (operating time, hr)(capacity, 11,760 lb abrasive/hr)(emission factor, 3.12 lb/ 1000 lb abrasive)/ (2000, lb/ton)

(c) Venus HIS fiberglass chop spray system (175 N. Wenzel):

$PM \text{ (ton)} = (\text{resin usage, lbs}) (10\% \text{ solid}) (1 - \text{transfer efficiency, } 65\%) / (2000, \text{ lb/ton})$

$PM_{10} = PM$

- (d) For the paint booth (located at 700 E. Main), the abrasive blast room (located at 700 E. Main), the ALC Sandy Jet sandblaster (located at 175 N. Wenzel), and the Venus HIS fiberglass chop spray system (located at 175 N. Wenzel): The owner or operator shall, monthly, calculate and record the monthly and 12 consecutive month PM_{10} emissions for each month in the report period. The PM_{10} emissions shall be calculated using the following equations unless another method is approved in writing by the District:
- (i) Paint booth (700 E. Main):
 $PM \text{ (ton)} = (\text{paint usage, gal/month}) (\text{paint density, lb/gal}) (\text{solid content, } \%) (1 - \text{transfer efficiency, } 65\%) (1 - \text{control efficiency, } 90\%) / (2000, \text{ lb/ton})$
 $PM_{10} = PM$
- (ii) Abrasive blast room (700 E. Main):
 $PM_{10} \text{ (ton)} = (\text{operating time, hr/month}) (\text{capacity, } 11,760 \text{ lb abrasive/hr}) (\text{emission factor, } 3.12 \text{ lb/ } 1000 \text{ lb abrasive}) (1 - \text{control efficiency, } 95\%) / (2000, \text{ lb/ton})$
- (iii) ALC Sandy Jet sandblaster (175 N. Wenzel):
 $PM_{10} \text{ (ton)} = (\text{operating time, hr/month}) (\text{capacity, } 100 \text{ lb abrasive/hr}) (\text{emission factor, } 3.12 \text{ lb/ } 1000 \text{ lb abrasive}) / (2000, \text{ lb/ton})$
- (iv) Venus HIS fiberglass chop spray system (175 N. Wenzel):
 $PM \text{ (ton)} = (\text{resin usage, lbs}) (10\% \text{ solid}) (1 - \text{transfer efficiency, } 65\%) (1 - \text{control efficiency, } 90\%) / (2000, \text{ lb/ton})$
 $PM_{10} = PM$
- (e) The owner or operator shall account for the minor PM_{10} emissions from Insignificant Activities when totaling the monthly plant-wide emissions. Since the emissions are minor the owner or operator may

use the potential PM₁₀ emissions as the monthly emissions.

- (i) District calculated PM₁₀ PTE for the two plasma cutting tables combined is 61.67 pound/month.
 - (ii) District calculated PM₁₀ PTE for 23 welding unit combined is 35 pounds per month.
 - (iii) District calculated PM₁₀ PTE for 10 machining equipment combined is 33.33 pounds per month.
- ii. The owner or operator shall, monthly, sum the Total PM₁₀ emissions from controlled and uncontrolled emissions utilizing the methodologies above for each month.

b. For HAPs:

- i. The HAP emissions shall be calculated using the following equations, unless another method is approved in writing by the District:
- (a) Paint booth (700 E. Main):
$$\text{HAP (ton)} = (\text{paint usage, gal})(\text{density, lb/gal})(\text{HAP content, \%}) / (2000, \text{ lb/ton})$$
 - (b) Venus HIS fiberglass chop spray system (175 N. Wenzel):
$$\text{HAP (ton)} = (\text{resin usage, lbs})(121 \text{ lbs styrene} / 2000 \text{ lbs resin}) / (2000, \text{ lb/ton})$$
 - (c) The owner or operator shall account for the minor total HAP emissions from Insignificant Activities when totaling the monthly plant-wide emissions. Since the emissions are minor the owner or operator may use the potential total HAP emissions as the monthly emissions.

- (i) District calculated total HAP PTE for the 550 gallon gasoline storage tank and refueling pump combined is 12.67 pound/month.
 - (ii) District calculated total HAP PTE for 23 welding unit combined is 2.33 pounds per month.
 - (iii) District calculated total HAP PTE for 10 machining equipment combined is 2.17 pounds per month.
- ii. The owner or operator shall, monthly, sum the Total HAP emissions from the uncontrolled emissions utilizing the methodologies above for each month.
- c. For VOCs:
 - i. The VOC emissions shall be calculated using the following equations, unless another method is approved in writing by the District:
 - (a) Paint booth (700 E. Main):
$$\text{VOC (ton)} = (\text{paint usage, gal})(\text{density, lb/gal})(\text{VOC content, \%}) / (2000, \text{ lb/ton})$$
 - (b) Venus HIS fiberglass chop spray system (175 N. Wenzel):
$$\text{VOC (ton)} = (\text{resin usage, lbs})(121 \text{ lbs styrene} / 2000 \text{ lbs resin}) / (2000, \text{ lb/ton})$$
 - (c) The owner or operator shall account for the minor VOC emissions from Insignificant Activities when totaling the monthly plant-wide emissions. Since the emissions are minor the owner or operator may use the potential VOC emissions as the monthly emissions.

- (i) District calculated VOC PTE for the 550 gallon gasoline storage tank and refueling pump combined is 241.67 pound/month.
 - (ii) District calculated VOC PTE for the 500 gallon diesel storage tank is 1.67 pound/month.
- ii. The owner or operator shall, monthly, sum the VOC emissions from the uncontrolled emissions utilizing the methodologies above for each month.

7. Insignificant Activities

Equipment	Quan.	PTE (tpy)	Regulation Basis
Plasma Cutting tables (see emission unit IA-1)	2	0.37 PM ₁₀ each	Regulation 1.02, section 1.38
Brazing, soldering, or welding Equipment (see emission unit IA-2)	23	0.21 PM ₁₀ combined; 0.014 total HAPs combined	Regulation 1.02, Appendix A
Machining Equipment (see emission unit IA-2)	10	0.20 PM ₁₀ combined; 0.013 total HAPs combined	Regulation 1.02, section 1.38
500 gallon diesel fuel storage tank (see emission unit IA-3)	1	0.01 VOC	Regulation 1.02, Appendix A
One (1) 550 gallon underground Gasoline storage tank with refueling pump (see emission unit IA-4)	1	1.45 VOC; 0.076 total HAPs	Regulation 1.02, section 1.38

- 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.

8. Emission Unit UIA-1 – Two (2) Plasma Cutting Tables

a. Equipment:

P/PE	Capacity	Install Date	Applicable Regulation	Basis for Applicability
E5: Two (2) Plasma Cutting Tables	10 inches/min	2008	7.08	Regulation 7.08 establishes the requirements for PM emissions from new processes that commence construction after September 1, 1976.

i. Standards/Operating Limits

1) PM/PM₁₀

- (a) The emission standard for PM for the equipment in this Emission Unit is determined in accordance with Regulation 7.08, Table 1. Since the capacity of the equipment is less than 1,000 lb/hr, the PM emission standard is 2.34 lb/hr.
- (b) The District has performed a one-time PM compliance demonstration and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

2) Opacity

- (a) Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%, for processes that commenced construction after September 1, 1976.