



**LOUISVILLE METRO  
AIR POLLUTION CONTROL DISTRICT  
850 Barret Ave., Louisville, Kentucky 40204**



xx xx 2016

**Federally Enforceable District Origin Operating Permit  
Statement of Basis**

**Company:** General Shale Brick, Inc.

**Plant Location:** 212 South Park Road, Louisville, Kentucky 40118

**Date Application Received:** 14 October 2010      **Date Admin Complete:** 14 April 2011

**Date of Draft Permit:** 20 January 2016      **Date of Public Notice:** 20 January 2016

**District Engineer:** Nantaporn Noosai      **Permit No:** O-0079-16-F

**Plant ID:** 0079      **SIC Code:** 3251      **NAICS:** 327121

**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 (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), and particulate matter less than 10 microns (PM<sub>10</sub>); and is a non-attainment area for the 1997 standard for particulate matter less than 2.5 microns (PM<sub>2.5</sub>); unclassifiable for the 2012 standard for particulate matter less than 2.5 micron (PM<sub>2.5</sub>) and partial non-attainment area for sulfur dioxide (SO<sub>2</sub>).

**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:** General Shale Brick Inc., produces Face Bricks from shale.
2. **Process Description:** The manufacturing process involves mining, grinding, screening, and blending of the raw materials followed by forming, cutting or shaping, drying, firing (or curing), cooling, storage, and shipping of the final product. The raw shale is generally loaded by truck or front-end loader into a receiving hopper and is crushed by a primary crusher for initial size reduction. The inherent moisture content of the raw shale ranges from 10-15%. The material is then conveyed to an enclosed grinding room, which houses a grinding mill and banks of screens that produce a fine material that is suitable for forming brick. The shale is then conveyed to an enclosed storage area referred to as the shale reclaim operation. The ground raw shale is mixed with water, sand, and other additives. The material is continuously extruded into soft formed mud. The columns are then treated with various friction or setting materials that apply texture to the surface of the bricks. The columns are cut into soft "green" brick with a wire. The "green" or raw bricks are loaded onto kiln cars and sent to a pre-dryer which utilizes waste heat from the kilns, then to one of the two kilns (38A or 38B). Both kilns are tunnel-type kilns fueled by coal or natural gas. Each dryer/kiln includes a preheat zone, a firing zone, and a cooling zone. Firing of the green bricks involves six steps: the evaporation of free water, dehydration, oxidation, vitrification, flashing, and cooling. Each tunnel kiln utilizes a Dry Lime Scrubber and Fabric Filter (DLS/FF) control system.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent to this facility.
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	Coal/gas-fired kilns.
U2	Shale grinding, ground shale intrusion, and cement block manufacturing processes. Coal grinding process and coal storage silo.

5. **Fugitive Sources:** There are fugitive PM emissions from several process steps during the manufacturing of face brick. Travel on unpaved roads, storage piles, and truck loading also result in fugitive emissions.

**6. Permit Revisions:**

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	29-06-F	05/15/2006	03/26/2006	Initial	Entire Permit	Initial Permit Issuance
R 1	29-06-F	05/15/2006	03/26/2006	Admin	Entire Permit	Correct typographical errors
N/A	O-0079-15-F	Xx/xx/2016	01/20/2016	Renewal	Entire Permit	Permit Renewal, incorporation of construction permit 4-06-C

**7. Construction Permit History:**

Permit No.	Issue Date	Description
4-06-C	03/10/2006	One (1) VAC-U-MAX vacuum cleaning unit, model Monobloc, rated at 1250 cfm; and
47-04-C	09/30/2005	One (1) kiln (38B) for the production of brick
48-04-C	09/30/2005	One (1) enhanced all dry lime scrubber system with baghouse
92-04-C	07/31/2005	One (1) Block manufacturing operation consisting of: two (2) 100-ton aggregate hoppers, two (2) 36" belt feeders, two (2) 24" belt conveyors, one (1) 100-ton cement silo, one (1) 100-ton fly ash silo, two (2) enclosed screw conveyors, and one (1) mixer
93-04-C	07/31/2005	One (1) fabric filter dust collection system for the mixer
47-04-C	09/30/2004	One (1) kiln (38B) for the production of brick
48-04-C	09/30/2004	One (1) enhanced all dry lime scrubber system with baghouse
92-04-C	07/15/2004	One (1) Block manufacturing operation consisting of: two (2) 100-ton aggregate hoppers, two (2) 36" belt feeders, two (2) 24" belt conveyors, one (1) 100-ton cement silo, one (1) 100-ton fly ash silo, two (2) enclosed screw conveyors, and one (1) mixer
93-04-C	07/15/2004	One (1) fabric filter dust collection system for the mixer
95-02-C	03/11/2002	One (1) coal pulverizing mill for drying and pulverizing coal with exhaust passing
96-02-C	30/11/2002	One (1) baghouse, make Torit, model RFT72, to collect emissions from pulverizing mill

**8. Emission Summary:**

Pollutant	District Calculated Actual Emissions (ton/yr) 2008 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	46.60	Yes
NO <sub>x</sub>	18.44	No
SO <sub>2</sub>	7.37	Yes
PM/PM <sub>10</sub>	13.53	Yes
VOC	3.07	No
Total HAPs	2.27	Yes
Single HAP	0.09	Yes

Note: 2008 was the last full year of operation.

**9. Applicable Requirements:**

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

**10. MACT Requirements:** The source has no future MACT requirements.

**11. Referenced Federal Regulations in Permit:**

40 CFR 60, Subpart OOO      Standards of Performance for Nonmetallic Mineral Processing Plants

**12. Non-Applicable Regulations:** 40 CFR 60, Subpart Y—*Standards of Performance for Coal Preparation and Processing Plants*, does not apply because the facility does not process more than 200 tons of coal per day<sup>1</sup>.

**II. Regulatory Analysis:**

**1. Acid Rain Requirements:** General Shale Brick Inc., 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. General Shale Brick Inc. 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.

<sup>1</sup> The maximum capacity for coal processing operation (E6) is 2.1 ton/hr or 50.4 ton/day.

3. **Prevention of Accidental Releases 112(r):** General Shale Brick Inc. 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:** General Shale Brick Inc., is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*.
5. **Basis of Regulation Applicability**
  - a. **Plant-wide**

General Shale Brick Inc. is a potential major source for the pollutants SO<sub>2</sub>, CO, PM<sub>10</sub>, Single HAP, and Total HAPs. 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 SO<sub>2</sub>, CO, and PM<sub>10</sub> < 25 tons/year, < 5 tons/year for Single HAP, and < 12.5 tons/year for Total HAPs to be a FEDOOP STAR Exempt source as defined by Regulation 5.00, section 1.13.5.

Regulation 2.17, section 5.2, requires monitoring and recordkeeping 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 a Semi-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**

**i. Equipment**

<b>P/PE</b>	<b>Capacity</b>	<b>Installation Date</b>	<b>Applicable Regulation</b>	<b>Basis for Applicability</b>
E1: One (1) tunnel kiln, make Harrop-Kiln, model 16-wide, designated as "Kiln 38A". Fuels: coal and natural gas.	14.7 ton/hr	1996	7.08 and 7.09	Regulation 1.14 establishes the requirement for the control of fugitive particulate emissions for any sources.  Regulation 2.17 establishes procedures for the issuance of federally enforceable district origin operating permits.  Regulation 7.08 establishes the requirements for PM emissions from new processes that commence construction after September 1, 1976.
E2: One (1) tunnel kiln, make Ceric-Kiln, model 16-wide, designated as "Kiln 38B". Fuels: coal and natural gas.	14.7 ton/hr	2004		Regulation 7.09 establishes the requirements for each process gas stream not otherwise regulated that emits H <sub>2</sub> S, SO <sub>2</sub> , or CO that commenced after April 19, 1972.

**ii. Standards/Operating Limits**

**1) HAP**

- (a) Regulation 2.17, section 5.1 establishes the requirement to include specific conditions in the permit to limit the plant-wide emissions of individual and total combined HAPs to avoid Title V permitting, including operating the control devices.<sup>2</sup>

**2) SO<sub>2</sub>**

- (a) Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. Source requested a combined total plant-wide synthetic limit of less than twenty-five (25) tons in a 12 consecutive month period, for the pollutant SO<sub>2</sub>.

<sup>2</sup> As recognized by the U.S. EPA in 40 CFR 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing, kiln operators are allowed to bypass the kiln control device for routine maintenance of the kiln control device, not to exceed 4 percent of the operating hours

- (b) Regulation 7.09, section 4, requires the SO<sub>2</sub> emissions from E1 and E2 to be vented to a Dry Lime Scrubber/Fabric Filter (DLS/FF) control device system (C1 or C2), which is considered a BACT in combination with condition provided in (c) submitted on 12/19/2003.
- (c) Regulation 7.09, section 4, requires the sulfur content of the coal combusted in E1 and E2 to be less than 1% by weight. (BACT in combination with condition provided in (b) submitted on 12/19/2003)

3) **CO**

Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. Source requested a combined total plant-wide synthetic limit of less than twenty-five (25) tons in a 12 consecutive month period, for the pollutant CO.

4) **NO<sub>x</sub>**

Regulation 7.08, section 4, requires that the source not to allow or cause to be discharged into the atmosphere any NO<sub>x</sub> emissions fumes in excess of 300 ppm by volume expressed as NO<sub>2</sub>, or an invisible discharge<sup>3</sup>.

5) **PM/PM<sub>10</sub>**

- (a) Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. Source requested a combined total plant-wide synthetic limit of less than twenty-five (25) tons in a 12 consecutive month period, for the pollutant PM/PM<sub>10</sub>.
- (b) For Emission Points subject to Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2. The equation used to calculate the hourly PM emission limit is  $E = 3.59P^{0.62}$ , where E is the allowable lb/hr PM emission limit and P is process weight rate expressed in tons/hr.

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<sup>3</sup> Based on the stack tests performed on December 2001(for E1) and December 2005 (for E2), the potential uncontrolled NO<sub>x</sub> emissions are 44.79 and 45.73 ppm for emission units E1 and E2 respectively, which is less than the standard of 300 ppm; therefore, no monitoring, record keeping, or reporting is required. The company is not a major source for NO<sub>x</sub>.

6) **Opacity**

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

c. **Emission Unit 2**i. **Equipment**

<b>P/PE</b>	<b>Capacity</b>	<b>Installation Date</b>	<b>Applicable Regulation</b>	<b>Basis for Applicability</b>
E3: One (1) shale grinding operation, consisting of: one (1) single roll crusher, one (1) hopper, one (1) hammer mill, eight (8) vibrating screens, and eight (8) conveyors.	120 ton/hr	1996	7.08, and 40 CFR 60, Subpart 000	Regulation 1.14 establishes the requirement for the control of fugitive particulate emissions for any sources.
E4: One (1) shale reclaim operation inside enclosed building for belt conveyor and storage bunker.	120 ton/hr	1996		Regulation 2.17 establishes procedures for the issuance of federally enforceable district origin operating permits.
E5: Millroom 38 operation consisting of: one (1) J. C. Steele pug mill, one (1) 36" feed conveyor, one (1) 36" waste conveyor, four (4) 24" conveyors, and one (1) 5' chain conveyor.	120 ton/hr	1996		Regulation 7.02 incorporates by reference certain federal Standard of Performance for New Stationary Sources in 40 CFR Part 60.
E6: One (1) coal processing operation for grinding coal consisting of: one (1) C.E. Raymond coal pulverizing unit, and one (1) 4' x 5' single-deck vibratory screen.	2.1 ton/hr.	2002	7.08	Regulation 7.08 establishes the requirements for PM emissions from new processes that commence construction after September 1, 1976.
E7: One (1) coal storage bin.	2.1 ton/hr.	2002		
E8: One (1) sand silo with bin vent filter.	20,000 lb/hr.	1996	7.08, and 40 CFR 60, Subpart 000	40 CFR 60, Subpart 000 applies to a fixed or portable nonmetallic mineral processing plant

P/PE	Capacity	Installation Date	Applicable Regulation	Basis for Applicability
E9: One (1) cement block manufacturing operation consists of: Besser 100 ft <sup>3</sup> cement mixer, two (2) 100-ton aggregate hoppers, two (2) 36" belt feeders, two (2) 24" belt conveyors, one (1) 100-ton cement silo, one (1) cement screw conveyor, one (1) fly ash hopper, one (1) fly ash belt feeder, one (1) fly ash belt conveyor, one (1) 100-ton fly ash silo, and one (1) fly ash screw conveyor.	Mixer: 2.4 ton/hr.  Cement hopper, belt conveyor and silo: 2.0 ton/hr each.  Fly ash equipment: 0.4 ton/hr each.	2004		that commences construction, modification, or reconstruction after August 31, 1983.
E10: One (1) VAC-U-MAX vacuum cleaning unit, model Monobloc 40; and one (1) hopper.	1,250 cfm.	2006	7.08	

ii. **Standards/Operating Limits**

1) **PM/PM<sub>10</sub>**

- (a) Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. Source requested a combined total plant-wide synthetic limit of less than twenty-five (25) tons in a 12 consecutive month period, for the pollutant PM/PM<sub>10</sub>.
- (b) For Emission Points subject to Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2. The equation used to calculate the hourly PM emission limit is  $E = 3.59P^{0.62}$ , where E is the allowable lb/hr PM emission limit and P is process weight rate expressed in tons/hr.

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.
- (b) 40 CFR 60, Subpart OOO requires the source not to allow or cause the visible emissions to exceed the following standards:
  - (1) 7% from affected facilities with capture

systems; (40 CFR 60.672 (a), this streamlined permit condition assures compliance with Regulation 7.08, section 3.1.1.)

- (2) 10% opacity from affected facilities without capture systems and for fugitive emissions escaping capture systems. (40 CFR 60.672 (b))

**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:** They are no non-compliance issues.
6. **Calculation Methodology or Other Approved Method:**

Emission Unit 1:

For kilns 38A and 38B (E1 and E2), before retesting all control devices as required in the permit, the following emission factors shall be used to derive actual emission rates for purposes of demonstrating ongoing compliance with the terms and conditions of this permit. However, the owner or operator shall retest all control devices to determine new source-specific emission factors by conducting stack tests of the kilns before and after the control device within the first 180 days after startup of the source. During periods of control device routine maintenance, malfunctions, or other periods when the control device is offline while the kiln is in operation, actual emission rates shall be determined from the pre-control factors or using AP-42 emission factors.

Pollutant	lb/ton of Fired Product (pre-control)	lb/ton of Fired Product (post-control)	Source
HCl	0.17	0.00053	Stack test <sup>4</sup>
HF	0.165	0.00014 for E1; 0.00003 for E2	Stack test <sup>4</sup>
SO <sub>2</sub>	6.4	0.32 for E1; 0.144 for E2	Stack test <sup>4</sup>
PM	0.93	0.033 for E1; 0.0182 for E2	Stack test <sup>4</sup>

<sup>4</sup> Emission factors determined by stack tests performed on December 2001(for Kiln 38A) and December 2005 (for Kiln 38B) are outdated and allowed to be used only during the time before the Company retest all control devices as required in the permit EU U1, [Specific Condition S4](#).

Pollutant	lb/ton of Fired Product (pre-control)	lb/ton of Fired Product (post-control)	Source
NO <sub>x</sub>	0.71	0.71	Stack test <sup>4</sup>
CO	Coal: 0.80 Natural Gas: 1.20	Coal: 0.80 Natural Gas: 1.20	AP-42 Table 11.3-5
VOC	0.024	0.024	AP-42 Table 11.3-5

For Emission Unit 2:

For E3 – E8, the following emission factors obtained from AP-42 are used for the PM/PM<sub>10</sub> emission calculations. Emission factor units are lb of PM per ton of fired product unless otherwise noted.

Emission Unit	Emission Factor	Source for Emission Factor
Shale Grinding and Screening (E3)	0.0062 (controlled EF for PM) 0.0032 (controlled EF for PM <sub>10</sub> )	AP-42 Table 11.3-1
Shale Reclaimer (E4)	0.003 (uncontrolled EF for PM) 0.0011 (uncontrolled EF for PM <sub>10</sub> )	AP-42 Table 11.19.2-2
Millroom 38 (E5)	0.0036 (controlled EF for PM <sub>10</sub> )	AP-42 Table 11.3-1
Coal Processing (E6)	0.0062 (controlled EF for PM) 0.0032 (controlled EF for PM <sub>10</sub> )	AP-42 Table 11.3-1
Coal Storage Bin with bin vent (E7)	0.73 lb/ton throughput (uncontrolled EF for PM) 0.47 lb/ton throughput (uncontrolled EF for PM <sub>10</sub> )	AP-42 Table 11.12-2
Sand Silo (E8) equipped with Bin Vent Filter	0.73 lb/ton throughput (uncontrolled EF for PM) 0.47 lb/ton throughput (uncontrolled EF for PM <sub>10</sub> )	AP-42 Table 11.12-2

For E9, the PM/PM<sub>10</sub> emissions are calculated using the emission factors obtained from AP-42, Chapter 11.12-*Concrete Batching* (Table 11.12-2).

Equipment	Maximum throughput (ton/hr)	Uncontrolled Emission Factor (lb PM/PM <sub>10</sub> /ton)
Mixer	2.4	0.572 for PM 0.156 for PM <sub>10</sub>
Cement Hopper	2	0.0048 for PM 0.0028 for PM <sub>10</sub>
Cement Belt Feeder	2	0.0069 for PM 0.0033 for PM <sub>10</sub>
Cement Belt Conveyor	2	0.0069 for PM 0.0033 for PM <sub>10</sub>
Cement Silo	2	0.73 for PM 0.47 for PM <sub>10</sub>
Cement Screw Conveyor	2	0.0069 for PM 0.0033 for PM <sub>10</sub>
Flyash Hopper	0.4	0.0048 for PM 0.0028 for PM <sub>10</sub>
Flyash Belt Feeder	0.4	0.0069 for PM 0.0033 for PM <sub>10</sub>
Flyash Belt Conveyor	0.4	0.0069 for PM

Equipment	Maximum throughput (ton/hr)	Uncontrolled Emission Factor (lb PM/PM <sub>10</sub> /ton)
		0.0033 for PM <sub>10</sub>
Flyash Silo	0.4	3.14 for PM 1.1 for PM <sub>10</sub>
Flyash Screw Conveyor	0.4	0.0069 for PM 0.0033 for PM <sub>10</sub>

For E10, the PM/PM<sub>10</sub> emissions are calculated using the emission factors obtained from AP-42, Chapter 11.12-*Concrete Batching*. The following equations and emission factors, based on a 95% filter efficiency, are used for controlled PM emission calculations:

Total PM Emissions = Vacuum Emissions + Hopper Emissions

Vacuum Emissions:

$$= [(Material\ collected\ in\ the\ hopper)/95\%](100\% - 95\%)$$

Hopper Emissions:

$$= (0.0048\ lb\ PM/ton\ of\ material\ transferred)$$

$$= (0.0028\ lb\ PM_{10}/ton\ of\ the\ material\ transferred)$$

For fugitive sources:

The following equations and emission factors are used to calculate uncontrolled PM emissions from fugitive sources.

1) Unpaved roads

The emission factor expressed in lb of PM/PM<sub>10</sub> per vehicle mile traveled (lb/VMT) shall be estimated using following equation:

$$E = k (s/12)^a (W/3)^b \quad \text{Equation (1a) AP-24 Chapter 13.2.2}$$

where, E = size-specific emission factor (lb/VMT)

s = surface material silt content (%)

W = mean vehicle weight (tons)

k = 4.9 (lb PM/VMT) and 1.5 (lb PM<sub>10</sub>/VMT) (Table 13.2.2-2)

a = 0.7 for PM and 0.9 for PM<sub>10</sub> (Table 13.2.2-2)

b = 0.45 for Pm and PM<sub>10</sub> (Table 13.2.2-2)

2) Storage Piles

The emission factor expressed in lb of PM/PM<sub>10</sub> per ton of material transferred shall be estimated using the following equation:

$$E = k(0.0032) (U/5)^{1.3}/(M/2)^{1.4} \quad \text{Equation (1) AP-42 Chapter 13.2.4}$$

where, E = emission factor

k = particle size multiplier (dimensionless)

U = mean wind speed (mile per hour)

M = material moisture content (%)

- 3) Truck loading  
Emission factor for uncontrolled emissions from truck loading,  $E = 0.0001 \text{ lb PM}_{10}/\text{ton}$ , shall be used.

## 7. Insignificant Activities

Equipment	Quantity	Regulation Basis
Brazing, soldering, or welding	3	Regulation 1.02, Appendix A
Emergency relief vents	4	Regulation 1.02, Appendix A
Portable diesel or gasoline tanks (< 250 gallons)	3	Regulation 1.02, Appendix A

- 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 15<sup>th</sup>.
- 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.