Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-2624

xx xx 2016

Federally Enforceable District Origin Operating Permit
Statement of Basis

Company: AAK USA K2, LLC

Plant Location: 2520 South 7th Street Road, Louisville, Kentucky 40208

Date Application Received: 28 August 2006 **Date Admin Complete:** 27 October 2006

Date of Draft Permit: 14 April 2016 **Date of Public Notice:** 14 April 2016

District Engineer: Nantaporn Noosai **Permit No:** O-0291-16-F

Plant ID: 0291 **SIC Code:** 2079 **NAICS**: 311225

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_2), carbon monoxide (CO), 1 hr and 8 hr ozone (O_3), and particulate matter less than 10 microns (PM_{10}); 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 (SO_2).

Application Type/Permit Activity:

[ ] Initial Issuance

[ ] Permit Revision
- [ ] Administrative
- [ ] Minor
- [ ] Significant

[X] Permit Renewal

Compliance Summary:

[ ] Compliance certification signed
[ ] Source is out of compliance
[ ] Compliance schedule included
[X] Source is operating in compliance

I. Source Information

1. Product/Process Description: AAK USA K2, LLC refines vegetable oils for specialized products consisting of refining, bleaching, deodorizing, and hydrogenation processes.

2. Site Determination: There are no other facilities that are contiguous or adjacent to this facility.

3. Emission Unit Summary:

Emission Unit	Equipment Description
U1	- One bleaching process for vegetable oil which includes: five (5) pressure leaf filter presses, one (1) heat exchanger, one (1) vacuum pump and eighteen (18) tanks. - One hydrogenation process which includes: two (2) filter presses, two (2) heat exchangers, four (4) hydrogen converters and twenty-five (25) tanks. - Two (2) parallel continuous deodorizing systems designated G3 and G4, one (1) water cooler located on roof, a Bayonne unit and thirty-six (36) process vessels. - A refining process for vegetable oil which includes: one (1) caustic mix tank, one (1) caustic injection equipment, six (6) oil mixers, six (6) SRG-214 refining centrifuges, two (2) water wash POD horizontal centrifuges, oil to oil heat exchangers, heaters, coolers, one (1) condensate tank, one (1) vacuum dryer, one (1) vacuum pump, one (1) hot well tank, one (1) split box, fourteen (14) tanks, two (2) rail car wash tanks, three (3) storage tanks and one (1) acidulation tank. -
U2	- One (1) Dowtherm/oil heaters (3 MMBtu/hr), - One (1) Dowtherm/oil heaters (4 MMBtu/hr), - One (1) Watertube boiler (43 MMBtu/hr), and - One (1) Watertube boiler (60 MMBtu/hr)

4. Fugitive Sources: There are no fugitive source emissions at this facility.

5. Permit Revisions:

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
NA	0124-01-F	11/05/2001	06/03/2001	Initial	Entire Permit	Initial Permit Issuance
Renewal	O-0291-16-F	Xx/xx/20xx	04/14/2016	Renewal	Entire Permit	Permit Renewal

1. Construction Permit History:

Permit No.	Issue Date	Description
319-87	06/30/1988	One bleaching process for vegetable oil consisting of: one oil surge tank, one (1) mixing tank, two (2) 70,000 pound bleaching vessels, one steam injection vacuum system, one (1) vacuum pump, one (1) pre-coat tank, five (5) pressure leaf filter presses, two (2) coolers, nine (9) bleached and refined oil storage tanks, one (1) distillate tank and four (4) unused tanks.
320-87	06/30/1988	One (1) deodorizing process for vegetable oil consisting of: five (5) batch kettles (one (1) deaireator kettle, three (3) deodorizing kettles, and dump kettle), one (1) three stage vacuum system, one (1) scrub cooler, one (1) oil to oil heat exchanger, one (1) steam/oil heater, one (1) Dowtherm oil heater, two (2) water coolers, and a hot well.
49-88	06/30/1988	One (1) refining process for vegetable oil consisting of: four (4) crude oil storage tanks (two (2) million gallons, one (1) 6 million gallons, and one (1) one million gallons), three (3) surge tanks, four caustic storage tanks and two (2) caustic mix tanks, caustic injection equipment, five (5) oil mixers, six (6) SRG-214 refining centrifuge, two (2) water wash POD horizontal centrifuges, oil to oil heat exchangers, heaters, coolers, one (1) condensate tank, one (1) water wash tank, one (1) soap-stock tank, two (2) vacuum dryers, one (1) vacuum pump, one (1) barometric condenser, one (1) hot well, and one (1) split box.
50-88	06/30/1988	One (1) acidulation process for vegetable oil consisting of four (4) boil tanks, four (4) acid oil storage tanks, two (2) sulfuric acid storage tanks, one (1) sulfuric acid measuring tank, one (1) caustic mix tank, one (1) sludge pit, and one (1) outside holding pit.
119-88	08/1/1988	One (1) Hydro-Chan Processing, Inc. model H-49 steam reforming hydrogen producing plant including refractory furnace, desulfurizers, methanator absorber, and regenerator.
166-90	06/6/1990	One (1) Nebraska Boiler Company Inc. model 2D1807 “D” type water tube boiler.
338-94-C	06/17/1994	One (1) Babcock & Wilcox water tube steam boiler, model # FM10-61, Coen Combustion model DA with low NOx burner, with a capacity of 40,000 pound of steam per hour.
83-00-C	04/30/2000	One (1) Babcock & Wilcox water tube steam boiler, model # FM10-52, with low NOx burner; with a capacity of 35,000 pound per hour of steam (43 MMBtu/hr).

2. Emission Summary:

Pollutant	District Calculated Actual Emissions (ton/yr) 2009 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	17.74	No
NO_x	21.12	No
SO_2	0.13	No
PM_{10}	1.61	No
VOC	3.71	No
Total HAPs	1.12	No
Single HAP	1.12	Yes

3. Applicable Requirements:

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

4. MACT Requirements: The source has no future MACT requirements.

5. Referenced Federal Regulations in Permit:

40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

II. Regulatory Analysis:

1. Acid Rain Requirements: AAK USA K2, 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. AAK USA K2, 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): AAK USA K2, 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: AAK USA K2, LLC is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary*

Sources.

5. Basis of Regulation Applicability

Regulation	Basis for Applicability	Type
2.17	Establishes procedures for the issuance of federally enforceable district origin operating permits.	SIP
7.25	Establishes the requirements for VOC emissions, apply to a process not elsewhere regulated in District Regulation 7, and applies to new processes commenced after June 13, 1979.	SIP
7.06	Applies to each indirect heat exchanger having input capacity of more than one million BTU per hour commenced after September 1, 1976.	SIP
40 CFR 60 Subpart Dc	Applies to each steam generating unit that commences construction, modification, or reconstruction after June 9, 1989, and that has a heat input capacity from fuels combusted in the steam generating unit of less than 29 megawatts (MW) (100 MMBtu/hr).	Federal

a. Plant-wide

AAK USA K2, LLC is a potential major source for the pollutant SO_2 and Single HAP. Regulation 2.17 – F*ederally 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 *plant-wide* limits are less than 25 tons/year for SO_2, less than 5 tons/year for Single HAP, and less than 12.5 tons/year for Total HAP. Regulations 5.00 5.20, 5.21, and 5.23 (STAR Program) establish requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. The requirements to be exempt from STAR are defined by Regulation 5.00, section 1.13.5. The company requested an emission limit of less than 25 tons per year for each pollutant CO and NOx. For total hazardous air pollutants (HAPs), the company requested an emission limit of less than 12.5 tons per year for total HAP and less than 5 tons per year for any single HAP[1].

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

[1] The acidulation process is no longer used at the facility. The caustic mix pit, outside holding pit, and skimmers which were left from the acidulation process have been converted to secondary containment areas as part of the facility's Spill Prevention Countermeasure and Control (SPCC) Plan and the Facility Response Plan (FRP) to address oil spills.

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 – Bleaching, Hydrogenation, Deodorizing, and Refining processes

i. **Equipment:**

Emission Unit	Emission Point	Description	Application Regulation
U1	Bleaching Process		
	E1	Five (5) pressure leaf filter presses	7.25
	E2	One (1) heat exchanger	
	E3	One (1) vacuum pump	
	E4	Two (2) condensate receiver tanks 1000 gallons each	
	E5	Earth Slurry/Pre-coat tank 6000 lbs	
	E6	Mixer tank 100 gallons	
	E7	N. Oil bleacher tank 103,350 lbs	
	E8	S. Oil bleacher tank 103,550 lbs	
	E9	#36 Surge tank 129,200 lbs	
	E10	Steam out tank 25,000 lbs	7.25
	E11	Unused tank 1,400 gallons	
	E12	Unused tank 275 gallons	
	E13	#B7 Bleached oil storage tank 342,000 lbs	
	E14	#B9 Bleached oil blend tank 342,000 lbs	
U1	E15	#B11 Bleached oil tank 2,300,000 lbs	7.25
	E16	#B12 Bleached oil tank 305,600 lbs	
	E17	#B13 Bleached oil tank 398,160 lbs	
	E18	#B14 Bleached oil tank 398,160 lbs	
	E19	E. BW bleached oil tank 374,000 lbs	
	E20	W. BW bleached oil tank 374,000 lbs	7.25
	Hydrogenation Process		
	E21	Two (2) filter presses	7.25
	E22	Two (2) heat exchangers	
	E23	Four (4) hydrogen converters	

Emission Unit	Emission Point	Description	Application Regulation
	E24	#F1 Bleach tank 100,000 lbs	
	E25	#F2 Bleach tank 105,000 lbs	7.25
	E26	#F3 Bleach tank 50,000 lbs	7.25
	E27	#1 Oil tank 425,000 lbs	7.25
	E28	#2 Oil tank 429,000 lbs	
	E29	#3 Oil tank 334,000 lbs	
	E30	#4 Oil tank 338,000 lbs	
	E31	#5 Oil tank 342,000 lbs	
	E32	#6 Oil tank 342,000 lbs	
	E33	#8 Storage tank 342,000 lbs	
U1	E34	#40 Blend tank 84,500 lbs	7.25
	E35	#41 Blend tank 104,520 lbs	
	E36	#42 Blend tank 84,500 lbs	
	E37	#43 Oil tank 137,125 lbs	
	E38	#44 Oil tank 156,400 lbs	
	E39	#45 Oil tank 156,400 lbs	
	E40	#46 Oil tank 156,400 lbs	
	E41	#47 Oil tank 156,400 lbs	
	E42	#48 Oil tank 289,320 lbs	
	E43	#49 Oil tank 289,320 lbs	
	E44	#50 Oil tank 253,680 lbs	
	E45	#129 Dump tank 68,500 lbs	
	E46	#B 15 Blend tank 110,140 lbs	
	E47	Slurry tank 5,000 lbs	
	E48	Condensate tank 9,000 lbs	
U1	E49	Two (2) parallel continuous deodorizing systems, designated G3 and G4	7.25
	E50	Bayonne Unit	
	E51	One (1) water cooler located on roof	
	E52	#21 Inside Storage Room tank 64,500 lbs	
	E53	#22 Inside Storage Room tank 64,500 lbs	
	E54	#23 Inside Storage Room tank 64,300 lbs	
	E55	#24 Inside Storage Room tank 64,000 lbs	
	E56	#25 Inside Storage Room tank 64,500 lbs	
	E57	#26 Inside Storage Room tank 65,000 lbs	
	E58	#27 Inside Storage Room tank 64,700 lbs	
	E59	#28 Inside Storage Room tank 115,000 lbs	7.25
	E60	#70 Distillate tank 67,780 lbs	
	E61	#71 Shell drain tank 30,744 lbs	
	E62	#114 Outside Storage Area tank 204,950 lbs	
	E63	#115 Outside Storage Area tank 204,950 lbs	
	E64	#116 Outside Storage Area tank 204,950 lbs	

Emission Unit	Emission Point	Description	Application Regulation
	E65	#117 Outside Storage Area tank 153,700 lbs	
	E66	#118 Outside Storage Area tank 86,300 lbs	7.25
U1	E67	#119 Outside Storage Area tank 86,300 lbs	7.25
	E68	#120 Outside Storage Area tank 86,300 lbs	7.25
	E69	#121 Outside Storage Area tank 68,500 lbs	
	E70	#122 Outside Storage Area tank 43,354 lbs	
	E71	#123 Outside Storage Area tank 43,354 lbs	
	E72	#124 Outside Storage Area tank 98,002 lbs	
	E73	#126 Fat Removal Storage 94,005 lbs	
	E74	#161 Fat Removal Storage 95,009 lbs	
	E75	#201 Outside Storage Area tank 841,680 lbs	
	E76	#217 Outside Storage Area tank109,000 lbs	
U1	E77	#218 Outside Storage Area tank 109,000 lbs	7.25
	E78	#219 Inside Storage Area tank 81,980 lbs	
	E79	#220 Inside Storage Area tank 81,980 lbs	
	E80	#221 Outside Storage Area tank 99,000 lbs	
	E81	#404 Deodorizer Oil Storage 100,000 lbs	
	E82	#405 Deodorizer Oil Storage 45,000 lbs	
	E83	#406 Deodorizer Oil Storage 45,000 lbs	
	E84	K1 Bayonne Unit	
	E85	K2 Bayonne Unit	
	E86	K3 Bayonne Unit	
	E87	D/A Bayonne Unit	
	E88	K1 Bayonne Unit	
U1	Refining process		
	E89	One (1) caustic mix tank	7.25
	E90	Caustic injection equipment	
	E91	Six (6) oil mixers	
	E92	Six (6) SRG-214 refining centrifuges	
	E93	Two (2) water wash POD horizontal centrifuges	
	E94	Oil to oil heat exchangers	
	E95	Heaters	
U1	E96	Coolers	7.25
	E97	One (1) condensate tank	
	E98	One (1) vacuum dryer	
	E99	One (1) vacuum pump	
	E100	One (1) hot well tank	
	E101	One (1) split box	
	E102	#145 Crude oil storage tank 2,300,000 lbs	
	E103	#146 Crude oil storage tank 1,185,600 lbs	

Emission Unit	Emission Point	Description	Application Regulation
	E104	#147 Crude oil storage tank 3,765,000 lbs	
	E105	#148 Crude oil storage tank 2,300,000 lbs	7.25
U1	E106	#29 Refining wash water tank 40,000 lbs	7.25
U1	E107	#30 Refining soap stock hold tank 63,800 lbs	7.25
	E108	#31 Refining surge tank 63,800 lbs	
	E109	#32 Refining holding tank 64,300 lbs	
	E110	#33 Refining holding tank 63,800 lbs	
	E111	#34 Refining bleach tank 63,800 lbs	
	E112	#35 Refining tank	
	E113	#C1 Refining caustic storage 105,000 lbs	
	E114	#C2 Refining caustic storage 105,000 lbs	
	E115	#C3 Refining caustic storage 105,000 lbs	
U1	E126	Two (2) Rail car wash tanks 2,000 gallons each	7.25
	E127	Three (3) water storage tanks	
	E128	Acidulation tank	

ii. **Standards/Operating Limits**

1) **HAP (Hexane)**

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 be FEDOOP STAR Exempt. Source can use HAP (Hexane) emission as a surrogate for total VOC emissions.

2) **VOC**

a) Regulation 7.25, sections 2.1 and 3.1 establishes emission standards for processes producing VOC emissions. VOC emissions *plant-wide* shall be limited to less than 5 tons during any consecutive 12-month period.

b) Regulation 2.17, section 5.1 requires maintenance procedures in the plant which this equipment is located in will be conducted in such a manner to ensure that the plant remains reasonably clean and that any spill of organic materials shall be cleaned up expeditiously but, in event, no later than two days from the date of the spill unless other arrangements are made with the District.

c) Regulation 2.17, section 5.1 requires, for Refining process, any gaseous or vapor emissions containing volatile organic compounds from the vacuum equipment (E98 and E99) and hot well tank (E100) of this emission unit shall be controlled by either the Babcox and Wilcox Steam Boiler (E121) or Nebraska Steam Boiler (E122).

c. **Emission Unit 2 -** Two (2) Oil Heaters and two (2) Boilers

i. **Equipment:**

Emission Point	Description	Installation Date	Applicable Regulation
E129	One (1) Dowtherm/oil heater, capacity: 3 MMBtu/hr.	1988	7.06
E130	One (1) Dowtherm/oil heater, capacity: 4 MMBtu/hr.	1988	

Emission Point	Description	Installation Date	Applicable Regulation
E131	One (1) Babcox and Wilcox Steam Boiler, type: watertube boiler with low NO_x burner, installed originally in 1996, replaced in 2000 using same burner, capacity 43 MMBtu/hr. Fuels: natural gas.	1994	7.06 and 40 CFR 60, Subpart Dc
E132	One (1) Nebraska Steam Boiler, type: watertube boiler, capacity: 60 MMBtu/hr. Fuels: natural gas with NO. 2 fuel oil backup[2].	1990	

ii. **Standards/Operating Limits**

1) **SO_2**

i. Regulation 7.06, section 5.1.1, requires that the owner or operator to shall not cause not cause to be discharged into the atmosphere from each boiler any gases which contain SO_2 in excess of 1.0 pound per million BTU actual total heat input (four boilers combined are 110 MMBtu/hr) for combustion of liquid (for E122) and gaseous fuels.

ii. Per 40 CFR 60.42c(d), the owner or operator shall not combust fuel oil that contains greater than 0.5 weight percent sulfur.

2) **NOx**

Per Regulation 5.00, section 1.13.5.1, the owner or operator shall not allow or cause the plant-wide NO_x emissions to exceed 25 tons during any consecutive 12-month period.

3) **CO**

Per Regulation 5.00, section 1.13.5.1, the owner or operator shall not allow or cause the plant-wide CO emissions to exceed 25 tons during any consecutive 12-month period.

[2] 40 CFR 63 Subpart JJJJJJ, National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources emission standards are not applicable by definition to the boilers. §63.11195 lists boilers not subject to the subpart and §63.11195(e) states "A gas fired boiler as defined in this subpart." §63.11237 defines a gas fired boiler as "Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year."

4) **PM**

a) Regulation 7.06, section 4.1.1 requires the PM emissions to be less than or equal to 0.56 lb/MMBtu (E129 and E130) for sources having total heat input capacity of 10 MMBtu/hr or less.

b) Regulation 7.06, section 4.1.4 requires the PM emissions to be calculated from the product of 1.919 and (total heat input capacity)$^{-0.535}$ for liquid or gaseous fuels if the source has total heat input capacity of greater than 10 MMBtu/hr but less than 250 MMBtu/hr. Therefore, the PM emissions shall be less than or equal to 0.155 and 0.202 lb/MMBtu for E131 and E132 respectively.

5) **Opacity**

a) Regulation 7.06, section 4.2 requires indirect heat exchangers less than 250 MMBtu/hr to limit the opacity to less than or equal to 20% except; for a maximum of 40% opacity for not more than 2 minutes during any 60 consecutive minutes, for a maximum of 40% for not more than 6 minutes during any 60 consecutive minutes during cleaning the fire box or blowing soot, or during building a new fire which the time does not exceed the manufacturer's recommendations.

b) Per 40 CFR 60 Subpart Dc, for E132, no owner or operator of an affected facility that can combust coal, wood, or oil and has a heat input capacity of 8.6 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

c) 40 CFR 60.43c(d) requires the opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

6) **Unit Operations**

The source is exempt from 40 CFR 63, subpart JJJJJJ, contingent upon the source combusting liquid fuel, for E132,

only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. The source is not allowed to exceed a combined total of more than forty-eight (48) hours of operation, for E132, during a calendar year of liquid fuel testing. (40 CFR 63.11237)

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:

For Emission Units 1: *Plant-wide* VOC/Hexane emission calculations are based upon the throughput of VOC/Hexane containing material used and the weight percentage of the VOC/Hexane. The following equation is used to calculate VOC/Hexane/n-Hexane emissions unless another is authorized in writing by the District.

Plant-wide VOC/Hexane emissions (ton) = VOC/Hexane emissions (ton) from Refinery process x (1-0.98) + VOC/Hexane emissions (ton) from Bleaching process + VOC/Hexane emissions (ton) from Hydrogenation process + VOC/Hexane emissions (ton) from Deodorization process[3]

where;

VOC/Hexane emissions (ton) from each process = Oil processed (ton) x (ppm of Hexane before processing – ppm of Hexane after processing) /1,000,000

Oil processed (ton) = Oil (ton) that is extracted using solvent[4]

For Emission Unit 2: The Emission factors from AP-42, Chapter 1.3-*Fuel Oil Combustion* and Chapter 1.4-*Natural Gas Combustion*, are used to determine emissions for NOx, CO and PM pollutants.

[3] For refinery process, VOC emissions from the process are vented to E121 or E122. A typical control efficiency of 98% shall be used for the emission calculation.

[4] The oils are not extracted at the facility. The soybean and cottonseed oils are the only oils that are extracted by solvent. All other oils are mechanically extracted.

7. Insignificant Activities

Equipment	Quan.	PTE (tpy)	Regulation Basis
Cooling Towers for packaging line #1 (900 gal/minute)	1	1.13 PM_{10}	Regulation 1.02, section 1.38,
Cooling Towers for packaging line #2 (900 gal/minute)	1	1.13 PM_{10}	Regulation 1.02, section 1.38
Cooling Towers for packaging line #3 (900 gal/minute)	1	1.13 PM_{10}	Regulation 1.02, section 1.38
Oil/Water separator for packaging line	1	0.015 VOC	Regulation 1.02, Appendix A
Wastewater Treatment Process			
Receiving tank (TK-W100)	1	1.36 VOC	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 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.