



Louisville Metro Air Pollution Control District  
701 West Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137



Permit No.: 378-06-C(R2)

Plant ID: 0189

Effective Date: 0/00/2016

Expiration Date: 0/00/2017

Owner: Rohm and Haas Chemicals, LLC  
Source: Rohm and Haas – Louisville Plant  
4300 Camp Ground Road  
Louisville, KY 40216

is authorized to install the described process equipment by the Louisville Metro Air Pollution Control District. Authorization is based on information provided with the application submitted by the company and in accordance with applicable regulations and the conditions specified herein.

Process equipment description:

E-KVP2-(Bulk Dump Station (11-115), 50# Bag Dump Station (11-124), Pelletizer (11-154), Flow Aid System (11-184), Pellet Rework Hopper System (11-194), Pack-Out Hopper System (11-210), and Rework System (11-236)) all points controlled by Fabric Filter (11-250)

Applicable Regulation(s): 2.03, 2.16, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.08, 7.25

Control reference(s): 157-97-TV(R3)

Application No. 77534

Application Received: 6/2/2016

Permit Writer: Chris Gerstle

Date of Public Comment 00/00/2016

{Manager1}  
Air Pollution Control Officer  
{date1}

**Construction Permit Revisions/Changes**

<b>Revision No.</b>	<b>Permit No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Change Type</b>	<b>Change Scope</b>	<b>Description</b>
Initial	378-06-C	2/28/2007	NA	Initial	Entire Permit	Initial Permit Issuance, revised permit 144-86
R1	378-06-C(R1)	8/23/2011	7/20/2011	Significant	Pelletizer KVP2-11-154	Increase VOC emission limit from 1.67 tpy to 8.77 tpy
R2	378-06-C(R2)	?/?/2016	?/?/2016	Significant	Pelletizer KVP2-11-154	Increase VOC emission limit from 8.77 tpy to 36.6 tpy. Added limits for formaldehyde and cumene.

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. 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**

- G1. The owner or operator of the affected facility covered by this permit shall notify the District of any process change, equipment change, material change, or change in method or hours of operation. This requirement is applicable to those changes (except equipment changes) that may have the potential for increasing the emission of air contaminants to a level in excess of the applicable limits or standards specified in this permit or District regulations.
- G2. The owner or operator shall obtain new or revised permits from the District in accordance with District Regulation 2.16 for Title V sources, District Regulation 2.17 for FEDOOP sources or District Regulation 2.03 for other sources including:
- a. The company relocates to a different physical address.
  - b. The ownership of the company is changed.
  - c. The name of the company as shown on the permit is changed.
  - d. Permits are nearing expiration or have expired.
- G3. The owner or operator shall submit a timely application for changes according to G2. Timely renewal is not always achievable; therefore, the company is hereby authorized to continue operation in compliance with the latest District permit(s) until the District issues the renewed permit(s).
- G4. The owner or operator shall not be authorized to transfer ownership or responsibility of the permit. The District may transfer permits after appropriate notification (Form AP-100A) has been received and review has been made.
- G5. The owner or operator shall pay the required permit fees within 45 days after issuance of the SOF by the District, unless other arrangements have been proposed and accepted by the District.
- G6. This permit allows operation 8,760 hours per year unless specifically limited elsewhere in this permit.

- G7. The owner or operator shall submit emission inventory reports as required by Regulation 1.06.
- G8. The owner or operator shall timely report abnormal conditions or operational changes, which may cause excess emissions as required by Regulation 1.07.
- G9. 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.
- G10. If a change in the Responsible Official (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of the date the RO change occurs.

### Specific Conditions

**S1. Standards** (Regulation 2.03, section 6.1)

**a. VOC**

- i. For Emission Point 11-154, the owner or operator shall not allow VOC emissions to exceed 36.6 tons per 12 consecutive month period. (Regulation 7.25, section 3.1) (BACT)<sup>1</sup>
- ii. For Emission Point 11-154, the owner or operator shall not allow VOC emissions to exceed 18.1 lb/hr. (Regulation 7.25, section 3.1) (BACT)

**b. HAP<sup>2</sup>**

- i. The owner or operator shall limit each single plant-wide HAP emission to less than 10 tons per 12 consecutive month period. (Regulation 2.03)
- ii. The owner or operator shall limit plant-wide HAP emission to less than 25 tons per 12 consecutive month period. (Regulation 2.03)

**c. Opacity**

For Emission Points 11-115, 11-124, 11-154, 11-184, 11-194, 11-210, and 11-236, the owner or operator shall not allow the opacity to equal or exceed 20%. (Regulation 7.08, section 3.1.1)

**d. PM<sup>3</sup>**

- i. For Emission Points 11-115, 11-124, 11-154, 11-210, and 11-236, the owner or operator shall not allow the combined PM emissions to exceed 6.34 lb/hr. (Construction Permit # 144-86-C, dated July 8, 1986) (Regulation 7.08, section 3.1.2)
- ii. For Emission Points 11-184 and 11-194, the owner or operator shall not allow the combined PM emissions to exceed 2.34 lb/hr. (Construction Permit # 144-86-C, dated July 8, 1986) (Regulation 7.08, section 3.1.2)

**e. TAC**

- i. For Emission Point 11-154, the owner or operator shall not allow emissions of cumene to exceed 2,691 pounds per 12 consecutive month period.<sup>4</sup>

---

<sup>1</sup> The company submitted a BACT analysis on 6/2/2016, which demonstrated no controls were economically feasible.

<sup>2</sup> These HAP emission limits were taken to avoid applicability of future MACTs, including 40 CFR 63 Subpart FFFF (Miscellaneous Organic NESHAP (MON)). These limits will ensure that the source remains a synthetic minor source of HAPs.

<sup>3</sup> The potential uncontrolled lb/hr PM emissions for emission points (11-115, 11-124, 11-154, 11-184, 11-194, 11-210, and 11-236) are less than the limits in Specific Conditions S1.d.i. and ii.

<sup>4</sup> The emission limit ensures an unadjusted risk value of 0.86 and an industrial risk value of 1.19 for the KVP2 Pelletizer (S-KVP2-11-250).

- ii. For Emission Point 11-154, the owner or operator shall not allow emissions of formaldehyde to exceed 2,365.2 pounds per 12 consecutive month period.<sup>5</sup>
- iii. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.<sup>6</sup> (Regulations 5.00 and 5.21)

**S2. Monitoring and Record Keeping** (Regulation 2.03, section 6.1)

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

**a. VOC**

- i. For Emission Point 11-154, the owner or operator shall keep a daily record of the amount of production from the pelletizer system for each batch.
- ii. For Emission Point 11-154, the owner or operator shall monthly calculate and record the monthly and 12 consecutive month VOC emissions.

**b. HAP**

The owner or operator shall monthly calculate and record the plant wide (including LDAR emissions) monthly and 12 consecutive month single and total HAP emissions.

**c. Opacity**

- i. For Emission Points 11-115, 11-124, 11-154, 11-184, 11-194, 11-210, and 11-236, the owner or operator shall conduct a weekly one-minute visible emissions survey of the fabric filter (C-KVP2-11-250), during normal operation and daylight hours, of the emission points. No more than four emission points shall be observed simultaneously.

At emission 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.

- ii. 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 point is not being operated during a given month, then no visible emission

---

<sup>5</sup> The emission limit ensures an unadjusted risk value of 0.99 and an industrial risk value of 1.36 for the KVP2 Pelletizer (S-KVP2-11-250).

<sup>6</sup> Acetophenone, butyl acrylate, and methyl methacrylate were de minimis at the time of the issuance of the permit.

survey needs to be performed and a negative declaration shall be entered in the record.

d. **PM**

See Specific Condition S2.c.

e. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to SDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above de minimis at the time of the change.
- iii. The owner or operator shall monthly calculate and record the monthly and 12 consecutive month cumene and formaldehyde emissions.

S3. **Reporting** (Regulation 2.03, section 6.1)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. 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. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete”.
- Signature and title of the responsible official of the company.

The compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through June 30 <sup>th</sup>	August 29 <sup>th</sup>
July 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup>

a. **VOC**

- i. Emission Unit number and Emission Point number for each exceedance
- ii. The beginning and ending date of the reporting period
- iii. The monthly and 12 consecutive month VOC emissions for each month in the reporting period
- iv. Identification of all periods of exceedance of the VOC emission limit
- v. Description of any corrective action taken for each exceedance.

b. **HAP**

- i. Emission Unit number and Emission Point number for each exceedance

- ii. The beginning and ending date of the reporting period
- iii. The monthly and 12 consecutive month emissions for each month for each single HAP and total HAPs in the reporting period
- iv. Identification of all periods of exceedance of the HAP emission limit
- v. Description of any corrective action taken for each exceedance

c. **Opacity**

- i. Emission Unit number and Emission Point number for each exceedance
- ii. The beginning and ending date of the reporting period
- iii. The number of surveys where visible emissions were observed
- iv. The date, time, and results of each Method 9 that exceeded the opacity standard
- v. Description of any corrective action taken for each exceedance.

d. **PM**

For Emission Points 11-115, 11-124, 11-130, 11-154, 11-184, 11-190, 11-194, 11-210, and 11-236: There are no compliance reporting requirements for this equipment to show compliance with the lb/hr PM emission standard.

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze.  
(Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in S2.e.ii.
- iv. The owner or operator shall report any exceedances of the TAC limits in S1.e. The report shall include the following:
  - 1) Emission Unit number and Emission Point number for each exceedance;
  - 2) The beginning and ending date of the reporting period;
  - 3) The monthly and 12 consecutive month individual TAC emissions;

- 4) Description of any corrective action taken for each exceedance. If no corrective action was taken during the reporting period, the owner or operator shall submit a negative declaration.