



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



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0243-18-F (R1)

Plant ID: 0243

Effective Date: 3/20/2018

Expiration Date: 3/31/2023

Revision Date: x/xx/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:

Owner: Heaven Hill Distilleries, Inc.

Source: Heaven Hill Distilleries – Bernheim Facility

1701 West Breckenridge Street

Louisville, Kentucky 40210

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 months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	CO	NO _x	VOC
Tons/year:	<100	<100	<100

Application No.:

See **Application and Related Documents** table.

Public Notice Date:

08/02/2019

Permit writer: Shannon Hosey

Air Pollution Control Officer
{date1}

Table of Contents

FEDOOP Permit Revisions/Changes.....	3
Construction Permit History	3
Applications and Related Documents.....	4
Abbreviations and Acronyms	5
Preamble	6
General Conditions	6
Plantwide Requirements	10
Facility Description.....	10
Applicable Regulations.....	10
Plantwide Specific Conditions.....	11
Comments for Plantwide Requirements	12
Emission Unit U1: Grain Handling and Processing	13
U1 Applicable Regulations.....	13
U1 Equipment.....	13
U1 Control Devices.....	14
U1 Specific Conditions.....	15
Emission Unit U2: Whiskey Manufacturing.....	18
U2 Applicable Regulations.....	18
U2 Equipment.....	18
U2 Control Devices.....	20
U2 Specific Conditions.....	21
Emission Unit U3: Boilers.....	23
U3 Applicable Regulations.....	23
U3 Equipment.....	23
U3 Control Devices.....	24
U3 Specific Conditions.....	25
Emission Unit U4: Parts Washers (Insignificant Activity).....	31
U4 Applicable Regulations.....	31
U4 Equipment.....	31
U4 Control Devices.....	31
U4 Specific Conditions.....	32
Insignificant Activities.....	35
Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests	36

FEDOOP Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	190-01-F	11/05/2001	07/01/2001	Initial	Entire Permit	Initial Permit Issuance
R1	190-01-F (R1)	05/01/2012	02/25/2012	Renewal	Entire Permit	Permit renewal; incorporation of construction permits 98-07-C, 99-07-C, 123-07-C, 124-07-C, 414-08-C, 325-07-C, 222-09-C and 61-09-C
N/A	O-0243-18-F	03/20/2018	02/10/2018	Renewal	Entire Permit	Permit renewal; incorporation of Construction Permits 36982-13-C (R1), C-0243-1001-14-F, and C-0243-1000-17-F Admin revision to correct a typo in referencing tanks
R1	O-0243-18-F (R1)	xx/xx/2019	08/02/2019	Significant	Entire Permit	Incorporating Construction Permit C-0243-1003-18-F and C-0243-1002-17-F (R1), removing the 5 tpy limit for Fermentation Tanks 14-17 (E51a, E51b, E51c and E51d) ¹

Construction Permit History

Permit No.	Effective Date	Description
36982-13-C	04/02/2013	Four fermentation tanks, 124,000 gallon capacity each
C-0243-1001-14-F	09/25/2014	Removed the existing 92.4 MMBtu/hr "Nebraska" boiler and installed in its place a new 99 MMBtu/hr "Victory" boiler
36982-13-C (R1)	08/25/2015	Incorporated permit 123-07-C and added acceptance of BACT analysis
C-0243-1002-17-F	02/28/2017	Corn Silo #3B (E50), 10,220 Bu capacity; 4 Fermentation tanks (51a-d), 124,000 gallons capacity each; Whiskey Surge Tank (E53), 150 gallons capacity; Victory Boiler #2 (E54), 61 MMBtu/hr

¹ Company submitted a BACT per Regulation 7.25 and there is no feasible BACT.

Permit No.	Effective Date	Description
C-0243-1001-14-F (R1)	03/14/2017	Revision to add correct Regulation 7.06 standards, 100 tpy CO limit and 100 tpy VOC limit.
C-0243-1003-18-F	12/14/2018	Replacing Bucket Elevator #2
C-0243-1002-17-F (R1)	07/05/2019	Revising construction permit to remove the 5 tpy limit for Fermentation Tanks 14-17 (E51a, E51b, E51c and E51d) ²

Applications and Related Documents

Document Number	Date Received	Description
66569	08/18/2014	Construction application form AP-100A to replace existing 92.4 MMBtu/hr Nebraska boiler with a new 99 MMBtu/hr Victory boiler
71008	05/01/2015	BACT analysis, VOC emission from fermenters
71051	05/06/2015	Form AP-100A BACT analysis
80648	11/29/2016	FEDOOP renewal application and construction application to expand production including one new grain silo, 3 rd distillation system, four fermenters, one drop tub, a wet cake system, new boiler, cooling tower, centrifuges, and chillers
81374	01/19/2017	Revised construction application to correct potential and actual emissions on Form AP-100A and to submit flow diagram
96410	12/10/2018	AP-100A construction application to replace existing bucket elevator #2
98497	05/28/2019	BACT Analysis for VOC emissions subject to Regulation 7.25 emitted from Fermentation Tanks 14-17 (Emission Points E51a, E51b, E51c, and E51d)

² Company submitted a BACT per Regulation 7.25 and there is no feasible BACT.

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
Bu	- Bushel
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

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. 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.
- G3. 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.
- G4. 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.
- G5. 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.
- G6. 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.

- G7. 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.
- G8. 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.
- G9. 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.
- G10. 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; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. 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.
- G12. 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 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 annual report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.

G13. 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, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
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
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

G14. 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
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
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 and Incorporation by Reference of Federal New Source Performance Standards

G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

G16. 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.

G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137***

Plantwide Requirements

Facility Description

Distillery

Applicable Regulations

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

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1, 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 7
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

Plantwide Specific Conditions

S1. **Standards** [Regulation 2.17, section 5.1]

a. **CO**

The owner or operator shall not allow or cause total plantwide CO emissions to equal or exceed 100 tons during any consecutive 12-month period.
[Regulation 2.17, Section 5.1]

b. **NO_x**

The owner or operator shall not allow or cause total plantwide NO_x emissions to equal or exceed 100 tons during any 12 month consecutive period.
[Regulation 2.17, Section 5.1]

c. **TAC**

i. 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*.
[Regulations 5.00 and 5.21] [See Comments 1, 2 and 3]

ii. If the TAC does not have an established BAC or *de minimis* value, the owner or operator shall calculate and report these values. The form, located in Attachment C - Determination of Benchmark Ambient Concentration (BAC), may be used for determining BAC and *de minimis* values. [Regulation 5.20, sections 3 and 4]

d. **VOC**

The owner or operator shall not allow or cause total plantwide VOC emissions to equal or exceed 100 tons during any 12 month consecutive period.³
[Regulation 2.17, Section 5.1]

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. **CO/NO_x/VOC**

³ The fugitive emissions from the warehouse in Emission Unit 2 are not counted toward determination of status as a major source per Regulation 2.16, section 1.25.2.

The owner or operator shall monthly calculate and record the monthly and 12-month rolling plantwide total for CO, NO_x, and VOC for the month and previous 12-month period.³

b. **TAC**

The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to, (M)SDS, analysis of emissions, and/or modeling results.

S3. **Reporting** [Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. **CO/NO_x/VOC**

The owner or operator shall report the plantwide total emissions for CO, NO_x, and VOC for each 12-month period.³

b. **TAC**

Any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration.

Comments for Plantwide Requirements

1. Heaven Hill submitted their TAC Environmental Acceptability Demonstration to the District on September 10, 2008. The report showed that all TACs are emitted at levels below *de minimis* uncontrolled.
2. For Emission Units U1 and U2, there are no Toxic Air Contaminant (TAC) emissions subject to the STAR program.
3. For Emission Unit U3, the TAC emissions from the combustion of natural gas are considered to be "*de minimis* emissions" by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. [Regulation 5.21, Section 2.7]

Emission Unit U1: Grain Handling and Processing**U1 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.14	Control of Fugitive Particulate Emissions	1, 2, 8
7.08	Standards of Performance for New Process Operations	1, 2, 3

U1 Equipment

Emission Point	Description	Applicable Regulation	Control ID	Installation Date	Release ID
E46	Grain Receiving – Hopper Truck	1.14, 7.08	N/A	1992	N/A
E1	Screw Conveyor, Thomas Conveyor, 25,000 lbs/hr	7.08	C1	1992	S1
E2	Bucket Elevator #1, Thomas Conveyor, 2,500 Bu ⁴ /hr Bucket Elevator #2, Thomas Conveyor, 2,500 Bu/hr	7.08	C1	1992 2018	S1
E3	Grain Cleaner, 2,500 Bu/hr	7.08	C1	1992	S1
E4	Corn Silo #1, In-House Design, 7,000 Bu/hr	7.08	C1	1992	S1
E5	Corn Silo #2, In-House Design, 7,000 Bu/hr	7.08	C1	1992	S1
E6	Corn Silo #3, In-House Design, 9,000 Bu/hr	7.08	C1	1992	S1
E50	Corn Silo #3B, In-House Design, 10,222 Bu/hr	7.08	C1	1992	S1
E7	Wheat/Rye Silo #4, In-House Design, 7,000 Bu/hr	7.08	C1	1992	S1
E8	Wheat/Rye Silo #5, In-House Design, 7,000 Bu/hr	7.08	C1	1992	S1
E9	Malt Silo #6, In-House Design, 4,800 Bu/hr	7.08	C1	1992	S1
E10	Malt Silo #7, In-House Design, 4,800 Bu/hr	7.08	C1	1992	S1
E11	Corn Hammermill, Sprout-Waldron, 18 tons/hr	7.08	C2	2007, 2016/2017 ⁵	S2
E12a	Corn Storage Bin, In-House Design, 344,641 lbs/hr	7.08	C2	1992	S2

⁴ Bu = Bushel⁵ Emission Point E11 was originally installed in 2007 and was modified in 2016/2017.

Emission Point	Description	Applicable Regulation	Control ID	Installation Date	Release ID
E12b	Corn Weigh Hopper, In-House Design, 24,256 lbs/hr	7.08	C2	1992	S2
E13	Malt Hammermill, Prater, 350 Bu/hr	7.08	C3	1992	S3
E14a	Malt Storage Bin, In-House Design, 8,399 lbs/hr	7.08	C3	1992	S3
E14b	Malt Weigh Hopper, In-House Design, 2,110 lbs/hr	7.08	C3	1992	S3
E15	Small Grain Hammermill, Prater, 350 Bu/hr	7.08	C4	1992	S4
E16a	Small Grain Storage Bin, In-House Design, 7,264 lbs/hr	7.08	C4	1992	S4
E16b	Small Grain Weigh Hopper, In-House Design, 6,656 lbs/hr	7.08	C4	1992	S4
E17	Mash Cooker #1 & #2, In-House Design, 14,000 gal (IA)	7.08	N/A	1992	N/A
E18	Mash Cooker #3, In-House Design, 14,000 gal (IA)	7.08	N/A	2007	N/A

U1 Control Devices

Control ID	Description	Control Efficiency
C1	Baghouse, Manufacturer Carter Day, Model 24RJ37	95%
C2	Baghouse, Manufacturer MAC, 96AVR32	95%
C3	Baghouse, Manufacturer MAC, 96AVR32	95%
C4	Baghouse, Manufacturer MAC, 96AVR32	95%

U1 Specific Conditions

S1. Standards [Regulation 2.17, section 5.1]

a. Opacity

- i. For Emission Points E1, E2, E3, E4, E5, E6, E50, E7, E8, E9, E10, E11, E12a, E12b, E13, E14a, E14b, E15, E16a, E16b, E17 and E18, the owner or operator shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]
- ii. For Emission Point E46, the owner or operator shall not cause or permit the discharge of fugitive emissions in excess of 20% opacity. [Regulation 1.14, section 2.3]

b. PM/PM₁₀

- i. The owner or operator shall not allow PM emissions to each exceed the following limits based on actual operating hours in a calendar day. [Regulation 7.08, section 3.1.2]

Emission Point ID	Emission Limit (lb/hr) ⁶
E1 and E46	17.2
E2, E3, E4, E5, E6, E7, E8, E9, E10 and E50	31.4
E11 and E12a	21.5
E12b	22.5
E13, E14a, E15 and E16	14.7
E14b and E16b	10.3

- ii. For Emission Point E46, the owner or operator shall not allow fugitive emissions to create visible emissions beyond the facility lot line. [Regulation 1.14, section 2.4]

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.

⁶ A one-time PM compliance demonstration for this equipment on 03/15/2017 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.

a. **Opacity**

For Emission Point E46:

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey of the emission points during normal operation. No more than four emission 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 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 that initial observation.
- iii. The owner or operator shall maintain records 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 survey needs to be performed and a negative declaration shall be entered in the record.

b. **PM/PM₁₀**

The owner or operator shall monthly keep records of the throughput of grain at each grain-processing and grain-handling device.

S3. **Reporting** [Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. **Opacity**

- i. Emission Unit number and Stack ID numbers;
- ii. The time, date, and results for each visual emission survey during which visible emissions were detected. If no visible emissions were observed during the reporting period, the owner or operator shall submit a declaration that no visible emissions were observed;
- iii. The date, time, and results of each Method 9 or Method 22 observation conducted. If no Method 9 or Method 22 observations were performed

during the reporting period, the owner or operator shall submit a negative declaration;

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

b. **PM/PM₁₀**

There are no reporting requirements for this pollutant.

Emission Unit U2: Whiskey Manufacturing**U2 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.14	Control of Fugitive Particulate Emissions	1, 2, 8
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3, 4 5
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 5, 7
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, 5

U2 Equipment⁷

Emission Point	Description	Applicable Regulation	Installation Date
E19a	Fermenter #1, In-House Design, 123,800 Wine Gallons ⁸	6.24	Pre 6/13/1979
E19b	Fermenter #2, In-House Design, 123,800 Wine Gallons		
E19c	Fermenter #3, In-House Design, 123,800 Wine Gallons		
E19d	Fermenter #4, In-House Design, 123,800 Wine Gallons		
E19e	Fermenter #5, In-House Design, 123,800 Wine Gallons		
E20a	Fermenter #6, In-House Design, 123,800 Wine Gallons	7.25 (BACT)	2008
E20b	Fermenter #7, In-House Design, 123,800 Wine Gallons		2008
E20c	Fermenter #8, In-House Design, 123,800 Wine Gallons		2008
E20d	Fermenter #9, In-House Design, 123,800 Wine Gallons		2008
E48a	Fermenter #10, Cleveland Welding, In-House Design, 124,000 Gallons		2014
E48b	Fermenter #11, Cleveland Welding, In-House Design, 124,000 Gallons	7.25 (BACT)	2014
E48c	Fermenter #12, Cleveland Welding, In-House Design, 124,000 Gallons	7.25 (BACT)	2014
E48d	Fermenter #13, Cleveland Welding, In-House Design, 124,000 Gallons	7.25 (BACT)	2014
E51a	Fermenter #14, Cleveland Welding, In-House Design, 124,000 Gallons	7.25	2016/2017

⁷ 40 CFR 60, subpart Kb does not apply to vessels used to store beverage alcohol per 40 CFR 60,110b(d)(7).

⁸ A "wine gallon" is a measurement of any liquid's total volume. 1 "wine gallon" is equal to 128 fl oz or 3.78 liters.

Emission Point	Description	Applicable Regulation	Installation Date
E51b	Fermenter #15, Cleveland Welding, In-House Design, 124,000 Gallons	7.25	2016/2017
E51c	Fermenter #16, Cleveland Welding, In-House Design, 124,000 Gallons	7.25	2016/2017
E51d	Fermenter #17, Cleveland Welding, In-House Design, 124,000 Gallons	7.25	2016/2017
E21	Beer Well #1, In-House Design, 124,720 Wine Gallons	6.24	Pre 6/13/1979
E24	Quality Tank #7, In-House Design, 13,333 Wine Gallons	7.12	1993
E25	Quality Tank #8, In-House Design, 13,333 Wine Gallons	7.12	1993
E26	Heads and Tails Tank, In-House Design, 13,140 Wine Gallons	7.12	1993
E27a	Cistern Tank #10, In-House Design, 16,000 Gallons	7.12	1993
E27b	Cistern Tank #11, In-House Design, 16,000 Gallons	7.12	1993
E27c	Cistern Tank #12, In-House Design, 16,000 Gallons	7.12	1993
E27d	Cistern Tank #13, In-House Design, 16,000 Gallons	7.12	1993
E28	Whiskey Storage Tank #14, In-House Design, 53,000 Wine Gallons	7.12	2008
E49	Whiskey Storage Tank #15, In-House Design, 53,000 Wine Gallons	7.12	2013
E29a	Whiskey Storage Tank #16, In-House Design, 50,000 Wine Gallons	7.12	1993
E29b	Whiskey Storage Tank #17, In-House Design, 50,000 Wine Gallons	7.12	1993
E32	Whiskey Warehouse Aging	- ⁹	1990
E33a	Gauging Tank, In-House Design, 10,000 Wine Gallons	6.24	Pre 6/13/1979
E33b	Gauging Tank, In-House Design, 10,000 Wine Gallons		
E34	4 Station Filling and Evacuation System, MAC MFG SER# 7539, BEFS-101	6.24	Pre 6/13/1979
E35	Whiskey Surge Tank, In-House Design, 800 Wine Gallons	7.12	1990
E36	Whiskey Surge Tank, In-House Design, 400 Wine Gallons	7.12	1990
E37a	Gauging Tank, In-House Design, 6,500 Wine Gallons	6.24	Pre 6/13/1979
E37b	Gauging Tank, In-House Design, 6,500 Wine Gallons		
E37c	Gauging Tank, In-House Design, 6,500 Wine Gallons		
E47	Truck Loading Rack	N/A ¹⁰	1992

⁹ There are no applicable VOC emission standards for the whiskey warehouses.

¹⁰ Regulation 7.22 does not apply to the truck loading rack because the product loaded is not a “volatile organic material” as defined by the regulation. Under actual storage conditions, the true vapor pressure is less than 1.5 psia.

Emission Point	Description	Applicable Regulation	Installation Date
E53	Whiskey Surge Tank, Cleveland Welding, In-House Design, 150 Gallons	7.12	2016/2017

U2 Control Devices

There are no control devices associated with Emission Unit U2.

U2 Specific Conditions

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

a. **VOC¹¹**

- i. The owner or operator shall not allow or cause the VOC emissions from the four Fermentation Tanks 1, 2, 3, 4 and 5 (E19a, E19b, E19c, E19d, and E19e), the Beer Well #1 (E21), the gauging tanks (E33a, E33b, E37a, E37b and E37c), the barrel filling and evacuation system (E34) to equal or exceed 3000 pounds per day or 450 pounds per piece of equipment.¹² [Regulation 6.24, section 3.3]
- ii. The owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in Quality Tanks #7 and #8 (E24 and E25), the heads and tails tank (E26), Cistern Tanks 10-13 (E27a, E27b, E27c, and E27d), the whiskey storage tanks (E28, E29a, E29b and E49), and the whiskey surge tanks (E35 and E36). True vapor pressure shall be determined on an instantaneous basis under conditions representing expected worst-case conditions. [Regulation 7.12, section 3.1 and 3.3]
- iii. The owner or operator shall not allow total VOC emissions from the eight Fermentation Tanks 6-9 and 10-13 (E20a, E20b, E20c, E20d, E48a, E48b, E48c and E48d) to equal or exceed 31.4 tons in any period of twelve consecutive months.¹³ [Regulation 7.25, section 3.1]
- iv. See Plantwide Conditions.

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**

¹¹ For the four Fermentation Tanks 14-17 (E51a, E51b, E51c and E51d) the company submitted a BACT on May 28, 2019, determining that there is no feasible BACT for these emission points.

¹² The District has determined that the potential emissions from each of these affected facilities cannot exceed the standard uncontrolled.

¹³ The BACT analysis was submitted by the company on May 1, 2015 and approved by APCD on May 4, 2015. This analysis showed that there are no feasible controls for emissions from these emission points. The 31.4 ton emission limit represents the potential VOC emissions calculated by APCD using the current AP-42 emission factor for this process.

- i. No monitoring or record keeping is required for the four Fermentation Tanks 1, 2, 4 and 5 (E19a, E19b, E19d, and E19e), Beer Well #1 (E21), the gauging tanks (E33a, E33b, E37a, E37b and E37c), the barrel filling and evacuation system (E34) for Regulation 6.24.
- ii. The owner or operator shall monthly record the volume of mash introduced into Fermentation Tanks 6-9 and 10-13 (E20a, E20b, E20c, E20d, E48a, E48b, E48c and E48d). The owner or operator shall calculate VOC emissions from this process using AP-42 emission factors or another method, if approved in writing by the District. Monthly and twelve-month rolling total VOC emissions shall be recorded.
- iii. The owner or operator shall record the volume of mash introduced into Fermentation Tanks 14-17 (E51a, E51b, E51c and E51d). The owner or operator shall calculate VOC emissions from this process using AP-42 emission factors or another method, if approved in writing by the District. Monthly and twelve-month rolling total VOC emissions shall be recorded. [Regulation 1.06]
- iv. See Plantwide Conditions.

S3. Reporting [Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

- a. **VOC**
 - i. The owner or operator shall report the monthly and rolling twelve-month total VOC emissions from Emission Points E20a, E20b, E20c, E20d, E48a, E48b, E48c, E48d, E51a, E51b, E51c and E51d.
 - ii. See Plantwide Conditions.

Emission Unit U3: Boilers**U3 Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3, 4, 5, 6
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	§60.48c(f)(1)(i)-(iii), §60.42c(i), §60.48c(g)(2)-(3), §60.48c(d)-(e), §60.48c(e)(1), §60.48c(e)(11), §60.48c(j)
40 CFR 63 Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers for Area Sources	§63.11195(e), 63.11237

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 7
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

U3 Equipment

Emission Point	Description	Applicable Regulation	Installation Date	Release ID
E48	Victory Natural Gas Boiler #1, Victory, 99 MMBtu/hr, with Fuel Oil backup	STAR, 7.06, 40 CFR 60 Subpart Dc	2015	S8
E54	Victory Natural Gas Boiler #2, Victory, 61 MMBtu/hr		2016	S9

Plant ID: 0243

U3 Control Devices

There are no control devices associated with Emission Unit U3.

U3 Specific Conditions

S1. **Standards** [Regulation 2.17, section 5]

a. **CO**

See Plantwide Conditions.

b. **Fuel Requirements**

For Emission Point E48, the owner or operator shall only combust natural gas in this boiler during production, except that fuel oil may be fired during periods of natural gas curtailment or natural gas supply emergency, and for up to 48 hours per calendar year for periodic testing.¹⁴
[40 CFR 63.11195(e) and 63.11237]

c. **NO_x**

See Plantwide Conditions

d. **Opacity**

i. The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity. [Regulation 7.06, Section 4.2]

1) For indirect heat exchangers with a heat input capacity of less than 250 million BTU/hr, a maximum of 40% opacity shall be permissible for not more than two consecutive minutes in any 60 consecutive minutes; [Regulation 7.06, Section 4.2.1]

2) While building a new fire, for the period required to bring the boiler to normal operating conditions using the methods recommended by the manufacturer, for a length of time not to exceed the time recommended by the manufacturer.
[Regulation 7.06, section 4.2.3]

¹⁴ Heaven Hill has requested that the boilers be limited to natural gas combustion only, in order to not be subject to the requirements imposed by 40 CFR 63, subpart JJJJJ, *National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*. Terms of this regulation permit combustion of fuel oil "only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel (fuel oil) [without being subject to requirements of the regulation.] Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year."

e. **PM/PM₁₀**

For Emission Points E48 and E54, the owner or operator shall not cause to be discharged into the atmosphere from each affected facility particulate matter in excess of 0.10 pounds per million BTU actual total heat input. [Regulation 7.06, Section 4.1.4]

f. **SO₂**

i. For Emission Point E48, 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 0.81 pounds per million BTU actual heat input for combustion of gaseous fuels.
[Regulation 7.06, Section 5.1.2]

ii. For Emission Point E54, 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 0.80 pounds per million BTU actual heat input for combustion of gaseous fuels.
[Regulation 7.06, Section 5.1.2]

g. **TAC**

See Plantwide Conditions.¹⁵

h. **VOC**

See Plantwide Conditions.

S2. Monitoring and Record Keeping [Regulation 2.17, section 5.2]

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. **CO**

See Plantwide Conditions.

¹⁵ The TAC emissions from the combustion of natural gas are considered to be “*de minimis* emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. [Regulation 5.21, Section 2.7]

b. Fuel Requirements

i. Every month, the owner or operator shall maintain the following records:

- 1) Any notifications from the natural gas supplier of any natural gas curtailments or natural gas emergencies that require that the fuel source for this boiler be switched to fuel oil;
- 2) The type and quantity of fuel combusted in the boiler; and
- 3) The hours of operation for the boiler when fuel oil is burned.

c. NO_x

See Plantwide Conditions.

d. Opacity¹⁶

i. The owner or operator shall comply with the following opacity monitoring and recordkeeping requirements for boiler (E48) while burning fuel oil:

- 1) During each month that fuel oil is burned, the owner or operator shall conduct a monthly one-minute visible emissions survey of Emission Point E48 during normal operation and while fuel oil is being burned.
- 2) If 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.
- 3) The owner or operator shall maintain records 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 survey needs to be performed and a negative declaration shall be entered in the record.

¹⁶ The District has determined that using a natural gas fired boiler should inherently meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.

e. **PM/PM₁₀**

There are no monitoring or record keeping requirements for PM compliance.¹⁷

f. **SO₂**

i. During periods in which fuel oil is combusted, the owner or operator shall demonstrate compliance with the fuel oil sulfur limits by maintaining records of fuel supplier certification. These records shall include:
[40 CFR 60.48c(f)(1)]

- 1) The name of the oil supplier; [40 CFR 60.48c(f)(1)(i)]
- 2) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and [40 CFR 60.48c(f)(1)(ii)]
- 3) The sulfur content or maximum sulfur content of the oil. [40 CFR 60.48c(f)(1)(iii)]

ii. The fuel-oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction. [40 CFR 60.42c(i)]

iii. The owner or operator shall record and maintain records of the amount of each fuel combusted during each calendar month. [40 CFR 60.48c(g)(2)]

iv. As an alternative to meeting the requirements of 40 CFR 60.48c(g)(2), the owner or operator shall record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [40 CFR 60.48c(g)(3)]

g. **TAC**

See Plantwide Conditions.

h. **VOC**

See Plantwide Conditions.

S3. **Reporting** [Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

¹⁷ Using AP-42 emission factors, this standard cannot be exceeded uncontrolled for combustion of either natural gas or fuel oil.

a. **CO**

See Plantwide Conditions.

b. **Fuel Requirements**

- i. The type and quantity of fuel combusted each month of the reporting period;
- ii. The hours of operation when burning fuel oil.

c. **NO_x**

See Plantwide Conditions.

d. **Opacity**

- i. The time, date, and results for each visual emission survey during which visible emissions were detected. If no visible emissions were observed during the reporting period, the owner or operator shall submit a declaration the no visible emissions were observed;
- ii. The date, time, and results of each Method 9 or Method 22 observation conducted. If no Method 9 or Method 22 observations were performed during the reporting period, the owner or operator shall submit a negative declaration;
- iii. Description of any corrective action taken.

e. **PM/PM₁₀**

There are no compliance reporting requirements for this equipment.

f. **SO₂**

- i. The owner or operator shall keep records and submit reports to APCD, including the following information, as applicable.
[40 CFR 60.48c(d) and (e)]
 - 1) Calendar dates covered in the reporting period.
[40 CFR 60.48c(e)(1)]
 - 2) Records of fuel supplier certification. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the

fuel oil combusted during the reporting period. [40 CFR 60.48c(e)(11)]

- 3) The owner or operator shall submit reports for each six-month period, postmarked by the 30th day following the end of the reporting period.¹⁸ [40 CFR 60.48c(j)]

g. **TAC**

See Plantwide Conditions.

h. **VOC**

See Plantwide Conditions.

¹⁸ For periods during which no fuel oil was received or combusted, Heaven Hill need only submit a report stating that no fuel oil was received or combusted.

Emission Unit U4: Parts Washers (Insignificant Activity)

U4 Applicable Regulations

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

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1, 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 7
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

U4 Equipment

Emission Point	Description	Applicable Regulation	Release ID
PW1	Parts Washer, Clean Tech, KT1316, 30 Gallons	STAR, 6.18	Fugitive
PW2	Parts Washer, Clean Tech, KT1316, 30 Gallons		Fugitive

U4 Control Devices

There are no control devices associated with Emission Unit U4.

U4 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 1 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 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]
 - iv. See Plantwide Condition.
- b. **TAC**

See Plantwide Conditions.

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 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).

- ii. All records shall be retained for 5 years and made available to the District upon request. [Regulation 6.18, section 4.4.3]
- iii. See Plantwide Condition.

b. **TAC**

See Plantwide Conditions.

S3. **Reporting** [Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. **VOC**

See Plantwide Condition.

b. **TAC**

See Plantwide Conditions.

Insignificant Activities

Equipment	Quantity	Regulation Basis
Mash Cookers (EU U1, EP E17 and E18)	3	Regulation 1.02, Appendix A
Distillation Columns	3	Regulation 1.02, Appendix A
Cooling Tower	1	Regulation 1.02, Appendix A
Fuel Oil Tank	1	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.

Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests

Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc.) or hours of operation of the equipment by the appropriate emission factor and accounting for any control devices unless otherwise approved in writing by the District.

U1 Grain Handling and Processing				
EP ID	Description	Control Device	Acceptable Emission Factor Sources	
E46	Grain Receiving – Hopper Truck	N/A	AP-42, Table 9.9.1-1, PM 0.035 lb/ton	
E1	Screw Conveyor, Thomas Conveyor, 25,000 lbs/hr	C1	AP-42, Table 9.9.1-1, PM 0.061 lb/ton	
E2	Bucket Elevators (2), Thomas Conveyor, 2,500 Bu/hr	C1		
E3	Grain Cleaner, 2,500 Bu/hr	C1	AP-42, Table 9.9.1-1, PM 0.075 lb/ton	
E4	Corn Silo #1, In-House Design, 7,000 Bu/hr	C1	AP-42, Table 9.9.1-1, PM 0.025 lb/ton	
E5	Corn Silo #2, In-House Design, 7,000 Bu/hr	C1		
E6	Corn Silo #3, In-House Design, 9,000 Bu/hr	C1		
E50	Corn Silo #3B, In-House Design, 10,222 Bu/hr	C1		
E7	Weat/Rye Silo #4, In-House Design, 7,000 Bu/hr	C1		
E8	Weat/Rye Silo #5, In-House Design, 7,000 Bu/hr	C1		
E9	Matt Silo #6, In-House Design, 4,800 Bu/hr	C1		
E10	Matt Silo #7, In-House Design, 4,800 Bu/hr	C1		
E11	Corn Hammermill, Sprout-Waldron, 18 tons/hr	C2		AP-42, Table 9.9.1-2, PM 0.012 lb/ton
E12a	Corn Storage Bin, In-House Design, 344,641 lbs/hr	C2		AP-42, Table 9.9.1-1, PM 0.061 lb/ton
E12b	Corn Weigh Hopper, In-House Design, 24,256 lbs/hr	C2		
E13	Malt Hammermill, Prater, 350 Bu/hr	C3	AP-42, Table 9.9.1-2, PM 0.012 lb/ton	
E14a	Malt Storage Bin, In-House Design, 8,399 lbs/hr	C3	AP-42, Table 9.9.1-1, PM 0.061 lb/ton	
E14b	Malt Weigh Hopper, In-House Design, 2,110 lbs/hr	C3		
E15	Small Grain Hammermill, Prater, 350 Bu/hr	C4	AP-42, Table 9.9.1-2, PM 0.012 lb/ton	
E16a	Small Grain Storage Bin, In-House Design, 7,264 lbs/hr	C4	AP-42, Table 9.9.1-1, PM 0.061 lb/ton	
E16b	Small Grain Weigh Hopper, In-House Design, 6,656 lbs/hr	C4		
E17	Mash Cooker #1 & #2, In-House Design, 14,000 gal	N/A	AP-42, Table 9.12.3	
E18	Mash Cooker #3, In-House Design, 14,000 gal	N/A		

U1 Grain Handling and Processing Control Devices		
ID	Description	PM Control Efficiency (%)
C1	Baghouse, Manufacturer Carter Day, Model 24RJ37	95% ¹⁹
C2	Baghouse, Manufacturer MAC, 96AVR32	95% ¹⁹
C3	Baghouse, Manufacturer MAC, 96AVR32	95% ¹⁹
C4	Baghouse, Manufacturer MAC, 96AVR32	95% ¹⁹

U2 Whiskey Manufacturing		
EP ID	Description	Acceptable Emission Factor Sources
E19a	Fermenter #1, In-House Design, 123,800 Wine Gallons	AP-42, Table 9.12.3-1 VOC 14.26 lb/1000 bu
E19b	Fermenter #2, In-House Design, 123,800 Wine Gallons	
E19d	Fermenter #4, In-House Design, 123,800 Wine Gallons	
E19e	Fermenter #5, In-House Design, 123,800 Wine Gallons	
E20a	Fermenter #6, In-House Design, 123,800 Wine Gallons	
E20b	Fermenter #7, In-House Design, 123,800 Wine Gallons	
E20c	Fermenter #8, In-House Design, 123,800 Wine Gallons	
E20d	Fermenter #9, In-House Design, 123,800 Wine Gallons	
E48a	Fermenter #10, Cleveland Welding, In-House Design, 124,000 Gallons	
E48b	Fermenter #11, Cleveland Welding, In-House Design, 124,000 Gallons	
E48c	Fermenter #12, Cleveland Welding, In-House Design, 124,000 Gallons	
E48d	Fermenter #13, Cleveland Welding, In-House Design, 124,000 Gallons	
E51a	Fermenter #14, Cleveland Welding, In-House Design, 124,000 Gallons	
E51b	Fermenter #15, Cleveland Welding, In-House Design, 124,000 Gallons	
E51c	Fermenter #16, Cleveland Welding, In-House Design, 124,000 Gallons	
E51d	Fermenter #17, Cleveland Welding, In-House Design, 124,000 Gallons	AP-42 Chapter 7.1
E21	Beer Well, In-House Design, 124,720 Wine Gallons	
E24	Quality Tank #7, In-House Design, 13,333 Wine Gallons	
E25	Quality Tank #8, In-House Design, 13,333 Wine Gallons	
E26	Heads and Tails Tank, In-House Design, 13,140 Wine Gallons	
E27a	Cistern Tank #10, In-House Design, 16,000 Gallons	
E27b	Cistern Tank #11, In-House Design, 16,000 Gallons	
E27c	Cistern Tank #12, In-House Design, 16,000 Gallons	
E27d	Cistern Tank #13, In-House Design, 16,000 Gallons	
E28	Whiskey Storage Tank #14, In-House Design, 53,000 Gallons	
E49	Whiskey Storage Tank #15, In-House Design	
E29a	Whiskey Storage Tank #16, In-House Design, 50,000 Wine Gallons	
E29b	Whiskey Storage Tank #17, In-House Design, 50,000 Wine Gallons	

¹⁹ District pre-approved control efficiency.

U2 Whiskey Manufacturing		
EP ID	Description	Acceptable Emission Factor Sources
E32	Whiskey Warehouse Aging ²⁰	Site specific emission factor
E33a	Gauging Tank, In-House Design, 10,000 Wine Gallons	AP-42 Chapter 7.1
E33b	Gauging Tank, In-House Design, 10,000 Wine Gallons	
E34	4 Station Barrel Filling and Evacuation System, MAC MFG SER# 7539, BEFS-101	AP-42 Chapter 7.1
E35	Whiskey Surge Tank, In-House Design, 800 Wine Gallons	
E36	Whiskey Surge Tank, In-House Design, 400 Wine Gallons	
E37a	Gauging Tank, In-House Design, 6,500 Wine Gallons	
E37b	Gauging Tank, In-House Design, 6,500 Wine Gallons	
E37c	Gauging Tank, In-House Design, 6,500 Wine Gallons	
E47	Truck Loading Rack	AP-42 Ch. 5.2, Liquid loading, VOC 2.00 lb/1000gal
E53	Whiskey Surge Tank, Cleveland Welding, In-House Design, 150 Gallons	AP-42 Chapter 7.1

U3 Boilers		
EP ID	Description	Acceptable Emission Factor Sources
E48	Victory Boiler #1, Victory, 99 MMBtu/hr	Natural Gas Combustion: AP-42, Tables 1.4-1 through 1.4-4 Fuel Oil Combustion: AP-42, Table 1.3-1
E54	Victory Boiler #2, Victory, 61 MMBtu/hr	

U4 Parts Washers (Insignificant Activity)		
EP ID	Description	Acceptable Emission Factor Sources
PW1	Parts Washer, Clean Tech, KT1316, 30 Gallons	Mass Balance
PW2	Parts Washer, Clean Tech, KT1316, 30 Gallons	

²⁰ There are no applicable VOC emission standards for the whiskey warehouses.