

LOUISVILLE METRO AIR POLLUTION CONTROL DISTRICT
850 Barret Ave., Louisville, Kentucky 40204
22 January 2010

TITLE V PERMIT SUMMARY

Company: GE Consumer & Industrial

Plant Location: Appliance Park, Louisville, Kentucky 40225

Date App. Received: 21 April 1997

Date Admin. Complete: 12 May 1997

Date of Draft Permit: 07 September 2009

Date of Proposed Permit: 25 November 2009

District Engineer: Stephen Taylor

Permit No.: 155-97-TV (R1)

Plant ID: 0870

SIC Code: 3639

NAICS: 33522

AFS: 00870

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), 8 hr ozone (O₃), particulate matter less than 10 microns (PM₁₀); and particulate matter less than 2.5 microns (PM_{2.5}).

Application Type/Permit Activity:

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

Compliance Summary:

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

I. Source Description

1. **Class I Area Impacts:** This source is not located in or near a Class I area.
2. **Product Description:** The source manufactures home laundry appliances, dishwashers, and refrigerators.
3. **Overall Process Description:** The source receives raw steel sheet, coated steel sheet, tubing, drives, motors, and other assorted paint, chemicals, and hardware from which it manufactures and assembles major home appliances.
4. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**
 - a. **Large Appliance Coating:** (U01; U30; U40; and U42;) 40 CFR 60 Subpart SS does not apply to powder coatings, according to section 60.451.
 - b. **Cure and dry-off ovens:** (U01 and U30) These ovens are used to dry metal parts after washing and to dry, cure, or bake paint. The District has agreed with the source's NO_x RACT assessment that all appliance coating oven and furnace NO_x emissions are insignificant and not subject to NO_x RACT requirements in Regulation 6.42.
 - c. **Storage tanks:** (U87, U89, and U90) Storage tanks are used throughout the plant to store gasoline, paint, solvents, and foam constituents.
 - d. **Boilers and related systems:** Boiler # 6 is landfill gas-fired with a natural gas backup system. Standby Boiler # 8 is a natural gas system with the physical capability to use landfill gas. Steam from the boilers is used primarily for space and process heat.
 - e. **ABS Extruders:** (U100 through U103) Four extruders for cabinet and inner door liners.
 - f. **Steel Parts Fabrication:** (U104 through U107) Four lubricators for door panels, toe panels, and access panels.
 - g. **Stainless Steel Dishwasher Tub Line:** (U108) One line to produce stainless steel dishwasher tubs.
 - h. **Abrasive Blasting:** (U109) One abrasive unit using steel shot.
 - i. **Emergency Generator:** (U111) One emergency generator rated at 2220 hp.

- j. **Solvent Metal Cleaning Equipment**
Up to 30 cold solvent parts cleaners equipped with secondary reservoirs.
Twelve cold solvent parts cleaners not equipped with secondary reservoirs.
- k. **Combustion Units less than 10 MMBtu**
Sixty-nine combustion units less than 10 MMBtu but greater than 1 MMBtu with a combined heating capacity of 187.79 MMBtu/hr.
- l. **Miscellaneous**
Miscellaneous chemical use in assembly/packing operations; paint touch-up activities; drawing compound and lubricant use in hydraulic presses and other fabrication operations; and plastics handling, grinding, and regrind storage.
- m. **Removed Units:**
Unit U55 was permanently disconnected as of March 10, 2003.
Unit U65 was permanently disconnected as of March 2005.
U74 through U76; and U78 through U82, coal fired Boilers #1 through #5, were permanently disabled and requested to be removed per correspondence dated September 25, 2008.
U79, Ash Handling, was removed from the permit along with the coal fired boilers.
EP909 Boiler #7 (U81 & U82) was natural gas-fired was requested to be removed per correspondence dated September 25, 2008.

6. **Fugitive Sources:** Fugitive emissions of dust from any part of the plant are subject to Regulation 1.14, *Control of Fugitive Particulate Emissions*.

7. **Title V Permit Revisions/Changes**

Revision No.	Date of Issuance	Public Notice Date	Type	Emission Unit/Page No.	Description
Initial	01/22/2010	9/7/2009	Initial	Entire permit	Initial issuance of the permit
R1	01/22/2010	NA	Administrative	U01, U04, U30, U42, Combustion Sources <10 MMBtu/hr, and Miscellaneous	Incorporate construction permits # 72-89-C(R1), 73-89-C(R1), 19-91-C(R1), 145-98-C(R1), 201-01-C(R1), 216-93-C(R1), 405-92-C(R1), 334-92-C, 22-91-C(R1), 494-08-C (R1), 129-09-C (R1), and 652-08-C (R1)

8. Title V Major Source Status by Pollutant:

Pollutant	Actual Emissions 2007 Data (tpy)	Major Source Status (based on PTE)
CO	27.76	Yes
NO _x	73.27	Yes
SO ₂	76.79	Yes
PM	19.75	Yes
VOC	13.19	Yes
Single HAP > 1 tpy		
Styrene	1.03	Yes
Hydrogen Chloride	4.22	Yes
Hydrogen Fluoride	1.52	Yes
Total HAPs	7.59	Yes

9. MACT Standards: This source is major for HAPs and will be subject to the following MACT regulations:

40 CFR 63 Subpart NNNN Large Appliance Surface Coating
 40 CFR 63 Subpart ZZZZ Stationary Reciprocating Internal Combustion Engines

10. Applicable Requirements:

PSD NSPS SIP Other
 NSR NESHAPS District-Origin MACT

11. Referenced Federal Regulations in Permit:

40 CFR 60 Subpart A General Provisions
 40 CFR 60 Subpart SS Standards of Performance for Industrial Surface Coating: Large Appliances
 40 CFR 60 Subpart Dc Standard of Performance for Industrial-Commercial-Institutional Steam Generating Units
 40 CFR 63 Subpart NNNN Large Appliance Surface Coating
 40 CFR 63 Subpart ZZZZ Stationary Reciprocating Internal Combustion Engines

12. Future MACT Requirements

The federal regulation 40 CFR 63, Subpart DDDDD has been vacated since June 8, 2007; therefore, the boiler MACT requirements will not be included in this permit.

II. Regulatory Analysis

- 1. Emission and Operating Caps:** In 1980 an agreement was reached between the source and the District and incorporated into the State Implementation Plan stating that the source would not emit more than 979 tons of THCs per year. In later years the definition of THC was changed to eliminate some non-photochemically reactive hydrocarbons and the term THC was replaced with VOC.

On 25 September 1979, the source submitted a detailed compliance plan and schedule to bring it into compliance with Regulation 6.16. The compliance plan was formally approved by the District on 20 February 1980 and incorporated into a Board Order on 20 August 1980. The Board Order includes a time schedule listing actions to be taken for reducing emissions on specific pieces of equipment and specifies the quantity of emissions to be reduced for each. The order called for a reduction of total hydrocarbons from 4937 tons to a limit of 979 tons by 31 December 1992.

On 15 October 1991, the source submitted, at the request of the District, a revised Plant Emission Plan. The revised plan served to account for equipment which had either been removed or replaced and reflect the change in terminology and definition of organic material from Total Hydrocarbons (THC) to Volatile Organic Compounds (VOC). The sum of all VOC emissions listed in the new plan was 921.31 tons per year, accounting for the elimination of THCs which did not fit the definition of Volatile Organic Compounds. Those emissions not fitting the new definition were banked.

Since the October 1991 submittal, the source has replaced or abandoned most of the processes listed in the 1991 SIP update while reducing VOC emissions well below the 979 ton plant-wide limit; therefore, the Board Order and Plant Emission Plan no longer serve any purpose and have been eliminated from the Title V permit.

- 2. Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.
- 3. Operational Flexibility:** The source did not request to operate under alternative operating scenarios in its Title V Permit Application.
- 4. Testing Requirements:** The source's NO_x RACT includes required testing.

Also, the District is requiring a PM stack test for emission unit U42 (C32) controlling the fluid bed PVC rack coater emission point 309 and for VOCs if the company ever chooses to demonstrate compliance with the 85% reduction Regulation 6.16 standard.

- 5. Monitoring, Record Keeping and Reporting Requirements:** The source is required to monitor, maintain records of, and report on various operating

parameters to demonstrate ongoing compliance with all applicable requirements. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting.

- a. **Opacity:** For the units with an opacity standard, the source is required to perform monthly surveys. The source is required to initiate corrective action within 8 hours if visible emissions are observed during the survey. A Method 9 test is required if visible emissions persist. The periodic surveys coupled with Method 9 tests, if necessary, should be adequate monitoring to reasonably assure the source meets the opacity standards.
- b. **VOC:**
 - i. For U01 and U30 (Powder coating operations), the owner or operator shall maintain records in accordance with Regulation 7.59.
 - ii. For U04 (E-coat prime), the owner or operator shall maintain at the source, for a period of at least 5 years, records of all data and calculations used to determine VOC emissions from each affected facility.
 - iii. For U40 and U42 (large appliance coating), the owner or operator shall maintain the following records daily:
 - 1) The amount and type of adhesive, coatings (including catalyst and reducer for multi-component coatings), solvent, and/or graphic arts material used at each point of application, including exempt compounds;
 - 2) The VOC content as applied in each adhesive, coating, solvent, and/or graphic arts material;
 - 3) The date for each application of adhesive, coating, solvent, and/or graphic arts material;
 - 4) The amount of surface preparation, clean-up, wash-up, of solvent (including exempt compounds) used and the VOC content of each material used during each calendar month; and
 - 5) The oven temperature when an oven is part of the coating line.
 - 6) VOC content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coating, and inks; using EPA Method 24.

- iv. For U87(gasoline refueling), the owner or operator shall keep a record of the amount of throughput of gasoline per month
- v. For U100-U103, U108 (ABS Extruders, steel parts fabrication, and dishwasher tub line), the owner or operator shall keep a record of the amount VOC material used each month and calculate the monthly and 12 consecutive month VOC emissions each month. Also for U108, the owner or operator shall record the number of tubs produced each month and calculate the number of tubs produced that year in order to demonstrate compliance with the 726,500 tub/year limit.
- vi. For U104 – 107, the potential combined VOC emissions for emission points (U104-U107) is below the limit listed in Specific Condition S1. based on one-time compliance demonstrations dated December 2, 2002 and April 28, 2003. Therefore, there are no monitoring, recordkeeping, or reporting requirements for this standard.
- vii. For the solvent metal cleaning equipment, all persons shall maintain records that include the following for each purchase:
 - 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).
- viii. For the miscellaneous emission unit:
 - 1) For equipment subject to Regulation 6.24,
 - a) Daily record the hours of operation of the equipment;
 - b) Monthly calculate and record the average hourly and daily VOC emissions for Class II and Class III solvents subject to Regulation 6.24;
 - 2) For emission point 483-92, weekly record the total production (units) for the week, monthly calculated and record the year to date total production (units), and monthly calculate and record the monthly and twelve consecutive month VOC emissions.
 - 3) For equipment subject to Regulation 7.25, the owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for each emission point.

c. **PM**

- i. For (U01, U30, and U109), monthly records of process throughput, daily records of the hours of operation, and calculate the PM emissions in lb/hr if a process bypasses a control device or process control. The company has the option to maintain a record of the daily potential to emit in place of the monthly records of process throughput and daily records of hours of operation.
- ii. For U42 (large appliance coating) and U109 (abrasive blasting), the owner or operator shall, monthly, perform and record a visual inspection of the structural and mechanical integrity of the control devices for signs of damage, air leakage, corrosion, etc. and repair as needed.
- iii. For U81 and U82 (landfill gas fired and natural gas fired boilers), the District has performed one-time PM and SO₂ compliance demonstration for the boilers, using AP-42 emission factors when combusting natural gas and landfill, and the potential emissions cannot exceed the standards. Therefore, there are no monitoring, record keeping, and reporting requirements for these boilers with respect to PM and SO₂ emission limits. For Standby Boiler #8, the owner or operator shall keep records of the amount of fuel combusted each month for 40 CFR 60.48c(g).

d. **SO₂**

For U81 and U82 (gas) and combustion sources less than 10 MMBtu/hr, the District has performed one-time PM and SO₂ compliance demonstration for the boilers, using AP-42 emission factors when combusting natural gas, and landfill gas, and the potential emissions cannot exceed the standards. Therefore, there are no monitoring, record keeping, and reporting requirements for this equipment with respect to PM and SO₂ emission limits.

e. **NO_x**

For U81-U82 (all boilers), the owner or operator shall comply with the NO_x RACT Plan attached to the permit.

f. **Unit Operation**

For U111 the emergency generator, the owner or operator shall monthly calculate and record the hours of operation and the amount of fuel combusted each month.

6. **Off-Permit Documents:** The District considers an “off-permit document” as a document on which a source’s compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source’s Title V Operating Permit. The designation “off-permit document” shall be made at the District’s discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, PMPs, MOCS; or other documents which are too voluminous to be included in a source’s Title V Operating Permit, as determined by the District.

III. Other Requirements

1. **Temporary Facilities:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Compliance Schedule/Progress Reports:** The source has certified compliance with all applicable requirements; therefore, no compliance schedule or progress reports are necessary.
4. **Emissions Trading:** The source participates in emissions trading.
5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
6. **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. This source 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, and commercial refrigerators. Additionally, in 1995, the source voluntarily substituted a high ozone depleting with a low ozone depleting compound in its refrigerator foaming operation under a "pollution control project" which received formal EPA approval on May 1, 1995.
7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR 68 Subpart F and Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount. If the source becomes subject to 40 CFR 68 and Regulation 5.15, the source shall comply with the Risk Management Program and Regulation 5.15 and submit a Risk Management Plan to:

RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346

- 8. Insignificant Activities:** The following activities, as referenced in the source's Title V Permit Application, have been determined by the District to be insignificant.

Insignificant Activities			
Description		Quantity	Basis
Fuel or lubricating oils; VP <10 mm Hg		11	Regulation 2.02, section 2.3.9.2
Fuel oil or diesel tanks; annual turnover < 2 times capacity		6	Regulation 2.02, section 2.3.25
Brazing, soldering, or welding equipment		Various	Regulation 2.02, section 2.3.4
Woodworking, except for conveying, hogging, or burning wood/sawdust		Various	Regulation 2.02, section 2.3.5
Resin curing ovens		Various	Regulation 2.02, section 2.3.7
Plastics compression or injection molding		Various	Regulation 2.02, section 2.3.8
Dipping operations - oils, waxes, or grease		Various	Regulation 2.02, section 2.3.9.1
Emergency relief vents - non- regulated process		Various	Regulation 2.02, section 2.3.10
Lab venting and exhausting		7	Regulation 2.02, section 2.3.11
Vent systems restaurants and bakeries		Various	Regulation 2.02, section 2.3.12
Blast cleaning - abrasives in water		Various	Regulation 2.02, section 2.3.13
Heat treating, soaking or case hardening		Various	Regulation 2.02, section 2.3.14
Residential/domestic equipment		Various	Regulation 2.02, section 2.3.16
Use of peanut, sunflower, canola, or cottonseed oils		1	Regulation 2.02, section 2.3.19
Soil or groundwater remediation		1	Regulation 2.02, section 2.3.20
Maintenance Paint Booth (Previously Permit 35-04)		1	Regulation 2.16, section 1.22.1.2.
R & D facilities		7	Regulation 2.02, section 2.3.27
GUH 03-0	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-02	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-03	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1

Insignificant Activities			
Description		Quantity	Basis
GUH 03-04	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-05	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-06	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-07	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-08	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-09	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-10	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-11	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-12	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-14	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-15	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-16	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-17	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-18	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-19	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-20	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-21	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-22	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-23	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1

Insignificant Activities			
Description		Quantity	Basis
GUH 01-13	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-14	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-15	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-16	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-17	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-18	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-19	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-20	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-21	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-22	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
EUH 01-23	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
EUH 01-24	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
EUH 01-25	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
GUH 01-26	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-27	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-28	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-29	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-30	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-31	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1

Insignificant Activities			
Description		Quantity	Basis
GUH 01-32	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-33	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-34	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-35	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-36	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-37	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-38	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-39	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-003	S800 rated at 0.73 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-013	S400 rated at 0.365 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-017	S800 rated at 0.73 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-001	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-002	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-003	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-004	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-005	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-006	Rated at 0.3 MMBtu/hr located in the paint room (A15)	1	Regulation 2.02, section 2.1.1
UH-007	Rated at 0.3 MMBtu/hr located in the maintenance shop (A21)	1	Regulation 2.02, section 2.1.1
UH-008	Rated at 0.3 MMBtu/hr located in the maintenance shop (A19)	1	Regulation 2.02, section 2.1.1
UH-009	Rated at 0.3 MMBtu/hr located in the oil room (west wall)	1	Regulation 2.02, section 2.1.1
UH-010	Rated at 0.3 MMBtu/hr located at the dock door (H34)	1	Regulation 2.02, section 2.1.1

Insignificant Activities			
Description		Quantity	Basis
UH-011	Rated at 0.3 MMBtu/hr located in the foam room (A6)	1	Regulation 2.02, section 2.1.1
UH-012	Rated at 0.3 MMBtu/hr located at the lab dock (H2)	1	Regulation 2.02, section 2.1.1
UH-013	Rated at 0.3 MMBtu/hr located at the lab dock (H3)	1	Regulation 2.02, section 2.1.1
AP4 250000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 75000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 75000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 250000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 150000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
Waste water treatment plant consisting of two (2) clarifiers, two filter presses, and a skimmer.		1	Regulation 2.16, Section 1.22
Cooling towers: AP-1 Front Tower AP-2 Rear Tower AP-2 Front Tower AP-2 Outlying Tower AP-3 North Tower AP-4 South Tower AP-4 Front Tower AP-4 Plastics Tower AP-5 Plastics Tower AP-5 Front Tower AP-20 Tower AP-32 Tower AP-33 Tower		13	Regulation 2.16, Section 1.22
Two Infrared Surface-stabilization Electric Heaters located prior to the application of powder paint. (EP 214A)		1	No applicable regulation.
One dishwasher rack pretreatment tunnel to prepare wire racks for vinyl coating. (Previously Permit 255-96)		1	No applicable regulation.
Washing System (Previously Permit 226-03)		1	No applicable regulation.

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

- B. Activities identified in Regulation 2.02, section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.
 - b. No visible emission surveys or other monitoring shall be required for facilities designated as insignificant activities.
- C. The Insignificant Activities table is correct as of the date of the permit was proposed for review by the USEPA, Region 4. The company shall submit an updated list of insignificant activities annually with the Title V compliance certification pursuant to District Regulation 2.16, section 4.3.5.3.6.
- D. Trivial Activities are only those activities or processes falling into the general categories defined in Regulation 2.16, section 1.41, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.