



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



14 March 2010

FEDOOP Statement of Basis

Company: Altugas International, a division of Arkema Inc.

Plant Location: 4350 Camp Ground Road, Louisville, Kentucky 40216

Application	Receipt Date	Application Number
FEDOOP Application	02/28/2003	9355
FEDOOP RO Change	10/2/2008	11102
FEDOOP Permit Renewal	2/27/2009	11222
FEDOOP Permit Revision	5/11/2009	11300

Date of Draft Permit: 14 March 2010

Date of Final Permit: xx xx 2010

District Engineer: Karen Thorne

Permit No: 40-06-F (R2)

Plant ID: 1294

SIC Code: 2821

NAICS: 325211

AFS: 01294

Introduction:

This permit will be issued pursuant to District Regulation 2.17, Federally Enforceable District Origin Operating Permits. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for 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
 Source is out of compliance

Compliance schedule included
 Source is operating in compliance

I. Source Information

1. **Product Description:** Altuglas manufactures acrylic molding powder and pellets.
2. **Process Description:** The source is a chemical manufacturing plant that produces acrylic molding powder and pellets.
3. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**
 - Bulk Loading System
 - Extruder Die System
 - Beringer Pyrolysis Oven
 - Bagging
 - Packout System
 - Parts Washers
5. **Fugitive Sources:** Equipment leaks from pumps, valves, compressors, agitators, pressure relief devices, open-ended valves or lines, flanges, connectors, and instrumentation systems that operate in organic hazardous air pollutant (OHAP) service 300 hours or more during the calendar year.
6. **Permit Revisions:**

Revision No.	Issue	Public Notice	Type	Page No.	Description
Initial	08/31/06	06/19/06	Initial	Entire Permit	Initial Permit Issuance
R1	N/A	N/A	Administrative	Additional Conditions 2.ix., 2.xii., 2.xiii., and 3.c.ii.1)	Correct the identification numbers for the Clr-Load and Red-Load Filters. Correct the pressure drop range of 18-108. Change gallons to pounds of product, since it is dry.
R2	xx/xx/10	03/14/10	Renewal	Entire Permit	Renewal

7. Emission Summary:

Pollutant	Actual Emission (2008 Data) (tpy)	Pollutant that triggered FEDOOP Status (based on PTE)
CO	NA	No
NO _x	NA	No
SO ₂	NA	No
PM ₁₀	10.8	Yes
VOC	1.922	Yes
Single HAP >1 tpy	1.776	Yes
Total HAP	1.888	Yes

Note: The source has installed a Thermal Oxidizer and instituted a Leak Detection and Repair program in order to reduce emissions to less than major source thresholds

8. Applicable Requirements:

PSD NSPS SIP MACT
 NSR NESHAPS District-Origin Other

9. Referenced Federal Regulations in Permit:

None

II. Regulatory Analysis

- 1. Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
- 2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. 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.
- 3. 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 Part 68, Subpart F, and District Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
- 4. Basis of Regulation Applicability**

Emission and Operating Caps: The source is subject to a plantwide emission cap of less than 100 tons per year for PM and VOC and less than 10 tons per year for

any single HAP and less than 25 tons per year for combined HAPs in accordance with Regulation 2.17.

a. Equipment

Bulk Loading System Emission Sources

EP ID	Description	Applicable Regulation	Control Device
12-614	DCL Heads (DCL Loading Station 1)	7.08	12-613 (DCL Loading Filter)
12-615	DCL Heads Bulk Loading (DCL Loading Station 2)		
12-616	DCL Loading Middle Bay (DCL Loading Station 3)		
12-617	DCL Head Middle Bay #2 (DCL Loading Station 4)		
12-376	Railcar Unloading Filter		
12-377	Railcar Unloading Process Cyclone		
Clear Silos (U-KM-Silos1)			
16-630, 16-635	Two (2) Clear Storage Silos (1973)	6.09	16-671 (Clear Silo Bag Filter)
16-640, 16-645	Two (2) Clear Storage Silos (1985)	7.08	
16-650, 16-655	Two (2) Clear Storage Silos (1986)	7.08	
16-690	KM-Blend Tank (1974)	6.09	
16-644	Clear Bulk Loading (formerly Clr-Load) (1973)	6.09	16-671 (Clear Silo Bag Filter) and 16-644 (Clear Silo Loading Filter)
Color Silos (U-KM-Silos2)			
12-380, 12-385	Two (2) Red Storage Silos (1989)	7.08	12-390 (Red Silo Bag Filter)
12-338	Red Bulk Loading (formerly Red-Load) (1989)	7.08	12-338 (Red Silo Loading Filter (Dual Cyclone)) and 12-390 (Red Silo Bag Filter)

Extruder Die System Emission Sources

EP ID	Description	Applicable Regulation	Control Device
KM Die and Die Ventilation Systems (U-KM-Die)			

EP ID	Description	Applicable Regulation	Control Device
12-701	One (1) 4,700 gallon Chemical Sewer Storage Tank	7.12	N/A
12-162, 16-162	Two (2) Extruder Die Heads (KM-1 (1974) and KM-2 (1981))	5.21	16-547 (Wet Rotoclone)
		6.09	
		6.24	
12-105	KM-1 Recycle Monomer Tank, 4,800 gal (1967)	5.21	12-199 (Thermal Oxidizer (TO))
		6.24	
12-110	KM-1 MMA Mix Tank, 4,800 gal (1967)	5.21, 6.13	
12-115	KM-1 EA Tank, 4,800 gal (1967)	5.21, 7.12	
12-118	KM-1 nDDM Weigh Tank, 20 gal (2001)	5.21, 6.24	
12-127	KM-1 Methyl Salicylate Tank, 150 gal (2001)	5.21, 7.25	
12-140	KM1 Reactor, 950 gal (1967)	5.21, 6.24	
12-150	KM1 Dump Tank, 2000 gal (1966)	5.21, 6.24	
12-155, 12-156	Two (2) KM-1 "Color" Additive Tanks, 150 gal ea. (1986)	5.21, 7.25	
12-160	KM-1 Extruder (1974)	5.21, 6.24	
12-165, 12-166	Two (2) KM-1 "Clear" Additive Tanks, 150 gal ea. (1986)	5.21, 7.25	
12-190	KM Rundown Tank, 700 gal (1967)	5.21, 6.24	
12-367	KM1 Hub Seal	5.21, 7.25	
12-455	DtDDS Storage Tank, 100 gal	5.21, 7.25	
12-458	KM-1 nDDM Storage Tank (2000)	5.21, 7.25	
12-465	KM Reactor Feed Tank #1, 200 (1970)	5.21, 6.24	
16-105	KM-2 Recycle Tank, 4,800 gal (1974)	5.21, 6.24	
16-110	KM-2 MMA Tank, 4,800 gal (1974)	5.21, 6.13	
16-127	KM-2 Methyl Salicylate Tank, 150 gal	5.21, 6.24	
16-140	KM2 Reactor, 750 gal (1974)	5.21, 6.24	
16-150	KM-2 Dump Tank, 2,500 gal (1973)	5.21, 6.24	
16-155 – 16-156	Two (2) KM-2 "Color" Additive Tanks, 150 gal ea. (1974)	5.21, 6.24	
16-160	KM-2 Extruder, 20,000 lb/hr (1986)	5.21, 6.24	
16-165 - 16-166	Two (2) KM-2 "Clear" Additive Tanks, 150 gal ea. (1974)	5.21, 6.24	
16-367	KM-2 Hub Seal (1974)	5.21, 7.25	

EP ID	Description	Applicable Regulation	Control Device
16-465	KM Reactor Feed Tank #2, 200 gal (1970)	5.21, 7.25	
Fugitive	KM Fugitive emissions	--	Fugitive
12-461	KM-1 DTAC Storage Tank	5.21, 7.25	NA
KM-1 Rework Feed System (U-KM-KM1Rework)			
12-256	KM-1 Rework Process Cyclone, including hopper and weigh belt (1995)	7.08	12-257 (KM-1 Rework Baghouse)
KM-2 Rework System (U-KM-KM2Rework)			
16-331	KM-2 Rework System (Rework Process Cyclone (1974) and DR Process Cyclone (1995))	6.09	16-328 (KM-2 Rework/DR Baghouse)
16-348		7.08	

Beringer Pyrolysis Oven Emission Point (U-KM-Oven)

EP ID	Description	Applicable Regulation	Control Device
Oven	Pyrolysis Oven (1992)	5.21, 7.08, 7.25	Uncontrolled

Bagging Emission Sources

EP ID	Description	Applicable Regulation	Control Device
18-106	Bagging Pellet Exhaust (1974)	6.09	18-106 (KM Bagging Silo Bag Filter)
18-488	Bag Filling Station & Conveying (1991)	7.08	18-520 (KM Bagging Conveyer Dust Collector)
18-542	Bag Tote Dump Station	7.08	
18-525	Bagging House Vacuum System (1973)	7.08	18-525 (KM Bagging House Vacuum Bag Filter)

Packout System Emission Sources

EP ID	Description	Applicable Regulation	Control Device
12-267	KM-1 Witte Screener (1989)	7.08	12-270 (Dual Cyclone)
12-363	KM-1 Pellet Transfer System Process Cyclone (1995)	7.08	12-362 (KM-1 Pellet Transfer Bag Filter)
16-272	KM-2 Screener (1970)	6.09	16-275 (Dual Cyclone)

EP ID	Description	Applicable Regulation	Control Device
16-330	KM-2 Pellet Transfer Process Cyclone (1995)	7.08	16-329 (KM-2 Pellet Transfer Bag Filter)
12-087	Packout House Vacuum System (1974)	6.09	12-087 (KM House Vacuum Filter)
12-371	KM Pelletron Process Baghouse (1999)	7.08	Uncontrolled
12-343, 16-303	Two (2) Fill Stations (1995)	7.08	16-286 (KM Packaging Station Dust Collector)
16-337	KM Third Witte Screener (1994)	7.08	16-338 (Dual Cyclone)

Parts Washers (U-KM-Washers)

EP ID	Description	Applicable Regulation	Control Device
Washer1, Washer2	KM Parts Washers in Maintenance Shop and Pelletizer Shop (1994)	6.18	Uncontrolled

b. Basis for Applicability

Bulk Loading System Emission Sources

Applicable Regulation	Basis for Applicability
6.09	Applicable to process operations that commenced construction on or before September 1, 1976
7.08	Applicable to process operations that commenced construction after September 1, 1976

Extruder Die System Emission Sources

Applicable Regulation	Basis for Applicability
5.21	
6.09	Applicable to process operations that commenced construction on or before September 1, 1976
6.13	VOC storage tanks with a storage capacity greater than 250 gallons that was in being or had a construction permit prior to September 1, 1976
6.24	Any affected facility using any organic materials which was in being prior to June 13, 1979

7.08	Applicable to process operations that commenced construction after September 1, 1976
7.12	VOC storage tanks with a storage capacity greater than 250 gallons that commenced construction or medication on or after April 19, 1972
7.25	Any affected facility which uses VOCs that commenced construction after June 13, 1979

Beringer Pyrolysis Oven Emission Point (U-KM-Oven)

Applicable Regulation	Basis for Applicability
5.01, 5.21 and 5.23	Applicable to process equipment emitting a TAC
7.08	Applicable to process operations that commenced construction after September 1, 1976
7.25	Any affected facility which uses VOCs that commenced construction after June 13, 1979

Bagging Emission Sources

Applicable Regulation	Basis for Applicability
6.09	Applicable to process operations that commenced construction on or before September 1, 1976
7.08	Applicable to process operations that commenced construction after September 1, 1976

Packout System Emission Sources

Applicable Regulation	Basis for Applicability
6.09	Applicable to process operations that commenced construction on or before September 1, 1976
7.08	Applicable to process operations that commenced construction after September 1, 1976

Parts Washers (U-KM-Washers)

Applicable Regulation	Basis for Applicability
6.18	Applicable to solvent metal cleaning equipment that use VOCs

c. **Standards**

i. **PM**

- 1) Pursuant to Regulation 2.17, Section 5.1, the *plantwide* PM emissions shall not equal or exceed 100 tons per consecutive 12-month period.
- 2) The PM limits for EP 12-614, 12-615, 12-616, 12-617, 12-376, 12-377, 12-338, 16-640, 16-645, 16-650, 16-655, 12-256, 16-348, 18-488, 18-542, 18-525, 12-267, 12-363, 16-330, 12-371, 12-343, 16-303 and 16-337 are established per Regulation 7.08, section 3.3. The PM emission standard is 2.34 lb/hr for each piece of equipment.
- 3) The PM limits for EP 16-630, 16-635, 16-690, 16-644, 16-331, 18-106, 12-087 and 16-272 are established per Regulation 6.09, section 3.2. The PM emission standard is 2.58 lb/hr for each piece of equipment.
- 4) The PM limits for EP 12-380 and 12-385 are established per Regulation 7.08, section 3.3. The PM emission standard is 2.34 lb/hr combined for both pieces of equipment.
- 5) The PM limit for EP 12-162 and 16-162 is established per Regulation 6.09, Section 3.4. The PM emission standard is 21.67 lb/hr combined for both pieces of equipment.
- 6) The PM limit for the Oven is established per Regulation 7.08, section 3.3. The PM emission standard is 0.4 lb/hr and 0.6 tons/year.
- 7) The owner or operator shall utilize the control devices 12-613, 16-671, 16-644, 12-390 and 12-338 18-10, 18-520, 18-525, 12-270, 12-362, 16-275, 16-329, 12-087, 16-286, 16-338 at all times.

ii. **Opacity**

Regulation 6.09, section 3.1 and 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

iii. **VOC**

- 1) Pursuant to Regulation 2.17, Section 5.1, the *plantwide* VOC emissions shall not equal or exceed 100 tons per consecutive 12-month period.

- 2) EP 12-110, 12-115, 16-110, 12-140, 12-160, 16-140, 16-160, 12-105, 12-118, 12-455, 12-150, 12-190, 12-367, 12-127, 16-105, 16-127, 16-150, 16-155, 16-156, 16-165, 16-166, 16-367, 12-458, 12-465, 12-155, 12-156, 12-165, 12-166 and 16-465 shall vent to the Thermal Oxidizer (TO), 12-199.
- 3) The combined post-control VOC emissions from all emission points that vent to the TO shall be less than or equal to 1.8345 tons per consecutive 12-month period. (Permit 207-03-C, May 31, 2004)
- 4) The VOC emissions that are vented to the bypass stack (S-KM-TOBypass) shall be less than or equal to 0.72 tons per consecutive 12-month period. (Permit 207-03-C, May 31, 2004)
- 5) When any emission point is being vented to the TO, the minimum combustion temperature shall be 1405°F. At the minimum combustion temperature, the performance test indicated a destruction efficiency of 99.98%. (Permit 207-03-C, May 31, 2004)
- 5) Regulations 6.13 and 7.12, Section 3.3 require EP 12-110, 12-115, 12-701 and 16-110 to be equipped with a permanent submerged fill pipe.
- 6) Regulation 6.24, Sections 3.2 and 3.3, limits the VOC emissions from each EP 12-162, 16-162, 12-140, 12-160, 16-140, 16-160, 12-105, 12-118, 12-465, 12-150, 12-190, 16-105, 16-127, 16-150, 16-155, 16-156, 16-165 and 16-166 to less than or equal to 40 lbs/day and 8 lbs/hr for Class II solvents and less than or equal to 3000 lbs/day and 450 lb/hr for Class III solvents, unless VOC emissions are reduced by at least 85% by weight.
- 7) Regulation 7.25 requires an affected facility to be equipped with and utilize best available control technology (BACT) for VOC.
 - A) The District has determined that venting EP 12-127, 12-458, 12-455, 12-461, 12-155, 12-156, 12-165, 12-166, 12-367, 16-367 and 16-465 to the TO is VOC BACT for Regulation 7.25.
 - B) From the Oven, VOC emissions shall not exceed 54 lb/hr and 6 tons/yr.

- 8) For Washer1 and Washer2, Regulation 6.18, section 4 establishes the equipment requirements and the operating requirements for cold solvent metal parts cleaners that shall be adhered to ensure compliance with the permit.

iv. **HAP**

- 1) Pursuant to Regulation 2.17, Section 5.1, the *plantwide* single HAP emissions shall not equal or exceed 10 tons per consecutive 12-month period.
- 2) Pursuant to Regulation 2.17, Section 5.1, the *plantwide* total HAP emissions shall not equal or exceed 25 tons per consecutive 12-month period.

v. **HAP (LDAR)**

The permit contains LDAR standards that apply to pumps, valves, compressors, agitators, pressure relief devices, open-ended valves or lines, flanges, connectors, and instrumentation systems that operate in organic hazardous air pollutant (OHAP) service 300 hours or more during the calendar year.

vi. **TAC**

- 1) Regulations 5.01, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. The source submitted an Environmental Acceptability demonstration with a modeling analysis for TAC, which demonstrated that the risk from the industrial and residential modeled emissions does not exceed the environmental acceptability (EA) goals for Ethyl Acrylate (EA). For Methacrylate (MMA), the source demonstrated that the potential emissions are de minimis.
- 2) Regulation 5.21, Section 3.1.1 requires allowed emission standards for Category 1 and 2 TACs. Ethyl Acrylate emissions shall not exceed from the following limits, pursuant to the EA demonstration submitted March 8, 2010:
 - A) 29.95 lbs/consecutive 12-month period from the TO.
 - B) 492.31 lb/consecutive 12-month period from the bypass stack.
 - C) 594.80 lb/consecutive 12-month period from 16-547.
 - D) 14.98 lb/consecutive 12-month period from the

- oven.
- E) 120.01 lb/consecutive 12-month period from plantwide LDAR.

c. **Monitoring**

i. **PM**

Regulations 6.09 or 7.08 do not require any specific monitoring requirements for PM, however, Regulation 2.17, section 5.2 requires sufficient monitoring to assure compliance with the terms and conditions of the permit. The source is required to conduct the following monitoring to assure ongoing compliance with the PM standards.

- 1) For each control device 12-613, 16-671, 16-644, 12-390, 12-338, 12-257, 16-328, 18-106, 18-520, 18-525, 12-087, 16-286, 12-362 and 16-329:
 - A) Perform periodic visual inspections of the structural and mechanical integrity.
 - B) Perform annual thorough inspections of the filter media and mechanical and pneumatic systems.
 - C) Monitor the daily pressure drop to ensure it does not exceed the permit limits.
- 2) For control device 16-547:
 - A) Perform periodic visual inspections of the structural and mechanical integrity.
 - B) Monitor the daily water flow rate to ensure it is greater than 4.0 gallons per minute.
- 3) For control devices 12-270, 16-275 and 16-338, perform periodic visual inspection of the structural and mechanical integrity.
- 4) For EP 12-371, monitor the daily pressure drop to ensure it does not exceed the permit limits.

ii. **Opacity**

Regulations 6.09 or 7.08 do not require any specific monitoring requirements for opacity, however, Regulation 2.17, section 5.2 requires sufficient monitoring to assure compliance with the terms and conditions of the permit. The source is required to conduct

periodic visible emission surveys to assure ongoing compliance with the opacity standard.

iii. **VOC**

Regulation 7.25, Section 4.1 requires sufficient monitoring to assure compliance with the terms and conditions of the permit.

- 1) The source is required to monitor the combustion temperature of the TO every sixty (60) seconds and calculate and record 15 minute block averages to assure ongoing compliance with the VOC standards.
- 2) For the oven, the source is required to monitor and record the date and time of operation.

iv. **HAP (LDAR)**

Regulation 2.17, Section 5.2 requires sufficient monitoring to assure compliance with the terms and conditions of the permit. The source is required to conduct monitoring using Method 21 of 40 CFR 60, Appendix A, to assure ongoing compliance with the HAP LDAR standards.

d. **Record Keeping**

i. **PM**

Regulations 2.17, 6.09 or 7.08 do not require any specific recordkeeping requirements for PM, however, Regulation 2.17, section 5.2 requires sufficient recordkeeping to assure compliance with the terms and conditions of the permit. The source is required to conduct the following recordkeeping to assure ongoing compliance with the PM standards.

- 1) For control devices 12-613, 16-671, 16-644, 12-390, 12-338, 12-257, 16-328, 18-106, 18-520, 18-525, 12-362, 12-087, 16-286 and 16-329:
 - A) Results of periodic visual inspections,
 - B) Results of annual thorough inspections,
 - C) The daily pressure drop, and
 - D) Any excursions from the pressure drop range.

- 2) For control device 16-547:
 - A) The results of the monthly visual inspections.
 - B) The daily water flow rate.
- 3) For control devices 12-270, 16-275 and 16-338, the results of periodic visual inspections.
- 4) For 12-371:
 - A) The daily pressure drop, and
 - B) Any excursions from the pressure drop range.
- 5) For each PM Emission Point, a monthly record of the throughput of each emission point.
- 6) The *plantwide* consecutive 12-month PM emissions for each month.
- 7) Any periods of time when the process was operating and the control device was not operating.

ii. **Opacity**

Regulations 6.09 or 7.08 do not require any specific recordkeeping requirements for opacity, however, Regulation 2.17, section 5.2 requires sufficient recordkeeping to assure compliance with the terms and conditions of the permit. The source is required to maintain records of the periodic visible emission surveys to assure ongoing compliance with the opacity standards.

iii. **VOC**

- 1) Regulations 2.17, 6.24, 6.13 and 7.12 do not require any specific recordkeeping requirements for VOC, however, Regulation 2.17, section 5.2 requires sufficient recordkeeping to assure compliance with the terms and conditions of the permit. The source is required to conduct the following recordkeeping to assure ongoing compliance with the VOC standards:
 - A) The *plantwide* consecutive 12-month VOC emissions for each month.
 - B) The lb/hr and lb/day VOC emissions from each EP 12-162, 16-162, 12-140, 12-160, 16-140, 16-160, 12-105, 12-118, 12-465, 12-150, 12-190, 16-105, 16-127, 16-150, 16-155, 16-156, 16-165 and 16-166

during any time that the Thermal Oxidizer is bypassed.

- C) Monthly records of the material stored in storage vessels 12-110, 12-115, 12-701 and 16-110 and if the contents of the storage vessels are changed, a record shall be made of the new contents.
- 2) Regulation 7.25, Section 4.1 requires sufficient recordkeeping to assure compliance with the terms and conditions of the permit. The source is required to maintain records of the following to assure ongoing compliance with the VOC standards.
- A) When any emission point is being vented to the TO, the 15 minute block average TO temperatures and when the Data Acquisition System is down, record the temperature manually once per hour.
 - B) A monthly throughput record of the amount of material in pounds produced and the product recipe containing the amount of pounds of each component.
 - C) A monthly record of what equipment is operating during each bypass and monthly calculate the consecutive 12-month VOC emissions.
- 3) For Washer1 and Washer2, Regulation 6.18, section 4.4.2 has record keeping requirements for an operator of a cold cleaner using solvent.

iv. **HAP**

Regulation 2.17 does not require any specific recordkeeping requirements for HAP. However, Regulation 2.17, section 5.2 requires sufficient recordkeeping to assure compliance with the terms and conditions of the permit. The source is required to maintain records of the consecutive 12-month single and total HAP *plantwide* emissions to assure ongoing compliance with the HAP standards.

v. **HAP (LDAR)**

Regulation 2.17, section 5.2 requires sufficient recordkeeping to assure compliance with the terms and conditions of the permit. To assure ongoing compliance with the HAP (LDAR) standards, the source is required to maintain the following records:

- 1) When a leak is detected, a readily visible identification shall be attached to the leaking component.
- 2) Component identification numbers and description;
- 3) Process stream OHAP concentrations for each component;
- 4) Monitoring schedule for each component;
- 5) Results of the required monitoring, including measured background levels; and
- 6) When a leak is detected, the component identification number, date the leak was detected, and the date of final repair.

vi. **TAC**

Regulation 5.21 does not require any specific recordkeeping requirements for TAC. However, Regulation 2.17, section 5.2 requires sufficient recordkeeping to assure compliance with the terms and conditions of the permit. The source is required to maintain records of the consecutive 12-month Ethyl Acrylate emissions from the TO, the bypass stack; the Oven; and plantwide LDAR to assure ongoing compliance with the HAP standards. The source is also required to maintain a copy onsite of all STAR EA demonstrations submitted to the District, including all air dispersion modeling input parameters and the associated EAGC Risk, in units of risk in one million for each TAC.

e. **Reporting**

i. **PM**

Regulations 6.09 or 7.08 do not require any specific reporting requirements for PM, however, Regulation 2.17, section 5.2 requires sufficient reporting to assure compliance with the terms and conditions of the permit. The source is required to report the following to assure ongoing compliance with the PM standards.

- 1) For each PM Emission Point, the consecutive 12-month plantwide PM emissions for each month in the reporting period and all periods of exceedance of the lb/hr emission standards.
- 2) Excursions from the operating parameters of each control device.
- 3) Periods of time when a process was operating and the control device was not operating.

ii. **Opacity**

Regulations 6.09 or 7.08 do not require any specific reporting requirements for opacity, however, Regulation 2.17, section 5.2 requires sufficient reporting to assure compliance with the terms and conditions of the permit. The source is required to report results of the periodic visible emission surveys to assure ongoing compliance with the opacity standards.

iii. **VOC**

Regulations 2.17, 6.24, 6.13, 7.12 and 7.25 do not require any specific reporting requirements for VOC, however, Regulation 2.17, section 5.2 requires sufficient reporting to assure compliance with the terms and conditions of the permit. The source is required to report the following to assure ongoing compliance with the VOC standards.

- 1) The consecutive 12-month VOC emissions from the bypass stack (S-KM-TOBypass) for each month in the reporting period.
- 2) The average lb/hr and lb/day VOC emissions from emission points subject to Regulation 6.24 during any bypass.
- 3) The consecutive 12-month plantwide VOC emissions for each month in the reporting period.
- 4) Periods of Thermal Oxidizer bypassing.
- 5) Temperature excursions of the Thermal Oxidizer.
- 6) Description of any corrective action taken for excursions.

iv. **HAP**

Regulation 2.17 does not require any specific reporting requirements for HAP. However, Regulation 2.17, section 5.2 requires sufficient reporting to assure compliance with the terms and conditions of the permit. The source is required to report the consecutive 12-month single and total HAP *plantwide* emissions and any corrective action taken to assure ongoing compliance with the VOC standards.

iv. **HAP (LDAR)**

Regulation 2.17, section 5.2 requires sufficient reporting to assure compliance with the terms and conditions of the permit. To assure ongoing compliance with the HAP (LDAR) standards, the source is required to report the number of each type of component for which a leak was detected, the number of each type of component monitored; the total number of components of each type; an explanation of each delay of repair; any changes in the number of components; and any corrective action taken.

v. **TAC**

Regulation 2.17, section 5.2 requires sufficient reporting to assure compliance with the terms and conditions of the permit. To assure ongoing compliance with the TAC standards, the source is required to report the consecutive 12-month Ethyl Acrylate emissions; all exceedances; any corrective action taken; and any change in operations that would increase the TAC content of raw materials not identified in the STAR EA demonstrations submitted to the District.

f. **Testing**

VOC

Within 60 days of resuming operation of both KM-1 and KM-2 lines, the owner or operator shall perform an EPA Reference Method 25A performance test within +/- 10% of maximum production on the outlet and inlet of the Thermal Oxidizer; and a capture efficiency test using EPA guidelines.

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Alternative Operating Scenarios:** The source did not request an alternative operating scenario in its FEDOOP application.
5. **Compliance Status:** The source is required to submit their annual Compliance Certification to the District on or before April 15th of each calendar year. As of the effective date of Permit 158-97-TV (R1), there are no compliance schedules in effect or progress reports required.
6. **Emission Factors:** District approved emission factors shall be used, as provided in

the March 5, 2003 submittal.

7. Insignificant Activities

Equipment	Quantity	Basis for Exemption
Direct-Fired Space Heaters (<10 MMBtu/hr)	4	Regulation 2.02, Section 2.1.1
Portable Diesel/Gasoline Storage Tanks (<500 gal)	2	Regulation 2.02, Section 2.3.23
Internal Combustion Engines, Fixed or Mobile	20	Regulation 2.02, Section 2.2
Emergency Generators (40 hp each)	2	Regulation 2.02, Section 2.2
Brazing, Soldering, Welding Equipment	5	Regulation 2.02, Section 2.3.4
Woodworking, except Conveying, Hogging, or Burning Wood/Sawdust	1	Regulation 2.02, Section 2.3.5
Lab Ventilating and Exhausting Systems, Non-radioactive materials	1	Regulation 2.02, Section 2.3.11
Blast cleaning, abrasives in water	1	Regulation 2.02, Section 2.3.13
Soil or Groundwater Contamination Remediation, Passive or total removal	1	Regulation 2.02, Section 2.3.20 Regulation 2.02, Section 2.3.1
Processes used exclusively for extruding metals, minerals, or wood	1	
Ovens for curing potting materials or castings made with epoxy resins	3	Regulation 2.02, Section 2.3.7
Plastics molding	2	Regulation 2.02, Section 2.3.8
VOC Storage Vessels < 250 gal	15	Regulation 2.02, Section 2.3.24