

**Commonwealth of Kentucky
Energy and Environment Cabinet
Department for Environmental Protection
Division for Air Quality
300 Sower Blvd, 2nd Floor
Frankfort, Kentucky 40601
(502) 564-3999**

**AIR QUALITY PERMIT
Issued under 401 KAR 52:040**

Permittee Name: Daicel Safety Technologies America, Inc.
Mailing Address: 1382 Old Liberty Church Road
Beaver Dam, KY 42320

Source Name: Daicel Safety Technologies America, Inc.
Mailing Address: 1382 Old Liberty Church Road
Beaver Dam, KY 42320

Source Location: Same as above

Permit ID: S-16-038
Agency Interest #: 6238
Activity ID: APE20160001
Review Type: Minor Source, Operating
Source ID: 21-183-00101

Regional Office: Owensboro Regional Office
3032 Alvey Park Dr. W., Suite 700
Owensboro, KY 42303
(270) 687-7304

County: Ohio

Application
Complete Date: March 15, 2016
Issuance Date: July 8, 2016
Expiration Date: July 8, 2026



**Sean Alteri, Director
Division for Air Quality**

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	Permit type	Activity#	Complete Date	Issuance Date	Summary of Action
S-16-038	Renewal	APE20160001	3/15/16	7/8/2016	Renewal

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality (Division) hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes (KRS) Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Energy and Environment Cabinet (Cabinet) or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**Emission Point 02 (EP02) *Weighing of Oxidizer for Propellant Manufacturing*****Description:**

220 lb/hr throughput capacity

Construction commenced – November, 2005

PM emission control - AAF AR-20 Cartridge Fabric Filter (DC-2)

Control Efficiency - 99.0%

APPLICABLE REGULATIONS:

401 KAR 59:010, *New process operations.*

1. Operating Limitations:

None

2. Emission Limitations:

- a. Pursuant to 401 KAR 59:010, Section 3(2), particulate emissions shall not exceed 2.34 lbs/hr.
- b. Pursuant to 401 KAR 59:010, Section 3(1), the opacity of visible emissions shall not equal or exceed twenty (20) percent.

Compliance Demonstration Method:

- a. Compliance with the PM limit is demonstrated based on the maximum throughput of 0.11 ton/hr, an emission factor of 22.23 lbs/ton and a PM control efficiency of 99.0%, resulting in maximum hourly PM emissions of 0.024 lb/hr. Annual inspections shall be performed on the fabric filter (DC-2). See **4. Monitoring Requirements** and **5. Recordkeeping Requirements**.
- b. For compliance with the visible emission limitation, refer to **4. Monitoring Requirements** and **5. Recordkeeping Requirements**.

3. Testing Requirements:

Pursuant to 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using Reference methods specified in 401 KAR 50:015 shall be conducted if required by the Division.

4. Monitoring Requirements:

- a. The permittee shall perform annual inspections on the fabric filter (DC-2) to ensure proper operation of the following:
 - (1) Filters – replace as needed;
 - (2) Gaskets and seals;
 - (3) Filter cleaning mechanism; and
 - (4) Differential pressure gauge.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- b. The permittee shall demonstrate compliance with the opacity limit by performing a qualitative visual observation of the opacity of emissions from each stack at least once per week. If emissions are visible, the permittee shall perform an EPA Reference Method 9 test for opacity on the applicable stack emissions within 24 hours of observing visible emissions, and make any necessary repairs to bring the opacity into compliance. In lieu of performing an EPA Reference Method 9 test, the permittee may shut down the process and complete repairs before restarting the unit.

5. Recordkeeping Requirements:

- a. The permittee shall maintain records of the results of each annual inspection performed on the fabric filter (DC-2).
- b. In order to demonstrate compliance with 401 KAR 59:010, Section 3(1), a record of weekly visual observations and any EPA Method 9 test performed shall be maintained.
- c. Refer to **Section C.2 – Recordkeeping Requirements.**

6. Reporting Requirements:

Refer to **Section C.3 – Reporting Requirements.**

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Points 08 and 09 (EP08 & EP09)*****Boiler #1 and Boiler #2*****Description:**

Fuel: Natural gas

Rated capacity: 10.2 mmBtu/hr, each

Construction commenced: November, 2005

APPLICABLE REGULATIONS:**401 KAR 59:015**, *New Indirect Heat Exchangers*.**401 KAR 60:005**, incorporating by reference, **40 CFR 60, Subpart Dc**, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*.**1. Operating Limitations:**

None

2. Emission Limitations:

- a. Pursuant to 401 KAR 59:015, Section 4(1)(c), particulate emissions from each Emission Point shall not exceed 0.47 lb/MMBtu.
- b. Pursuant to 401 KAR 59:015, Section 5(1)(c), sulfur dioxide emissions from each Emission Point shall not exceed 2.24 lb/MMBtu.
- c. Pursuant to 401 KAR 59:015, Section 4(2), the opacity of visible emissions from each boiler shall not exceed twenty (20) percent except, a maximum of forty (40) percent opacity shall be allowed for a maximum of six (6) consecutive minutes in any sixty (60) consecutive minutes during fire box cleaning or soot blowing. For emissions caused by building a new fire, emissions during the period required to bring the boiler up to operating conditions shall be allowed, if the method used is recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.

Compliance Demonstration Method:Compliance with the allowable PM, opacity, and SO₂ limitations is demonstrated while burning natural gas.**3. Testing Requirements:**

Pursuant to 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using Reference methods specified in 401 KAR 50:015 shall be conducted if required by the Division.

4. Monitoring Requirements:

None

5. Recordkeeping Requirements:

- a. Pursuant to 40 CFR 60.48c(g)(2), the permittee shall record and maintain records of the amount of natural gas combusted during each calendar month.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

b. Refer to Section C.2 – Recordkeeping Requirements.

6. Reporting Requirements:

Refer to Section C.3 – Reporting Requirements.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Unit 12 (EP12)****Natural Gas Fired Emergency Generator****Description:**

Primary fuel: Natural gas

Power Output: 49 hp

Construction date: April 2005

APPLICABLE REGULATIONS:

401 KAR 63:002, incorporating by reference, **40 CFR 63, Subpart ZZZZ** - *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

Note: D.C. Circuit Court [*Delaware v. EPA*, 785 F. 3d 1 (D.C. Cir. 2015)] has vacated the provisions in 40 CFR 63, Subpart ZZZZ that contain the 100-hour exemption for operation of emergency engines for purposes of emergency demand response under 40 CFR 63.6640(f)(2)(ii)-(iii). The D.C. Circuit Court issued the mandate for the vacatur on May 4, 2016.

1. Operating Limitations:

- a. Pursuant to 40 CFR 63.6595(a)(1), the permittee shall comply with the applicable operating limitations no later than October 19, 2013.
- b. Pursuant to 40 CFR 63.6625(f), the permittee shall install a non-resettable hour meter on the engine if one is not already installed.
- c. Pursuant to 40 CFR 63.6603(a), the permittee shall comply with the following work practice standards specified in 40 CFR 63, Subpart ZZZZ, Table 2d, Item 5:
 - (1) Change the oil and filters every five-hundred (500) hours of operation or annually, whichever comes first;
 - (2) Inspect the spark plugs every one-thousand (1,000) hours of operation or annually, whichever comes first; and
 - (3) Inspect all hoses and belts every five-hundred (500) hours of operation or annually, whichever comes first, and replace them as necessary.
- d. Pursuant to 40 CFR 63.6605, the permittee must be in compliance with the emission limitations, operating limitations, and other requirements in 40 CFR 63, Subpart ZZZZ that apply at all times. At all times the permittee must operate and maintain the engines, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
- e. Pursuant to 40 CFR 63.6625(h), the permittee must minimize the engines' time spent at idle during startup and minimize the engines' startup time to a period needed for appropriate and safe loading of the engines, not to exceed thirty (30) minutes, after which time the emission standards applicable to all times other than startup in 40 CFR 63,

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Subpart ZZZZ, Table 2d apply.

- f. Pursuant to 40 CFR 63.6625(e)(3) and 40 CFR 63.6640(a), the permittee must either operate and maintain the engines according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow a custom maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions.
- g. Pursuant to 40 CFR 63.6640(f), in order for the engine to be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine according to the requirements in 40 CFR 63.6640(f)(1) through (4), the engine will not be considered an emergency engine under 40 CFR 63, Subpart ZZZZ and must meet all requirements for non-emergency engines.
 - (1) There is no time limit on the use of these engines in emergency situations.
 - (2) The permittee may operate these engines for any combination of the following for a maximum of 100 hours per calendar year per engine. Any operation for non-emergency situations as allowed by 40 CFR 63.6640(f)(4) counts as part of the 100 hours per calendar year allowed by 40 CFR 63.6640(f)(2):
 - i. The permittee may operate these engines for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Division for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency reciprocating internal combustion engines beyond one-hundred (100) hours per calendar year.
 - (3) The permittee may operate these engines for up to fifty (50) hours per calendar year in non-emergency situations. The fifty (50) hours of operation in non-emergency situations are counted as part of the one-hundred (100) hours per calendar year for maintenance and testing and emergency demand response. Except for the following, the fifty (50) hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
 - i. The fifty (50) hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

conditions are met:

- A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
- B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
- C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- D. The power is provided only to the facility itself or to support the local transmission and distribution system.
- E. The permittee identifies and records the entity that dispatches the engines and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engines. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee.

2. Emission Limitations:

None

3. Testing Requirements:

Pursuant to 401 KAR 50:045, Section 1, performance testing using Reference methods specified in 401 KAR 50:015 shall be conducted if required by the Division.

4. Monitoring Requirements:

The permittee has the option of utilizing an oil analysis program to extend the oil change requirement as specified in 40 CFR 63.6625(j).

5. Recordkeeping Requirements:

- a. Pursuant to 40 CFR 63.6660 and in accordance with 40 CFR 63.10(b)(1), the permittee shall keep each record readily accessible in hard copy or electronic form for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records shall be in a form suitable and readily available for expeditious review.
- b. Pursuant to 40 CFR 63.6655(e), the permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to its own maintenance plan.
- c. Pursuant to 40 CFR 63.6655(f), the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

d. Refer to **Section C.2 – Recordkeeping Requirements**.

6. Reporting Requirements:

a. Pursuant to 40 CFR 63.6640(b), the permittee must report each instance in which an applicable emission limitation or operating limitation in Table 2d. of 40 CFR 63, Subpart ZZZZ, was not met. These instances are deviations from the emission and operating limitations. These deviations must be reported according to the requirements in 40 CFR 63.6650. If a catalyst is changed on any engine which has a catalytic control device, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the operating parameter values are reestablished, the permittee must also conduct a performance test to demonstrate that the required emission limitations applicable to these engines are being met.

b. Refer to **Section C.3 – Reporting Requirements**.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Point 14 (EP14) *DSSA Three Functioning Units*****Description:**

Gas Generant Functioning Unit Capacity: 1,350 treatments/yr
Inflator, Enhancer Cup, and Initiator Functioning Unit #1 Capacity: 2,548 treatments/yr
Inflator, Enhancer Cup, and Initiator Functioning Unit #2 Capacity: 2,548 treatments/yr
Gas Generant Functioning Unit Fuel: Electric
Inflator, Enhancer Cup, and Initiator Functioning Units Fuel: Propane
Construction commenced: 2007

APPLICABLE REGULATIONS:

401 KAR 63:010, *Fugitive Emissions.*

1. Operating Limitations:

- a. Pursuant to Regulation 401 KAR 63:010, Section 3(1), no person shall cause, suffer, or allow any material to be handled, processed, transported, or stored; a building or its appurtenances to be constructed, altered, repaired, or demolished, or a road to be used without taking reasonable precaution to prevent particulate matter from becoming airborne.
- b. Pursuant to Regulation 401 KAR 63:010, Section 3(2), no person shall cause or permit the discharge of visible fugitive dust emissions beyond the lot line of the property on which the emissions originate.
- c. Pursuant to Regulation 401 KAR 63:010, Section 3(3), when dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance or to violate any administrative regulation, the Secretary may order that the building or equipment in which processing, handling and storage are done be tightly closed and ventilated in such a way that all air and gases and air or air-borne material leaving the building or equipment are treated by removal or destruction of air contaminants before discharge to the open air.

Compliance Demonstration Method:

- a. The Gas Generant Functioning Unit shall be thoroughly cleaned following each two times the unit is operated.
- b. The Inflator, Enhancer Cup, and Initiator Functioning Units shall be thoroughly cleaned not less frequently than once every seven (7) days when in operation.
- c. The Inflator, Enhancer Cup, and Initiator Functioning Units be maintained to provide proper air flow and combustion conditions so as to minimize particulate emissions.

2. Emission Limitations:

None

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Testing Requirements:

Pursuant to 401 KAR 50:045, Section 1, performance testing using Reference methods specified in 401 KAR 50:015 shall be conducted if required by the Division.

4. Monitoring Requirements:

None.

5. Recordkeeping Requirements:

a. A log indicating the date and time of each operation of each functioning unit as well as the date and time of each thorough cleaning of each functioning unit shall be available for inspection at all reasonable times as specified in **Section C.4 – Inspections.**

b. Refer to **Section C.2 – Recordkeeping Requirements.**

6. Reporting Requirements:

Refer to **Section C.3 – Reporting Requirements.**

SECTION C - GENERAL CONDITIONS

1. Administrative Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b), and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- b. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
- c. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040, Section 23].
- d. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Section 1a-4, 5, of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040, Section 23].
- e. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040, Section 23].
- f. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040, Section 11(3)].
- g. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20.
- h. All previously issued permits to this source at this location are hereby null and void.

SECTION C - GENERAL CONDITIONS (CONTINUED)**2. Recordkeeping Requirements**

- a. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040, Section 3(1)(f), and Section 1b-IV-2 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040, Section 23].
- b. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

3. Reporting Requirements

- a. (1) In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- (2) The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition a.(1) above), the probable cause of the deviation, and corrective or preventive measures taken to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Section 1b-V-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040, Section 23].
- b. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040, Section 23].
- c. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was

SECTION C - GENERAL CONDITIONS (CONTINUED)

performed during the previous six months because the emission unit was not in operation. The summary reports are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

4. Inspections

In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f), the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours, or during an emergency:

- a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
- b. To access and copy any records required by the permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

5. Emergencies/Enforcement Provisions

- a. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040, Section 23].
- b. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - (1) An emergency occurred and the permittee can identify the cause of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- c. Emergency provisions listed in General Condition 5.b are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(3)].

SECTION C - GENERAL CONDITIONS (CONTINUED)

- d. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:040, Section 22(2)].

6. Compliance

- a. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
 - (1) Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - (2) All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and non-routine maintenance performed on each control device. Daily observations are required during daylight hours of all operations and control equipment to determine whether conditions appear to be either normal or abnormal.
 - (3) Visible Emissions: If Section B contains no specific requirement, daily qualitative observations of visible emissions shall be made for each affected facility. If visible emissions from the affected facility are observed, then an inspection of the equipment shall be initiated and corrective action taken. If visible emissions are still observed after corrective action, the permittee shall conduct EPA Method 9 and must then comply with the requirements of Section C – General Conditions, 3.a.(2), of this permit.
 - (4) A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division [401 KAR 50:055, Section 2].
- b. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
 - (1) Identification of the term or condition;
 - (2) Compliance status of each term or condition of the permit;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The method used for determining the compliance status for the source, currently and over the reporting period, and
 - (5) For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION C - GENERAL CONDITIONS (CONTINUED)

(6) The certification shall be submitted by January 30th of each year. Annual compliance certifications shall be sent to the Division for Air Quality, Owensboro Regional Office, 3032 Alvey Park Drive W., Suite 700, Owensboro, KY 42303-2191.

- c. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
- (1) Applicable requirements that are included and specifically identified in this permit; or
 - (2) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

7. Construction Requirements:

None

SECTION D - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

<u>Description</u>	<u>Generally Applicable Regulation</u>
<u>DSSA</u>	
1. Serec Airless vacuum vapor degreasing system (IA01)	401 KAR 63:020
2. D3 Diffuser Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
3. D4 Diffuser Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
4. D4 Collar Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
5. D5 Diffuser Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
6. D5 Collar Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
7. D6 Diffuser Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
8. D6 Collar Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
9. D7 Diffuser Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
10. D7 Collar Welder (EP15)	401 KAR 59:010, 401 KAR 63:020
11. Cooling Towers (two)	401 KAR 63:010
12. IPA Solvent Use on Rags (EP16)	-
13. Launch Applied Testing (LAT) Tanks	401 KAR 59:010

SECTION D - INSIGNIFICANT ACTIVITIES (CONTINUED)**DSTP**

- | | |
|---|---|
| 14. Line 6 Metal Degreasing Unit (EP13) | - |
| 15. Line 7 Metal Degreasing Unit (EP13) | - |
| 16. Line 8 Metal Degreasing Unit (EP13) | - |
| 17. Line 9 Metal Degreasing Unit (EP13) | - |
| 18. Line 10 Metal Degreasing Unit (EP13) | - |
| 19. Metal Degreasing Solvent Recycler (EP13) | - |
| 20. Line 6 Machining Operations (Cutting,
Deburring, Grinder, Swage, End Finisher, Drill) | - |
| 21. Line 7 Machining Operations (Cutting, Grinder #1,
End Finisher #1, Grinder #2, Swage, End Finisher #2,
Drill, In-Line Wash) | - |
| 22. Line 8 Machining Operations (Cutting, Deburring, End
Finisher #1, Grinder, Swage, End Finisher #2, Drill) | - |
| 23. Line 9 Machining Operations (Cutting, Deburring, End
Finisher #1, Grinder, Swage, End Finisher #2, Drill) | - |
| 24. Line 10 Machining Operations (Cutting, Grinder,
Drill #1, Drill #2) | - |
| 25. Remnant Saw | - |
| 26. 3,000 gallon Waste Coolant Tank | - |
| 27. Mist Eliminators | - |

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| 28. Grinding of strontium nitrate (EP01) | 401 KAR 59:010 |
| 29. Fuel Weighing (EP04) | 401 KAR 59:010 |
| 30. Kneader #1 (EP05) | 401 KAR 59:010 |
| 31. Wet Extruder / Cutting #1 (EP06) | 401 KAR 59:010 |
| 32. Rotary Blending Drum / Packaging (EP07) | 401 KAR 59:010 |
| 33. Kneader #2 (EP10) | 401 KAR 59:010 |
| 34. Wet Extruder / Cutting #2 (EP11) | 401 KAR 59:010 |
| 35. Wastewater Treatment – no VOC emissions | - |