MEMORANDUM

To: MM2A Docket No. EPA–HQ–OAR–2019–0282
From: Elineth Torres, U.S. EPA/OAQPS
Date: August 2020
Subject: Review of Reclassification Actions for the Rule "Reclassification of Major Sources as Area Sources under Section 112 of the Clean Air Act"

The purpose of this memorandum is to document EPA's evaluation of sources that we know have reclassified from major to area source status since January 2018. This review supports the rulemaking titled "Reclassification of Major Sources as Area Sources under Section 112 of the Clean Air Act (also known as Major MACT to Area [MM2A] rule). The MM2A rulemaking implements the plain language reading of the Clean Air Act (CAA) section 112 definitions of "major" and "area" source. The statutory language allows major sources to reclassify to area source status at such time as the source reduces its actual and potential emissions of hazardous air pollutants (HAP), as defined in 40 CFR part 63, below the major source thresholds (MST) of 10 tons per year (tpy) of any single HAP or 25 tpy of any combination of HAP. Upon reclassifying to area source status, a source must comply with any applicable area source requirements and is no longer subject to major source national emission standards for hazardous air pollutants (NESHAP) requirements or other major source requirements that were applicable to it as a major source under CAA section 112.

Many stakeholders have speculated about what would happen to emissions if sources that once were major sources subject to major source NESHAP requirements were to reclassify to area sources and no longer be subject to the major source NESHAP requirements. However, this is far from an easy exercise. To realistically assess the potential emission impacts of the reclassification of sources, one must identify each source that will reclassify and the methods of HAP emission reductions that will be made enforceable by the permit conditions for that source. In addition, and in contrast to other rulemakings that require sources to comply with certain requirements, this action does not *require* sources to reclassify. Any action a source takes to reclassify as an area source is voluntary on the part of the source.

For these reasons, it is very difficult for EPA to even begin to assess which sources may reclassify. **Thus, assessing the potential emission impacts of the rulemaking is equally difficult.**

However, to take the first steps toward assessing the potential emission impacts of this rulemaking, we evaluated the sources that EPA knows have reclassified to area source status, consistent with EPA's plain language reading of the CAA section 112 definitions of "major" and "area" source, since January 2018.[1]

[1] On January 25, 2018, the EPA issued a guidance memorandum from William L. Wehrum, Assistant Administrator of the Office of Air and Radiation, to the EPA regional air division directors titled "Reclassification of Major

As of March 2019,[2] EPA knew of 34 sources that, since January 2018, had reclassified to area source status or were in the process of reclassifying to area source status.[3] We analyzed these sources in detail in the MM2A proposal, which was published in the *Federal Register* in June 2019.

After the proposal was published, some commenters to EPA opined that 34 sources was a small sample, and a few speculated that we had "cherry picked" permits to review. But as we noted in the proposal documentation, these were the only post-January 2018 reclassifications we were aware of as of March 2019. EPA obtained information about these reclassifications through the normal course of business with the permitting authorities that notify us of permitting actions within their jurisdictions.

From proposal through February 2020,[2] EPA learned of another 35 sources that had reclassified or were in the process of reclassifying to area source status.[4] This brings the total number of reclassifications reviewed to 69, more than double the number of reclassifications reviewed for proposal.

Though we suspect these facilities may represent a relatively small sample of sources that may ultimately reclassify (though they may not—we do not know for certain), this analysis reviews the facts and circumstances of *actual reclassification actions*. Thus, it provides a real-world look at the potential impacts of sources that reclassify. Other analyses, including the thorough illustrative analysis we provide in a separate memorandum for this rulemaking, are informative

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Sources as Area Sources Under Section 112 of the Clean Air Act" (MM2A Memorandum). See notice of issuance of this guidance memorandum at 83 *FR* 5543 (February 8, 2018).

[2] March 2019 was EPA's "cutoff date" for proposal to allow enough time to review the permits and determine their potential impacts. Similarly, February 2020 was the latest date to allow time to review the permits for final rulemaking.

[3] The EPA had an initial list of 37 reclassifications as of March 2019. Per the review of these actions, we determined that for one source the plain language reading of the CAA section 112(a)(1) and (a)(2) discussed in the MM2A Memorandum and the withdrawal of the 1995 "Once-In, Always-In" policy had no impact on whether the source could have reclassified. We also determined that two other facilities originally included were never major sources for HAP, and as such did not actually reclassify under MM2A. Therefore, we did not include these three sources in the analysis presented here.

[4] The EPA had an initial list of 45 additional reclassifications we learned of from March 2019 through February 2020. Per the review of these actions, we determined that for four sources the plain language reading of the CAA section 112(a)(1) and (a)(2) discussed in the MM2A Memorandum and the withdrawal of the 1995 "Once-In, Always-In" policy had no impact on whether the sources could have reclassified. The application for another facility was pending pursuant to an enforcement action and an incomplete application. Three applications were in draft, with incomplete documentation. For two facilities, EPA was unable to obtain copies of other documents needed to fully analyze the impacts of the reclassifications. For these reasons, we did not include these nine sources in the analysis presented here.

in many respects. But these more speculative analyses include assumptions that introduce uncertainty, and they can only present a range of possible outcomes.5

## I. Review of Reclassification Actions

Table 1 presents a list of 34 sources that EPA reviewed for the MM2A proposal. Of these, we classify 21 sources as coatings-type sources; five as oil and gas sources; four as fuel combustion/boiler sources; three as chemical sources; and one as heavy industry. Two of these reclassifications were still being drafted as of March 2019; however, all are now final.

Since proposal, EPA learned of another 35 sources that had reclassified or were in the process of reclassifying. Table 2 lists these sources. Of these additional 35 sources, we classify 24 as coatings-type sources, eight as chemical sources, two as fuel combustion/boiler sources, and one as heavy industry. Additional reclassifications listed are final except for Empire District Electric Company - Riverton (table 2, source #34), which was still pending as of February 2020.

**Table 1: Reclassified sources reviewed for the MM2A proposal, grouped by source type (facility name, state)**

| **Coatings** |
|---|
| 1) 2700 Real Estate Holdings, IN |
| 2) Arkwright Advanced Coatings Inc., RI |
| 3) Bemis Films, WI |
| 4) Bemis Wisconsin, LLC - New London, WI |
| 5) Fairhaven Shipyard Companies, Inc., North Shipyard, MA |
| 6) Geiger International, Inc., GA |
| 7) Heritage Home Group, LLC – Hickory, NC |
| 8) Heritage Home Group, LLC - Lenoir Plant, NC |
| 9) Herman Miller, Inc., MI |
| 10) Highland Industries Inc. Cheraw, SC |
| 11) IAC Iowa City, LLC, IA |
| 12) Kimball Office Salem Wood Office Furniture, IN |
| 13) Mapes Panels, LCC, NE |
| 14) Meridian Manufacturing Group, IA |
| 15) Novel Iron Works , NH |

[5] The analysis of the actual reclassifications includes representation of some of the source categories subject to major source NESHAP requirements. While the actual reclassifications demonstrate a cross-section of the types of industries that have reclassified, we are unable to determine if this cross-section of industries is representative of all types of sources that may seek reclassification in the future.

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|---|
| 16) Shelburne Shipyard Incorporated, VT |
| 17) Talaria Company, LLC d/b/a The Hinckley Company, ME |
| 18) Tower Industries, Ltd, OH |
| 19) TruStile Doors of Iowa, IA |
| 20) Vacuum Orna-Metal, Inc, MI |
| 21) Vanguard National Trailer Corporation, IN |
| **Oil and Gas** |
| 22) Andeavor Field Services, LLC<br>Ponderosa Compressor Station (Ponderosa), UT |
| 23) Catamount Energy Partners, LLC - Ignacio Gas Treating Plant, CO |
| 24) Crescent Point Energy Corporation -<br>Ute Tribal Compressor Station, UT |
| 25) Denbury Onshore LLC, Little Creek EOR Facility, MS |
| 26) WGR Operating, LP's Granger Gas Plant, Section 16 (sweet gas processing), WY |
| **Fuel Combustion/Boilers** |
| 27) City of Columbia - Municipal Power Plant, MO |
| 28) Holland Board of Public Works - James DeYoung Generating Station and Wastewater Treatment Plant, MI |
| 29) MidAmerican Energy Company - Riverside Generating Station, IA |
| 30) UniFirst Corporation Pontiac, MI |
| **Chemicals** |
| 31) Citgo Petroleum Corporation, FL |
| 32) Ross Incineration Services, OH |
| 33) TransMontaigne, Evansville Terminal, IN |
| **Heavy Industry** |
| 34) Mississippi Lime Company - Verona Plant, KY |

**Table 2: Additional reclassified sources reviewed for the final MM2A rulemaking, grouped by source type (facility name, state)**

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|---|
| **Coatings** |
| 1) Arlwin Manufacturing, KS |

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| 2) A.S.A. Manufacturing, Inc., FL |
| 3) Crawford Kitchens, GA |
| 4) Dubois Wood Products, Inc., IN |
| 5) Emerald Transformer Kansas LLC, KS |
| 6) General Engines Company, FL |
| 7) Gulf Stream Coach, Inc, IN |
| 8) Icon Identity Solutions, IL |
| 9) Kimball International-Jasper, IN |
| 10) Lowen Corporation, KS |
| 11) MACtac, IN |
| 12) Moly Manufacturing, LLC, KS |
| 13) National Office Furniture-Jasper, IN |
| 14) Neenah Paper Michigan, MI |
| 15) Norbord Industries, MS |
| 16) Patrick Industries, Inc, (aka Middlebury Hardwood Products), IN |
| 17) Precision Coatings, Inc., MI |
| 18) Robert Weed Plywood Corporation, IN |
| 19) Stamas Yacht, FL |
| 20) Tampa Fiberglass, FL |
| 21) Tasman Leather, ME |
| 22) The Woodworks Architectural Millwork, Inc, NH |
| 23) Valeo North America Inc., IN |
| 24) Wayne Metals, LCC, IN |
| **Chemicals** |
| 25) Gage Products, MI |
| 26) Holcim USA, Inc., MS |
| 27) Kinder Morgan Liquids Terminals-Argo, IL |
| 28) Newport Biodiesel, RI |
| 29) South Bend Ethanol, LLC, IN |
| 30) Stericycle Environmental Solutions Inc., MI |
| 31) Valero Renewable Fuels Company, IN |
| 32) World Energy Natchez, MS |
| **Fuel Combustion/Boilers** |

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|---|
| 33) Cook Property Inc, IN |
| 34) Empire District Electric Company - Riverton, KS |
| **Heavy Industry** |
| 35) Innocor Foam Technologies, MS |

## A. Methods

Below, we present the methods EPA used to assess potential emission impacts from the reclassification of the 34 facilities presented in Table 1 and the 35 facilities listed in Table 2. We compiled these lists primarily from the reclassification actions (i.e., permit actions) received by EPA's regional offices and shared with the EPA's Office of Air and Radiation through February 2020.[6]

In response to the MM2A proposal, EPA received comments on the methods we used for the initial permit review for the proposal. These commenters noted several areas in which they believed we could improve our analyses and several items that they thought were lacking in the permits that we did not note in our summaries. Notably, some commenters believed that the monitoring, recordkeeping, and reporting (MRR) requirements in some of the permits that allowed sources to reclassify were inadequate, and thus EPA could not state that those sources' emissions would not increase. Others noted that specifics about how facilities were to verify emissions were missing from some permits, while others observed that some permits provided little or no margin-of-compliance buffer. Still others noted some large differences between current actual emissions and the emission limits provided in the permits and assumed that sources would then raise their emissions up to those limits.

In light of the comments received, the EPA performed an additional review of some of the permit actions reviewed at proposal. We respond to specific comments in the RTC Chapter 7. In general, the EPA agrees with some of these comments stating how many of the permits could be improved with the inclusion of potential to emit (PTE) limits with a larger compliance buffer. We also agree that language addressing more explicitly how sources should maintain and verify compliance with the enforceable permit conditions would have made some permits stronger.

We disagree with comments that EPA's conclusions were inaccurate because EPA did not account for changes in the MRR requirements pertaining to the sources that have reclassified. These commenters argued that MRR requirements in many permits were inadequate and that those sources' emissions would therefore likely increase. The results of our permit review show that, for many facilities that reclassified, the MRR requirements in permits were the same as those in effect before reclassification. While some permits' MRR requirements differ from those required when the source was subject to major NESHAP MRR requirements, we point out that MRR requirements do not *change* emissions. Instead, they provide timely information for the

[6] The review of the permit actions presented in this memorandum for purposes of the MM2A rulemaking does not represent a formal review on the part of EPA for these permit actions.

operator to document compliance with the PTE limitations and also to take appropriate action to prevent emissions increases. If the source was in compliance with the major source standards before reclassifying, and the method it used to remain in compliance remains unchanged after reclassifying, then there is little reason to assume that source's emissions will change, even with some reduction in MRR burden. In fact, for a large majority of the 69 reclassifications EPA reviewed in this analysis, our reviews show that the sources' methods of compliance were the same before and after they reclassified. In those cases, we continue to assert that the new MRR requirements are sufficient to ensure compliance.

EPA agrees that to be enforceable, MRR requirements must be adequate to demonstrate that the PTE limitations are met. We also agree that if these requirements are lacking or are inadequate to catch emissions deviations, emissions estimates may be inaccurate. However, we also assert that for the permits that we reviewed, each permitting authority assessed the MRR proposed by the source when taking PTE limits to reclassify and ensured that it was adequate in a particular circumstance.

We also disagree that simply looking at actual emissions and comparing them to permitted thresholds is enough to conclude that emissions will increase. This method does not consider enough factors to predict emission impacts from reclassification, nor does it consider whether facilities could increase emissions anyway even *without* reclassifying. We address these comments and concerns in detail in the preamble for this rule.

In light of these comments, we reexamined the first set of 34 permit reviews and updated these analyses when pertinent. We also incorporated the same improvements in our review of the additional 35 reclassification permits we learned of after proposal.

1) **Facility Matching**
   - EPA matched the facilities in Tables 1 and 2 to their corresponding EPA Facility Registry Service identification number (FRS ID) and Emissions Inventory System (EIS) ID.
   - Consistent with the updated database for the final rulemaking[7], EPA obtained whole-facility HAP emissions data for each facility, where available. Emissions data were obtained from the 2017 National Emissions Inventory (NEI) and, if available, from the modeling file used in EPA's risk and technology review. Note that we updated the emissions data from the 2014 NEI emissions data shown in the proposal to 2017 NEI data for the Table 1 sources; in the source summaries, for reference, we have retained the 2014 data for those sources.
   - We were unable to find/match the FRS ID/EIS ID for two facilities from Table 1, Crescent Point Energy Corp - Ute Tribal Compressor Station and Geiger International, Inc., and from one facility in Table 2, Crawford Kitchens.

[7] See Documentation of the Data for Analytical Evaluations & Summary of Industries Potentially Impacted by the Final Rule "Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act" (MM2A Database Memo) ERG, August 2020

- No NEI emissions data were available for the following nine facilities reviewed at proposal: Bemis Films; Bemis Wisconsin, LLC; Crescent Point Energy Corp - Ute Tribal Compressor Station; Geiger International, Inc.; Mapes Panels, LLC; Shelburne Shipyard, Inc.; Tower Industries, Ltd., TransMontaigne Evansville Terminal; and Vacuum Orna-Metal, Inc. Similarly, among the sources reviewed after proposal, no NEI emissions data were available for Crawford Kitchens and Robert Weed Plywood Corporation.

2) **Permit Review**
   - EPA reviewed the documents associated with the reclassification of these sources. Reclassification documents included: Minor Source Permits, Tribal New Source Review Permits, Federally Enforceable State Operating Permits, Title V Permits, Permit Revocation Letters and their corresponding statement of basis (where available).
   - The following information was obtained from the permit documents, where available:
     i) Any previous applicable major source NESHAP subparts and major source NESHAP compliance method/strategy (i.e., control technology, work practice, process design, use of compliant materials, etc.) used to meet the major source requirements.
     ii) Any previous applicable area source NESHAP subparts and any new applicable area source NESHAP subparts.
     iii) Unrestricted HAP PTE prior to reclassification and restricted HAP PTE post-reclassification.
     iv) Any enforceable HAP PTE limitations existing prior to the MM2A Memorandum (including the method to determine compliance and corresponding MRR requirements).
     v) New enforceable HAP PTE limits (including the method to determine compliance and corresponding MRR) and whether the facilities will continue to use the same method of compliance they used to meet the applicable major source requirements after reclassification.
   - A summary of information obtained from the review of permit actions can be found in Appendix A for sources reviewed at proposal and Appendix B for additional sources reviewed for final.

3) **Assessing Potential for Emission Impacts**
   - To assess potential for emission impacts due to the reclassification, EPA focused the review on the enforceable conditions associated with the HAP PTE limitations for the emission units previously subject to major source NESHAP requirements and whether the sources that reclassified will continue to use the major source NESHAP compliance method/strategy for these emission units as an enforceable condition on the source's PTE after reclassification.
   - Below we present the main compliance methods/strategies and how we assessed potential for emission impacts due to the reclassification for the sources under review.
     i) **Use of compliant materials** (i.e., use of low-HAP/no-HAP coating/resins formulations, pollution prevention measures)
        - The use of compliant materials is one of the compliance options sources use to comply with many major source NESHAP requirements. This compliance method is more prevalent for coating source NESHAP categories. In general, sources comply by applying materials that meet the emission limits, either individually or

collectively, during each compliance period. Sources demonstrate compliance by showing that the organic HAP content of each coating/thinner/additive/resin used is less than or equal to the applicable limitation.

- A discussion with EPA's coatings source experts indicated that a source that reclassifies to area source status after being in compliance with major source NESHAP requirements through the use of compliant materials is highly unlikely to change their formulations from a low- or no-HAP content to a higher HAP content (e.g., switching from powder coatings back to liquid coatings). This change is unlikely because a change to higher HAP content formulation could also lead to an increase in VOC emissions, to applicability of VOC and OSHA regulations, and to an increase in costs associated with the disposal of the hazardous waste. In addition, many facilities have made substantive process changes to incorporate the use of the low-HAP/no-HAP coatings. These facilities would incur substantial costs to change their operations to use higher HAP coatings.
- Thus, EPA does not expect that sources that have employed the use of pollution prevention measures (*i.e.*, low-HAP/no-HAP coatings or no-HAP coatings/resins) as their compliance method to meet previous applicable major source NESHAP requirements and have reformulated their products accordingly will change their formulations and products as a result of a change in status.
- For these types of sources, if permits reflect the use of compliant materials (i.e., low-HAP or no-HAP coatings/resins) as the method of compliance with the PTE limitations, EPA assumed no potential for emissions increases due directly to the reclassification. However, if the post reclassification permit reflected a change in the use of compliant materials, the EPA analyzed whether such change could lead to emission increases that otherwise would have not happened if the source continued to be subject to major source NESHAP requirements.

ii) **Use of add-on emission control equipment** (i.e., fabric filters, catalytic oxidizers, regenerative thermal oxidizers [RTO])

- The use of add-on control equipment is one of the compliance options sources can use to comply with major source NESHAP requirements. In general, sources that comply using add-on controls demonstrate compliance by meeting certain operating limits/parameters established during performance tests.
- For sources relying on emission control equipment, EPA focused the review on those sources that used "adjustable" emission control equipment as the compliance method for previously applicable major source NESHAP requirements.
- Adjustable controls are those for which important operating parameters (e.g., combustion temperature) can be potentially adjusted, which could lead to a change in the HAP emission control level.
- For our analysis, we viewed particulate controls for inorganic HAP (e.g., fabric filters, electrostatic precipitators) as non-adjustable, but controls for organic HAP or acid gases (e.g., RTO, caustic scrubbers, wet scrubbers) as controls that could be adjustable.

- For sources employing adjustable emission controls, EPA reviewed the permit enforceable limitations associated with the use of the emission control, including operating parameters.
  - If the permit conditions reflect the use of the same control equipment and operating parameters as when the source was subject to major source NESHAP requirements, EPA assumed no potential for emissions increases due to the reclassification.
  - If permit conditions reflect the use of the same control equipment but a change in operating parameters (e.g., change in monitoring device, change in monitoring frequency), EPA assessed whether the change in operating parameters could lead to a change in HAP emission control level and an increase of HAP emissions.

iii) **Use of work practices** (i.e., tanks design, leak detection and repair)
- The use of work practices is another form of compliance that is used for some major source NESHAP requirements.
- For sources employing work practices, EPA focused on whether the work practice requirements previously applicable to the source changed when the source reclassified.
  - If the permit conditions reflect the same work practice requirements, EPA assumed no potential for emissions increases due to the reclassification.
  - If the permit conditions reflect a change in the work practice requirements, EPA assessed whether the change could lead to a change in the HAP emission control level and an increase of HAP emissions.

iv) **Operational restrictions** (i.e., restriction on amount of fuel burned)
- When reclassifying, a source can opt to operate with new operational limitations, which are incorporated into their operating permit, to avoid applicability to major source NESHAP requirements. .
- For these types of reclassifications, EPA assessed whether these new operational restrictions will lead to additional emission reductions.

v) **Process changes** (i.e., removal of processes, change in fuel)
- Many sources have made permanent process changes and have reclassified as true area sources (HAP PTE is below the MST and source does not rely on any physical or operational limits, including the use of pollution control equipment to constrain their emissions). EPA determined that the reclassification of such sources will not lead to emissions increases.

**B. Results from the Review of Reclassification Actions**

As described in the previous section, EPA focused the review of the reclassification actions on the enforceable conditions associated with the method of compliance for the HAP PTE limitations for the emission units previously subject to major source NESHAP subparts. EPA reviewed the reclassification actions to determine whether the sources will continue to use the same method of compliance used to meet major source NESHAP requirements as an enforceable condition after reclassification. Our review of these permitting actions supports the conclusion that sources that reclassify to area source status would in most cases achieve and maintain area

source status by operating the emission controls or continuing to implement the practices they used to comply with the major source NESHAP requirements.

Part 1 of this section contains EPA's general observations based on our review and analysis of the 34 reclassifications we reviewed at proposal. For this final rulemaking, EPA has updated these analyses when pertinent. A summary of the findings from the review of permits associated with the reclassification of these 34 sources is presented in Table 3 and in more detail in Appendix A. In Part 2, we present findings from the review of an additional 35 reclassifications EPA learned of from proposal through February 2020.

Even though these reclassifications represent a small subset of the sources that could reclassify, the general findings provide information regarding the type of sources that most likely will be interested in pursuing reclassification to area source status, their potential compliance methods, and potential impact on emissions resulting from the reclassification to area source status.

**1) Results for the 34 Reclassified Sources Reviewed at Proposal**

- Of the 34 sources reviewed for this analysis, 21 can be classified as coating type sources (*see* Facilities #1-21 in Table 3); five as oil and gas sources (facilities #22-26 in Table 3); four as fuel combustion/boiler sources (facilities #27-30 in Table 3); three as chemical sources (facilities #31-33 in Table 3) and one as heavy industry (facility #34). Coincidentally, 11 of the sources are owned by small businesses or entities as defined by the Small Business Administration (SBA).[8]
- Of the 23 sources for which we had 2017 NEI emissions data, all had actual emissions below the MST in 2017.
- Of the 21 coating sources, 20 used compliant materials (low-HAP/no-HAP) to meet applicable major source requirements before reclassification, and their continued use of compliant materials is an enforceable condition after reclassification. Only one source (facility #13) used an RTO to meet applicable major source requirements and maintain compliance before and after reclassification.
- All five oil and gas sources relied on the use of control technologies (oxidation catalyst [enclosed combustion device] and flares) to meet applicable major source requirements before reclassification, and their continued use is an enforceable condition to maintain compliance after reclassification. In addition, one of these sources (facility #25) took enforceable restrictions on the amount of low-pressure relief gas vented to the atmosphere to reclassify to area source status.
- Of the four fuel combustion/boiler sources, one ceased combustion of coal, one ceased operation of boilers, and two had restrictions on the usage of natural gas as their mechanism to meet applicable major source standards before reclassification and as an enforceable condition to maintain compliance after reclassification.
- Of the three chemical sources, two are gasoline distribution sources (facilities #31 and #33) that relied on vapor flare/vapor combustion to meet applicable major source

[8] The details of our analysis of business and entity size are included in the spreadsheet titled, *Analysis of MM2A Reclassifications for Small Business Determination*.

requirements before reclassification, and these controls are enforceable conditions to maintain compliance after reclassification. The remaining source is an incinerator (facility #32). The incinerator is still subject to the same requirements for 40 CFR 63 subpart EEEE and reclassified for purposes of applicability with 40 CFR subpart DD (off-site waste recovery operations). For purposes of the reclassification, this source relied on control technologies (fixed roofs with closed vents systems routed to carbon absorption units) to meet applicable major source requirements before reclassification, and the source will continue to use these technologies under an enforceable condition to maintain compliance after reclassification.

- The source of the heavy industry type is a lime manufacturing plant (facility #34). After reclassification, this source remains subject to other regulatory requirements, including PM emission limitations, use of a baghouse, and monitored opacity as an operating limit via operation of a continuous opacity monitoring system (COMS).
- Of the 34 reclassifications, six sources are now classified as true area sources[9] because these sources are no longer physically or operationally able to emit HAP above the MST.
- Of the 28 sources with PTE limitations, six sources had obtained PTE limitations before January 2018 (existing PTE limitations) while 22 obtained the limitations after January 2018 (aka new PTE limitations).

In general, we don't expect emissions increases from those sources using compliant materials (low-HAP/no-HAP) to maintain compliance after reclassification. In our permit review, we found one permit for one source previously subject to 40 CFR 63 subpart MMMM using compliant coatings to maintain compliance. This permit indicated the source wanted to leave open the option to use paints containing metal fabrication HAP (MFHAP). 40 CFR 63 subpart MMMM only regulates organic HAP. The permit for this source includes operational limitations (limits on amount of paint used at the facility) and HAP emission limits from the previously affected subpart MMMM sources of 3.8 tpy single HAP and 4.8 tpy total HAP and total facility HAP limits of 4.9 tpy single HAP and 5.9 tpy total HAP. In addition to these HAP PTE limitations, this source is now subject to the metal fabrication and finishing area source NESHAP (40 CFR 63 subpart XXXXXX [subpart 6X]), whenever using coating materials containing MFHAP as defined in 40 CFR §63.11522. Subpart 6X includes monitoring and work practice requirements for the spray booths, work practice and opacity monitoring requirements for welding areas and work practice requirements for their plasma table. All potential metal HAP emissions are controlled because the equipment standards and management practices requirements of subpart 6X control particulate matter as a surrogate for MFHAP. Subpart 6X requires spray booths to be fitted with filter technology demonstrated to achieve at least 98% control efficiency of paint overspray (arrestance). Given these requirements, we don't expect emission increases from the reclassification of this source.

[9] Any source that needs a physical or operational limit on its maximum capacity to emit, including requirements for the use of air pollution control equipment or restrictions on the hours of operations or on the type or amount of material combusted, stored, or processed, is not a true area source.

For the coating source using an RTO (facility #13 in Table 3) to maintain compliance, we reviewed the operating parameters associated with the enforceable conditions in the permit. We found that the RTO operating parameters were the same before and after reclassification, ensuring a HAP destruction efficiency of 95%. The permit for this source requires the use of an RTO as a federally enforceable permit requirement. The average combustion chamber temperature must remain at or above the level established during a manufacturer performance test or at the level recorded during the most recent valid performance test. This will require the source to maintain the RTO combustion chamber temperature at a level that ensures adequate control to remain a minor HAP source. We don't expect emissions increases resulting from the reclassification of this facility.

The five oil and gas sources (facilities #22-26) that reclassified relied on the use of control technologies to meet emissions requirements before and maintain compliance after reclassification. Four of these facilities (#22, #24, #25 and #26) were subject to the major source requirements of the Oil and Natural Gas Production NESHAP while one facility (#23) was subject to the major source requirements of the Stationary Reciprocating Internal Combustion Engines (RICE) NESHAP. The facility (#23) subject to the major source RICE NESHAP requirements replaced old engines with new engines equipped with an enclosed combustion device designed to reduce HAP emissions (formaldehyde) by 90%. We don't expect emissions increases resulting from the reclassification of this facility. Of the four facilities that were subject to the major source requirements of the Oil and Natural Gas Production NESHAP, two (#22 and #26) relied on the use of flares and enclosed combustion devices to meet the applicable major source emissions requirements before reclassification, and their continued use of these control technologies is required as an enforceable condition to maintain compliance after reclassification. The permit for another facility (#24) imposes enforceable emissions restrictions for an existing installed and operating emissions unit and associated voluntarily installed and operated control device. The enforceable conditions include the operation of an enclosed combustor to control the Volatile Organic Compound (VOC) and HAP emissions from a triethylene glycol (TEG) dehydrator still vent. We don't expect emissions increases resulting from the reclassification of this facility.

Before reclassifying, the last facility in the oil and gas category (#25) was subject to NESHAP subpart HH. Upon reclassifying, the facility took an additional enforceable limitation on the amount of low-pressure relief gas vented to the atmosphere. This limitation ensured emissions of the individual HAP 2,2,4-trimethylpentane (largest individual HAP for the gas compression/venting operation) would remain below 10 tpy. This limitation was needed due to a process change to vent the gas directly to the atmosphere; previously, the relief gas was routed to a vapor recovery unit. Without this enforceable limitation, emissions from the gas compression/venting operation could have increased to an uncontrolled PTE of 10.3 tpy for 2,2,4-trimethylpentane. (Note that since this gas compression/venting operation was *not* an affected source under NESHAP subpart HH prior to reclassification, any emission changes due to the process change are not related to the reclassification.)

Prior to the reclassification of facility #25, NESHAP subpart HH regulated emissions from the storage tanks. The modified Title V permit maintains the requirement for the tanks to be covered and the emissions to be vented through a closed-vent system to the same flare that was operated when complying with subpart HH. The modified Title V permit has associated operational, monitoring, recordkeeping and reporting requirements, many of which are generally consistent with the formerly applicable combustion and LDAR requirements of subpart HH. In addition, the flare is not subject to CAM because uncontrolled VOC and HAP from each storage tank is less than Title V major source thresholds. Overall, the actions taken by this facility to reclassify to area source status resulted in emission reductions.

Regarding the reclassification of the four fuel combustion/boiler sources (facilities # 27-30 in Table 3), three (#27, #28, #29) had emissions above the MST as reported in the 2014 NEI. To reclassify, these sources either ceased combustion of coal, ceased operation of boilers, and/or obtained restrictions on the usage of natural gas. The actions taken by these three sources to reclassify resulted in a reduction of HAP emissions, as reflected in the facilities' 2017 NEI emissions. Another source (#30) relied on material limits and operational restrictions on natural gas usage to meet the applicable major source requirements and the continued use of these compliance methods is required by an enforceable condition after the reclassification. Thus, the EPA does not expect emission increases from the reclassification of this source.

Two of the chemical sources are gasoline distribution facilities (facilities # 31 and #33 in Table 3). These facilities were subject to 40 CFR 63 subpart R and relied on vapor flare/vapor combustion to meet emissions requirements before and maintain compliance after reclassification. Per the permit review, the operation of the vapor flare/vapor combustor is required at all times when the facility's loading racks are loading gasoline into transports. These sources are now subject to 40 CFR subpart 63 BBBBBB, the area source rule that regulates emissions from tanks, transfer racks, roof landings and maintenance. The permit for one of these two sources (#31) specifies that the vapor combustor unit (VCU) is no longer subject to continuous monitoring of temperature and removed the requirement to obtain approval prior to changing the minimum operating temperature of the VCU. The specific conditions of the permit require the facility to continuously monitor the presence of the VCU pilot flame and to automatically prevent truck loading operations at any time that the pilot flame is absent. For this facility, we reviewed the specific permit requirements, including for the VCU, to assess whether the changes in operating parameters could potentially impact emission control. The permit for this facility includes a requirement for annual periodic testing in addition to the continuous pilot flame monitoring to ensure that the enclosed combustor is operational when loading operations occur. The annual performance test in conjunction with the monitoring of the presence of the flame act together to ensure proper operation and performance of the emission controls. We therefore do not expect emission increases due to the reclassification of this source. The other gasoline distribution facility (#33) continues to be subject to flare operating and monitoring requirements in 40 CFR 60 subpart XX (New Source Performance Standards for Bulk Gasoline Terminals). The flare operating and monitoring requirements in 40 CFR 60 subpart XX are identical to those in 40 CFR 63 subpart R. This permit also requires testing for specific HAP

associated with the vapor combustor to ensure operation and performance. We do not expect emission increases due to the reclassification of this source.

As for the incinerator (facility #32 in Table 3), the source continues to be subject to the same requirements for 40 CFR 63 subpart EEEE and reclassified for purposes of applicability with 40 CFR subpart DD (off-site waste recovery operations), which covers emissions from tanks and equipment leaks. This source relied on control technologies (fixed roofs with closed vents systems routed to carbon absorption units) as their method of compliance before reclassification and is required by an enforceable condition to continue to operate the same control technologies after reclassification. The source is also subject to Resource Conservation and Recovery Act (RCRA) regulation/permit requirements. The RCRA permit for this facility requires the source to control emissions by venting the tanks through closed vent systems to carbon adsorption units designed and operated to recover the organic vapors vented to them with an efficiency of 95% or greater by weight. The tanks must be covered by a fixed roof and vented directly through the closed vent system to a control device. Therefore, we don't expect emissions increases due to the reclassification of this source.

As for the lime manufacturing plant (facility #34 in Table 3), after reclassification this source remains subject to other regulatory requirements, including PM emission limitations, the use of a baghouse, and a requirement to monitor opacity as an operating limit via a continuous opacity monitoring system (COMS). Because of the inherent scrubbing properties of lime and the requirements for the use of a baghouse, we don't expect emissions increases resulting from the reclassification of this facility.

Table 3 presents a summary of the findings from the review of permits associated with the reclassification of the 34 sources EPA reviewed for proposal. The table presents the status of the reclassification, the reported 2017 NEI emissions for each facility's single largest HAP and total HAP in tons per year (tpy), previously known applicable major source NESHAP and the main compliance strategy for the applicable major source NESHAP before the reclassification. Table 3 also shows whether the source reclassified as a true area source, whether the source had obtained HAP PTE limitations before January 2018 (existing PTE limitations) or whether the source obtained new HAP PTE limitations after January 2018, and the method of compliance stated in the permit to meet HAP PTE limitations after reclassification. The last column of Table 3 shows the results of EPA's assessment of emission changes due to the reclassification of these sources.

The detailed summary and assessment for each of the 34 reclassifications reviewed for proposal can be found in Appendix A.

**Table 3: Summary of the findings from the review of permits at proposal associated with the reclassification of 34 sources**

| Facility Name | 2017 Emissions (tpy): Single Largest HAP; Total HAP– 2017 NEI | Previously Applicable Major Source NESHAP - 40 CFR 63 Subpart(s) | Method of Compliance for Major Source NESHAP Before Reclassification | Type of Reclassification (true area; existing PTE limitations; new PTE limitations) | Method of Compliance for HAP PTE Limitations | Results of Analysis of Emission Changes due to Reclassification |
|---|---|---|---|---|---|---|
| **Coating Sources** | | | | | | |
| 1) 2700 Real Estate Holdings, Elkhart, IN | 0.01; 0.01 | Subpart MMMM (Surface Coating for Miscellaneous Parts and Products) | Compliant materials | True area | Permanent operational changes (removal of emission units) and use of compliant materials | No change |
| 2) Arkwright Advanced Coatings, Fiskeville/Coventry, RI | 0.01; 0.01 | Subpart JJJJ (Paper and Other Web Coating) | Compliant materials | True area | Permanent operational changes (removal of emission units) | No change |
| 3) Bemis Films, Oshkosh, WI | Not available (n/a) | Subpart KK- (Printing and Publishing) and subpart DDDDD (Boilers) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 4) Bemis Wisconsin LLC - New London, WI | n/a | Subpart KK- (Printing and Publishing) and subpart DDDDD (Boilers) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 5) Fairhaven Shipyard Companies, Inc., North Shipyard, Fairhaven, MA | n/a (note: 2014 NEI emissions were 2.05; 2.05) | Subpart II (Shipbuilding) | Compliant materials | Existing PTE limitations | Compliant materials | No change |

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|---|---|---|---|---|---|---|
| 6) Geiger International, Atlanta, GA | n/a (note: permit emissions data from 2018 - 0.4; 0.4 | Subpart JJ (Wood Furniture) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 7) Heritage Home Group LLC – Hickory, NC | 3.39; 4.62 | Subpart JJ (Wood Furniture), Subpart DDDD (Plywood and Composite Wood Products) | Compliant materials | Existing PTE limitations | Compliant materials | No change |
| 8) Heritage Home Group LLC - Lenoir, NC | 6.05; 12.97 | Subpart JJ (Wood Furniture), Subpart DDDD (Plywood and Composite Wood Products), and case-by-case MACT (Boilers) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 9) Herman Miller, Inc., Zeeland, MI | 0.00; 0.00 | Subpart JJ (Wood Furniture) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 10) Highland Industries, Inc. Cheraw, SC | 0.62; 1.15 | Subpart OOOO (Printing, Coating, and Dyeing of Fabric and Other Textiles) | Compliant materials | True area | Compliant materials | No change |
| 11) IAC Iowa City LLC, Iowa City, IA | 2.16; 2.50 | Subpart PPPP (Plastic Parts and Products) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 12) Kimball Office Salem Wood Office Furniture, Salem, IN | 0.00; 0.00 | Subpart JJ (Wood Furniture) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 13) Mapes Panels, LCC, Lincoln, NE | n/a | Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products), | Permanent total enclosure and RTO with minimum | New PTE limitations | Operational limits, permanent total enclosure and RTO | No change |

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|---|---|---|---|---|---|---|
| | | Subpart PPPP (Surface Coating of Plastic Parts and Products), and Subpart QQQQ (Wood Building Products Surface Coating) | destruction/removal efficiency of 95 | | with minimum destruction/removal efficiency of 95% | |
| 14) Meridian Manufacturing Group, Storm Lake, IA | 2.71; 2.92 | Subpart MMMM (Miscellaneous Metal Parts and Products Surface Coating) | Compliant materials | New PTE limitations | Compliant materials and operational limits for spray booths | No change |
| 15) Novel Iron Works, Greenland, NH | 0.05; 0.06 | Subpart MMMM (Miscellaneous Metal Parts and Products Surface Coating) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 16) Shelburne Shipyard Incorporated, Shelburne, VT | n/a | Subpart II (Ship Building and ship Repair Surface Coatings) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 17) Talaria Company, LLC, Trenton, ME | 4.92; 8.22 | Subpart VVVV (Boat Manufacturing | Compliant materials | New PTE limitations | Compliant materials | No change |
| 18) Tower Industries, Ltd, Massillon, OH | n/a | Subpart WWWW (Reinforced Plastic Composites Production)[10] | Compliant materials | Existing PTE limitations | Compliant materials | No change |
| 19) TruStile Doors of Iowa, Northwood, IA | 0.52; 1.05 | Subpart QQQQ (Surface Coating of Wood Building Products) | Compliant materials | New PTE limitations | Compliant materials and operational limits for spray booths | No change |

[10] As discussed in the MM2A proposal preamble, 40 CFR 63, subpart WWWW (Reinforced Plastic Composite Production) contained a regulatory provision that reflected the 1995 OIAI policy. In the final MM2A rule, the EPA has amended Table 2 of subpart WWWW to remove the date after which a major source cannot become an area source.

| | | | | | | |
|---|---|---|---|---|---|---|
| 20) Vacuum Orna-Metal, Inc, Romulus, MI | n/a | Subpart PPPP (Surface Coating of Plastic Parts and Products | Compliant materials | New PTE limitations | Compliant materials and material limits | No change |
| 21) Vanguard National Trailer Corporation, Monon, IN | 0.03; 0.04 | Subpart MMMM (Miscellaneous Metal Parts and Products) | Compliant materials | True area | Permanent operational changes (removal of emission units) and Compliant materials | No change |
| **Oil and Gas** | | | | | | |
| 22) Andeavor Field Services, LLC Ponderosa Compressor Station (Ponderosa), Uintah and Ouray Indian Reservation, UT | n/a [11] | Subpart HH (Oil and Natural Gas Production Facilities) | Control technology (flare and enclosed combustion device) | Existing PTE limitations | Control technology (flare and enclosed combustion device) | No change |
| 23) Catamount Energy Partners, LLC - Ignacio Gas Treating Plant, Colorado Southern Ute Indian Reservation | 7.69; 15.36 | Subpart ZZZZ (RICE) | Replaced uncontrolled engines with new engines designed with control technology (catalytic oxidizer) to reduce formaldehyde by 90% | Existing PTE limitations | Control technology (engine designed with catalytic oxidizer to reduce formaldehyde by 90%) and operational limitations | No change |
| 24) Crescent Point Energy Corporation Ute Tribal Compressor Station, | n/a | Subpart HH (Oil and Natural Gas Production Facilities) | Control technology (enclosed combustion device) | New PTE limitations | Control technology (enclosed combustion device) | No change |

[11] Emissions reported for this source at proposal were from another source. NEI has no emissions for this source for any year.

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| Duchesne County, Ute Indian Tribe, UT | | | | | | |
| 25) Denbury Onshore LLC, Little Creek EOR Facility, Ruth, MS | 2.07; 3.60 | Subpart HH (Oil and Natural Gas Production Facilities) | Control technology (flare) | New PTE limitations | Control technology (flare) and restriction on amount of low-pressure relief gas vented to atmosphere | Reduction in HAP |
| 26) WGR Operating, LP's Granger Gas Plant, Section 16 (sweet gas processing), Granger, WY | 4.34; 4.36 | Subpart HH (Oil and Natural Gas Production Facilities) | Control technology (condenser and flare) | Existing PTE limitations | Control technology (engine oxidation catalyst, condenser and flare) | No change |
| **Fuel Combustion/Boilers** | | | | | | |
| 27) City of Columbia - Municipal Power Plant, Columbia, MO | 0.03; 0.04<br>(Note: 2014 NEI emissions 17.06; 20.53) | Subpart DDDDD (Boilers), YYYY (Turbines), and ZZZZ (Stationary Reciprocating Internal Combustion Engines [RICE]) | Not known | True area | Permanent operational changes (Ceased combustion of coal in boiler #6 and #7) | Reduction in HAP |
| 28) Holland Board of Public Works - James DeYoung Generating Station and Wastewater Treatment Plant, Holland, MI | 0.11; 0.66<br>(Note: 2014 NEI emissions 16.61; 20.69) | Subpart ZZZZ (RICE) | Not known | True Area | Permanent operational changes (coal-burning power plant ceased operations in 2016) | Reduction in HAP |

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| 29) MidAmerican Energy Company - Riverside Generating Station, Bettendorf, IA | 0.10; 0.10 (Note: 2014 NEI emissions 23.47; 38.36) | Subpart DDDDD (Boilers) | Not known | New PTE limitations | Operational restriction (usage of natural gas for Boiler #9) | Reduction in HAP |
| 30) UniFirst Corporation, Pontiac, MI | 0.24; 0.46 | Subpart DDDDD (Boilers) | Not known | Existing PTE limitations | Material limits and operational restriction on usage of natural gas boiler | No change |
| **Chemicals** | | | | | | |
| 31) Citgo Petroleum Corporation, Hillsborough, FL | 0.39; 1.49 | Subpart R (Gasoline Distribution Facilities) | Control technology (Vapor collection system) | New PTE limitations | Control technology (Vapor collection system) | No change |
| 32) Ross Incineration Services, Grafton, OH | 0.25; 1.37 | Subpart DD (Off-Site Waste Recovery Operations), Subpart EEEE (Hazardous Waste Combustor-HWC)12 | Control technology (thermal oxidizer, fixed roofs with closed vents systems routed to carbon adsorption units) | New PTE limitations | Control technology (thermal oxidizer, fixed roofs with closed vents systems routed to carbon adsorption units) | No change |
| 33) TransMontaigne, Evansville Terminal, Evansville, IN | n/a | Subpart R (Gasoline Distribution Facilities) | Control technology (vapor flare and vapor combustor) | New PTE limitations | Control technology (vapor flare and vapor combustor) | No change |
| **Heavy Industry** | | | | | | |

[12] Subpart EEEE continues to be applicable to the source after reclassification.

| | | | | | | |
|---|---|---|---|---|---|---|
| 34) Mississippi Lime Company - Verona Plant, Verona, KY | 6.20; 6.21 | Subpart AAAAA (Lime Manufacturing Plants) | Control (baghouse) | New PTE limitations | Control (baghouse) | No change |

**2) Results for 35 Additional Reclassified Sources Reviewed for Final Rulemaking**

- Of the 35 sources reviewed for this additional analysis, 24 can be classified as coating type sources (*see* facilities #1-24 in Table 4); eight as chemical sources (facilities #25-32 in Table 4); two as combustion/boiler sources (facilities 33-34 in Table 4); and one as heavy industry (facility #35 in Table 4). Coincidentally, 17 of the additional reclassified sources are owned by small businesses or entities as defined by the Small Business Administration (SBA), for a total of 28 small businesses out of the 69 reclassified sources reviewed in this memo.[13]
- Of the 33 sources for which we had 2017 NEI emissions data, 32 had actual 2017 emissions below the MST. For the one source with HAP emissions above the MST per 2017 NEI data, more recent emissions data available show HAP emissions were below the MST when they reclassified.
- Of the 24 coating sources, 12 used compliant materials (low-HAP/no-HAP) exclusively to meet applicable major source requirements before reclassification, and their continued use of compliant materials is an enforceable condition after reclassification. Seven other coating sources relied exclusively on compliant materials before reclassifying, while after reclassifying relied on both compliant materials and a change in operations and/or production limits to maintain compliance. Three coating sources used a combination of compliant materials and control technology (RTOs and or total enclosures) before reclassifying, all of which remained enforceable conditions after reclassifying. One source (facility #15 from Table 4) used RTOs and work practice standards to meet applicable major source requirements and maintain compliance before and after reclassifying without also relying on compliant materials. Finally, one source (facility #5 from Table 4) used compliant materials to reclassify but concurrently requested a change to HAP-based solvents with accompanying process limitations to maintain compliance. For this source, the change in formulation after reclassification could lead to emission increases of 4.3 tpy of the largest single HAP (xylene) or to18.75 tpy of total HAP.
- Of the eight chemical sources, four are miscellaneous organic chemical production facilities; these relied on a variety of control technologies (including RTOs, scrubbers, and flares) and work practices to maintain compliance before reclassifying. Two sources are off-site waste recovery facilities that relied on control technologies such as vapor balance/recovery systems, condensers, and scrubbers to meet applicable major source requirements before reclassification. One source is a gasoline distribution facility that relied on similar control devices to meet applicable major source requirements before reclassification. All seven of these chemical sources continue to rely on the same (or additional) requirements as enforceable conditions to maintain compliance after reclassification. Finally, one source (facility #26 from Table 4) is a former Portland cement facility that until 2015 fueled its cement kiln using collected hazardous and non-hazardous waste, using various control technologies to maintain compliance. This facility permanently removed all equipment associated with the Portland cement operation and took on a new primary role as a hazardous waste storage/transfer facility, using throughput limits and a carbon adsorption system to maintain compliance.

[13] The details of our analysis of business and entity size are included in the spreadsheet titled, *Analysis of MM2A Reclassifications for Small Business Determination*.

- The two fuel combustion/boiler sources each made permanent operational changes to meet applicable major source standards both before reclassification and as enforceable conditions to maintain compliance after reclassification. Both ceased combustion of coal, one by converting to natural gas boilers and one by retiring a turbine and two boilers; the latter source converted a simple cycle turbine to combined cycle.
- The source of the heavy industry type is a flexible polyurethane foam fabrication facility. It relied on compliant materials, control technology (carbon adsorption systems), work practices, and operational limitations to meet applicable major source standards before reclassification and rely on these as enforceable conditions to maintain compliance after reclassification.
- Of these 35 additional reclassifications, eight sources are now classified as true area sources[14] because these sources are no longer physically or operationally able to emit HAP above the MST.
- Of the 27 additional sources with PTE limitations, nine sources had obtained PTE limitations before January 2018 (existing PTE limitations) while 18 obtained the limitations after January 2018 (aka new PTE limitations).

As with the sources reviewed for proposal, we generally don't expect emissions increases from coating sources using compliant materials (such as low- or no-HAP coatings) to maintain compliance after reclassification. This includes several coating sources that, in addition to continued reliance on compliant materials, also made process changes to maintain compliance with the MST after reclassifying. However, in our permit review, we found one source (facility #5 from Table 4) with a circumstance that could allow for some emissions increases after reclassifying. In 2010, the source, subject at that time to 40 CFR 63 subpart T, switched to using a no-HAP solvent in its vapor degreasers. In 2018, the source installed surface coating equipment that was subject to 40 CFR Part 63 subpart MMMM and relied on using low HAP/no-HAP coatings and solvents for compliance. Still relying on these compliant materials, the source reclassified as an area source in 2019. However, in the same application to the state permitting authority in which they requested to reclassify, they also requested to make a process change from water-based surface coatings to solvent-based surface coatings and take enforceable throughput limits to maintain compliance with the MST. This concurrent process change meant that post-reclassification emissions increases from the surface coating operation are possible from this source that could not have otherwise happened without the facility reclassifying to area source status. Notably, this is the only facility of the 69 reclassifications EPA reviewed for this memo for which we foresee the potential for emissions increases due to reclassifying to area source status that could not have occurred without reclassifying.

One coatings source (facility #21 from Table 4) was subject to 40 CFR 63 subpart TTTT (Leather Finishing Operations) and had enforceable PTE limits as part of their Part 70 air license that were well above the MST. The facility's actual emissions also exceeded the single-HAP

[14] Any source that needs a physical or operational limit on its maximum capacity to emit, including requirements for the use of air pollution control equipment or restrictions on the hours of operations or on the type or amount of material combusted, stored, or processed, is not a true area source.

MST in the 2017 NEI. In 2019, the source requested to reclassify. The source had identified suitable non-HAP substitutes for nearly all HAP-based compounds they had been using in their leather finishing operations. These substitutions, which became enforceable permit conditions in their modified permit, resulted in the source reducing both their actual emissions and PTE below the MST. Thus, reclassifying resulted in HAP emissions decreases from this source.

For the four coating sources using RTOs to maintain compliance (including three also relying on compliant materials), EPA reviewed the operating parameters associated with the enforceable conditions in the permit. We found that the operating parameters for the RTOs were the same before and after reclassification, and the updated permits for these sources require the continued use of an RTO as an enforceable permit requirement. One coatings source (facility #15 from Table 4) relied exclusively on an RTO and work practices to maintain compliance before reclassifying. The source added three new RTOs and maintained the same work practices after reclassifying, both as permit conditions. The source is required to use the same compliance strategy as before reclassification (capture/destruction of exhaust gases from conveyer dryers, use of a biofilter to reduce formaldehyde emissions, and work practices for the drying system and board press vent with biofilter). The HAP emitted by the process are also VOC; permitted VOC emission limits and PM emission limits remain the same across the facility as before reclassification. The source also remains subject to compliance assurance monitoring for RTOs. HAP emissions increases as a result of reclassification are not expected from any of these sources.

Three of the four miscellaneous organic (MON) chemical production facilities reviewed relied on a variety of control technologies—including RTOs, scrubbers, and flares—to maintain compliance before reclassifying. These sources continued to rely on the same control technologies as enforceable permit conditions after reclassifying. One of the MON sources (facility #32 from Table 4) relied only on work practices to maintain compliance before reclassifying. This facility removed a boiler and added scrubber controls as enforceable permit conditions to reclassify as an area source. The new control equipment and process changes had the net effect of reducing HAP emissions from this source.

Two other chemical sources are off-site waste recovery facilities that relied on control technologies such as vapor balance/recovery systems, condensers, and scrubbers to meet applicable major source requirements before reclassification. One of the sources continued to use the same methods of compliance before and after reclassification, and the other added additional material throughput limits. We don’t expect HAP emissions changes from either of these sources. Similarly, we don’t expect changes from the one gasoline distribution facility that relied on a vapor collection system, vapor combustion, and work practices to meet applicable major source requirements both before and after reclassification.

One chemical source (facility #26 from Table 4) is a former Portland cement facility that before 2015 fueled its cement kiln using collected hazardous and non-hazardous waste, using various control technologies to maintain compliance. This facility permanently removed all equipment associated with the Portland cement and took on a new primary role as a hazardous waste

storage/transfer facility, using throughput limits and a carbon adsorption system to maintain compliance. Before reclassifying, the facility had been subject to 40 CFR 63 subpart EEE for Hazardous Waste Combustors, subpart LLL for Portland Cement Manufacturing, and Subpart PP for Containers. In its Statement of Basis for the updated permit approved when the source reclassified, the state permitting authority noted, "With the throughput limit on waste derived fuel, coupled with federal regulatory requirements to install, operate, and maintain … the carbon adsorption system, the potential emissions of VOC and HAP will be well below major source thresholds."

Both of the fuel combustion/boiler sources made permanent operational changes to meet applicable major source standards both before reclassification and as enforceable conditions to maintain compliance after reclassification. Each facility removed coal-fired units from operation. Facility #33 in Table 4 converted to natural gas-fired boilers and removed several emission units. Facility #34 in Table 4 converted a simple cycle turbine to combined cycle and retired two coal-fired boilers and one turbine. We don't expect any changes in emissions due to reclassification from either source, although we note that facility #34's reclassification was still pending as of February 2020.

The one heavy industry source EPA learned about after proposal, facility #35 in Table 4, had been subject to 40 CFR Part 63 subpart III for flexible polyurethane foam production. The facility relied on compliant materials, carbon adsorption systems, work practices, and operational limits to maintain compliance before reclassifying. To reclassify, the source took new HAP PTE limits below the MST. After reclassifying, the facility became subject to area source standard 40 CFR Part 63 subpart OOOOOO for polyurethane foam production and fabrication. The applicable requirements of subpart OOOOOO are equivalent to the previously applicable requirements of Subpart III. In addition, the source continued to use the same compliance methods after reclassifying. Therefore, EPA expects no increases in HAP emissions from this facility specifically due to reclassifying. The only pertinent change is the acceptance of HAP PTE limits, which was necessary for the source to reclassify.

Table 4 presents a summary of the findings from the review of permits associated with the reclassification of the 35 sources EPA learned of after proposal. The table presents the status of the reclassification, the reported 2017 NEI emissions for each facility's single largest HAP and total HAP in tons per year (tpy), previously known applicable major source NESHAP and newly applicable area source NESHAP, and the main compliance strategy for the applicable major source NESHAP before the reclassification. Table 4 also shows whether the source reclassified as a true area source, whether the source had obtained PTE limitations before January 2018 (existing PTE limitations), or whether the source obtained new PTE limitations after January 2018. It also shows the method of compliance stated in the permit to meet HAP PTE limitations after reclassification. The last column of Table 4 shows the results of EPA's assessment of emission changes due to the reclassification of these sources.

The detailed summary and assessment for each of the 35 reclassifications reviewed since proposal can be found in Appendix B.

**Table 4: Summary of the findings from the review of permits since proposal associated with the reclassification of 35 sources**

| Facility Name | 2017 Emissions (tpy): Single Largest HAP; Total HAP– 2017 NEI | Previously Applicable Major Source NESHAP - 40 CFR 63 Subpart(s) and Newly Applicable Area Source NESHAP Subparts (where applicable) | Method of Compliance for Major Source NESHAP Before Reclassification | Type of Reclassification (true area; existing PTE limitations; new PTE limitations) | Method of Compliance for HAP PTE Limitations | Results of Analysis of Emission Changes due to Reclassification |
|---|---|---|---|---|---|---|
| **Coating Sources** | | | | | | |
| 1) Arlwin Manufacturing, KS | 2.94; 3.94 | Subpart WWWW (Reinforced Plastic Composites Production) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 2) A.S.A. Mfg, Inc., FL | 3.51; 3.51 | Subpart WWWW (Reinforced Plastic Composites Production) | Compliant materials | New PTE limitations | Permanent operational change (removed product line), limit on amount of material use (styrene) and use of compliant materials | No change |
| 3) Crawford Kitchens, GA | Not available (n/a) | Subpart JJ (Wood Furniture) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 4) Dubois Wood Products, Inc., IN | 0.00; 0.00 | Subpart JJ (Wood Furniture), Subpart DDDDD (Boilers) | Compliant materials | New PTE limitations | Permanent operational changes (removal of wood fired boilers, reduced throughput in coating lines, replaced coatings with lower HAP and VOC content), Compliant materials | No change |

| | | | | | | |
|---|---|---|---|---|---|---|
| 5) Emerald Transformer Kansas LLC, KS | 0.01; 0.01 | Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products), Subpart T (Halogenated Solvent Cleaning), Subpart DD (Off-Site Waste Recovery Operations), Subpart DDDDD (Boilers) | Compliant materials | New PTE limitations | Operational limits | Potential increase |
| 6) General Engines Company, FL | 0.84; 1.34 | Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products), Subpart ZZZZ (RICE for area sources) | Compliant materials | True area | Compliant materials | No change |
| 7) Gulf Stream Coach, Inc, IN | 0.23; 0.49 | Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products), Subpart PPPP (Plastic Parts and Products) | Compliant materials | True area | Change in Operation, Compliant materials | No change |
| 8) Icon Identity Solutions, IL | 1.16; 1.78 | Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) | Compliant materials | Existing PTE limitations | Compliant materials | No change |
| 9) Kimball International-Jasper, IN | 0.08; 0.25 | Subpart JJ (Wood Furniture), Subpart RRRR (Surface Coating of Metal Furniture), Subpart JJJJJJ (Boilers area source) | Compliant materials | Existing PTE limitations | Compliant materials | No change |
| 10) Lowen Corporation, KS | 1.38; 1.68 | Subpart PPPP (Plastic Parts and Products), Subpart DDDDD (Boilers) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 11) MACtac, IN | 0.00; 0.00 | Subpart KK (Printing and Publishing), Subpart | Compliant materials | True Area | Permanent operational changes (increased | No change |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | DDDDD (Boilers); Subpart ZZZZ (RICE for area sources) | | | production efficiency, replaced coatings with lower HAP and VOC content), compliant materials | |
| 12) Moly Manufacturing, LLC, KS | 0.00; 0.00 | Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) | Compliant materials | True area | Compliant materials | No change |
| 13) National Office Furniture-Jasper, IN | 0.01; 0.01 | Subpart JJ (Wood Furniture), Subpart JJJJJJ (Boilers for Area Sources) | Compliant materials | Existing PTE limitations | Compliant materials | No change |
| 14) Neenah Paper Michigan, MI | 8.19; 11.86 | Subpart JJJJ (Paper and Other Web Coating), Subpart JJJJJJ (Boilers for Area Sources); Subpart ZZZZ (RICE) | Compliant materials, Control technology (spray dry absorber for boiler #1) | Existing PTE limitations | Compliant materials, control technology (spray dry absorber) | No change |
| 15) Norbord Industries, MS | 9.22; 21.82 | Subpart DDDD (Plywood and Composite Wood Products); Subpart ZZZZ (RICE for area sources) | Control technology, work practices | Existing PTE limitations | Control technology (including three new RTOs), work practices | No change |
| 16) Patrick Industries, Inc, (aka Middlebury Hardwood Products), IN | 0.00; 0.00 | Subpart JJ (Wood Furniture), Subpart DDDDD (Boilers) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 17) Precision Coatings, Inc., MI | 1.39; 1.91 | Subpart JJJJ (Paper and Other Web Coating), Subpart ZZZZ (RICE) | Compliant materials, control technology (RTOs and permanent total enclosures) | New PTE limitations | Compliant materials, control technology (RTOs and (permanent total enclosures) | No change |

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| 18) Robert Weed Plywood Corporation, IN | n/a | Subpart JJ (Wood Furniture), Subpart QQQQ (Surface Coating of Wood Building Products) | Compliant materials | True area | Compliant materials | No change |
| 19) Stamas Yacht, FL | 1.94; 2.40 | Subpart VVVV (Boat Manufacturing) | Compliant materials | New PTE limitations | Limit on amount of material use (styrene), Compliant materials | No change |
| 20) Tampa Fiberglass, FL | 0.31; 0.31 | Subpart WWWW (Reinforced Plastic Composites Production), Subpart VVVV (Boat Manufacturing) | Compliant materials | New PTE limitations | Limit on amount of material use (styrene), Compliant materials | No change |
| 21) Tasman Leather, ME | 10.14; 10.81 | Subpart TTTT (Leather Finishing Operations), Subpart JJJJJJ (Boilers for Area Sources) | Compliant materials | New PTE limitations | Compliant materials (reformulated to no-HAP for nearly all the glycol ether compounds previously used at the leather finishing operations) | Reduction in HAP |
| 22) The Woodworks Architectural Millwork, Inc, NH | 0.01; 0.03 | Subpart QQQQ (Surface Coating of Wood Building Products) | Compliant materials | New PTE limitations | Compliant materials | No change |
| 23) Valeo North America Inc., IN | 1.56; 2.19 | Subpart PPPP (Surface Coating of Plastic Parts and Products, Subpart DDDDD (Boilers) | Compliant materials, control technology (three RTOs with 90% control efficiency) | Existing PTE limitations | Compliant materials, control technology (four RTOs with 90% control efficiency) | No change |
| 24) Wayne Metals, LCC, IN | 0.00; 0.00 | Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) | Compliant materials | True area | Permanent operational changes (removal of | No change |

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| | | | | | four paint booths), Compliant materials | |
| **Chemical** | | | | | | |
| 25) Gage Products, MI | 1.66; 4.87 | Subpart DD (Off-Site Waste Recovery Operations), Subpart 6B (Gasoline Distribution for Area Sources) | Control technology (condensers), operational limitations | Existing PTE limitations | Control technology (condensers), material throughput limits | No change |
| 26) Holcim USA, Inc., MS | 4.20; 9.16 | Subpart EEE (Hazardous Waste Combustor), Subpart LLL (Portland Cement Manufacturing), Subpart PP (Containers), Subpart ZZZZ (RICE for Area Sources) | Control technology (floating roofs, closed vent system and vapor recovery system) | New PTE limitations | Permanent operational changes (removal of all equipment associated with Portland cement plant), throughput limits; control technology (carbon adsorption system) | No change |
| 27) Kinder Morgan Liquids Terminals-Argo, IL | 1.42; 6.20 | Subpart R (Gasoline Distribution Facilities); Subpart 6C (Gasoline Dispensing Facilities for Area Sources), Subpart Y (Marine Vessel Loading), Subpart ZZZZ (RICE) | Control technology (vapor collection system and vapor combustor), submerge filling, work practice (LDAR)s | Existing PTE limitations | Control technology (vapor collection system and vapor combustor), submerge filling, work practices (LDAR) | No change |
| 28) Newport Biodiesel, RI | 1.37; 1.38 | Subpart FFFF (MON) | Control technology | New PTE limitations | Control technology | No change |
| 29) South Bend Ethanol, LLC, IN | 7.23; 11.59 | Subpart FFFF (MON), Subpart DDDDD (Boilers); Subpart ZZZZ (RICE for Area Sources) | Control technology (two RTOs, $CO_2$ scrubber, flare) | New PTE limitations | Control technology (two RTOs, $CO_2$ scrubber, flare) | No change |

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| 30) Stericycle Environmental Solutions Inc., MI | 0.00; 0.00 | Subpart DD (Off-Site Waste Recovery Operations), Subpart EEE (Hazardous Waste Combuster) | Control technology (vapor balance systems) | New PTE limitations | Control technology (vapor balance systems), operational limitations | No change |
| 31) Valero Renewable Fuels Company, IN | 3.21; 11.77 | Subpart FFFF (MON) | Control technology (two thermal oxidizers, $CO_2$ scrubber, natural gas-fired flare system, and a cooling drum baghouse) | Existing PTE limitations | Control technology (two thermal oxidizers, $CO_2$ scrubber, natural gas-fired flare system, and a cooling drum baghouse) | No change |
| 32) World Energy Natchez, MS | 3.52; 3.52 | Subpart FFFF (MON), Subpart DDDDD (Boilers) | Work practices | New PTE limitations | Process changes (removed boiler and added control technology [scrubbers]), | Reduction in HAP |
| **Fuel Combustion/Boilers** | | | | | | |
| 33) Cook Property Inc, IN | 0.14; 0.14 | Subpart DDDDD (Boilers) | Natural gas burning | True area | Permanent operational changes (removal of several emission units and conversion to natural gas-fired boilers) | No change |
| 34) Empire District Electric Company – Riverton, KS | 2.67; 3.86 | Subpart YYYY (Turbines), Subpart ZZZZ (RICE) | Natural gas burning | True area | Permanent operational changes (converted simple cycle turbine to combined cycle and retired two coal-fired boilers and one turbine) | Note: Reclassification still in draft as of February 2020. |
| **Heavy Industry** | | | | | | |

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| 35) Innocor Foam Technologies, MS | 0.45; 1.03 | Subpart III (Flexible Polyurethane Foam Production) | Compliant materials, control technology (carbon adsorption systems), work practices, operational limitations | New PTE limitations | Compliant materials, control technology (carbon adsorption systems), work practices, operational limitations | No change |

### C. Potential Impacts

As mentioned above, this analysis reviews the facts and circumstances of actual reclassification actions that have occurred since EPA released the MM2A Memorandum in January 2018. Thus, it provides a real-world look at the potential impacts of sources that reclassify.

For the 69 sources that have already reclassified, we conclude that 68 of those sources have no potential for emissions increases for due to reclassification. Thus, we conclude that there will be no health impacts associated with nearly all of the known reclassification actions. For the one facility reviewed with the potential for an emissions increase, the change in emissions would be modest and is not likely to result in significant health impacts.

To understand the potential impact of this rulemaking on tribal and environmental justice communities, we conducted two analyses on the 69 sources that have reclassified to area source status.

In the first analysis, we looked at sources that were within 50 miles of an area of Indian country. Of the 69 sources that we analyzed, 30 are within 50 miles of at least one area of Indian country. Eleven of these are within 10 miles of an area of Indian country and three are in Indian country. However, after reviewing the reclassification of these sources, only one of these sources could have an increase in emissions. The potential increase will be minimal because the source has limited its emissions of and PTE HAP below the MST. Therefore, the EPA expects there will be no additional impact from reclassification to most areas of Indian country.

Second, we conducted a demographic analysis of the populations within 5 miles of these same 69 sources. We then compared the average concentrations of low-income and minority populations within that 5-mile radius and compared them to the national average to determine if these populations will be disproportionality impacted. In this analysis, we found that the 5-mile radius around 13 of the 69 sources has a minority population above the national average, and the area surrounding 39 sources has a low-income population above the national average. Although these results would suggest that low-income populations may be more impacted by this rule, as stated above, only one of these sources could have an increase in emissions. Therefore, the EPA expects there will be no additional impact to most of these communities.

## Appendix A: List of Permit Documents Reviewed for Proposal and Permit Summaries[15]

| Facility Name | Permit Documents Reviewed |
|---|---|
| **Coatings** | |
| 1) 2700 Real Estate Holdings, Elkhart, IN | 2018 Administrative Amendment FESOP No F039-34967-00182 |
| 2) Arkwright Advanced Coatings Inc., Coventry, RI | Arkwright-Revocation Letter- TV and Preconstruction |
| 3) Bemis Films, Oshkosh, WI | Analysis and Preliminary Determination to Establish A Plant-Wide Applicability Limit (PAL) for VOCs and Establish the Facility as a Synthetic Minor Source for Federal Hazardous Air Pollutant -06/26/2018<br>2018 Construction Permit and Operating Permit # 18-JJW-073-R1<br>Title V Operating Permit 471009990-P32<br>https://dnr.wi.gov/cias/am/amexternal/AM_PermitTracking2.aspx?id=3001751. |
| 4) Bemis Wisconsin, LLC - New London, WI | Draft Air Pollution Control Construction Permit Revision and Draft Air Pollution Control Operation Permit Renewal- 02/04/19<br>Analysis and Preliminary Determination for the Revision of Construction Permits<br>https://dnr.wi.gov/cias/am/amexternal/AM_PermitTracking2.aspx?id=3001568 |
| 5) Fairhaven Shipyard Companies, Inc., North Shipyard, Fairhaven, MA | Amendment to Air Quality Plan Approval (SE-12-031)-08/17/18<br>Operating Permit Application Termination - 08/17/18 |
| 6) Geiger International, Inc., Atlanta, GA | 2018 Air Quality Permit -4/27/18 |
| 7) Heritage Home Group, LLC, Hickory, NC | Air Quality Permit No 02779T25 -06/15/18 and Statement of Basis (SOB) |
| 8) Heritage Home Group, LLC Lenoir Plant, Lenoir, NC | Air Quality Permit No. 04172T26- 05/9/18 and SOB |

[15] These documents can be found in the docket MM2A Docket No. EPA–HQ–OAR–2019–0282.

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| 9) Herman Miller, Inc., Zeeland, MI | 2019 Opt-out Permit to Install No. 9-18A-01/04/19<br>Voided ROP letter-02/13/19 |
| 10) Highland Industries Inc. Cheraw, SC | Title V Minor Modification and SOB -6/4/18<br>Title V Operating Permit revision No.TV-0660-0002- 01/16/19 |
| 11) IAC Iowa City, LLC, Iowa City, IA | 2018 Air Construction Permits-06/05/18 |
| 12) Kimball Office Salem Wood Office Furniture, Salem, IN | 2018 FESOP No 175-39067-00007 -04/26/18 |
| 13) Mapes Panels, LCC, Lincoln, NE | 2018 Permit to Construct/Reconstruct/Modify An Air Contaminant Source No 199- 09/01/18 |
| 14) Meridian Manufacturing Group, Storm Lake, IA | 2018 Air Quality Construction Permit-Project Number 18-181-07/19/18 |
| 15) Novel Iron Works, Greenland, NH | Temporary Permit TP–0228 and NHDES Letter-12/31/18 |
| 16) Shelburne Shipyard Incorporated, Shelburne, VT | 2018 Air Pollution Control Permit to Construct-AP-15-025- 04/26/18 |
| 17) Talaria Company, LLC d/b/a The Hinckley Company, Trenton, ME | Minor Source Air Emission License (A-798-71-C-R/A)-05/4/18 |
| 18) Tower Industries, Ltd, Massillon, OH | Permit-to-Install P0123990-05/18/18 |
| 19) TruStile Doors of Iowa, Northwood, IA | 2018 Air Quality Construction Permit Project No 18-144-05/16/1// |
| 20) Vacuum Orna-Metal, Inc, Romulus, MI | Permit To Install No. 145-16A: 03/23/18<br>MI DEQ Letter Void Renewable Operating Permit No. MI-ROP-B4550-2017-11/14/18 |
| 21) Vanguard National Trailer Corporation, Monon, IN | 2018 Title V Operating Permit Renewal No 181-38409-00043-04/18/18 |
| **Oil and Gas** | |
| 22) Andeavor Field Services, LLC<br>Ponderosa Compressor Station (Ponderosa) | U.S. EPA Region 8 Letter Rescinding 40 CFR part 71 Title V -05/18/18<br>MNSR permit SMNSR-UO-002178- 2017.003-04/06/17 |

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| Uintah and Ouray Indian Reservation, UT | |
| 23) Catamount Energy Partners, LLC - Ignacio Gas Treating Plant, Colorado Southern Ute Indian Reservation | MNSR permit SMNSR-SU-000052-2018.002-03/04/19 |
| 24) Crescent Point Energy Corporation - Ute Tribal Compressor Station, Ute Indian Tribe, UT | MNSR permit SMNSR-UO-008008-2017.001-09/20/19 |
| 25) Denbury Onshore LLC, Little Creek EOR Facility, Ruth, MS | Title V Significant Modification Permit No 2280-00038 -08/02/18 and SOB |
| 26) WGR Operating, LP's Granger Gas Plant, Section 16 (sweet gas processing), Granger, WY | Title V Operating Permit Renewal Permit No P0020683 (Legacy No 3-3-032), SOB and RTC-04/24/18<br>NSR permit MD-1535A-09/5/2007 |
| **Fuel Combustion/Boilers** | |
| 27) City of Columbia - Municipal Power Plant, Columbia, MO | Title V Permit No OP2018-109-12/10/18 |
| 28) Holland Board of Public Works - James DeYoung Generating Station and Wastewater Treatment Plant, Holland, MI | MI DEQ Letter Voiding Renewable Operating Permit MI-ROP-B2357-2014a and Source-wide Permit to Install No MI-PTI-B2357-2014a |
| 29) MidAmerican Energy Company - Riverside Generating Station, Bettendorf, IA | 2018 Air Construction Permit Project Number 18-194-07/03/18 |
| 30) UniFirst Corporation Pontiac, MI | Permit to Install 166-16B -04/19/18 |
| **Chemicals** | |
| 31) Citgo Petroleum Corporation, Hillsborough, FL | 2018 FESOP Air Permit No. 0570016-019-AF - 11/13/18 |
| 32) Ross Incineration Services, Grafton, OH | Permit-to-Install Administrative Modification P0124980-01/3/19<br>Title V renewal to permit P0108010-2/5/19<br>RCRA permit OHD 048 415 665- 05/23/14 |

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| 33) TransMontaigne, Evansville Terminal, Evansville, IN | FESOP Renewal No 163-38296-00063 -04/16/18 |
| **Heavy Industry** | |
| 34) Mississippi Lime Company - Verona Plant, Verona, KY | Air Quality Permit V-15-027 R1-12/23/18 and SOB |

**Permit Summaries for 34 Reclassification Actions Reviewed for Proposal**

1) **2700 Real State Holding, Elkhart, IN**
   a) *Status prior to 2018 MM2A Memo*
      i) The source was originally classified major for HAP. The removal of existing emission units changed the source from a major source to an area source. The facility has been an area source since December 2011.
      ii) Subject to 40 CFR 63 subpart MMMM (Surface Coating for Miscellaneous Parts and Products)- Two RV assembly lines involving coating material applications, using manual flowcoating, wiping and aerosol spray applications. Compliance strategy for NESHAP was the use of compliant coatings (no-HAP/low-HAP).
      iii) Subject to 40 CFR 63 subpart CCCCCC (Gasoline Dispensing Facilities- Area Source)
      iv) Unrestricted PTE
         - Largest single HAP- 1.94 tpy (toluene)
         - Total HAP- 5.63
      v) Source received a Federally Enforceable State Operating Permit (FESOP) Minor Source in 2015 that included facilitywide HAP PTE limitations and NESHAP applicability.
         - The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and the potential to emit any combination of HAP from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
      vi) 2017 NEI emissions data for facility
         - Largest single HAP: 0.01 tpy
         - Total HAP: 0.01 tpy
      vii) 2014 NEI emissions data for facility
         - Largest single HAP: 0.01 tpy
         - Total HAP: 0.01 tpy
   b) *Status post-2018 MM2A Memo*
      i) In March 2018, source submitted application to Indiana Department of Environmental Management (IDEM) to remove the requirements of 40 CFR 63 subpart MMMM from 2015 FESOP.

ii) IDEM issued an Administrative Amendment to the 2015 FESOP in April 2018.

c) *2015 FESOP/2018 Administrative Amendment*
   i) Removes applicability of subpart MMMM.
   ii) Source still subject to sourcewide HAP limits. RV assembly lines are still subject to VOC content limitations.

d) *General observations from reclassification*
   i) Source has been an area source of HAP since 2011.
   ii) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, the removal of existing emission units, and that the facility is now a true area source, we don't expect emission increases resulting from the reclassification of this source.

2) **Arkwright Advanced Coatings, Fiskeville/Coventry, RI**

a) *Status prior to 2018 MM2A Memo*
   i) Facility was subject to Title V Operating Permit.
   ii) Subject to 40 CFR 63 subpart JJJJ (Paper and other web coating). Compliance strategy for NESHAP was the use of compliant coatings (no-HAP/low-HAP).
      - The permittee shall, on a facilitywide basis limit organic Hazardous Air Pollutant (HAP) emissions, from emission units P001 (when used for production purposes), P003, P007, P005, L001, L003, P006, and P012 to no more than 4% of the mass of coating materials applied for each month. [40 CFR 63.3320(b)(2)]
   iii) 2017 NEI emissions data for facility
      - Largest single HAP: 0.01 tpy
      - Total HAP: 0.01 tpy
   iv) 2014 NEI emissions data for facility
      - Largest single HAP: 0.12 tpy
      - Total HAP: 0.15 tpy

b) *Status post-2018 MM2A Memo*
   i) Facility implemented process removals, with PTE from remaining sources determined by RI Office of Air Resources to not exceed major source thresholds (MST).
   ii) Reclassified as true area source 10/12/2018 with no emissions cap required to remain below MST.
   iii) RI DEM issued a revocation letter terminating the operating permit effective October 12, 2018.

c) *PTE Limitations*
   i) None.

d) *General observations from reclassification*
   i) Due to process changes in the facility, the use of compliant coatings, this source is now a true area source. We don't expect emission increases resulting from the reclassification of this source.

3) **Bemis Films, Oshkosh, WI**

a) *Status prior to 2018 MM2A Memo*

i) Subject to 40 CFR 63 subpart KK- Printing and Publishing
   - Compliant materials.
   - Most solvent based flexographic inks contain little or no HAP. Capture and control devices used with solvent based inks are usually designed, permitted and operated for VOC control.

ii) Subject to 40 CFR 63 subpart DDDDD- Industrial, Commercial, and Institutional Boilers and Process Heaters

iii) Subject to 40 CFR 63 subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines- RICE)- for spark ignition RICE emergency generators and compression ignition RICE fire pump, compression ignition RICE emergency generator

iv) Facility is in an attainment area for NAAQS.

v) No HAP emissions data for facility available in 2014 or 2017 NEI.

vi) VOC emissions from flexographic press are controlled by thermal oxidizers and catalytic oxidizers.

b) *Status post-2018 MM2A Memo*

i) July 31, 2018 facility obtains permit that establishes plant applicability limit (PAL) for VOC and federal HAP synthetic minor limitations.

ii) In March 2019 facility submitted application to revise the air pollution control construction permit and Title V operating permit to correct PAL compliance demonstration equation.

iii) Source is major for CAP and will continue to have Title V Operating Permit 471009990-P32.

iv) https://dnr.wi.gov/cias/am/amexternal/AM_PermitTracking2.aspx?id=3001751

c) *2018 Construction Permit and Operating Permit (*18-JJW-073-R1)

i) Permit states: General conditions applicable to entire facility: (1)(a) The permittee shall limit the emissions from the facility of each federal HAP to less than 1,500 pounds per month averaged over each 12-consecutive month period; and (b) limit the cumulative emissions of all federal HAP to less than 4,000 pounds per month averaged over each 12-consecutive month period.

ii) Permit provides compliance demonstration calculation.

iii) Permit requires recordkeeping of

a) A unique name or identification number for each federal HAP-containing material;

(b) The total volume or mass of each federal HAP-containing material used for the entire facility for each month, in gallons or pounds;

(c) The mass of each individual federal HAP present in each federal HAP-containing material used during each month, in pounds per gallon or percent by weight;

(d) The total mass of each individual federal HAP used during each month, in pounds;

(e) The total mass of each individual federal HAP emitted, averaged over the previous 12 consecutive months, in pounds;

(f) The total mass of all federal HAP combined emitted, averaged over the previous 12 consecutive months, in pounds;

(g) Copies of USEPA test method results, Certified Product Data sheets, Safety Data Sheets, analytical records from suppliers, or other records that list the federal HAP content of each federal HAP-containing material in units necessary to determine compliance; and
(h) Copies of all compliance reports documenting the capture and destruction efficiency for each process, as applicable.

iv) For VOC limitations purposes,
- When using solvent based inks, process emissions are exhausted to through control devices C03, C04, and/or C05. When using compliant inks, process emissions are exhausted to oxidizer bypass stacks.
- The permittee shall operate an oxidation system whenever solvent based inks and coatings are used with a minimum destruction efficiency of 95%.

d) *General observations from reclassification*
i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), and the fact that the permit requires the operation of an oxidation system whenever solvent based inks and coatings are used with a minimum destruction efficiency of 95% (same as NESHAP subpart KK), we don't expect emission increases resulting from the reclassification of this source.

4) **Bemis Wisconsin LLC, New London, WI**
a) *Status prior to 2018 MM2A Memo*
i) Subject to 40 CFR 63 subpart KK- Printing and Publishing
- Compliant materials.
- Most solvent based flexographic inks contain little or no HAP. Capture and control devices used with solvent based inks are usually designed, permitted and operated for VOC control.

ii) Subject to subpart DDDDD- Industrial, Commercial, and Institutional Boilers and Process Heaters
iii) Subject to 40 CFR 63 subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines -RICE) for emergency RICE
iv) No HAP emissions data for facility available in 2014 or 2017 NEI.
v) Title V Operation Permit 445030850-P22

b) *Status post-2018 MM2A Memo*
i) Facility requested revision of construction permit issued in May 9, 2017 to take HAP limitations to reclassify as area source and remove requirements of subpart KK for the two flexographic presses authorized in the 2017 permit (construction permit 17-JJW-043) and remove requirements of subpart DDDDD.
ii) Facility also requested emission limitations for VOC of 39.8 tpy.
iii) *https://dnr.wi.gov/cias/am/amexternal/AM_PermitTracking2.aspx?id=3001568*

c) *Draft Construction Permit and Title V permit revision (445030850-P30)*

i) The renewal of the operation permit (445030850-P21) was processed with the construction permit revisions requested by the facility.
ii) Draft construction permit revision/operation permit renewal approved (and submitted for public comment) Feb 2019. Public comment period ended on 3/3/19.
iii) PTE- Facilitywide HAP usage per permit analysis
- N-butanol- 4,800 lb/yr (2.4 tpy)
- Glycol ether- 800 lb/yr (0.4 tpy)
iv) Facility limited in new permit to <1500 pounds/month for individual HAP, <4000 pounds/month combined HAP, averaged over each 12-consecutive month period.
v) Limited to 125 pounds/month and 333.3 pounds/month for first 12 months after permit issuance.
vi) Permit uses monthly recordkeeping of raw material and calculations to demonstrate compliance.
vii) https://dnr.wi.gov/cias/am/amexternal/AM_PermitTracking2.aspx?id=3001568

d) *General observations from reclassification*
i) Permit analysis document from WI DNR
- the proposed change does not require a new construction permit under ch. NR 406, Wis. Adm. Code because the change does not result in an increase in emissions, and the change does not trigger a requirement under section 111 or 112 of the Clean Air Act. Thus, the proposed change can be made through a construction permit revision issued under s. NR 406.11, Wis. Adm. Code. Upon issuance of operation permit 445030850-P30, any federal HAP emissions that are also considered state HAP emissions will be subject to regulation under ch. NR 445, Wis. Adm. Code. The removal of the existing major source NESHAPs and the insertion of synthetic minor source conditions will not result in an increase in potential federal HAP emissions.

ii) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source.

5) **Fairhaven Shipyard Companies Inc, North Shipyard, Fairhaven, MA**
a) *Status prior to 2018 MM2A Memo*
i) Subject to 40 CFR 63 subpart II (shipbuilding). Compliance strategy was the use of compliant coatings.
ii) No HAP emissions data for facility available in 2017 NEI.
iii) 2014 NEI emissions data for facility
- Largest single HAP: 2.05 tpy
- Total HAP: 2.05 tpy
iv) Source had taken enforceable PTE limitations in a 2016 Limited Air Quality Operating Permit (SE-12-030).

b) *Status post-2018 MM2A Memo*

i) On July 2018, the source requested the withdrawal/revocation of the Final Air Quality Operating Permit and requested revision to the underlying 2016 Limited Air Quality Operating Permit to remove applicability to subpart II.
ii) On September 2018, MassDEP issued an administrative amendment and re-issued Limited Air Quality Operating Permit (SE-12-030) removing subpart II and the issued a final air quality operating permit revocation.

c) 2018 Limited Air Quality Operating Permit Revision (SE-12-031).
i) Limit material usage such that HAP (single) emissions do not exceed 9.9 tpy/3.3 tons per month (tpm)
ii) Limit material usage such that HAP (total) emissions do not exceed 9.9 tpy/3.3 tpm
iii) Limit material usage such that VOC content and emissions do not exceed 9.9 tpy/3.3 tpm
- *Permit includes VOC limits by coating category*
iv) Monitor the use of solvents, thinners, and coatings, to include VOC and HAP used and emitted, in order to demonstrate compliance with operational and emission limits.

d) *General observations from reclassification*
i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source in 2016 reflect the use of compliant coatings, we don't expect emission increases resulting from the reclassification of this source.

6) **Geiger International, Atlanta, GA**
a) *Status prior to 2018 MM2A Memo*
i) Facility located in ozone nonattainment area with a major source threshold of 25 tpy of VOC.
ii) In November 2016, source proposed to reduce VOC emissions to 25 tpy and became a synthetic minor NSR source (permit amendment- # 2521-121-0558-V-04-1.)
iii) Source was still classified as major for HAP.
- Subject to 40 CFR 63 Subpart JJ (wood furniture). Spray booths, adhesive operations and staining operations. Compliance strategy was the use of compliant coatings-low solvent coating technology (no-HAP/low HAP); emissions determined by mass balance)
(a) Per 2016 Title V permit narrative- "The compliance reports from the facility to the Division indicate that all of the finishing materials used in the past are compliant materials."
- Subject to 40 CFR 63 subpart ZZZZ (emergency power generation)
iv) No HAP emissions data for facility available in 2014 or 2017 NEI.
v) Actual emissions data per 2018 permit
- Largest single HAP: 0.4 tpy
- Total HAP: 0.4 tpy; primarily xylenes and toluene

b) *Status post-2018 MM2A Memo*
i) In February 2018, Geiger International submitted an application to GA Department of Natural Resources (GADNR) requesting a synthetic minor permit with HAP limits to

reclassify the source as area source of HAP and remove subpart JJ from permit. The facility no longer would be a Title V source, and per GADNR, public advisory was not needed.

ii) On April 27, 2018, GA DNR issued an air quality permit for the source establishing enforceable emission limitations so that the facility will not be considered a major source of HAP and revoked previously issued air quality permits.

c) *2018 Air Quality Permit*

i) Emission limits to establish/reclassify facility as an area source of HAP
- Individual HAP less than 10 tpy (any 12 consecutive months)
- Total combined HAP less than 25 tpy (any 12 consecutive months)

ii) The Permittee shall maintain monthly usage records of all VOC-containing materials used in the entire facility. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage).

iii) The Permittee shall use the equation provided in permit to calculate HAP emissions.

i) Permittee shall notify the Division in writing if, during any calendar month, facility-wide emissions of any individual HAP exceed 0.83 tons or emissions of all listed HAP combined exceed 2.08 tons.

i) Provided that total combined HAP emissions from the facility are less than 5 tons per year, the facility may opt to track total HAP only. If total HAP emissions equal or exceed 5 tons during any 12 consecutive months, the Permittee shall, beginning the next calendar month and from that point forward, track individual HAP as well as total HAP.

d) *General observations from reclassification*

i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant, no/low-HAP coatings, we don't expect emission increases resulting from the reclassification of this source to area source status.

7) **Heritage Home Group LLC, Hickory, NC**

a) *Status prior to 2018 MM2A Memo*

i) Subject to 40 CFR 63 subpart JJ "Wood Furniture Manufacturing Operations"- for wood furniture and coating operations. Compliance strategy was the use of compliant coatings

ii) Subject to 40 CFR 63 Subpart DDDD "Plywood and Composite Wood Products." For glue press.

iii) Facility remained subject to these subparts even after the facility accepted an operating limit to be considered an Area Source.

iv) In December 2013, Permit T23 added an avoidance condition for HAP-Major Status by obtaining enforceable facilitywide emission limits for HAP.
- Less than 10 tons per consecutive 12-month period for any single HAP and 25 tons per consecutive 12-month period for all HAP.

v) 2017 NEI emissions data for facility
   - Largest single HAP: 3.39 tpy
   - Total HAP: 4.62 tpy

vi) 2014 NEI emissions data for facility
   - Largest single HAP: 4.18 tpy
   - Total HAP: 6.48 tpy

vii) From Permit Application Review -total actual emissions single and total HAP (tpy)
   - 2014 — 4.18 (single); 6.48 (total)
   - 2015 — 3.80 (single); 5.74 (total)
   - 2016 — 3.50 (single); 4.78 (total)

b) *Status post-2018 MM2A Memo*

i) Facility submitted application in February 2018 to remove conditions for subparts JJ and DDDD from the source's operating permit.

c) *Revision to Title V Permit 02779T25, issued June 15, 2018*

i) Removed All specific conditions for Subpart JJ and DDDD.

ii) Added a permit condition for Subpart OOOOOO (Flexible Polyurethane Foam Production and Fabrication Area Sources).
   - The Permittee shall not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process.
   - The Permittee shall use adhesive usage records, Material Safety Data Sheets, and/or engineering calculations in order to demonstrate compliance.

iii) The facility remains subject to and (based on most recent inspection) continues to comply with area source standards under Subparts ZZZZ (RICE), Subpart JJJJJJ (Industrial, Commercial, and Institutional Boilers Area Sources).

iv) Facility continues to be subject to HAP PTE limitations
   - Facilitywide emissions shall be less than 10 tons per consecutive 12-month period for any single HAP and 25 tons per consecutive 12-month period for all HAP.
   - The Permittee shall maintain monthly records of consumption for each fuel type or HAP containing material (e.g., coatings, adhesives, etc.) and/or operating hours for each emission source
   - Compliance demonstration: the facility must calculate HAP emissions from the furniture finishing operations and boilers. The facility must keep records of the rolling 12-month total HAP emissions and report this twice per year.

d) *General observations from reclassification*

i) From Permit Statement of Basis (SOB)- Permit SOB "This permit renewal is not expected to change potential emissions from the facility."

ii) The facility's PTE limits were already in effect prior to reclassification and did not change. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

8) **Heritage Home Group (HHG) LLC, Lenoir, NC**
   a) *Status prior to 2018 MM2A Memo*
      i) Facility subject 40 CFR 63 subpart JJ (wood furniture manufacturing) for wood furniture coating operations. Compliance strategy was the use of compliant coatings.
      ii) Subject to 40 CFR 63 subpart DDDD (plywood and composite wood) for wood treatment operation/lumber kiln
      iii) Subject to case by case MACT (boilers and process heaters),
      iv) Facility subject to 40 CFR 63 subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines) for area sources.
      v) 2017 NEI emissions data for facility
         - Largest single HAP: 6.05 tpy
         - Total HAP: 12.97 tpy
      vi) 2014 NEI emissions data for facility
         - Largest single HAP: 6.74 tpy
         - Total HAP: 14.48 tpy
      vii) In December 21, 2016, facility submitted application for renewal of Air Permit No 04172T25. And in March 2017, facility submitted application for a significant modification of the existing Title V permit for purposes of the facility being classified as minor for HAP. Facility requested federally enforceable avoidance condition for HAP
         - From Permit Application Review -total actual emissions single and total HAP (tpy)
         - 2014 6.74 (single); 15.29 (total)
         - 2015 5.11 (single); 11.90 (total)
         - 2016 5.55 (single); 13.30 (total)
   b) *Status post-2018 MM2A Memo*
      i) In January 2018, facility submitted a request to remove MACT applicability from permit.
      ii) In May 2018, issued the updated Air Quality Permit No. 04172T26 replacing permit No 04172T25.
   c) *Air Quality Permit/Title V modification dated May 9, 2018*
      i) The state determined that facility meets the criterion set forth in the 2018 MM2A memo and will no longer be subject to NESHAP Subparts DDDD (Plywood and Composite Wood Products) and JJ (Wood Furniture Manufacturing Operations) upon the issuance of Air Permit No. 04172T26 with a federally enforceable avoidance condition for HAP.
      ii) As a minor source of HAP, facility will be subject to the National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers (40 CFR 63 Subpart JJJJJJ).
      iii) The facilitywide emission sources shall discharge into the atmosphere less than 10 tons of any single hazardous air pollutant (HAP) per consecutive 12-month period and less than 25 tons of any combination of HAP per consecutive 12-month period.

- The Permittee shall maintain monthly consumption records of each material used containing hazardous air pollutants as follows: i. quantity of individual hazardous air pollutants in pounds used by the facility each month and for the 12-month period ending on that month, ii. quantity of all hazardous air pollutants in pounds used by the facility each month and for the 12-month period ending on that month.
- The Permittee shall keep a record of the applicability determination on site at the source for a period of five years after the determination, or until the source becomes an affected source. The determination must include the analysis demonstrating why the Permittee believes the source is unaffected pursuant to 40 CFR Part 63.10(b)(3). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .111 t if the records are not maintained.

d) *General observations from reclassification*
   i) From permit SOB "Emissions of N. C. air toxics are not increased, and are not being reviewed, with this permitting action. However, future modifications that result in an increase in N. C. air toxics emissions may trigger a review of previously exempt sources."
   ii) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

9) **Herman Miller Inc. Zeeland, MI**
   a) *Status prior to 2018 MM2A Memo*
      i) Prior to 2018 MM2A Memo source had Renewable Operating Permit (ROP).
      ii) Facility subject 40 CFR 63 subpart JJ (wood furniture manufacturing) for wood furniture coating operations. Compliance strategy was the use of compliant coatings.
      iii) Subject to 40 CFR 63 subpart JJJJJJ (area source boiler MACT), wood fired boiler.
      iv) 2017 NEI emissions data for facility
         - Largest single HAP: 0.00 tpy
         - Total HAP: 0.00 tpy
      v) 2014 NEI emissions data for facility
         - Largest single HAP: 0.37 tpy
         - Total HAP: 0.47 tpy
   b) *Status post-2018 MM2A Memo*
      i) Facility submitted application for an Opt-out Permit to install on 11/26/18 and requested to void the Renewable Operating Permit (Title V).
      ii) State approved Permit to Install on 01/04/19 and voided ROP on 2/13/19.
   c) *2019 Opt-out Permit to Install No. 9-18A*
      i) Sourcewide emissions limit
         - individual HAP less than 9 tpy, 12-month rolling time period determined at the end of each calendar month

- aggregate HAP less than 22.5 tpy 12-month rolling time period determined at the end of each calendar month

ii) The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data.

iii) The permittee shall keep
- Records of coating usage and the HAP content of each coating, both on an individual and aggregated HAP basis, based upon a rolling 12-month time period.
- Records of fuel usage and the individual and aggregated HAP emitted through the stack or in the fly-ash based on stack test data, sampling data or established emission factors on a rolling 12-month time period.

iv) Boiler continues to be subject to subpart JJJJJJ (HCl limit 0.66 tpy.)
- Fabric filter, HCl gas sorbent injection system

d) *General observations from reclassification*

i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

10) **Highland Industries Inc, Cheraw, SC**

a) *Status prior to 2018 MM2A Memo*

i) The facility is a textile manufacturing facility that produces woven and knitted fabric mainly for industrial uses.

ii) Originally, Takata Resistant Systems Inc. (TRSI) was collocated with Highland Industries for permitting applicability determinations. TRSI was closed on February 7, 2006.

iii) Subject to 40 CFR 63 subpart OOOO (Printing, Coating, and Dyeing of Fabric and Other Textiles)

iv) In 2007, a modeling study using emissions from the combined facilities showed total HAP emissions were 447.8 tpy, which would classify this facility as a major source. Highland Industries would also be classified as a major source of HAP, as total HAP emissions from the facility were 51.087 tpy.

v) As a part of the facility's current Title V renewal application, which was received September 29, 2017, the facility updated calculations to include information gathered from a review of all the Safety Data Sheets (SDS) for all the materials used at the facility. The updated facilitywide potential emission calculations showed total uncontrolled HAP emissions of 2.72 tpy.

vi) Per SCDHEC's Bureau of Air Quality (BAQ), Highland Industries will no longer be a major source of HAP. As a result, BAQ stated that a State Operating Permit would be issued for the facility upon renewal of the operating permit in 2018.

vii) 2017 NEI emissions data for facility
- Largest single HAP: 0.62 tpy
- Total HAP: 1.15 tpy

viii) 2014 NEI emissions data for facility
- Largest single HAP: 0.32 tpy
- Total HAP: 0.80 tpy (RTR modeling file: 33.31 tpy)

b) *Status post-2018 MM2A Memo*
i) In March 2018, the facility requested removal of the existing NESHAP requirements for Subpart OOOO (Printing, Coating, and Dyeing of Fabric and Other Textiles) from the current Title V operating permit.
ii) Per BAQ, based on information submitted by the facility, along with their operating permit renewal application, the facility is currently operating as a true area source of HAP emissions.
iii) Thus, per BAQ, the facility is no longer subject to the NESHAP requirements for a major source of HAP emissions.
iv) This was reflected in a Title V permit minor modification dated June 4, 2018.
v) State Operating Permit SOP-0660-0002 was issued January 16, 2019, effective April 1, 2019.

c) *PTE Limitations*
i) N/A

d) *General observations from reclassification*
i) The state has classified the source as a true area source with an uncontrolled HAP PTE of 2.72 tpy. We don't expect emission increases resulting from the reclassification of this source to area source status.

11) **IAC Iowa City LLC, Iowa City, IA**

a) *Status prior to 2018 MM2A Memo*
i) In 2004, source obtained permit establishing plantwide VOC limit.
ii) In 2013, source requested to modify plantwide VOC limit and add NESHAP requirements.
iii) Source was classified as major for HAP.
- Subject to 40 CFR 63 subpart PPPP (plastic parts and products) for paint booths. Compliance strategy was the use of compliant coatings (no-HAP/low-HAP).

iv) 2017 NEI emissions data for facility
- Largest single HAP: 2.16 tpy
- Total HAP: 2.50 tpy

v) 2014 NEI emissions data for facility
- Largest single HAP: 2.16 tpy
- Total HAP: 2.60 tpy (RTR modeling file: 4.66 tpy)

vi) From permit emission calculations – 2017 emissions
- Largest single HAP: 0.62 tpy (Triethylamine)
- Total HAP: 0.63 tpy

b) *Status post-2018 MM2A Memo*
i) In June 2018, IA DNR issued an Air Quality Construction Permit for the source. Permit updated VOC and HAP limits:

- Facilitywide emission limit of 95.0 tpy of VOC per rolling 12-month period to restrict PTE below the MST for purposes of Title V and PSD.
- Facilitywide emissions for HAP to restrict PTE below the major source thresholds for purposes of NESHAP applicability.
- Previous permits established operating limits and/or restrict paint usage for paint booths.
  (a) https://programs.iowadnr.gov/airqualityconstructionpermits/Pages/ConstructionPermit/SearchResult.aspx

c) *2018 Air Construction Permit*
   i) Emission limits to establish/reclassify facility as an area source of HAP
      - Individual HAP less than 9 tpy per rolling 12-month period
      - Total combined HAP less than 25 tpy per rolling 12-month period
   ii) Operating Requirements
      - Daily and monthly records of the identification, the VOC content, the HAP content, and the amount (gallons) of each VOC-containing material and/or HAP-containing material used in the noncombustion sources at this facility.
      - If the rolling 12-month total of any individual HAP emitted from the noncombustion sources at this facility exceeds 6.5 tons per 12-month rolling period, the permittee shall maintain the following daily records: (1) The total emissions of individual HAP (tons) from the noncombustion sources at this facility, and (2) the rolling 365-day total amount of individual HAP emissions from the noncombustion sources at this facility. Daily recordkeeping/calculations for individual HAP emissions shall continue until the rolling 12-month total amount of individual HAP emissions drops below 6.5 tons on the last day of a month. Monthly calculation of individual HAP emissions will then begin in the following month.
      - If the rolling, 12-month total of cumulative HAP emitted from the noncombustion sources at this facility exceeds 18.0 tons per 12-month rolling period, the permittee shall maintain the following daily records: (1) The total emissions of cumulative HAP (tons) from the noncombustion sources at this facility, and (2) the rolling 365-day total amount of cumulative HAP emissions from the noncombustion sources at this facility. Daily recordkeeping/calculations for cumulative HAP emissions shall continue until the rolling 12-month total amount of cumulative HAP emissions drops below 18.0 tons on the last day of a month. Monthly calculation of cumulative HAP emissions will then begin the following month.
   i) Per permit documentation
      - Since 2012, emissions have been less than 2.64 tpy total HAP.
      - 2017 actual emissions: 0.62 tpy single HAP (triethylamine); 0.63 tpy total HAP.

d) *General observations from reclassification*
   i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification

(the use of compliant coatings (no-HAP/low HAP) and that the source also has other permits establishing operating limits and/or restrict paint usage for paint booths/ovens, we don't expect emission increases resulting from the reclassification of this source to area source status.

12) **Kimball Office Salem Wood Office Furniture, Salem, IN**
   a) *Status prior to 2018 MM2A Memo*
      i) Source submitted an application to IDEM in September 2017 to renew its operating permit and transition to a FESOP.
         - Subject to 40 CFR 63 subpart JJ (wood furniture). Compliance strategy was the use of compliant coatings (no-HAP/low-HAP).
      ii) 2017 NEI emissions data for facility
         - Largest single HAP: 0.00 tpy
         - Total HAP: 0.00 tpy
      iii) 2014 NEI emissions data for facility
         - Largest single HAP: 0.05 tpy
         - Total HAP: 0.05 tpy
      iv) Unrestricted PTE
         - Largest single HAP: 105.39 tpy
         - Total HAP: 195.83 tpy
   b) *Status post-2018 MM2A Memo*
      i) In April 2018, after a 30-day comment period, IDEM issued the final FESOP limiting PTE HAP to below the MST and reclassifying this source as an area source under section 112 of CAA and removing applicability to 40 CFR 63 subpart JJ.
   c) *2018 FESOP No 175-39067-00007*
      i) PTE HAP limitations
         - The input of any single HAP to spray booths, identified as SB1 through SB15, UV-1 and UV-2 shall be limited to less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The input of any combination of HAP to spray booths, identified as SB1 through SB15, UV-1 and UV-2 shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
         - Compliance with these limits, in conjunction with the potential to emit HAP from the other emission units at this source, shall limit the sourcewide emissions of HAP to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of combined HAP and will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.
         - Compliance with the HAP input usage limitations shall be determined by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using EPA Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings.
      ii) PTE after issuance of FESOP

- Largest single HAP: 9.5 tpy (methanol)
- Total HAP: 24.42 tpy

d) *General observations from reclassification*

i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

13) **Mapes Panels, LLC, Lincoln, NE**

a) *Status prior to 2018 MM2A Memo*

i) Facility was classified as a major source of HAP.

ii) Subject to 40 CFR 63 subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products), subpart PPPP (Surface Coating of Plastic Parts and Products), and subpart QQQQ (Wood Building Products Surface Coating)

- Compliance strategy to meet major source NESHAP requirement was the use of a regenerative thermal oxidizer (RTO).

iii) No HAP emissions data for facility available in 2014 or 2017 NEI.

b) Status *post-2018 MM2A Memo*

i) In May 2018, Mapes Panels submitted a minor source construction permit application requesting that the Lincoln-Lancaster County Health Department (LLCHD) withdraw the June 28, 2017, operating permit renewal application concurrent with issuance of a construction permit to establish the facility as an area source of HAP.

ii) LLCHD issued a minor NSR permit effective on September 1, 2018. A 30-day period was allowed for public comments.

c) *2018 Permit to Construct/Reconstruct/Modify An Air Contaminant Source No 199*

i) Allows for operation of architectural panel laminating spray line with permanent total enclosure and a thermal oxidizer.

ii) Sets emission limits to establish/reclassify facility as an area source of HAP

- Individual HAP less than 2.5 tpy (any 12 consecutive months)
- Total combined HAP less than 10.0 tpy (any 12 consecutive months)

iii) Operational limits

- Limit adhesive throughput associated with EU 1-1 (Architectural Panel Laminating – Spray Line) to no more than 64,500 gallons during any consecutive 12-month period.
- VOC and organic HAP emissions from EU 1-1 (Architectural Panel Laminating – Spray Line) shall be controlled by EU 3-1 (Thermal Oxidizer). EU 3-1 shall be capable of achieving and maintaining, at a minimum, a destruction and removal efficiency (DRE) of 95.0% of emissions of VOCs and organic HAP.
  (a) Operational parameters for RTO include continuous compliance with temperature requirement.

d) *General observations from reclassification*

i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same operational design, control technology and emission destruction efficiency as prior to the reclassification, we don't expect emission increases resulting from the reclassification of this source to area source status.

14) **Meridian Manufacturing Group, Storm Lake, IA**

a) *Status prior to 2018 MM2A Memo*

i) Source was classified as major for HAP.

ii) Subject to 40 CFR 63 subpart MMMM (Miscellaneous Metal parts and Products Surface Coating). Compliance strategy was the use of compliant coatings (no-HAP/low-HAP).

iii) 2017 NEI emissions data for facility

- Largest single HAP: 2.71 tpy
- Total HAP: 2.92 tpy

iv) 2014 NEI emissions data for facility

- Largest single HAP: 1.23 tpy
- Total HAP: 1.61 tpy (RTR modeling file: 9.52 tpy)

b) *Status post-2018 MM2A Memo*

i) On May 3, 2018. facility submitted an air construction permit application to IA DNR to establish enforceable limits for VOC and HAP to get out of Title V. IA DNR issue the construction permit on July 19, 2018. Plant Number 11-01-029; Project Number 18-181.

ii) This facility is now subject to NESHAP subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

c) *2018 Air Quality Construction Permit Project Number 18-181*

i) All VOC and HAP emissions from this unit are accounted for in the facility's paint booth permits.

ii) Limits:

- Spray booths – limited to 40,000 gallons/yr paint @ 4.52 lb/gal VOC, 0.19 lb/gal SHAP, 0.24 lb/gal THAP. Limited to 700 gal/yr solvent @ 7.5 lb/gal.
  (a) Maintain the SDS of any paint used at this facility showing the SHAP content.
  (b) The total HAP (THAP) content of any paint used in this facility shall not exceed 0.24 pounds per gallon. Maintain the SDS of any paint used at this facility showing the THAP content.
- Welding areas – limited in hours of operation
- Plasma table – limited in hours of operation

iii) This facility is subject to NESHAP subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

- Spray booths – monitoring and work practice requirements
- Welding areas – monitoring and work practice requirements

- Plasma table – work practices

iv) Potential emissions from engineering analysis:
- Largest single HAP: 4.9 tpy
- Total HAP: 5.9 tpy

d) *General observations from reclassification*

i) Based on IA's engineering analysis for permit, source wants to leave open the option to use paints and metals with the MFHAP.

ii) Previous applicable NESHAP (MMMM) only regulates organic HAP. Source had the flexibility of using paints and metals with MFHAP while a major source. By reclassifying this source is now subject to the metal fabrication and finishing area source NESHAP (40 CFR 63 subpart XXXXXX [6X]), whenever using spray material containing MFHAP as defined in 40 CFR §63.11522. 40 CFR 63 Subpart 6X includes monitoring and work practice requirements for the spray booths, work practice and opacity monitoring requirements for welding areas and work practice requirements for their plasma table. All potential metal HAP emissions are controlled because the equipment standards and management practices requirements of 40 CFR subpart 6X control particulate matter as a surrogate for MFHAP. 40 CFR subpart 6X requires spray booths to be fitted with filter technology demonstrated to achieve at least 98% control efficiency of paint overspray (arrestance). We don't expect emission increases from the reclassification of this source.

iii) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings [no-HAP/low HAP] and limits on usage and hours of operation), we don't expect emission increases resulting from the reclassification of this source to area source status.

15) **Novel Iron Works Inc., Greenland, NH**

a) *Status prior to 2018 MM2A Memo*

i) Novel Iron Works, Inc. (Novel) was issued a Title V Permit (TV-OP-049) on December 10, 2003, for spray painting of structural metal components. Novel was issued another Title V Permit (TV-049) on February 1, 2016.

ii) Facility subject to 40 CFR 63 subpart MMMM (Miscellaneous Metal parts and Products Surface Coating). Compliance strategy was the use of compliant coatings (no-HAP/low-HAP).

iii) 2017 NEI emissions data for facility:
- Largest single HAP: 0.05 tpy
- Total HAP: 0.06 tpy

iv) 2014 NEI emissions data for facility:
- Largest single HAP: 0.12 tpy
- Total HAP: 0.81 tpy

v) Actual uncontrolled emissions for 2017 as reported by facility:
- Largest single HAP: 0.18 tpy

- Total HAP: 0.25 tpy.

b) *Status post-2018 MM2A Memo*
   i) Novel submitted an application on May 25, 2018, requesting enforceable limitations on the potential to emit HAP to below the major source threshold of 10 tpy for any individual HAP and 25 tpy for combined HAP.
   ii) 30-day public comment period 11/20 - 12/21/2018
   iii) Final temporary permit issued 12/31/18.

c) *Temporary Permit TP–0228*
   i) Facility removed from Title V requirements by temporary permit.
   ii) As a compliance strategy, per the temporary permit, the facility must continue to use compliant (low- or no-HAP) coatings in their spray-painting process and document via reporting/recordkeeping requirements.
   iii) Per their permit, the facility has the potential to emit HAP above the MST. PTE limits of HAP to <10/25 tpy added to this permit, establishing the facility as a synthetic area source for HAP.
      - Maintain monthly records of total quantity of coating, thinning and cleaning material containing VOCs, HAP and/or RTAPs; and SDS or other documentation containing the concentration of total VOCs, each HAP, and each RTAP in each coating, thinning and cleaning material used.
      - Submit an annual emissions report which shall include the following information:
        a.) Actual calendar year emissions of: 1.) Total VOCs; 2.) Each RTAP and each HAP reported by CAS number;
        b.) The methods used in calculating such emissions in accordance with Env-A 705.02, D*etermination of Actual Emissions for Use in Calculating Emission-Based Fee*;
        c.) The emission factors and the origin of the emission factors; and
        d.) total quantity of coating, thinning and cleaning material containing VOCs, HAP and/or RTAPs compiled on a monthly basis.
   iv) 40 CFR 63 XXXXXX (Nine metal fabrication and finishing source category for area sources) is applicable to the source. NHDES has not taken delegation of this rule and so no applicable requirements have been placed into the permit.

d) *General observations from reclassification*
   i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant no-HAP/low-HAP coatings), we don't expect emission increases resulting from the reclassification of this source to area source status.

16) **Shelburne Shipyard Inc, Shelburne, VT**

a) *Status prior to 2018 MM2A Memo*
   i) Facility was constructed and commenced operations without a Permit to Construct or a Title V Permit to Operate and had uncontrolled HAP PTE above MST (even though actual emissions were much lower, according to EPA).

ii) Subject to 40 CFR 63 subpart II (Ship building and ship repair surface coatings). Compliance strategy was the use of compliant coatings.
iii) No HAP emissions data for facility available in 2014 or 2017 NEI.
iv) In January 2018, facility submitted a Permit to Construct and a Permit to Operate as a Synthetic Minor source that included an allowable emissions limit of less than 10 tons per year of all pollutants combined.

b) *Status post-2018 MM2A Memo*
i) On April 26, 2018, VT issued an Air Pollution Control Permit to Construct for the facility with restrictions on PTE below the MST. The facility will not be subject to Subpart II or Title V.

c) *2018 Air Pollution Control Permit to Construct- AP-15-025*
i) HAP PTE Limits – The permit restricts emissions of individual HAP from the facility to less than 8 tpy and emissions of total HAP and VOC combined to less than 8 tpy based upon any rolling 12-month period for combined total emissions of HAP and VOC. Limitation includes all surface coating operations, including coatings and solvents.
ii) Compliance strategy – Permit requires the facility to use both compliant materials (low/no HAP coatings) and emission control equipment (filters) as enforceable conditions to achieve compliance.
iii) Reporting Requirements
- At the beginning of each month, the Permittee shall calculate the total quantity of the following emissions from the use of all coatings and solvents combined for the previous month as well as the previous twelve (12) consecutive calendar months, including "low-usage exempt" coatings, expressed in tons of VOC and pounds of HAC and HAP:
  (a) VOC emissions;
  (b) Each individual HAC emission; and
  (c) Each individual HAP emission;
  (d) The combined VOC and total of HAP emissions. For purposes of this condition, emissions that are considered to be both hazardous air pollutants and volatile organic compounds need not be double counted. (This is for comparison to the VOC, HAP and HAC limits of conditions (10) and (13) of this Permit.)

d) *General observations from reclassification*
i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant no-HAP/low-HAP coatings), we don't expect emission increases resulting from the reclassification of this source to area source status.

17) **Talaria Company, LLC, Trenton, ME**
a) *Status prior to 2018 MM2A Memo*
i) The facility was issued an initial Title V License in 2002.

ii) Subject to 40 CFR 63 subpart VVVV (boat manufacturing). Compliance strategy was the use of compliant materials.
iii) Subject to 40 CFR 63 subpart ZZZZ (RICE for area sources).
iv) Since its initial license, the facility had reduced HAP emissions to below MST through operational changes.
v) 2017 NEI emissions data for facility
- Largest single HAP: 4.92 tpy
- Total HAP: 9.22 tpy

vi) 2014 NEI emissions data for facility
- Largest single HAP: 4.59 tpy
- Total HAP: 9.24 tpy

b) *Status post-2018 MM2A Memo*
i) Source submitted a request to license its existing equipment and equipment and processes from another nearby facility being merged with the original facility. They requested HAP PTE limits below MST and for the agency replace its Title V license with a minor source license.
ii) In May 2018, ME DEP issued the Minor Source Air Emission License (A-798-71-C-R/A).

c) *Minor Source Air Emission License*
i) Establishes HAP PTE limits
- Largest single HAP: 9.9 tpy
- Total HAP: 24.9 tpy

ii) With the annual VOC and PTE limits associated with the boat building processes (composite fabrication and coating operations) and work practice standards, the facility's emissions are below major thresholds for HAP.
- Facility processes must adhere to Maine's Best Practical Treatment (BPT), which means the facility uses methods that control or reduce emissions to the lowest possible level considering the existing state of technology, effectiveness of available alternatives, and economic feasibility for the type of establishment involved.
- Epoxy-based part production and curing processes use low/no HAP materials, and the agency considers this process an insignificant activity.
- Polyester/vinylester resin operations use higher HAP materials, but the facility uses a closed-molding operation to limit emissions.
- Work practice standards also include good housekeeping practices such as leak detection and repair, with annual reporting required.
- The facility shall also continue research and manufacturing test trials of pollution prevention technologies.

iii) Compliance demonstration: maintaining records of total HAP and single HAP on a monthly and 12-month rolling total basis using mass-balance calculations.

d) *General observations from reclassification*
i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source

to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant no-HAP/low-HAP coatings), the state's BPT requirements and permit-required work practice standards, we don't expect emission increases resulting from the reclassification of this source to area source status.

18) **Tower Industries, Ltd, Massillon, OH**
   a) *Status prior to 2018 MM2A Memo*
      i) Facility was a major source of HAP beyond its compliance date for the applicable MACT standard, and thus was considered a major source and required to obtain a Title V permit.
         - Draft Title V permit renewal issued 12/22/2017, but no final version was issued prior to reclassification.
      ii) Subject to 40 CFR 63 subpart WWWW (Reinforced Plastic Composites Production). Compliance strategy was the use of compliant materials.
      iii) One emissions unit was subject to the MACT standard, the reinforced plastics composite production unit P002 (solid surface casting line, affected operations are mixing, cleaning of equipment, and HAP containing materials storage).
         - The only HAP is styrene- also a VOC. VOC emissions are equal to HAP/styrene emissions.
         - Best Available Technology, or BAT, standards were required for VOC emissions for this unit. Work practice standards for this unit require no-HAP materials, except in closed systems where HAP were fully controlled. Other work practice standards used included proper storage of HAP-containing materials.
         - Use of only non-VOC clean-up solvent per BAT is more stringent that the limitation in subpart WWWW prohibiting the use of HAP coating solvents.
      iv) No HAP emissions data for facility available in 2014 or 2017 NEI.
   b) *Status post-2018 MM2A Memo*
      i) Prior to final issuance of the Title V permit,
      ii) The facility submitted calculations demonstrating that the facility's current PTE for HAP is less than 10 tpy.
   c) *Permit-to-Install P0123990*
      i) PTIO issued May 18, 2018.
         - Permit describes itself as "Renewal PTIO issued to transition this facility from TV major source status to minor source status due to revocation of the US EPA MACT 'once-in-always-in' policy guidance."
      ii) The facility's current potential to emit for VOC is less than 10 tons per year.
      iii) Same BAT and work practice standards limiting HAP emissions outlined in previous draft Title V permit remain in place in PTIO.
         - Operational restriction- The permittee shall use only non-VOC containing clean-up material in this emissions unit
         - Recordkeeping- The permittee shall collect and record the following information on a daily basis for this emissions unit:
           a. the name and identification number of the resin employed;

b. the tons of resin used per day;
c. the starting monomer (styrene) VOC content of the resin (as employed) in pounds styrene/pound resin;
d. the number of hours per day the emissions unit was in operation; and
e. the name, identification number and VOC content of the cleanup/solvent material used.

d) *General observations from reclassification*
- Use of only non-VOC clean-up solvent per BAT is more stringent that the limitation in subpart WWWW.
- Based on the review of the compliance strategy for major source NESHAP and the enforceable emission limitations taken by the source to reclassify, which reflect the same compliance strategy as prior to the reclassification (the use of no-HAP compliant coatings and work practice standards), we don't expect emission increases resulting from the reclassification of this source to area source status.

19) **TruStile Doors of Iowa, Northwood, IA**
a) *Status prior to 2018 MM2A Memo*
i) Major source for VOC and HAP.
ii) Subject to 40 CFR 63 subpart QQQQ (Surface Coating of Wood Building Products). Compliance strategy was the use of compliant coatings (no-HAP/low-HAP).
iii) 2017 NEI emissions data for facility:
- Largest single HAP: 0.52 tpy
- Total HAP 1.05 tpy

iv) 2014 NEI emissions data for facility:
- Largest single HAP: 0.40 tpy
- Total HAP 0.72 tpy

b) *Status post-2018 MM2A Memo*
i) IA DNR issued the Air Quality Construction Permit in May 2018, updating VOC and HAP limits and NESHAP applicability.

c) *2018 Air Quality Construction Permit*
i) Establishes emission limits for spray booths, adhesive and putty application
- The owner or operator shall not emit more than 9.0 tons of single HAP from all noncombustion sources at this facility per rolling 12-month period. The owner or operator shall not emit more than 24.0 tons of total HAP from all noncombustion sources at this facility per rolling 12-month period. These limits were established to limit HAP emissions below the area source HAP limits.

ii) Establishes operating limits for spray booths
- Shall not use more than 16,000 gallons of any surface coating materials per rolling 12-month period.

iii) Compliance demonstration and recordkeeping
- The facility is required to track actual SHAP and THAP emissions from all noncombustion sources on a rolling 12-month basis. The facility is also required

to track VOC material usage from the spray booths and putty application and actual VOC emissions from the adhesive application.

- If the rolling 12-month total amount of single HAP emissions from all noncombustion sources, including the spray booths, adhesive application, and putty application, exceeds 7.2 tons, the owner or operator shall track single HAP emissions on a daily basis. On a daily basis, the owner or operator shall calculate the 365-day total amount of single HAP emissions from these emission units. This calculation must be done each day until the 365-day total amount of single HAP emissions from these emission units are less than 7.2 tons. Calculations may then be performed on a monthly basis as long as the total amount of single HAP emissions is below 7.2 tons.
- If the rolling 12-month total amount of total HAP emissions from all noncombustion sources, including the spray booths, adhesive application, and putty application, exceeds 19.2 tons, the owner or operator shall track total HAP emissions on a daily basis. On a daily basis, the owner or operator shall calculate the 365-day total amount of total HAP emissions from these emission units. This calculation must be done each day until the 365-day total amount of total HAP emissions from these emission units are less than 19.2 tons. Calculations may then be performed on a monthly basis as long as the total amount of total HAP emissions is below 19.2 tons.

d) *General observations from reclassification*

i) IA's engineering evaluation shows that, the actual HAP (and VOC) emissions over the past 15 years have not been close to the MST.

ii) In EPA's 2018 Risk and Technology review rulemaking for this category, EPA stated that EPA's review of the developments in technology for the Surface Coating of Wood Building Products source category did not reveal any changes in practices, processes, and controls. In the original NESHAP, we noted that the most prevalent form of emission control for surface coating of wood building products is the use of low-volatile organic compounds and low-HAP coatings, such as waterborne or ultraviolet (UV)-cured coatings. That continues to be the prevalent compliance approach.

iii) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), and limits on operation, we don't expect emission increases resulting from the reclassification of this source to area source status.

20) **Vacuum Orna-Metal, Romulus, MI**

a) *Status prior to 2018 MM2A Memo*

i) On November 6, 2017, the issuance data of ROP No. MI-ROP-B4550-2017, Vacuum Orna-Metal (VOM) was required to obtain and operate in compliance with an ROP because the facility's PTE HAP classified VOM as a major source.

ii) VOM was subject to 40 CFR 63 subpart PPPP (Surface Coating of Plastic Parts and Products). Compliance strategy was the use of compliant coatings (no-HAP/low-HAP).

iii) Latest emissions data reported to EIS Gateway, for 2015:

- Total HAP: 0.98 tpy

b) *Status post-2018 MM2A Memo*

i) On March 23, 2018, VOM obtained Permit to Install (PTI) No. 145-16A and began operating under legally enforceable permit conditions limiting the PTE to below the MST.

ii) On September 14, 2018, VOM requested reclassification under the MM2A memo as an area source.

iii) On November 14, 2018, the state sent a letter agreeing to the reclassification and voided ROP No. MI-ROP-B4550-2017, meaning the source is no longer subject to Title V requirements.

c) *PTI No. 145-16A*

i) Emission limits: less than 8.9 tpy of individual HAP and less than 22.4 tpy of combined HAP, VOC less than 89.9 tpy based on a 12-month rolling period as determined at the end of each calendar month.

ii) Material limits: VOC content of coatings as applied (7.5lb/gal minus water), coatings-24,200 gallons/yr based on a 12-month rolling period as determined at the end of each calendar month.

iii) Compliance strategy involves using compliant materials (no-HAP/low-HAP coatings).

iv) The permittee shall determine the HAP content of any material as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.

v) The permittee shall keep the following information on a monthly basis for FGFACILITY:

a) Gallons or pounds of each HAP containing material used.

b) Where applicable, gallons or pounds of each HAP containing material reclaimed.

c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.

d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.

e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.

d) *General observations from reclassification*

i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source prior to reclassification (the use of compliant no-HAP/low HAP coatings), we don't expect emission increases resulting from the reclassification of this source.

21) **Vanguard National Trailer Corporation, Monon, IN**

a) *Status prior to 2018 MM2A Memo*

i) Stationary truck trailer manufacturing

ii) Subject to 40 CFR part 63, subpart MMMM (Miscellaneous Metal Parts and Products) for paint booths. Compliance strategy was the use of compliant coatings (no-HAP/low-HAP).

iii) Subject to 40 CFR part 63, subpart ZZZZ, for the standby spark ignition emergency generator (area sources)

iv) Subject to 40 CFR part 63, subpart CCCCCC (Gasoline Dispensing Facilities for area sources), for the fueling operations

v) Source removed emission units: primer booth, finish paint booth, dutch oven boiler.

vi) 2017 NEI emissions data for facility:

- Largest single HAP: 0.03 tpy
- Total HAP: 0.04 tpy

vii) 2014 NEI emissions data for facility:

- Largest single HAP: 0.30 tpy
- Total HAP: 0.32 tpy; RTR modeling file 1.49 tpy

viii) Unrestricted potential emissions for HAP

- Largest single HAP- 2.95 tpy (manganese, from welding)
- Total HAP- 3.55 tpy

b) *Status post-2018 MM2A Memo*

i) As a result of the MM2A memo, IDEM, OAQ reviewed the applicability of the major source NESHAP standards and determined that because this facility is an area source the paint booths will no longer be subject to subpart MMMM.

c) *2018 Title V Operating Permit Renewal No 181-38409-00043*

i) On April 18, 2018 IDEM issued the renewed Title V permit (the source continues to be a major source for non-HAP).

- Removed applicability/requirements to subpart MMMM.
- As area source, the source continues to be subject to subpart ZZZZ and subpart CCCCCC.

d) *General observations from reclassification*

i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the classification of the source as a true area with an unrestricted PTE of 3.55 tpy total HAP, we don't expect emission increases resulting from the reclassification of this source to area source status.

22) **Andeavor Field Services, LLC Ponderosa Compressor Station, Uintah and Ouray Indian Reservation, UT**

a) *Status prior to 2018 MM2A Memo*
   i) Title V operating permit application identified Ponderosa as an area source for HAP under 40 CFR 63 subpart HH (Oil and Natural Gas Production facilities).
      - Facility runs a NG compressor station that includes a triethylene glycol (TEG) dehydration system using open flame flare for VOC, and releases HAP from two condensate tanks and one water storage tank using an enclosed vapor combustion device.
   ii) In 2016, facility requested enforceable emissions and operational limitations that recognize emissions control equipment installed and operating on existing emissions units.
   iii) EPA issued a tribal synthetic minor new source review (Tribal MNSR) permit in April 2017 that includes enforceable controls of VOC and HAP that result in emissions below the HAP MST.
   iv) 2017 NEI emissions data for facility: n/a
   v) 2014 NEI emissions data for facility: n/a
b) *Status post-2018 MM2A Memo*
   i) On April 9, 2018, facility requested EPA Region 8 to rescind their Title V permit application under MM2A guidance.
   ii) In a letter dated May 18, 2018, EPA Region 8 agreed to rescind the Title V application.
      - Per Region 8 letter, Andeavor no longer subject to the requirements to operate under a Part 71 permit. The source must adhere to the current enforceable limits and controls in the MNSR permit in order to remain an area source of HAP and exempt from the Title V program.
c) *MNSR permit SMNSR-UO-002178- 2017.003*
   i) TEG units
      - Permit includes construction and operational limits, emission limits and control and operational limits requiring routing of all emissions from the TEG dehydration system still vent through a closed-vent system to an open flame vapor combustion device (flare) designed, operated and monitored as specified in permit.
   ii) Natural Gas Condensate and Produced Water Storage Tanks
      - Permit includes construction and operational limits, emission limits and control and operational limits requiring routing of all emissions from the natural gas condensate and produced water storage tanks through a closed-vent system to an enclosed combustion device designed, operated, tested and monitored as specified in permit.
         (a) Aggregate emissions from the two 400 bbl natural gas condensate storage tanks and one produced water tank shall not exceed 0.02 tons total HAP in any consecutive 12-month period.
   iii) Flare and enclosed combustion device

- Permit requires the flare and enclosed combustion device to continuously operate so that uncontrolled VOC emissions and total HAP emissions are reduced by at least 95.0% by weight.
- Flare shall be designed and operated in accordance with the requirements of 40 CFR 63.11(b).

d) *General observations from reclassification*

i) Based on the review of the permit, the enforceable emission limitations (construction and operational limits, emission limits and control and operational limits) the source had prior to the reclassification we don't expect emission increases resulting from the reclassification of this source.

23) **Catamount Energy Partners, LLC- Ignacio Treating Plant in La Plata County, Colorado Southern Ute Indian Reservation**

a) *Status prior to 2018 MM2A Memo*

ii) In 2017, facility obtained a synthetic minor NSR (SMNSR) permit with PTE limitations for two triethylene glycol (TEG) dehydration units as a result of a 2016 settlement agreement with Southern Ute Indian Tribe.

iii) Facility is and has always been an area source for purposes of 40 CFR 63 subpart HH (Oil and Natural Gas Production facilities).

iv) Facility is under a 2012 Consent Decree (CD) with EPA requiring the source to be classified as major for 40 CFR 63 subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines) and to obtain a Title V permit. Per CD, facility replaced uncontrolled engines with new engines designed with oxidation catalysts to reduce formaldehyde by 90% and meet RICE requirements for new major sources.

v) 2017 NEI emissions data for facility

- Largest single HAP: 7.69 tpy
- Total HAP: 15.36 tpy

vi) 2014 NEI emissions data for facility

- Largest single HAP: 1.52 tpy
- Total HAP: 2.76 tpy

*b) Status post-2018 MM2A Memo*

i) On February 8, 2018, the facility submitted a SMNSR application requesting a permit with enforceable limitations to be used when determining the applicability of NESHAP as well as other CAA requirements such as Title V once the CD is terminated.

ii) EPA proposed a permit to replace the 2017 SMNSR permit in November 2018. After a 60- day public comment period (during which no comments regarding reclassification were received), on March 3, 2019, the EPA issued a final permit. Final permit took effect on April 3, 2019 (2019 SMNSR permit).

*c) 2019 SMNSR permit SMNSR-SU-000052-2018.002*

i) Established enforceable limitations for two existing TEG units and eight existing compressor engines. Emissions limits, control efficiency, and operational

requirements will result in facility-wide allowable emissions of 15.84 tpy for total HAP and 7.43 tpy for formaldehyde.

ii) Two TEG units continue to be subject to operational limitations and benzene PTE limitations (facility-wide benzene limit of 1.65 tpy) and subject to 40 CFR 63 subpart HH for area sources (Oil and Natural Gas Production facilities).

iii) Eight engines will be subject to PTE limitations for carbon monoxide (CO), nitrogen oxide ($NO_X$), volatile organic compound (VOC) and formaldehyde emissions. These engine requirements become effective when the CD is terminated.
- For this analysis, these engines are considered to be MM2A-affected units.

iv) Engines are subject to design and operational limitations unaffected by reclassification:
- Engines catalytic oxidizer design and engine operation remains the same as prior reclassification (catalytic oxidizer designed to reduce carbon monoxide [CO] by 93%, volatile organic compounds (VOC) by 60% and formaldehyde by 90%.)
- Engines are limited to a maximum horsepower/nameplate rating.
- Engines are limited to burn natural gas.
- Engines are subject to routine inspection and maintenance to ensure optimum performance of each engine and respective catalytic control system to ensure compliance with the required emission limits and control efficiencies.
- Engines are subject to an initial performance test and semiannual performance test requirements to demonstrate compliance.

v) Engines are subject to emission limitations for formaldehyde.
- As major affected sources, the engines are subject to reduce CO emissions by 93% or more **or** limit the concentration of formaldehyde in the engine exhaust to 14 ppmvd or less at 15% $O_2$ (major source requirements 40 CFR 63 Subpart ZZZZ). The engines are also subject to CPMS monitoring of exhaust temperatures of each engine at the inlet and outlet to each catalyst bed.
- As area affected sources, the engines will be subject to enforceable PTE limits: not to exceed limits for CO and formaldehyde (in lb/hr and tpy). These limits reflect a reduction of CO by at least 93% by weight and formaldehyde by at least 90% by weight. Total emissions of formaldehyde from all engines are limited to 7.43 tpy. Engines will also be subject to area source requirements 40 CFR 63 Subpart ZZZZ. Engine monitoring will consist of continued use of the CPMS as backup verification of compliance with the exhaust temperature limitations at the inlet and outlet to each catalyst bed. However, compliance demonstration will rely on weekly manual readings of exhaust temperature, with weekly review of the continuous temperature logs at the same time as the weekly readings serving only as backup verification of the manual readings (i.e., Permittee will no longer be subject to MAC ZZZZ major source CPMS operation and maintenance requirements).

d) General observations from reclassification

i) Based on the review of the permit, the review of the compliance strategy for major source NESHAP, and the enforceable emission limitations taken by the source to

reclassify reflecting the same operational design, control technology, and emission destruction efficiency as prior to the reclassification, we don't expect emission increases resulting from the reclassification of this source to area source status. Note that post-permit allowable emissions of 0.41 tpy of benzene and the corresponding 0.41 tpy total HAP represent a slight increase because the permit authorized an increase in throughput to one of the dehydrators. However, this increase was permissible under the major source standards and would have occurred regardless of reclassification.

24) **Crescent Point Energy Corp, Duchesne County, Ute Indian Tribe, UT**

a) *Status prior to 2018 MM2A Memo*

i) Facility is a natural gas compressor station with a triethylene glycol (TEG) dehydrator located on tribal lands in a NAAQS nonattainment area for ozone.

ii) Subject to 40 CFR 63 subpart HH (Oil and Natural Gas Production facilities) for major sources.

iii) In October 2017, facility applied for tribal MNSR permit to construct.

- Requested acknowledge control equipment that was already voluntarily installed (enclosed combustion unit) and continuously operating as enforceable requirements to control emissions from a TEG dehydrator still vent.

iv) No HAP emissions data for facility available in 2014 or 2017 NEI.

b) *Status post-2018 MM2A Memo*

i) EPA proposed a MNSR permit in July 2018.

ii) Subject to 40 CFR 63 subpart HH (Oil and Natural Gas Production facilities) for area sources

c) *Proposed MNSR permit*

i) Establishes enforceable emission restrictions for the control of VOC and HAP from the TEG dehydrator

- Proposed permit includes construction and operational limits, emission limits and control and operational limits.
- Requires all produced natural gas emissions from the TEG dehydrator to vent through a closed-vent system to an enclosed combustor designed and continuously operated to meet the manufacturer guaranteed 95% VOC and HAP destruction efficiency.

d) *General observations from reclassification*

i) Based on the review of the compliance strategy prior to the reclassification and the proposed enforceable emission limitations, we don't expect emission increases resulting from the reclassification of this source.

25) **Denbury Onshore LLC, Little Creek OER Facility, Ruth, MS**

a) *Status prior to 2018 MM2A Memo*

i) Denbury Onshore LLC (Denbury) operates an enhanced oil recovery (EOR) operation in Ruth, Mississippi referred to as the Little Creek EOR Facility. Denbury uses a

tertiary recovery process known as enhanced oil recovery to extract additional oil from depleted fields.

ii) Most of the pollutants emitted by the facility are volatile organic compounds (VOC), with the majority coming from the tanks and low pressure (LP) vent stream. A flare was installed to control emissions of VOC from many of the tanks, and a vapor recovery unit (VRU) was installed to recover VOCs from the LP vent stream.

iii) Facility subject to 40 CFR 63 subpart HH – the NESHAP for Oil and Natural Gas Production Facilities.

iv) Title V Operating Permit reissued December 8, 2017

ii) 2017 NEI emissions data for facility
- Largest single HAP: 2.07 tpy
- Total HAP: 3.60 tpy

iii) 2014 NEI emissions data for facility
- Largest single HAP: 2.39 tpy
- Total HAP: 7.02 tpy

b) *Status post-2018 MM2A Memo*

i) Process modified to shut down the low-pressure vent stream. As a result, the low-pressure gas is vented directly to the atmosphere instead of being recovered, and the Vapor Recovery Unit (VRU) is no longer used. At a maximum estimated low-pressure gas flow rate of 420 Mscf per day, emissions of VOC will increase by approximately 140.35 tons per year (tpy) and emissions of total hazardous air pollutants (HAP) will increase by 17.99 tpy.

ii) This change is considered a significant modification for the Title V Operating Permit.

iii) Source requested also to remove the applicability of 40 CFR 63 subpart HH.
- For the evaluation for major source applicability for subpart HH, oil and gas production wells and associated equipment and emissions from any pipeline compressor or pump station shall not be aggregated, even if in a contiguous area and under common control. Therefore, the HAP emissions from the oil recovery are evaluated separately for HAP emissions associated with the gas compressors.
- The subpart HH affected sources were emission points AA-006 and AA-007 – storage vessels vented to the flare (AA-020).
- To meet the control device requirements from Subpart HH, the pre-reclassification permit chose the use of a flare pursuant to 63.771(d)(1)(iii) and NOT the use of a vapor recovery device with 95% reduction, pursuant to 63.771(d)(1)(ii)

iv) Denbury proposed enforceable restrictions on the amount of low-pressure relief gas vented to the atmosphere to ensure emissions of the individual HAP 2,2,4-trimethylpentane (largest individual HAP for the gas compression/venting operation) are below 10 tpy and, thereby, become an area source of HAP no longer subject to MACT Subpart HH. This federally enforceable restriction on gas flow and removal of the MACT Subpart HH requirements for the emission points AA-006 and AA-007 and it also requires a significant modification to the Title V Operating Permit.

- Emission point AA-001 – low-pressure relief gas – venting of low-pressure gas was NOT formerly required under subpart HH to be routed to a vapor recovery unit. Emission point AA-001 was not an affected source under subpart HH.
- The requirement for the VRU was established as a federally enforceable requirement for a PSD moderate source and the pre-reclassification permit does not have a 95% reduction requirement associated with the VRU

c) *Title V Modification*

i) MS Environmental Quality Permit Board issued Title V permit modification in August 2018.

- Enforceable restrictions for emission points AA-006 (5,000-barrel vertical, fixed roof wet oil tank) and AA-007 (5,000-barrel vertical, fixed roof dry oil tank)
  (a) storage vessels must be covered and routed through a closed vent system to a flare (emission point- 020)
  (b) Flare shall be operated with a flame present at all times and with no visible emissions, except for a period of 5 minutes during any 2 consecutive hours.
  (c) flare shall be designed and operated in accordance with 40 CFR 63.11(b).
- Enforceable restriction for low pressure (LP) relief gas vented to the atmosphere (emission point AA-01)
  (a) the permittee shall not vent more than 147,825 Mscf/yr of low-pressure relief gas to the atmosphere, as determined for each consecutive 12-month rolling period.
- Monitoring and recordkeeping requirements
  (a) For Emission Point AA-020, the permittee shall record the following:
    (i) (a) Flare design (i.e., steam-assisted, air-assisted, or non-assisted); and
    (ii) (b) All visible emission readings, heat content determinations, flowrate measurements, and exit velocity determinations made during the initial compliance demonstration.
  (b) For Emission Point AA-001, the permittee shall record the amount of any off-gases vented to the atmosphere from the LP relief system for each consecutive rolling 12-month period.

ii) Although the requirements of 40 CFR 63, Subpart HH were removed, the permit still contains some monitoring, recordkeeping, and reporting related to control of the tank emissions and operation of the flare to ensure proper operation needed to achieve the control efficiency indicated in the permit application.

- For the facility, the permittee must keep a record of the applicability determination related to 40 CFR Part 63, Subpart HH readily available for review by MSDEQ for a period of 5 years after the determination, or until the facility changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the permittee believes the source is unaffected (e.g., because the source is an area source).

d) *General observations from reclassification*

i) Without the enforceable limitations in the amount of low-pressure relief gas vented to the atmosphere, emissions from the gas compression/venting would have increased (uncontrolled PTE) to 10.3 tpy for largest individual HAP. The PTE limitations ensure emissions of the individual HAP 2,2,4-trimethylpentane are below 10 tpy and, thereby, become an area source of HAP no longer subject to MACT Subpart HH.

26) **WGR Operating, LP's Granger Gas Plant, Granger, WY**

a) *Status prior to 2018 MM2A Memo*

i) Facility is a sweet gas processing plant operating 10 engines with oxidation catalysts or NSCR controls, glycol dehydrators, condensers, refrigerants, and a plant flare. Formaldehyde is the only significant HAP emitted by engines.

ii) Facility took limits in 2007 due to the installation of engine oxidation catalysts.
- Formaldehyde limits were issued in a 2007 NSR permit for the following engines: White Superior 8GTLB 0.51 tpy and White Superior 16GTB 1.28 tpy.

iii) Subject to 40 CFR 63 subpart HH (Oil and Natural Gas Production facilities)
- DHY 001 (TEG Dehy) subject to major source requirements) – controlled by plant flare.
- DHY 003 (V-130 WilRan) subject to area source requirements) – controlled by condenser and plant flare.

iv) Subject to 40 CFR 63 subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines)- area sources

v) Subject to several NSPS

vi) 2017 NEI emissions data for facility:
- Largest single HAP: 4.34 tpy
- Total HAP: 4.36 tpy

vii) 2014 NEI emissions data for facility:
- Largest single HAP: 6.02 tpy
- Total HAP: 20.76 tpy

viii) January 18, 2018, WGR states in their Title V permit renewal comments to WY that the facility continues to operate as an area source of HAP and is requesting a revision to the 40 CFR 63 subpart HH requirement.

b) *Status post-2018 MM2A Memo*

i) WY issued Title V Permit renewal on April 18, 2018
- Statement of Basis indicate the removal of the major source requirements from the Title V Operating Permit for DHY001 emission unit

c) *Title V Operating Permit Renewal Permit No P0020683*

i) Total facility estimated HAP emission = 9.5 tpy

ii) Subject to 40 CFR 63 subpart HH for Oil and Natural Gas Production Facilities- Area source- affected sources include DHY001 and DHY003

iii) Subject to 40 CFR 63 subpart ZZZZ (RICE) – area source- Affected sources at this facility include ENG001-ENG010 (K-300, K-301, K-350, K- 351, K-352, K-353, C-101, C-102, A-101 and D-1).

iv) Subject to 40 CFR 60 Subpart KKK for Flare

v) Requirements
- Engine configuration requirements
  (a) Two White Superior 8GTLB engines, ENG001 and ENG002 (K-300 and K-301), each equipped with an oxidation catalyst.
  (b) (ii) Three White Superior 16SGTLB engines, ENG003, ENG004 and ENG005 (K-350, K-351 and K-352), each equipped with an oxidation catalyst.
  (c) (iii) One Waukesha 7042GSI engine, ENG006 (K-353), equipped with a NSCR catalyst.
  (d) (iv) Two Ajax DPC-600 engines, ENG007 and ENG008 (C-101 and C-102).
  (e) (v) One Ford LSG-875i-6006ER engine, ENG009 (A-101), equipped with a NSCR catalyst.
  (f) (vi) One Allis Chalmers diesel fired emergency generator, ENG010 (D-1).
- Engine emission limitations- formaldehyde
  (a) K-300 and K-301 – 0.12 lb/hr; 0.51 tpy
  (b) K-350, K-351 and K3-52- 0.29 lb/hr; 1.28 tpy
- Engine and catalyst monitoring
  (a) The permittee shall follow the monitoring and maintenance requirements as follows for the White Superior engines, ENG001-ENG005 (K-300, K-301, K-350, K351 and K-352), equipped with an oxidation catalyst:
  (b) (i) Operate and maintain a thermocouple to measure the temperature at the inlet of the catalyst. The inlet temperature shall be monitored and recorded at least monthly. If the temperature is outside the range of 450°F to 1350°F corrective action shall be taken.
  (c) (ii) Operate and maintain a device to measure the pressure drop across the catalyst. The pressure drop across the catalyst shall be monitored and recorded at least monthly. If the pressure changes by more than two inches of water from the reference pressure drop, corrective action shall be taken.
  (d) (A) The reference pressure drop for each engine shall be established during the initial performance test.
  (e) (B) When a catalyst is replaced, the reference pressure drop shall be re-established for that catalyst during the first engine testing which occurs after the catalyst replacement.
  (f) (C) A valid reference pressure drop shall be established only during testing conducted in accordance with condition F9 of this permit and demonstrating compliance with condition F3.
  (g) (b) The permittee shall monitor the operating hours of the Allis Chalmers diesel fired emergency generator, ENG010 (D-1), by utilizing the hour meter required by condition F3(c).

vi) Ethylene glycol dehydrator system
  (a) VOC and HAP emissions associated with the 300 MMSCFD ethylene glycol dehydration system still vent, DHY002 (EG3), shall be controlled with a

condenser with the non-condensables routed to the plant flare, FLR001/FLA002.

(b) (b) VOC and HAP emissions associated with the 15 MMSCFD triethylene glycol dehydration system still vent, DHY001 (TEG Dehy), shall be controlled with the plant flare, FLR001/FLA002.

(c) (c) VOC and HAP emissions associated with the 12 MMSCFD triethylene glycol dehydration system still vent, DHY003 (V-130 WilRan), shall be controlled with a condenser with the non-condensables routed to the plant flare, FLR001/FLA002. Condensed still vent liquids shall be collected and routed to the gasoline system, with produced water being routed to an evaporation pond. Flash tank vapors shall be routed to the plant flare, FLR001/FLA002.

(d) (d) The permittee shall maintain and operate the plant flare, FLR001/FLA002, during all periods of active operation of the dehydration units such that it remains effective as a viable emissions control device.

(e) (e) VOC and HAP emissions associated with the amine unit flash tank, AMN002 (AFT), shall be routed to the fuel gas system.

- Flare Monitoring

(a) The presence of the pilot flame for the plant flare, FLR001, shall be monitored using a thermocouple, continuous recording device, or any other equivalent device approved by the Division to detect and record the presence of the flame.

(b) (b) The permittee shall monitor for the dates and duration of time when the 15 MMSCFD triethylene glycol dehydration system still vent, DHY0001 (TEG Dehy); the 300 MMSCFD ethylene glycol dehydration system still vent, DHY002 (EG3); or the 12 MMSCFD triethylene glycol dehydration system still vent, DHY003 (V-130 WilRan), are in active operation and the pilot flame is not present.

d) *General observations from reclassification*

i) Based on the permit review, the facility continues to be subject to the same emission and operational limitations for the engines and TEG units as prior to the reclassification, we don't expect emission increases resulting from the reclassification of this source.

27) **Columbia Municipal Power Plant, Columbia, MO**

a) *Status prior to 2018 MM2A Memo*

i) Columbia Municipal Power Plant operates a biomass and natural gas-fired power plant and several emergency backup diesel generators.

ii) Construction Permit 122015-003A, issued June 22, 2017, implemented a modification to cease combustion of coal in Boiler Units #6 and #7 (EP0 1 & EP02) and to convert to 100% woody biomass combustion.

iii) Subject to 40 CFR subpart DDDDD (Boilers), YYYY (Turbines), and ZZZZ (RICE)

iv) 2017 NEI emissions data for facility:

- 0.03 tpy single HAP
- 0.04 tpy total HAP

v) 2014 NEI emissions data for facility:
- 17.06 tpy single HAP
- 20.53 tpy total HAP

b) *Status post-2018 MM2A Memo*
i) MO DNR issued a Title V operating permit in December 2018. Permit removes applicability to 40 CFR subpart DDDDD (Boilers), YYYY (Turbines).
ii) Source continues to be subject to requirements under 40 CPR Part 63, Subparts ZZZZ(RICE) and is now subject to 40 CFR 63 subpart JJJJJJ (Boilers).

c) *Title V, Part 70 Permit (12/10/18)*
i) Reflects the modification of boilers #6 and #7 and operational limitations of Construction Permit 122015-003 and 122015-003A.
- *Construction Permit 122015-003, Issued December 8, 2015*
- *Construction Permit 122015-003A, Issued June 22, 2017*
- *Application of authority to cease combusting coal in Boiler Units #6 and #7 (EP01 & EP02) and to convert to 100% woody biomass combustion. After the conversion, the installation became a HAP area source, and the boilers became subject to 40 CFR Part 63, Subpart JJJJJJ.*
- *The original construction permit was amended to allow the installation of a supplemental 40 MMBtu.hr natural gas burner on Boiler Unit #7 (EP02) to trim carbon monoxide emissions. The natural gas burner does not increase the boiler's MHDR and results in a lower emission rate than biomass for all criteria pollutants.*

ii) PTE HAP 12.31 tpy total; benzene 3 tpy
iii) Reported facilitywide HAP emissions in permit statement of basis (tons):
- 2013: 21.81
- 2014: 19.15
- 2015: 10.39
- 2016 and 2017: 0.00 (after the coal combustion ceased)

d) *General observations from reclassification*
i) The facility became a true area source for HAP after conversion from coal to woody biomass in its boilers, we don't expect emission increases resulting from the reclassification of this source.

28) **Holland Board of Public Works- James DeYoung Generating Station and Wastewater Treatment Plant, Holland, MI**

a) *Status prior to 2018 MM2A Memo*
i) Facility is a decommissioned municipal power plant with ongoing wastewater treatment activities.
ii) Facility was subject to 40 CFR 63 subpart ZZZZ (RICE) as a former coal-burning power plant. Source ceased operations in 2016, and per media reports, the site is expected to be completely repurposed (possibly as a real estate development).

iii) 2017 NEI emissions data for facility:
- Largest single HAP: 0.11 tpy
- Total HAP: 0.66 tpy

iv) 2014 NEI emissions data for facility:
- Largest single HAP: 16.61 tpy
- Total HAP: 20.69 tpy

b) *Status post-2018 MM2A Memo*
   i) In 2018, source requested to void their renewable operating permit (ROP) No. MI-ROP-B2357-2014a and their permit to install (PTI) No. MI-PTI-B2357-2014a in response to MM2A memo. Per agency letter of acceptance of withdrawal (10/24/18), all permitted equipment on site had been decommissioned except for the equipment at the wastewater treatment plant, which is a true area source and exempt from NSR permitting. Michigan AQD reviewed the request and agreed to void the two permits based on the MM2A memo.

c) *PTE Limitations*
   i) As noted above, the operating permits have been voided, so there are no PTE limits. However, because the site equipment has been decommissioned, there are no emissions from the former generating station; the wastewater treatment facility is a true area source, with no changes to its operation.

d) *General observations from reclassification*
   i) Based on the review of the permit, the source was no longer in existence and the site is to be repurposed. No emissions increases are possible. Source made the request to void the ROP.

29) **MidAmerican Energy Company-Riverside Generating Station, Bettendorf, IA**

a) *Status prior to 2018 MM2A Memo*
   i) Facility was classified as a major source with regard to the Title V Operating Permit program and major stationary source for PSD purposes (PTE for several criteria pollutants are greater than 100 tpy).
   ii) Subject to 40 CFR 63 subpart DDDDD (boilers).
   iii) Vaporizers and auxiliary boilers are subject to NSPS subparts A and Dc.
   iv) Boiler burns natural gas and is not an affected source of 40 CFR 63 subpart UUUUU.
   v) 2017 NEI emissions data for facility
      - Largest single HAP: 0.10 tpy (hexane)
      - Total HAP: 0.10 tpy
   vi) 2014 NEI emissions data for facility
      - Largest single HAP: 23.47 tpy (hexane)
      - Total HAP: 38.36 tpy

b) *Status post-2018 MM2A Memo*
   i) In May and June 2018, source submitted an air construction permit application to IA DNR for the purpose of restricting HAP emissions below NESHAP MST and address PM for NAAQS issues. The permit was issued in July 2018.

c) *2018 Air Construction Permit Project Number 18-194-07/03/18*

i) Restricts usage of natural gas for Boiler # 9 so that the facility can be classified as an area source for NESHAP purposes.
   - Operator is required to keep track of the amount of natural gas burned on a monthly basis and on a 12-month rolling basis.
   - Annual Potential Emissions
     (a) Hexane = 9.33 tpy
     (b) Total HAP = 9.75 tpy

ii) Removes reference to 40 CFR 63 subpart DDDDD for the permits issued to the vaporizers and auxiliary boilers.

d) *General observations from reclassification*

i) This reclassification restricts the usage of natural gas. Based on 2014 NEI data and data from permit on annual potential emissions, emissions dropped 14.14 tpy hexane and 28.61 tpy total HAP. We don't expect emission increases resulting from the reclassification of this source.

30) **UniFirst Corporation, Pontiac, MI**

a) *Status prior to 2018 MM2A Memo*

i) UniFirst is a leading supplier of uniforms, workwear and related products to businesses. At the Pontiac plant, UniFirst uses conventional water-based industrial laundry equipment and methods, e.g., washing machines and natural gas fired dryers, to launder various apparel, mats, mops, and shop towels that it rents to customers. The plant's activities are covered under SIC 7218 - Industrial Launderers.

ii) Facility sent a letter to the EPA in July 2017, requesting non-applicability determination for 40 CFR 63 subpart DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters).
   - Affected unit: A natural gas-fired boiler with a maximum heat input of 10.5 MMBtu/hr

iii) 2017 NEI emissions data for facility
   - Largest single HAP: 0.24 tpy
   - Total HAP: 0.46 tpy

iv) 2014 NEI emissions data for facility
   - Largest single HAP: 0.20 tpy
   - Total HAP: 0.38 tpy

b) *Status post-2018 MM2A Memo*

i) Permit to Install 166-16B issued April 19, 2018. The state voided their ROP on 3/5/2018.

c) *PTI 166-16B limits*

i) Facilitywide HAP limits:
   - Emission limits: emission limits
     *(a)* individual HAP 8.9 tpy based on 12-month rolling period as determined at the end of each calendar month.
     *(b)* aggregate HAP 22.4 tpy based on 12-month rolling period as determined at the end of each calendar month.

- Material limits
  *(a)* The permittee shall process no more than 2,300,000 pounds of soiled shop towels in FGLAUNDRY per year, based on a 12-month rolling time period as determined at the end of each calendar month.

i) EUBOILER 01 limitations
- The permittee shall burn only sweet natural gas in EUBOILER01.
- The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc for Small Industrial-Commercial-Institutional Steam Generating Units as they apply to EUBOILER01. (40 CFR Part 60 Subparts A & Dc)
- The permittee shall record the following for each calendar month:
  - a. The amount of natural gas delivered to the facility during the month
  - b. Based on the ratio of the heat input rating of EUBOILER01 to the heat input rating of all natural gas-burning equipment at the facility, the amount of natural gas combusted attributable to EUBOILER01.

i) The permittee shall record the amount of soiled shop towels processed through FGFACILITY in pounds per calendar month and in pounds per 12-month rolling time period as determined at the end of each calendar month.

ii) The permittee shall keep monthly records for FGFACILITY of individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month. For shop towel laundering, HAP emission factors in Appendix A may be used, or an alternate emission factor approved by the AQD District Supervisor.

d) *General observations from reclassification*

i) Based on the review of the permit, the material limits and the operational restrictions on the boiler we don't expect emission increases resulting from the reclassification of this source.

31) **Citgo Petroleum Corporation, Hillsborough, FL**

a) *Status prior to 2018 MM2A Memo*

i) Major source for VOC

ii) Subject to 40 CFR 63 Subpart R (major source NESHAP for gasoline distribution facilities).
- Standards for
  (a) loading cargo tanks: loading rack emissions at both new and existing facilities to be collected and processed to limit emissions to no more than 10 milligrams total organic compound per liter (mg TOC/liter) of gasoline loaded
  (b) gasoline storage tanks: new and existing facilities requires floating-roof gasoline storage tanks to be equipped with specified types of primary and secondary rim seals. In addition, fixed-roof storage tanks must be equipped with internal floating roofs with specified types of primary seals. Installation

of gaskets on floating roof fittings are required on all new tanks and when installing the specified rim seals on existing internal floating roof tanks.

(c) leaks from equipment as pumps, valves, and connectors: must be controlled by adopting a monthly visual equipment leak detection and repair program.

iii) Subject to 40 CFR 63 Subpart ZZZZ.
- Standards for diesel fuel-fired emergency engine.

iv) Subject to 40 CFR 60 Subparts Kb and XX.

v) 2017 NEI emissions data for facility
- Largest single HAP: 0.39 tpy
- Total HAP: 1.49 tpy

vi) 2014 NEI emissions data for facility
- Largest single HAP: 0.38 tpy
- Total HAP: 1.50 tpy

b) *Status post-2018 MM2A Memo*

i) In July 2018, facility submitted application for a minor source air pollution Federally Enforceable State Operating Permit (FESOP). Permit application requested limits on the facility throughput and corresponding VOC emissions and to classify the source as an area source under CAA section 112.

ii) The Environmental Protection Commission of Hillsborough County distributed a second draft of the minor FESOP package in October 2018, and the applicant published a public notice. No comments on the Second Revised Draft Permit were received from the public or the applicant.

iii) Final FESOP was issued in November 2018.

c) *2018 FESOP Air Permit No. 0570016-019-AF -11/13/18*

i) Establishes throughput limitations and facility-wide VOC PTE limit of 96.1 tpy.
- Loading racks
  (a) Throughput limitations in gallons and max vapor pressure of liquid for gasoline, denatured ethanol and diesel.
  (b) Testing requirements and operational requirements for vapor collection system (vapor combustion unit-VCU)
  (c) Emission standards: Emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline cargo tanks shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded. The maximum combined potential VOC emissions from the two loading racks shall not exceed 47.1 tons for any consecutive 12-month period, which includes fugitive emissions from equipment leaks.
- Tanks
  (a) Throughput limitations in gallons and max vapor pressure
  (b) Tanks design requirements: roof type, seals, controls
  (c) Tanks inspection requirements

ii) Establishes facility-wide HAP PTE limits and reclassifies source as an area source of air pollutants.

- The facility-wide HAP emissions, as defined in Rule 62-210.200, F.A.C., shall be less than 4.4 tons in any consecutive 12-month period for any combination of HAP.
- Because the facility no longer has the potential to emit more than 10 tons per year of hazardous air pollutants (HAP) or 25 tons per year of any combination of HAP, this permit reclassifies the facility as an area source of HAP as requested by the permittee.

i) Facility continues to be subject to 40 CFR 63 Subpart ZZZZ (diesel fuel-fired emergency engine) and to 40 CFR 60 Subparts Kb and XX.

iii) Facility is now subject to 40 CFR 63 Subpart BBBBBB (area source NESHAP: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities)

iv) Since the facility is no longer subject to 40 CFR 63 Subpart R, the VCU is no longer subject to the continuous monitoring requirements specified under 40 CFR 63.425 and 40 CFR 63.427. Therefore, this permit removes the requirement to obtain approval prior to changing the minimum operating temperature of the VCU. The specific conditions of the permit require the facility to maintain a device to monitor the presence of the VCU pilot flame and to automatically prevent truck loading operations at any time that the pilot flame is absent. Specific permit requirements include:

- The presence of the thermal oxidation system (VCU) pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity of the pilot light to indicate the presence of a flame. The heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on or a negative parameter value to indicate that the pilot flame is off.
- The VCU shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.
- The permittee shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used. The VCU shall be operated at all times when emissions are vented to it.
- Permit include a requirement for annual periodic testing in addition to the monitoring of the presence of the pilot flame to ensure that the enclosed combustor is operational when loading operations occur.
- Required: performance test of VCU, annual certification test of storage vessels, leak detection testing (M21), CPMS for VCU.

*d) General observations from reclassification*

i) The permit includes requirement for annual periodic testing in addition to the monitoring of the presence of the pilot flame to ensure that the enclosed combustor is operational when loading operations occur. The annual performance test in conjunction with the monitoring of the presence of the flame act together to ensure operation and

performance.

ii) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same operational design, control technology and practices to reduce emissions as prior to the reclassification, we don't expect emission increases resulting from the reclassification of this source to area source status.

32) **Ross Incineration Services, Grafton, OH**

a) *Status prior to 2018 MM2A Memo*

i) Facility operates a commercial hazardous waste incinerator.

ii) Facility was (and remains) subject to Title V permit P0108010 as of 11/16/2018.

iii) Subject to NESHAP 40 CFR 63 subpart EEE (Hazardous Waste Combustor) and 40 CFR 63 subpart DD (Off-Site Waste Recovery Operations)

iv) Subject to Resource Conservation and Recovery Act (RCRA) regulations and permit requirements.

v) 2017 NEI emissions data for facility

- Largest single HAP: 0.25 tpy
- Total HAP: 1.37 tpy

vi) 2014 NEI emissions data for facility

- Largest single HAP: 0.40 tpy
- Total HAP: 1.33 tpy

b) *Status post-2018 MM2A Memo*

i) Administrative permit modification to decrease allowable HCl emissions below the major source threshold of 10 tons per year because the facility is not major for HAP

- Permit to Install No. P0124980 1/3/2019.
- Their potential to emit was already less than the 10/25 tons per year thresholds but the facility voluntarily took PTE limits below 10/25 for HCl to ensure that they stay below the 10 tons per year threshold.
  (a) Source would no longer be subject to 40 CFR 63, subpart DD applicable requirements for tanks.

c) Facility was issued a Title V renewal to permit P0108010, effective 2/26/2019, which includes the HAP PTE limits (these limits were not explicitly listed in their previous Title V permit renewal issued in 2017).

i) Per Title V permit renewal tanks are insignificant emission units. Title V renewal removed requirements previously applicable to the tanks and including subpart DD.

d) Tanks and equipment leaks continue to be subject to RCRA requirements as specified in RCRA permit (OHD 048 415 665, April 2014).

i) Source must fully comply with all applicable Clean Air Act (CAA) and RCRA permit limits. Where two or more operating limitations apply, the most stringent operating limitations take precedence.

ii) Equipment leaks subject to 40 CFR 264 subpart BB, tanks subject to 40 CFR 264 subpart CC

- You shall control the air emissions from each of the tanks in Tank Farms 1, II, III, and Process Dock in accordance with Tank Level2 control requirements at 40 C.F.R. § 264.1084(d), by venting the tanks through closed vent systems to carbon adsorption units designed and operated to recover the organic vapors vented to them with an efficiency of 95% or greater by weight. The tanks shall be covered by a fixed roof and vented directly through the closed vent system to a control device in accordance with the following requirements specified in 40 C.F.R. §§ 264.1084(g), (k), and (1).

e) *Permit-to-Install P0124980*
   i) Emission Unit- rotary kiln for hazardous waste incinerator (N001) subject to subpart EEE is controlled by a thermal oxidizer. Subpart E emission requirements nor operation of the control technology is not affected by the reclassification of this source.
   ii) Potential HCl emissions are related to the total chlorine and chloride feed rate to the incinerator. The permittee has opted to limit incineration of wastes containing chlorine and chloride and use the voluntary restriction under OAC rule 3745-31-05(F) to ensure HCl emissions do not exceed 10 tons per year.
   iii) Emission limitation: Hydrochloric acid and chlorine gas emissions, expressed as hydrochloric acid equivalents, shall not exceed 10 tons per year.
      - Compliance shall be demonstrated using the following equation and summing the monthly hydrochloric acid equivalents on an annual basis:
         (a) Tons HCl equivalents per month = tons chlorine/chloride fed per month x CPT emission factor
         *(b)* Where: Tons chlorine/chloride fed per month = monthly total chlorine/chloride feed rate in d)(24); and CPT emission factor = emission factor established during the last Comprehensive Performance Test (CPT) that demonstrated compliance in units of mass HCl equivalents per mass chlorine/chloride feed.
   iv) The permittee's potential to emit (PTE) HAP is less than 10/25 as stated in the permittee's Notification of Compliance required pursuant to 40 CFR 63, subpart EEE.
f) *General observations from reclassification*
   i) Source continues to be subject to NESHAP subpart EEE (requirements are the same for both major and area sources). Source continues to be subject to RCRA regulation/permit requirements, including requirements for tanks and equipment leaks. Therefore, we don't expect emissions increases due to reclassification of this source.

33) **TransMontaigne Evansville Terminal, Evansville, IN**
   a) *Status prior to 2018 MM2A Memo*
      i) The Permittee owns and operates a stationary bulk petroleum storage and transfer terminal.
      ii) Subject to 40 CFR 63 Subpart R (major source NESHAP for gasoline distribution facilities).

- Standards for
  (a) loading cargo tanks: loading rack emissions at both new and existing facilities to be collected and processed to limit emissions to no more than 10 milligrams total organic compound per liter (mg TOC/liter) of gasoline loaded
  (b) gasoline storage tanks: new and existing facilities requires floating-roof gasoline storage tanks to be equipped with specified types of primary and secondary rim seals. In addition, fixed-roof storage tanks must be equipped with internal floating roofs with specified types of primary seals. Installation of gaskets on floating roof fittings are required on all new tanks and when installing the specified rim seals on existing internal floating roof tanks.
  (c) leaks from equipment as pumps, valves, and connectors: must be controlled by adopting a monthly visual equipment leak detection and repair program.

iii) Subject to 40 CFR 60 subpart Kb (tanks), and subpart XX (loading racks vapor flare and vapor combustor).

iv) No HAP emissions data for facility available in 2014 or 2017 NEI.
- Facility operating but not reporting.

b) *Status post-2018 MM2A Memo*

i) On March 2017 source submitted application to IDEM to renew its operating permit.

ii) Final Federally Enforceable State Operating Permit (FESOP) permit was issued on April 6, 2018
- Compliance with these limits, combined with the potential to emit VOC and HAP from all other emissions units at the source, shall limit the source-wide total potential to emit VOC to less than 100 tons per twelve (12) consecutive month period, the source-wide total potential to emit each single HAP and total HAP emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, and render the requirements of 326 IAC 2-7 (Part 70 Operating Permit) not applicable, and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

c) *FESOP Renewal No 163-38296-00063 -04/16/18*

i) FESOP renewal includes limits to make the source an area source of HAP.
- The requirements of National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 63, Subpart R, which is incorporated by reference as 326 IAC 20-10, are not included in the permit for the north tank truck loading rack (L-25) and south tank truck loading rack (L-26) because the source is not a major source of HAP emissions.
- This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, 40 CFR 63, Subpart BBBBBB. The source is an area source gasoline distribution terminal that is not subject to the control requirements of 40 CFR part 63, subpart R. The emission sources to which this subpart applies are gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, and equipment components in

vapor or liquid gasoline service that meet the criteria specified in Tables 1 through 3 to this subpart.

- Permit emission analysis:
  (a) Unrestricted worst-case PTE total HAP 86.76 tpy and n-hexane 27.06.
    (i) Main emission point is truck loading racks (L-25 and L-26)- 84.77 tpy total HAP (26.08 tpy n-hexane)
  (b) After issuance of FESOP renewal total PTE of entire source 24 tpy total HAP and 9.5 for largest single HAP (n-Hexane).
    (i) truck loading racks emissions after limits in permit 22.01 tpy total HAP

ii) Overall Source HAP Limits

- The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period;
- The potential to emit any combination of HAP from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- To render the source an area source for HAP, the Permittee shall comply with the following:
  (a) The total benzene emissions from the vapor combustion systems C-1 and C-2 shall not exceed 9.27 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
  (b) The total n-hexane emissions from the vapor combustion systems C-1 and C-2 shall not exceed 8.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
  (c) The total toluene emissions from the vapor combustion systems C-1 and C-2 shall not exceed 9.15 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
  (d) The total 2,2,4-trimethylpentane (iso-octane) emissions from the vapor combustion systems C-1 and C-2 shall not exceed 9.29 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
  (e) The total combined HAP emissions from loading racks L-25 and L-26 shall not exceed 22.01 tons per twelve (12) consecutive month period, with compliance determined at the end of each month,

iii) Permittee shall comply with the following

- The vapor flare (C-1) controlling VOC emissions from the north tank truck loading rack, identified as L-25, shall be in operation at all times when loading rack L-25 is loading gasoline into transports.
- (b) The vapor combustor (C-2) controlling VOC emissions from the south tank truck loading rack, identified as L-26, shall be in operation at all times when loading rack L-26 is loading gasoline into transports.

iv) Compliance formula (calculation) provided in permit - based on monthly gasoline throughput and HAP emission factors in permit or values determined in the latest compliant stack text.
- Permit requires testing for specific HAP associated with the vapor combustor.

v) Monitoring for vapor flare system and vapor combustor, include monitoring of pilot flame using a thermocouple or equivalent device when loading rack is in operation.

vi) Subject to 40 CFR 63 subpart BBBBBB – Area Source Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline facilities. Applicable when tanks store gasoline and for fugitive emissions from roof landings and maintenance.

d) *General observations from reclassification*

i) Tanks and transfer racks are now subject to subpart BBBBBB (regulates emissions from tanks, transfer racks, roof landings and maintenance, including minimum monthly AVO monitoring and leak repair). Main HAP emission points (transfer racks) continue to be controlled (transfer racks L-25 by a vapor flare and L-26 by a vapor combustor). Source continues to be subject to 40 CFR 60 subparts Kb and XX. The flare operating, and monitoring requirements required by 40 CFR 60 subpart XX are essentially equivalent to those from subpart R. Therefore, we don't expect emissions increases due to reclassification of this source.

34) **Mississippi Lime Company, Verona, KY**

a) *Status prior to 2018 MM2A Memo*

i) Mississippi Lime Company (MS Lime) was initially authorized to construct two kilns. Potential emissions of hydrochloric acid (HCl) were calculated to exceed 10 tpy, making the facility a major source of HAP.

ii) Subject to 40 CFR 63 subpart AAAAA (Lime Manufacturing Plants).
- Regulates PM as a surrogate for non-volatile and semi volatile metal HAP.
- Compliance strategy use of a baghouse, opacity and use of COMs

iii) Subject to area source Subpart ZZZZ (RICE) for diesel fired emergency generator

iv) 2017 NEI emissions data for facility:
- Largest single HAP: 6.20 tpy
- Total HAP 6.21 tpy

v) 2014 NEI emissions data for facility:
- Largest single HAP: 6.19 tpy
- Total HAP 6.20 tpy

b) *Status post-2018 MM2A Memo*

i) On February 23, 2018, MS Lime submitted an application to revise their current Title V operating permit. MS Lime now only has one kiln and does not have the authority to construct another kiln in the permit. Stack test for HCl submitted established the potential emissions are below 10 tpy. Therefore, the Kentucky Division of Air Quality concluded that the facility should be designated an area source of HAP and 40 CFR 63, Subpart AAAAA should be removed from the permit.

c) *Air Quality Permit V-15-027 R1*

i) Draft revision dated 4/11/2018; Final permit issued on 12/27/2018.

ii) To preclude applicability requirements of 40 CFR 63, Subpart AAAAA, MS Lime took PTE limits not to exceed the following for any consecutive 12-month period:
- Any single HAP emissions shall not exceed 9 tpy;
- Combined HAP emissions shall not exceed 22.5 tpy.
- Compliance shall be determined by calculating and recording monthly emission rates and rolling 12-month total emissions of each individual HAP and total HAP.
- Actual emission rate for HCl is calculated using the following equation:
- Monthly Emission Rate = [Monthly Processing Rate x HCl Emission Factor]
- A report of the consecutive 12-month totals of HAP emissions for each HAP and combined HAP from all emission points in Section B and C of the permit shall be maintained onsite.

iii) Source still subject to other regulatory requirements including PM emission limitations, use of baghouse, monitor opacity as an operating limit with operation of continuous opacity monitoring system (COMS), all of which are equivalent to Subpart AAAAA.

iv) Source is also subject to 401 KAR 63:020, Potentially hazardous matter or toxic substances
- This regulation is applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances, provided such emissions are not elsewhere subject to provisions of an administrative regulation of the Division for Air Quality. [State-Origin Requirement] Emission units subject to this regulation shall not emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants.
- This regulation applies to Process 06 – Lime Kiln

b) *General observations from reclassification*

Facility was already only operating one kiln without HAP-specific operating limits and with equivalent control technology, opacity, and PM COMS, and it cannot operate a second kiln without re-permitting and without exceeding its new PTE limits. Source still subject to other regulatory requirements including PM emission limitations, use of baghouse, monitor opacity as an operating limit with operation of continuous opacity monitoring system (COMS). We don’t expect emission increases resulting from the reclassification of this facility.

## Appendix B: List of Permit Documents Reviewed After Proposal and Permit Summaries[16]

| Facility Name | Permit Documents Reviewed |
|---|---|
| **Coatings** | |
| 1) Arlwin Manufacturing, KS | Class I Operating Permit, 4/2008 (renewed 2012 and 2016)<br>Class II Operating Permit - Permit-by-Rule (PBR) Tracking No. OPO000169v1.0, 11/2018 |
| 2) A.S.A. Mfg, Inc., FL | Title V Air Operation Permit No. 0830104-008-AV effective 01/28/2015<br>General Permit authorization 0830104-009-AG (with permit by rule 62-210.310 F.A.C.), 06/20/2019 |
| 3) Crawford Kitchens, GA | Air Quality-Part 70 Operating Permit, No 2434-073-0029-V-03-0; 05/15/2017<br>Air Quality Permit, No 2434-073-0029-R-04-0; 06/19/2018 and Statement of Basis (SOB) |
| 4) Dubois Wood Products, Inc., IN | Title V-Renewal 037-36645-00023, 10/10/2017<br>Federally Enforceable State Operating Permit (FESOP) No. 037-40000-00023, 08/14/2018 |
| 5) Emerald Transformer Kansas LLC, KS | Class I Operating Permit O-12192, renewed 07/14/2017<br>Construction Approval C-14138, 01/2018 (modified 10/2019) |
| 6) General Engines Company, FL | Title V Permit (no. 1050432-006-AV) renewed 05/07/2016<br>State of Florida minor air construction permit package 1050432-007-AC, 08/14/2019. |
| 7) Gulf Stream Coach, Inc, IN | Part 70 Operating Permit Renewal Permit No. 039-32537-00145 (2008)<br>Minor Source Operating Permit Permit No. 039-32537-00145, 11/21/2018 |
| 8) Icon Identity Solutions, IL | Title V Permit No.: 98080019, renewed 05/17/2016<br>FESOP No. 98080019, 10/31/2018 |

[16] These documents can be found in the docket MM2A Docket No. EPA–HQ–OAR–2019–0282.

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|---|---|
| 9) Kimball International-Jasper, IN | Part 70 Operating Permit Renewal, Title V Significant Source Mod. 037-38130-00100, 05/09/2017<br>Part 70 Operating Permit Renewal Title V Significant Permit Mod. 037-40179-00100, 11/02/2018 |
| 10) Lowen Corporation | Class II Operating Permit - Permit-by-Rule OP2PBR00336v1.0 |
| 11) MACtac, IN | Title V Permit Number: 005-37853-00087, renewed 06/19/2017<br>Title V Significant Source Modification (Minor PSD) Permit Number: 005-40497-00087, 12/06/2018 |
| 12) Moly Manufacturing, LLC | Class I Operating Permit O-10925, 10/20/2015<br>Class II Operating Permit - Permit-by-Rule (PBR) 00339v1.0, 02/17/2020 |
| 13) National Office Furniture-Jasper, IN | Title V Permit Number: 037-36570-00048, 02/03/2016<br>FESOP Permit Number: 037-39499-00048, 07/09/2018 |
| 14) Neenah Paper Michigan, MI | Renewable Operating Permit (ROP) Permit Number: MI-ROP-B1470-2013, 01/07/2013<br>Renewable Operating Permit (ROP) Permit Number: MI-ROP-B1470-2019a, 03/12/2019 |
| 15) Norbord Industries, MS | Title V Permit (no. 1540-00058), issued 9/19/2016, modified 03/28/2019 |
| 16) Patrick Industries, Inc, (aka Middlebury Hardwood Products), IN | Part 70 Operating Permit Renewal No. T039-34196-00245, 02/09/2015<br>Post-classification significant modification to 039-34196-00245, 09/06/2018. |
| 17) Precision Coatings, Inc., MI | Renewable Operating Permit (ROP) Permit Number: MI-ROP-A5496-2014, 09/02/2014<br>Permit to Install 154-18, 01/29/2019 |
| 18) Robert Weed Plywood Corporation, IN | FESOP Permit F039-39418-00178, 07/06/2016<br>Permit 039-39418-00178, 03/21/2018 |

| | |
|---|---|
| 19) Stamas Yacht, FL | Title V Air Operation Permit Renewal No. 1030226-008-AV, 01/04/2014<br>FESOP Permit 1030226-010-AF, 08/22/2018 |
| 20) Tampa Fiberglass, FL | Title V Air Operation Permit Renewal No. 0570472-008-AV, 04/14/2014<br>General Permit 0570472-010-AG, 09/30/2018 |
| 21) Tasman Leather, ME | Part 70 Air License A-252-70-C-R/M, 03/06/2015<br>"Minor modification" to Condition 29 in License A-252-70-C-R/M, 10/2019 |
| 22) The Woodworks Architectural Millwork, Inc, NH | Title V renewal to permit TV-059, 10/06/2015<br>Temporary Permit (TP-0245, 08/28/2019 |
| 23) Valeo North America Inc., IN | Title V Operating Permit Renewal (Permit # 071-37124-00006), 04/11/2017<br>Title V Significant Permit Modification (Permit # 071-39106-00006), 01/31/2018 |
| 24) Wayne Metals, LCC, IN | Title V renewal permit No T179-32584-00016 and SOB, 05/20/2013<br>Minor Source Operating Permit No M179-38963-00016 and SOB, 05/18/2018 |
| **Chemicals** | |
| 25) Gage Products, MI | Renewable Operating Permit MI-ROP-N0842-2013, Permit to Install MI-PTI-N0842-2013 (2013)<br>Permit to Install PTI 64-18B, 05/2019 |
| 26) Holcim USA, Inc., MS | Title V Permit (no. 1680-00025), 12/29/2004<br>Air Synthetic Minor Operating (No.: 1680-00025), 10/21/2019. |
| 27) Kinder Morgan Liquids Terminals-Argo, IL | CAA Permit Program 95120128, 11/2017<br>CAA Permit Program 95120128, 03/2019 |
| 28) Newport Biodiesel, RI | |
| 29) South Bend Ethanol, LLC, IN | Part 70 Operating Permit Renewal (No. T141-32025-00033), 10/03/2013<br>Post-classification revision (same permit number), 11/02/2018 |

| | |
|---|---|
| 30) Stericycle Environmental Solutions Inc., MI | ROP No. MI-ROP_N0737-2009 and PTI No. MI-PTI-N0731-2009 (2009)<br>Permit to Install (PTI) No. 6-19, 06/2019 |
| 31) Valero Renewable Fuels Company, IN | Title V – Operating Permit Number 129-39437-00051, 09/25/2013 (modified 01/26/2018). Modified removing subpart FFFF requirements 11/16/2018 |
| 32) World Energy Natchez, MS | Title V permit (permit no. 0040-00005), issued 2003 (modified 2015 and 2016)<br>Synthetic minor operating permit (SMOP) No. 0040-00005, 04/02/2019 |
| **Fuel Combustion/Boilers** | |
| 33) Cook Property Inc, IN | 105-38053-00003, 02/2017 Operating to Registration<br>105-39357-00003, 05/2018 Registration Admin Amendment |
| 34) Empire District Electric Company – Riverton, KS | PSD construction permit C-13534, 09/27/2016<br>Applications for Significant Modification received 10/29/2019 and 01/27/2020 |
| **Heavy Industry** | |
| 35) Innocor Foam Technologies, MS | Title V Permit 1540-00046 2015, 09/25/2015<br>State of MS and FE APC Permit No. 1540-00046 2019, 01/18/2019 |

**Permit Summaries for 35 Additional Reclassification Actions Reviewed After Proposal**

**1) Arlwin Manufacturing, KS**

a. *Status prior to 2018 MM2A Memo*

i) Facility manufactures fiberglass components parts for recreational vehicles.

ii) Facility has been operating under a Class I Operating Permit issued April 30, 2007, renewed in 2012 and 2016.

iii. Source was subject to 40 CFR 63 subpart WWWW (Reinforced Plastic Composites Productions). Compliance method was the use of compliant materials.

iv)2017 NEI emissions for facility (total/single largest HAP): 3.94 tpy; 2.94 tpy

b. *Status post-2018 MM2A Memo*

i) In September 2018, the facility submitted a request to Kansas Department of Health and Environment (KSDHE) for the termination of the Class I Operating Permit and to

move forward with an operating permit under a Class II Permit-by-Rule for sources with actual emissions less than 50% of major source thresholds.

ii) KSDHE authorized the permit-by-rule, Class II Operating Permit, in November 2018. Operating in accordance with the provisions of the permit-by-rule will limit actual emissions to less than 50 percent of the major source thresholds.

c. *Reclassification Details*

i. Permit-by-Rule Limitation Requirements: limit actual emissions from the facility to less than 50 percent of the major source thresholds during each consecutive 12-month period.

- Individual HAP limited- Styrene – less than 10 tpy
- Combined HAP –source is not required to limit actual emissions of combined HAP because PTE of these pollutants is below the major source thresholds.

ii. Recordkeeping requirements: The owner or operator shall maintain records on-site demonstrating that actual emissions have not exceeded 50 percent of the major source thresholds during each consecutive 12-month period. Each record shall be updated monthly, no later than the last day of the month following the month to which the record relates. Each record shall be kept on-site for a minimum of two (2) years from the date of the
record.

iii. Reporting requirements: shall submit to KDHE all operating or relevant information to estimate actual air emissions from the source during the preceding calendar year. This compliance demonstration is to be a summary of the monthly records of the facility's actual emissions.

d. *General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant materials (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

**2) A.S.A. Manufacturing, Inc., Dunnellon, FL**

a. *Status prior to 2018 MM2A Memo*

i. A.S.A. Mfg, Inc. is a manufacturer of fiberglass sumps, tanks, waterstop fittings and gutter systems for the aquatics industries. The sumps are manufactured in a three-sided booth within the building. Gelcoat and resin are applied to molds using chop gun spray application. A.S.A. uses a non-atomized chop gun and gelcoat spray gun for reduced emissions. Waterstops are manufactured in the open shop area using a hand lay-up process with rollers. Tanks are made using a combination of hand lay-up and gelcoat spray. All emissions exhaust out of the building through two roll up doors, two exhaust fans, two roof mounted fans and ceiling vents on the roof. Sumps, Acetone is used for chop gun flushing and cleaning of tool

ii. The state issued Title V Air Operation Permit No. 0830104-008-AV effective January 28, 2015.

- Based on the initial Title V air construction permit, 0830104-003-AC, this facility is a major source of hazardous air pollutants (HAP) for styrene.
- The facility is classified as a Title V facility.
- The facility is subject to NESHAP regulations, 40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

iii. Construction Permit No. 0830104-003-AC Potential to Emit (PTE) Parameters

- Hours of Operation. This emission unit may operate 7,488 hours/year.
- Operation Requirements. The permittee shall comply with the following:
  (a) The two axial flow exhaust fans in the three-sided booth shall have no device that restricts the exhaust exiting the stacks, i.e., rain cap.
  (b) The wall mounted exhaust fans located on both ends of the manufacturing/shop building shall have no device that restricts the exhaust exiting the stack, i.e., rain cap.
  (c) The intake of each exhaust fan shall not be obstructed, except for fiber filters that are used to control particulate emissions.
  (d) An exhaust fan shall be operating during any time materials containing VOCs and/or Styrene is being used in the section (area of the building) being exhausted by that fan. The fan shall remain operating for at least 1 hour after usage of such materials.
- VOC Recordkeeping. The permittee shall maintain a monthly log at the facility. The logs shall be based on deliveries. The log at a minimum shall contain the following:
  (a) Facility Name, Facility ID No. (i.e. 0830104), Emission Unit No. and description;
  (b) Month and year of record;
  (c) Identification and quantity of each resin, solvent, chemical, etc. delivered to the facility that month which contains Styrene and/or VOCs;
  (d) The appropriate emission factor(s) with the application method(s) used.
    (i) Styrene and Methyl Methacrylate (MMA) emissions shall be determined by using the emission factor (EF) in the attached Unified Emission Factor for Open Molding of Composites (UEF) Table (Appendix G) and the following formula:

        Styrene or MMA Emissions (tons) = [(% tons of resin or gel coat) x (EF / 2000 lbs/ton)]

    (ii) VOC and HAP emissions, other than Styrene and MMA, shall be determined by a mass balance method, or appropriate emission factors. When applicable, the emission factor used shall be documented appropriately. If the permittee seeks emission credits for removed chemicals, the documentation for all chemicals removed from the facility for recycling or disposal shall be attached to the log.

(e) The tons of each individual HAP emissions for the month of record and for the most recent consecutive 12-month period;
(f) The tons of total HAP emissions for the month of record and for the most recent consecutive 12-month period;
(g) The tons of VOC (including Styrene) emissions for the month of record and for the most recent consecutive 12-month period

iv. HAP Emissions Limit (total/single largest HAP, identified): 35.8 tpy/34.1 tpy, Styrene

v. History of actual emissions (tpy)
- 2018 – total HAP 3.663 tons; styrene oxide 3.466 tons
- 2017 – total HAP 3.704 tons; styrene oxide 3.508 tons (NEI: 3.51/3.51)
- 2016 – total HAP 4.045 tons; styrene oxide 3.821 tons

b. *Status post-2018 MM2A Memo*

i. On May 29, 2019, A.S.A. submitted a request to surrender the Title V permit (0830104-008-AV) since the facility has determined that the current operations at their facility meet the criteria of Rule 62-210.310(4)(d) 2., F.A.C., Air General Permit for Reinforced Polyester Resin Operations (see below).
- The source discontinued a product line allowing it to meet the applicability of the Air General Permit of maximum usage of 38 tons (76,000 lbs) of resin and gelcoat combined annually.

ii. The state set the effective date for General Permit authorization 0830104-009-AG as June 29, 2019. The state also changed the expiration date of the above referenced Title V permit to June 28, 2019. In its notice, the Department wrote that they will consider the above-noted action final unless a timely petition for an administrative hearing was filed within 14 days.

c. *Reclassification Details – Air General Permit*

i. Rule 62-210.310(2)(a) includes eligibility requirements and the following emission limits: "The facility as a whole, including any emissions units or pollutant-emitting activities that are exempt from air permitting and any units or activities that are authorized under another air general permit, shall not emit nor have the potential to emit ten (10) tons per year or more of any hazardous air pollutant, twenty-five (25) tons per year or more of any combination of hazardous air pollutants, or one hundred (100) tons per year or more of any other regulated air pollutant."

ii. Air General Permit for Facilities Comprising Reinforced Polyester Resin Operations
- A facility comprising one or more reinforced polyester resin operations shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C., and the following specific criteria.
(a) The facility shall use no other air general permit.
(b) The facility shall not be subject to any unit-specific limitation or requirement other than any such limitation or requirement set forth in this air general permit.
(c) The combined quantity of styrene-containing resin and gelcoat used shall not exceed 76,000 pounds (38 tons) in any consecutive twelve (12) months.

(d) The owner or operator shall maintain records to document the quantity of resin and gelcoat used on a monthly basis. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years.

iii. Facility estimated styrene-containing resin and gelcoat material usage: 75,000 lbs (37.5 tons)

d. *General Observations from Reclassification* –

i. Based on the review of the reclassification documents, the source discontinued a product line allowing it to meet the applicability of the Air General Permit, HAP emission limits are lower post-reclassification than pre-reclassification. MRR requirements continue to track and record resin use and calculate emissions on a rolling 12-month basis. We don't expect emission increases resulting from the reclassification of this source to area source status.

**3) Crawford Kitchens Inc., Martinez, GA**

a. *Status prior to 2018 MM2A Memo*

ii. Crawford Kitchens Inc. was issued an Air Quality – Part 70 Operating Permit (major source) on May 15, 2017 (Permit No. 2434-073-0029-V-03-0).

iii. The facility manufactures wood cabinets and laminate countertops.

iv. Facility had emission cap for VOC emissions

*1.* Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility volatile organic compound (VOC) emissions in an amount equal to or exceeding 100 tons during any consecutive 12-month period.

v. SIP Rule standard for PM emissions from the Spray Booths. PM emissions were controlled using exhaust filters.

vi. Facility was subject to 40 CFR 63, Subpart JJ (NESHAP for Wood Furniture Manufacturing Operations) for emissions volatile HAP (VHAP) from four Spray Booths, one Countertop Shop, and one Wood Cabinet Shop.

*1.* Compliance with emission limits by using compliant materials (coatings, thinners, finishing materials and foam or other adhesives) following criteria in permit.

*2.* Conventional air spray guns were only allowed if all emissions from the station routed to a functioning control device.

vii. Other requirements: Filter changes were required within 24 hours of pressure drop exceeding manufacturer's recommendation.

*1.* Pressure drop across each spray booth filter required to be recorded at least once for each day or portion of each day of operation.

viii. 2017 NEI emissions (facility AIRS is 04-13-073-00029): n/a

b. *Status post-2018 MM2A Memo*

i. The facility submitted an application for a Permit By Rule on May 22, 2018

ii. Air Quality Permit (No. 2434-073-0029-R-04-0) was issued on June 19, 2018. for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

iii. Per permit SOB, no Public Advisory was needed.

c. *Air Quality Permit* No. 2434-073-0029-R-04-0 (SIP permit)

i. Limits allowable emissions for VOC and HAP

1. The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility VOC emissions in an amount equal to or exceeding 50 tons during any consecutive 12-month period.
2. The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility any single hazardous air pollutant which is listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons during any twelve consecutive months, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any twelve consecutive months.

ii. MRR

1. The Permittee shall maintain monthly usage records of all HAP-containing materials used from the entire facility. These records shall include the total weight of each material used and the HAP content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the HAP content of waste materials from the HAP emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the HAP content of the containerized waste material, and documentation of the method for determining the HAP content of the waste material.
2. The Permittee shall use the required records to determine the total monthly emissions of combined hazardous air pollutants and the total monthly emissions of each listed hazardous air pollutant from the entire facility. All demonstration calculations, including any Division-approved emission factor, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in the permit. The Permittee shall notify the Division in writing if emissions of any individual hazardous air pollutant exceed 0.83 tons from the entire facility, or if emissions of all listed hazardous air pollutants combined exceed 2.08 tons from the entire facility, during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit.

iii. Spray booths and wood working operations continue to be subject to opacity limits.

iv. Paint booth filters must be replaced at least once per week while booths are in operation

v. Performance tests must be conducted when directed by the state.

vi. Permit SOB states that facilitywide PTE are decreasing with this modification, the state determined that a detailed Toxic Impact Assessment was not needed.

d. *General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and enforceable emission limitations taken by

the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

**4) Dubois Wood Products, Huntingburg, IN**

a. *Status prior to 2018 MM2A Memo*

i. Dubois Wood Products is a stationary wood components and furniture manufacturing.

ii. Facility was classified as a major source and was operating under Title V permit No. 037-36645-00023.

iii. The facility was subject to 40 CFR 63, subpart JJ (NESHAP for Wood Furniture Manufacturing Operations)

- Emission units: 1 coating line consisting of 14 Spray Booths and Dip Tank
- Method of compliance: compliant coatings

iv. Facility removed all wood-fired boilers.

v. Woodworking shops are equipped with integral baghouses.

vi. Spray booths and dip tank are equipped with particulate filters.

vii. In its 2017 permit renewal, facility revised emission calculations to reflect a reduced throughput in the wood working shops, and the restructuring of the coating lines, including the replacement of coatings with lower VOC and HAP emitting products.

viii. Unrestricted PTE:

- VOC: 283.56 tpy
- Worst single HAP: 59.60 tpy (Xylene)
- Total HAP PTE: 72.59 tpy

ix. 2017 NEI emissions for facility (total/single largest HAP): 0.0004 tpy; 0.0003 tpy

b. *Status post-2018 MM2A Memo*

i. In May 2018, facility submitted an application to transition their Part 71 Operating Permit Renewal to a Federally Enforceable State Operating Permit (FESOP) by limiting the emissions of VOC and HAP.

ii. IDEM issued a FESOP No. 037-40000-00023 in August 2018.

c. *2018 FESOP*

i. PTE limitations

a. The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, to the surface coating operations (Plant 1, Line 1), consisting of fourteen (14) spray booths and one (1) dip tank, shall not exceed 84.89 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

b. The total input of any single HAP, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations (Plant 1, Line 1), consisting of fourteen (14) spray booths and one (1) dip tank, shall not exceed 9.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

c. The total input of combined HAP, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations (Plant 1, Line 1), consisting of fourteen (14) spray booths and one (1) dip tank, shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

d. Compliance with the HAP limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the sourcewide emissions of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and the source-wide emissions of total HAP to less than twenty-five (25) tons per 12 consecutive month period and shall render the source an area source of HAP and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

ii. Recordkeeping and Reporting Requirements

a. To document the compliance status of VOC and HAP input monthly records must be maintained:

- The VOC and HAP content of each coating material and solvent used.
- The amount of coating material and solvent less water used in a monthly basis.
  Records must include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  Solvent usage records must differentiate between those added to coatings and those used as cleanup solvents.
- The cleanup solvent usage for each month.
- The total VOC and total single and combined HAP input for each month
- The total VOC and total single and combined HAP input for each compliance period.

b. Quarterly summaries of information to document the compliance status are submitted.

iii. FESOP removes applicability of 40 CFR 63, subpart JJ.

iv. PTE after issuance of FESOP

- VOC: 95.00 tpy
- Worst single HAP: 9.50 tpy (Xylene)
- Total HAP PTE: 24.50 tpy

d. *General Observations from Reclassification*

i. Based on the review of the reclassification documents, facility removed all wood-fired boilers, reduced throughput in the wood working shops, restructured the coating lines including the replacement of coatings with lower VOC and HAP content. In addition to reclassify source took enforceable emission limitations reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP). We don't expect emission increases resulting from the reclassification of this source to area source status.

**5) Emerald Transformer Kansas LLC, Coffeyville, KS**

a. *Status prior to 2018 MM2A Memo*
   i. Emerald Transformer Kansas LLC (Emerald) operates a Polychlorinated Biphenyl (PCB) commercial storage and disposal facility.
   ii. Before reclassifying, Emerald operated under Class I Operating Permit O-12192, most recently renewed on July 14, 2017. At the time this permit was issued, the site was considered a major source of HAP. However, Emerald switched to a non-HAP solvent in its vapor degreasers in 2010, and the facility no longer used perchloroethylene (PERC). Thus, as of 2010, the plantwide PTE for HAP was below the MST, although the source remained subject to the major source NESHAP.
   iii. In 2018, the source received a construction approval (C-14138) to install a new refurbishing operation, which included an infrared drying oven, a sanding booth, and one spray paint booth.
   iv. Subject to major source Boiler NESHAP (40 CFR Part 63 Subpart DDDDD) and, starting in 2018, the Surface Coating NESHAP (Subpart MMMM).
   v. The Class I Operating Permit O-12192 also lists that the facility is subject to the NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63 Subpart T) and the NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63 Subpart DD). However, due to the 2010 changes in operation, the facility no longer operated the affected sources under these two NESHAP.
   vi. 2017 NEI emissions for facility (total/single largest HAP): 0.0118 tpy/0.0118 tpy

b. *Status post-2018 MM2A Memo*
   i. On December 26, 2018, Emerald submitted an application to alter the Construction Approval C-14138 to reclassify as an area source of HAP because the changes in operation (facility no longer using PERC).
   ii. In addition, the source requested to change the paint used for the paint booth from water-based to solvent-based paints. To remain an area source, the source requested PTE limitations below major source thresholds.
   iii. Uncontrolled HAP estimates: 28.11 tpy of xylene, 39.09 tpy combined HAP. Permit limits: 9.7 tpy single HAP, 24.9 tpy combined HAP.
   iv. On October 9, 2019, the Kansas Department of Health and Environment (KHDE) issued a modified construction permit that approved these requests and reclassified the facility as an area source.

c. *Reclassification Details*
   i. Federally enforceable operation restrictions to reduce PTE to below the MST.
   ii. Permit limits: 9.7 tpy single HAP, 24.9 tpy combined HAP.
   iii. MRR requirements:
      - Emerald is required to
         a. Maintain monthly records of the raw material usage for any process that involves the use of surface coatings, paint thinners, or other solvents (called Type I processes) for any raw materials containing HAP.
         b. Maintain records of the HAP content and density of each Type I raw material used.

c. Maintain monthly records of the amount of material processed/run time for any non-Type I HAP-emitting processes.
d. Maintain records of the emission factors used and how the emission factors were determined for each non-Type I HAP-emitting process.
e. Maintain a log of the HAP emissions (in order to demonstrate compliance with air emission limitations in Section V.B. of this permit) during each consecutive 12-month period.

- These records are to be updated monthly and retained for at least 5 years.
- Emerald is required to submit records of individual and combined HAP emissions during each consecutive 12-month period to KDHE.
- If, at the end of any calendar quarter, the facility's actual emissions exceed 85% of the quarterly MSTs for the past four calendar quarters, including the most recently completed calendar quarter, Emerald is required to report the actual emissions to KDHE. They also must report any exceedances.

d. *General Observations from Reclassification*

i. The source requested the process change from water-based surface coatings to solvent-based surface coatings at the same time as their request to reclassify, and KDHE granted both in the same permit modification. Based on the PTE using the HAP-based coatings, EPA's analysis shows that there is no compliance method that the source could have used to meet the subpart MMMM new-source requirements of 1.9 pounds of organic HAP per gallon of coating solids, as the new HAP-based coatings have HAP ranging from just over 9 pounds of HAP per gallon of solids to almost 11 pounds of HAP per gallon of solids. Thus, reclassifying could result in a HAP emissions increase above what would have been allowed if the source was still subject to subpart MMMM and complying using a no-HAP solvent formulation. Based on the new PTE, the source has a potential increase in HAP of 4.3 tpy xylene and/or 18.75 tpy of total HAP.

**6) General Engines Company, Inc., Lake Wales, FL**

a. *Status prior to 2018 MM2A Memo*

ii. Facility manufactures construction equipment trailers. The permitted sources at this facility include surface coating, sandblasting, and various reciprocating internal combustion engines.

iii. The state renewed the facility's Title V permit in 2016. As noted in the permit, the facility at that time was not a major source of HAP, but previous records indicated that the facility's individual and total HAP emissions had exceeded their respective major source thresholds in the past, so was still considered a major source.

iv. Surface Coating Operation (EU No. 001)

1. Coating done indoors in two spray paint booths: one booth is utilized for large and one for medium and small trailers. Particulate matter emissions are controlled with fabric filters. The surface coatings are applied utilizing airless spray guns.
2. No hourly operation restrictions on EU No. 001

3. Subject to the applicable requirements of 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products using compliant coatings.
4. HAP Monthly Records
    a. The quantity (gallons) and HAP content (lbs/gal) of each HAP-containing material (surface coatings and solvents) used for the month.
    b. The calculated monthly HAP emissions for each individual HAP, in tons.
    c. The calculated monthly HAP emissions for total HAP, in tons.
    d. A cumulative total of the HAP emissions for each individual HAP for the most recent consecutive 12-month period, in tons.
    e. A cumulative total of the HAP emissions for total HAP for the most recent consecutive 12-month period, in tons.
5. Semiannual NESHAP MMMM compliance report required with monthly log of organic HAP emissions, including
    a. The calculation of the total mass of organic HAP emissions for the month. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials minus the organic HAP in waste materials.
    b. The calculation of the total volume of coating solids used each month.
    c. The calculation of the 12-month organic HAP emission rate using equations listed in §63.3951.

v. The existing compression ignition engine at an area source of HAP included in this emissions unit is subject to the applicable requirements contained in 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
    1. Limited to 50 hours per year to be considered emergency stationary RICE
    2. Feed rates of various HAP constituents restricted on a 12-hour rolling average basis (rates matching those in subpart EEE HWC MACT)
    3. Vapor recovery systems recover organic vapors at 95% efficiency or greater (as per part 61 subpart V)

vi. Unrestricted HAP PTE (total/single largest HAP, identified): 24 tpy/9.9 tpy

vii. 2017 NEI emissions for facility (total/single largest HAP): 1.34 tpy/0.84 tpy

b. *Status post-2018 MM2A Memo*

i. State distributed a draft minor air construction permit package 1050432-007-AC on July 24, 2019. The applicant published the Public Notice in the Polk News Sun on July 31, 2019. The Department received the proof of publication on August 5, 2019. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received. No comments on the Draft Permit were received from the public, the EPA Region 4 Office or the applicant. The final action of the Department was to issue the permit as drafted on August 14, 2019.

c. *Reclassification Details*

i. PTE limitations
    a. For EU No. 001, this construction permit:

- revises the emissions limit for VOCs from 33.0 to 30.0 tons per year
- revises emissions limit for total HAP from 24.0 to 9.0 tons per year
- eliminates the Individual HAP emissions limit
- removes all 40 CFR 63 Subpart MMMM requirements from the permit.
- No hourly operation restrictions on EU No. 001—same as before reclassification

b. For EU No. 003, this construction permit will change the status of the Existing Emergency Stationary CI RICE Engine from a regulated emissions unit to an exempt emissions unit based on Categorical Exemption 62-210.300(3)(a)35, F.A.C.
c. Compliance demonstration: MRR to verify HAP quantity/content. Same as before reclassification
d. Recordkeeping, reporting requirements are the same as before reclassification
e. State Observations: "The facility is a natural minor source of air pollution."

d. *General Observations from Reclassification*

v) Based on the review of the reclassification documents, unrestricted PTE for HAP was below major source thresholds before reclassification, but source continued to be subject to subpart MMMM because OIAI. For subpart MMMM the source complied with the use of compliant coatings. For reclassification source took an enforceable limit for total HAP of 9 tpy and continues to use compliant coatings, we don't expect emission increases resulting from the reclassification of this source to area source status.

**7) Gulf Stream Coach, Inc, IN**

a. *Status prior to 2018 MM2A Memo*

i. Facility is permitted to assemble motor homes, buses, vans, pick-up truck, fifth wheels and trailers in four segments determined for be one source.
ii. The source was issued a Part 70 Operating Permit in 2008 (T039-23289-00145).
iii. Stationary source consists of two laminating booths, four paint booths for metal fiberglass and plastic parts equipped with high volume low pressure (HVLP) spray applicators and dry filters fir particulate control. Two coating and assembly area for glass, metal, plastic and wood parts. Eight coating application systems, four wood working areas and two fifth wheel and travel assembly areas (surface coating application areas).
iv. HAP PTE of entire source
- 344.7 tpy total HAP; 66.2 TPY toluene (single HAP)

v. Facility was subject to 40 CFR 63 subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) and subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products). Method of Compliance:
vi. 2017 NEI emissions for facility (total/single largest HAP): 0.49 tpy/0.23 tpy

b. *Status post-2018 MM2A Memo*

i. *Source transitioned from Title V permit to a Minor Source Operating Permit.*

- In June 2018 Gulf Stream Coach informed Indiana Department EM (IDEM) that they had sold the manufacturing space located at 625 S. Oakland Ave as well as the three booths to Alexander Dennis Inc. The Gulf Stream Coach plant and Alexander Dennis, Inc.'s plant located at 625 S. Oakland Avenue do not meet all three parts of the major source definition. Therefore, IDEM, OAQ finds that they are not part of the same major source
- The Gulf Stream Coach plant and the Alexander Dennis, Inc. plant located at 502 S. Oakland Avenue do not meet all three parts of the major source definition. Therefore, IDEM, OAQ finds that they are not part of the same major source.
- The Gulf Stream Coach plant and the CHaSE Manufacturing plant located at 506 S. Oakland Avenue do not meet all three parts of the major source definition. Therefore, IDEM, OAQ finds that they are not part of the same major source.
- The Gulf Stream Coach plant and the seed business located at 506 S. Oakland Avenue, Building 12a, do not meet all three parts of the major source definition. Therefore, IDEM, OAQ finds that they are not part of the same major source.
- Gulf Stream Coach acquired a new plant located at 829 S. Oakland Ave., Nappanee, Indiana, in Kosciusko County, to expand its operations at its existing plant at 853 S. Oakland Ave., Nappanee. IDEM, OAQ has examined whether this new plant is part of the same major source as the existing plant.

c. *Reclassification Details*

i. Minor Source Operating Permit No M039-39795-00145 issued on November 21, 2018.

ii. Unrestricted PTE –

- Total HAP: 6.64 tpy, Single HAP (Toluene) 2.43 tpy

iii. Permit removes applicability of 40 CFR 63 subparts MMMM and PPPP. Facility is now subject to 40 CFR 63 CCCCCC- NESHAP for Gasoline Dispensing Facilities for Area Sources.

*d. General Observations from Reclassification*

i. As a result of a decrease in the source's potential to emit HAP to an amount below major source thresholds, this source is now a true area source and no longer subject to major source requirements. We don't expect emission increases resulting from the reclassification of this source to area source status.

**8) Icon Identity Solutions, Elk Grove Village, IL**

a. *Status prior to 2018 MM2A Memo*

i. Icon Identity is a signage and sign components manufacturing plant that utilizes four paint spray booths, each equipped with a filter, all constructed in 1998.

1. Combined HAP in the years 2015, 2016, and 2017 were 1.04, 1.00, and 1.69 tons emitted, respectively.
2. The facility submitted a renewal permit application on March 7, 2016 and a Draft/Proposed Clean Air Act Permit Program Permit for Title I and Title V was recorded on May 17, 2016 by the ILL EPA (Permit No. 98080019). HAP were

limited under Synthetic Minor Limits but are noted to be subject to EPA 'OIAI' major MACT requirements.

ii. NESHAP subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products.

iii. Toluene is listed as the single HAP emitted in the greatest amounts. In the years 2015, 2016, and 2017 there were 0.64, 0.64, and 1.16 tons of Toluene emitted, respectively. The PTE permit limit was 7.50 tons/year.

iv. 2017 NEI emissions for facility (total/single largest HAP): 1.78 tpy/1.16 tpy

b. *Status post-2018 MM2A Memo*

i. Icon Identity Solutions requested a Federally Enforceable State Operating Permit (FESOP) to provide enforceable PTEs while relieving the facility of Title V permitting requirements under the NESHAP.

ii. The Illinois EPA opened a public comment period and issued a FESOP on Oct. 31, 2018 limiting HAP to below major source standards. The FESOP expires on Oct. 31, 2028.

c. *Reclassification Details*

i. PTE limitations

1. HAP usage or emissions from the four paint spray booths shall not exceed 0.75 ton/month and 7.5 ton/yr for a single HAP and 1.50 ton/month and 15.00 ton/yr of combined HAP.
2. A formula is provided in the FESOP to calculate actual HAP emissions.
3. Testing by the facility or the IL EPA will be performed if required by the IL EPA (35 Ill. Adm. Code 212.282).
4. The facility must keep a record of the applicability determination on site at the source for a period of 5 years after the determination or until the source changes its operations to become an affected source, whichever comes first – pursuant to 40 CFR 63.10(b)(3). Owner or operator shall retain testing records for at least three years after the test is performed ((35 Ill. Adm. Code 212.110(e). Records are also to be kept for inspection and repair related to good operating practices for the paint booth filters. Any violation or change in compliance method shall be reported within 30 days.

ii. The state issued FESOP notes that the paint spray booths do not use chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) so are not subject to 40 CFR part 63 Subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating at Area Sources).

d. *General Observations from Reclassification*

i. Based on the review of the reclassification documents, the source had PTE limitations below MST but continued to be subject to subpart MMMM because of OIAI. After reclassification the source continues to have enforceable limitations reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

**9) Kimball International-Jasper, Jasper, IN**

a. *Status prior to 2018 MM2A Memo*

i. Kimball International is permitted for 3 contiguous manufacturing plants, all in Jasper, IN, for (1) laminating hardwood and softwood veneers and high-pressure plastic laminates (HPL) onto particleboard and medium density fiberboard (MDF); (2) manufacturing medium- and high-end furniture; and (3) manufacturing wood office furniture and metal wall panels.

ii. Kimball was issued a Significant Permit Modification (May 9, 2017) for Part 70 Operating Permit Renewal No. T037-36228-00100 (Dec 31, 2015), permit is federally and state enforceable (General Condition B.4).

iii. Previously subject to NESHAP Subparts JJ (Wood Furniture Manufacturing), RRRR (Surface Coating of Metal Furniture),

iv. Facility had source-wide enforceable HAP PTE limitations below the major source thresholds and rendering the requirements of 40 CFR 63 subpart DDDDD (Boilers for major sources) not applicable. Source was subject to subpart JJJJJJ (6J) Industrial, Commercial, and Institutional Boilers Area Source).

v. Emission unites and pollution control devices were:

**Plant 1: Jasper Cherry St**

– Two (2) boilers, consisting of:

(a) One firetube boiler, fired by a mixture of resinated wood, containing laminated and un-laminated particleboard, medium density fiberboard (MDF), plywood and solid wood, with a centrifugal collector (cyclone) for particulate control, exhausting at stack S1.

(b) One natural gas-fired (firetube) boiler used as back-up and equipped to burn only natural gas, exhausting at stack S2.

**Plant 2: Jasper 16$^{th}$ St**

– Two (2) boilers, consisting of:

(a) Two firetube boilers fired by a mixture of resinated wood, containing laminated and un-laminated particleboard, medium density fiberboard (MDF), plywood and solid wood, with a fly ash collector for particulate, exhausting at stack S1.

(b) Two natural gas-fired (firetube) boilers equipped to burn only natural gas, exhausting at stack S2.

– Thirty (30) spray booths for wood furniture and panel coating, each equipped with HVLP or air assisted airless spray guns, each considered an existing affected facility under Subpart JJ. Each equipped with filters, 18 vent through one stack (unique) and 12 vent to 2 (unique) stacks.

**Plant 3: Jasper 15$^{th}$ St**

– Two (2) boilers, consisting of:

(a) One firetube boiler fired by a mixture of resinated wood, containing laminated and un-laminated particleboard, medium density fiberboard

(MDF), plywood and solid wood, with an 80% effective fly ash collector for particulate, exhausting at stack BS-1.

(b) One natural gas-fired boiler, exhausting at stack BS-2.

– 31 surface coating booths: 26 spray booths for wood furniture, one adhesive spray booth, and one metal paint booth, each considered an existing affected facility under either Subpart JJ (Wood and Adhesive Booths) or Subpart RRRR (Metal Paint Booth). Booths equipped with HVLP or air assisted airless spray guns. Three equipped with water pans, the rest each equipped with filters, and each with a unique stack/vent.

– A UV water-based wood coating process consisting of two (2) coating lines each with a process capacity of 1,000 lbs per hr and each subject to Subpart JJ, also one (1) sanding/scuffing operation.

vi. 2017 NEI emissions for facility (total/single largest HAP): 0.25 tpy/0.08 tpy

*b. Status post-2018 MM2A Memo*

i. Kimball requested a permit change on July 5, 2018.

ii. The IN DEM approved the request Nov. 2, 2018 and issued a Title V Significant Permit Modification on the same date (Permit No. 037-40179-00100).

iii. Subject to NESHAP 6J (area source boilers), should no longer be subject to JJ or RRRR.

*c. Reclassification Details*

i. PTE limitations

a. Facility continues to be subject to source-wide operations are limited to less than 10 tpy single HAP and less than 25 tpy combined HAP.

b. Calculations and record keeping of HAP content, use, and cleanup solvent usage are specified with quarterly reporting requirements.

c. The facility must keep a record of the applicability determination on site at the source for a period of 5 years after the determination or until the source changes its operations to become an affected source, whichever comes first – pursuant to 40 CFR 63.10(b)(3). Owner or operator shall retain testing records for at least three years after the test is performed ((35 Ill. Adm. Code 212.110(e). Records are also to be kept for inspection and repair related to good operating practices for the paint booth filters. Any violation or change in compliance method shall be reported within 30 days.

*d. General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

**10) Lowen Corporation, KS**

a. *Status prior to 2018 MM2A Memo*

i. Facility is a manufacturer of real estate signs and color graphics.

ii. Operations at the facility include 20 digital and screen-printing presses of color graphics.
iii. Facility was subject to 40 CFR 63 subpart PPPP (Plastic Parts and Products), method of compliance is the use of compliant coatings. Facility was also subject to 40 CFR 63 subpart DDDDD (Boilers for major sources) for two boilers which run on natural gas.
iv. HAP emissions for 2018 Operating Year: 0.989 tpy (total HAP) and 0.987 tpy (single HAP)
v. 2017 NEI emissions for facility (total/single largest HAP): 1.38 tpy/1.68 tpy

b. *Status post-2018 MM2A Memo*
i. In May 2019, the Facility submitted a Class II Permit-by-Rule Application and requested that the applicability requirements of subparts PPPP and DDDDD be rescinded. The facility also requested to withdraw their 2017 Class I Permit Application.
ii. In September 2019, Kansas Department of Health and Environment issued the Class II Operating Permit-by-Rule Authorization.

c. *Reclassification Details*
i. Operating in accordance with the provisions of the Class II Permit-by-Rule for Organic Solvent Evaporative Sources will limit the PTE of the facility to less than 100 tons of VOC, 10 tons of any single HAP, and 25 tons of any combination of HAP during each consecutive twelve-month period.
ii. The method of compliance is the use of materials that contain less than 90 tons of VOC, less than 22.5 tons of any combination of HAP, and less than nine tons of any single HAP are used for each consecutive 12-month period and maintain records accordingly. Each record shall be updated monthly, no later than the last day of the month following the month to which the record relates. Each record shall be kept for a minimum of two (2) years from the date of the record.

d. *General Observations from Reclassification*
i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

**11) MACtac, Columbus, IN**

a. *Status prior to 2018 MM2A Memo*
i. MACtac is a printing & publishing facility. Primary emissions prior to 2018 memo and reclassification were predominantly from surface (paper) coating (acetaldehyde). This made the facility subject to Title V operating permits.
ii. Part 70 Operating Permit Renewal was approved on June 19, 2017
iii. Source was subject to:
- Major Source under 40 CFR 63 subpart KK (printing and publishing)
- Major Source under 40 CFR 63 subpart DDDDD (Boilers)

- Area Source under 40 CFR 63 subpart ZZZZ (for area source reciprocating internal combustion engines)

iv. HAP Emissions: Total: 17.4 ton/year, Single: 11.18 ton/year (acetaldehyde). Given the single source HAP emissions of acetaldehyde exceeding 10 ton/year, this site is considered a major source for HAP.

v. 2017 NEI Emissions (total/single largest HAP): 0.004 tpy/0.003 tpy

b. *Status post-2018 MM2A Memo*

i. MACtac applied to the Indiana Department of Environmental Management (IDEM) to reclassify on September 20, 2018. The source increased production efficiency and changed surface coating materials in order to reduce their HAP emissions below major source thresholds. Their method of emission reduction was a switch from using acetaldehyde to acetonitrile for their surface coating material.

ii. The reclassification was approved on December 6, 2018 by IDEM

c. *Reclassification Details*

i. Source reduced the PTE single HAP for paper coating from 11.18 tons/year to 4.95 tons/year (Single HAP). The site is an area source. Removed major source NESHAP requirements.

ii. The boilers on site meet the definition of a gas-fired boiler as defined in 40 CFR 63.11237 and are not subject to area source NESHAP subpart 6J.

iii. Site remains a source of VOC due to the paper coating line and hot melt coating line which is subject to NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR 60 RR) because the units coat pressure sensitive tape and label materials and were constructed after Dec. 30, 1980. Source is subject to VOC content and usage limitations.

d. *General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the changes in operation (raw material changes) that reduced unlimited PTE to 4.95 tpy single HAP and 14.22 tpy total HAP, we don't expect emission increases resulting from the reclassification of this source to area source status.

**12) Moly Manufacturing, LLC, KS**

a. *Status prior to 2018 MM2A Memo*

i. Facility manufactures livestock handling equipment.

ii. Facility has one paint booth subject to 40 CFR 63 subpart MMMM (Surface Coatings of Miscellaneous Metal Parts and Products). Method of compliance is the use of compliant coatings.

iii. The facility was operating under a Class I (Title V) operating permit issued on October 20, 2015 (O-10925). At the time of Class I operating permit issuance the facility did not have controlled potential-to-emit (PTE) for any single Hazardous Air Pollutant (HAP) or combined HAP greater than 10 tons/year (tpy) or 25 tpy, respectively**.**

iv. 2017 NEI emissions for facility (total/single largest HAP): 0.0000 tpy/0.0000 tpy

*b. Status post-2018 MM2A Memo*

i. In December 2019, facility requested to terminate their Class I Operating Permit and obtain a Class II Permit-by-Rule. The state issued the permit on Feb. 17, 2020.
ii. The source submitted emissions calculations showing that for the 12-month rolling periods have consistently been under 50% of the major source threshold for individual HAP. The source PTE for total HAP is 0.59 tons and emissions are 0.14 tons.

*c. Reclassification Details*

i. Class II Permit-by-Rule: Operating according to the provisions of the permit-by-rule will limit the source's actual emissions to less than 50% of the major source thresholds.
ii. The facility has elected to limit the actual emissions from the facility to less than 50% of the major source thresholds during each consecutive 12-month period. The owner or operator shall maintain records on-site for not less than two (2) years of the date of the record, that are adequate to demonstrate actual emissions are less than 50 percent of major source thresholds in each consecutive twelve (12) month period. Each record shall be updated monthly, no later than the last day of the month following the month to which the record relates.
iii. PTE total HAP uncontrolled: 0.62 tpy, actual emissions in 2019- 0.14
iv. Fabric filter with assumed control efficiency of 95% and capture efficiency of 100% is still required for the paint booth for PM emissions only per K.A.R regulations.

*d. General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP)), we don't expect emission increases resulting from the reclassification of this source to area source status.

**13) National Office Furniture-Jasper, IN**

a. *Status prior to 2018 MM2A Memo*

i. Facility is stationary wood office products manufacturing plant.
ii. Facility operates under a Title V Air Operation Permit Renewal No. 037-32617-00048.
iii. Unrestricted PTE- 335.13 tpy (total HAP); 334.88 tpy (single HAP- toluene).
iv. Source consists of 25 wood surface coating booths equipped with robotic and/or manual application HVLP spray guns and two boilers burning natural gas (under grate ram-stoker plus burners) or wood. Wood working facilities are equipped with a baghouse.
v. Source was subject to 40 CFR 63 subpart JJ (Wood furniture).
vi. The source obtained HAP limitations below major source thresholds. Compliance with such limits shall make the source area source and render the requirements of 40 CFR 63 subpart DDDDD (major source boilers) not applicable. Source is subject to 40 CFR 63 subpart JJJJJJ (Boilers for Area Sources).
vii. Method of compliance with HAP limits was the use of compliant coatings.
viii. 2017 NEI emissions for facility (total/single largest HAP): 0.0170 tpy/0.0117 tpy

b. *Status post-2018 MM2A Memo*
   i. In January 2018 the facility submitted an application requesting to renew its operating permit. The facility requested at the renewal time to transition from a Part 70 Operating Permit Renewal to a Federally Enforceable State Operating Permit (FESOP)
   ii. In July 2018 Indiana Department of Environmental Management issued the FESOP No 037-39499-00048. All previous registrations and permits are superseded by this permit.

c. *Reclassification Details*
   i. Federally Enforceable State Operating Permit (FESOP) No 037-39499-00048 includes enforceable conditions limiting HAP emission below major source thresholds:
      - The total input of each single HAP delivered to the spray booths, identified as SB-1, SB2, SB-4, SB-5, SB-6AB, SB-7, SB-8AB, SB-9, SB-10, SB-11AB, SB-12, SB-13, SB-14, SB-15, SB-16, SB-17AB, SB-18AB, SB-19, SB-20, SB-22, SB-23AB, SB-24AB, SB-25, SB-41, and SB-42 shall not exceed 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
      - The total input of combined HAP delivered to the spray booths, identified as SB-1, SB-2, SB-4, SB-5, SB-6AB, SB-7, SB-8AB, SB-9, SB-10, SB-11AB, SB-12, SB-13, SB-14, SB15, SB-16, SB-17AB, SB-18AB, SB-19, SB-20, SB-22, SB-23AB, SB-24AB, SB-25, SB41, and SB-42 shall not exceed 24.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
      - To document compliance with the HAP content and usage limitations the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
        (1) The amount and VOC and HAP content of each coating material and solvent used.
        (2) The amount of coating material and solvent less water used on a monthly basis.
        (A) Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used.
        (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
        (3) The cleanup solvent usage for each month.
        (4) The total VOC and HAP usage for each month.
        (5) The weight of VOC and HAP emitted for each compliance period.
   ii. Two boilers are considered existing affected facilities for 40 CFR subpart JJJJJJ.

d. *General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant coatings (no-HAP/low HAP)), we don't expect emission increases resulting from the reclassification of this source to area source status.

**14) Neenah Paper Michigan, MI**

a. *Status prior to 2018 MM2A Memo*

i. Neenah Paper operates a non-integrated paper mill. It obtains large bales of pulp; the bales are soaked in water then go through a hydro-pulper which can apply additives. Afterward, it goes to a paper machine with rapidly rotating rollers and dryers. The mill has two (2) paper machines, one with a latex coater and a dryer. The facility has two (2) boilers, both with 202 MMBtu/hr heat input capacity. Boiler #1 (EU05), can burn coal or natural gas. Boiler #2 (EU15) uses No. 2 fuel oil and is "limited-use" as a backup for Boiler #1. There are also two (2) emergency generators and one (1) emergency fire pump that operate on No. 2 fuel oil.

ii. Renewable Operating Permit MI-PTI-B1470-2013 was issued January 7, 2013 as a federally enforceable permit to install.

iii. The facility was subject to 40 CFR 63, Subpart JJJJ (Paper and Other Web Coating), and JJJJJJ (Boilers for Area Sources). Emergency engines are subject to NESHAP Subpart ZZZZ.

iv. Boiler #1 (EU05) is the main source of emissions. It can burn coal and natural gas and is equipped with a baghouse.

- In 2015 the source limited facility emissions to less than HAP major source thresholds. The source installed a spray dry absorber (SDA) on the boiler to reduce emissions of acid gas HAP. This rendered the source an area source for purposes of subpart DDDDD.

v. Emission unit "Flexible Group: Saturators and Coaters" was subject to 40 CFR Part 63 Subpart JJJJ other than machine coaters and saturators for #1 paper machine. Units included Paper Machine Nos. 1 and 2 and Saturator Nos. 15 and 18 and ovens, and Coater Nos. 16, 17 and 19.

- Coatings materials are limited to 2.9 lbs VOC emitted per gallon of coating, minus water, as applied. Can be determined from manufacturer's formulation data using Method 311 (40 CFR 63.3360(c)(3))
- Machine Coater emission unit limits (corrected to 70°F and 29.92 inches Hg, time period "according to method"):
  a. Acrylonitrile to 0.19 ug/$m^3$,
  b. Formaldehyde to 0.19 ug/$m^3$
- Applicant shall not fire any fuel in the dryers other than sweet natural gas
- Maintain records for 5 years and report monitoring semiannually

vi. Paint Booth is limited to 200 gallons per month per emission unit.

vii. 2017 NEI emissions for facility (total/single largest HAP): 11.86 tpy/8.19 tpy

b. *Status post-2018 MM2A Memo*

i. After the 2018 memo, Neenah Paper requested removal of the provisions NESHAP Subpart JJJJ with this ROP renewal. The stationary source had accepted a legally enforceable permit condition limiting the potential to emit of HAP to below major source thresholds in 2015.
ii. A 30-day public hearing was held.
iii. Boiler #1 is subject to Compliance Assurance Monitoring under 40 CRF Part 64.

c. *Reclassification Details*
i. ROP MI-ROP-B1470-2019a was approved and issued on March 12, 2019 with an expiration date of March 12, 2024 and included Source-Wide PTI MI-PTI-B1470-2019a.
ii. Source wide emissions are limited to less than 9.5 tpy individual HAP and less than 23.5 tpy aggregate HAP.
iii. Machine Coater
- Hourly emission unit limits (corrected to 70°F and 29.92 inches Hg):
  a. Acrylonitrile to 0.19 ug/$m^3$
  b. Formaldehyde to 6.3 ug/$m^3$ (previously 0.19)
- Only sweet natural gas as fuel (R 336.1205(1)(a))
- Handle to minimize fugitive emissions as in R 336.1205(1)(a) & (b)
- Emission verification upon request of AQD, testing with 40 CFR Part 63 Appendix A method.
- 5 years recordkeeping and semiannual reporting

iv. Emergency generators have underlying applicable requirements 40 CFR 63.6604(b)
v. Cold cleaner solvents are limited to less than 5% by weight for listed halogenated compounds (HAP), drained for on less than 15 seconds or until dripping ceases. Routine maintenance as recommended by manufacturer (unit is subject to applicable state rules). Other state rules applied.
vi. Page 20 of the permit states "The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.[2] (40 CFR Part 63, Subparts A and JJJJJJ)" with Footnote 2 being: [2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a)
vii. Boiler #2 (EU15) remains as "limited-use" as a backup for Boiler #1 (defined as under Subpart JJJJJJ.

d. *General Observations from Reclassification*
i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the changes in operation (installation of SDA on boiler #1) that limited HAP PTE below MST, we don't expect emission increases resulting from the reclassification of this source to area source status.

**15) Norbord Industries, Guntown, MS**

a. *Status prior to 2018 MM2A Memo*
i. Norbord Industries manufactures oriented strand board.

ii. Subject to 40 CFR part 63 subpart DDDD - National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products. Compliance strategy was capture/destruction of exhaust gases from conveyer dryers, use of a biofilter to reduce formaldehyde emissions, and work practices for the drying system and board press vent with biofilter.
iii. Source subject to enforceable limits on HAP PTE below major source thresholds.
iv. Subject to 40 CFR part 63 subpart JJJJJJ (area source boiler MACT), for wood-fire burners/oxidizers.
v. Subject to 40 CFR part 63 subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE), for a fire pump engine and an emergency generator.
vi. 2017 NEI emissions for facility (total/single largest HAP): 21.83 tpy/9.22 tpy

b. *Status post-2018 MM2A Memo*
i. The facility requested a modification to their title V operating permit (permit no. 1540-00058) for the installation and operation of the three RTOs for VOC control on the conveyor dryers.
ii. The facility was granted permission to construct air emissions equipment on April 3, 2018. The facility constructed three regenerative thermal oxidizers (RTOs) on the conveyor dryers.
iii. A 30-day public comment period on the proposed modifications to the facility's Title V permit began on February 7, 2019, and an opportunity for a public hearing was provided.
iv. On March 28, 2019, the facility was issued a final permit modification to their title V permit issued on September 19, 2016.

c. *Reclassification details*
i. The continue to be subject to limits on all HAP to less than 9.9 tpy of any single HAP and 24.9 tpy of combined HAP.
ii. The permittee shall submit semiannual reports providing:
- any changes, including but not limited to, production capacity, method of operation, and the removal, replacement, or addition of a control device;
- identification of each resin, or any other HAP-containing material used;
- the HAP content(s) of each resin, or other HAP-containing material used;
- the total quantity used of each resin, or other HAP-containing material used in any consecutive 12-month period; and
- the emission rate of each individual HAP and the total HAP emission rate in tpy for each consecutive period.

iii. For the wafer drying system and the RTOs, the permittee shall continue to monitor and maintain documentation verifying that all zone 1 dryer emissions are routed directly into the flame zones of the combustion units.
iv. For the board press vent (with biofilter) and RTOs, operational parameters include continuous compliance with temperature requirement.
v. The permittee shall maintain copies of all records and reports on site for at least 5 years.

d. *General Observations from Reclassification*
   i. The source is subject to the same compliance strategy as before reclassification to comply with DDDD (capture/destruction of exhaust gases from conveyer dryers, use of a biofilter to reduce formaldehyde emissions, and work practices for the drying system and board press vent with biofilter). The HAP emitted by the process are also VOC. The permitted VOC emission limits and PM emission limits are also the same across the facility as before reclassification. Source is subject to CAM for RTOs. Permit testing and monitoring requirements include biennial VOC and HAP testing of RTOs via same EPA reference methods in previously applicable subpart DDDD, plus fuel monitoring, COMS, CPMS for RTO operating temperature monitoring, and weekly visible emissions inspections. Source subject to semiannual reporting. Therefore, HAP emissions increases as a result of reclassification are not expected.

**16) Patrick Industries, Inc. d/b/a Middlebury Hardwood Products, Middlebury, IN**

a. *Status prior to 2018 MM2A Memo*
   i. The permittee owns a stationary hardwood cabinet doors and components manufacturing and surface coating plant.
      - Source consisted of five surface coating booths for wood furniture coating, one automated CEFLA profile surface coating booth comprising six HVLP spray guns, automatic finishing coating machine comprising four spray machines and brush wiping and manual wiping stations, seven ovens, one wood-fired boiler
   ii. State issued significant modification to Part 70 Operating Permit Renewal No. T039-34196-00245 on February 9, 2015 (received Nov. 12, 2014).
   iii. Major source under section 112. Subject to
      - 40 CFR Part 63, subparts JJ (Wood Furniture Surface Coating),
      - Subpart DDDDD (Boilers).
   iv. Source is also subject to NSPS40 CFR 60, Subpart Dc.
   v. HAP PTE (total/single largest HAP, identified): 238.29 tpy total, 147.84 single (xylene).
      - Material known as “Stain 711” used mostly in surface coating booths E1-E5 has a weight % HAP of 85% and is responsible for 200.63 tpy total and 133.75 tpy xylene uncontrolled PTE.
   vi. 2017 NEI emissions for facility (total/single largest HAP): 0.0003 tpy/0.0002 tpy

b. *Status post-2018 MM2A Memo*
   i. Indiana DEM received an application requesting changes to the permit on March 29, 2018.
      - Source is taking PTE limitation on HAP emissions to render the source an area source of HAP.
   ii. State issued significant modification to 039-34196-00245 on September 6, 2018.

c. *Reclassification Details*
   i. New sourcewide PTE limits: 22.5 tpy combined; 9.0 single HAP,
      - IDEM, OAQ determined that the following major source NESHAP(s) are no longer applicable to this source and have been removed from the permit:

a. National Emission Standards for Wood Furniture Manufacturing Operations, NESHAP, Subpart JJ
b. National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, NESHAP, Subpart DDDDD
c. Boiler (EU8) is subject to the requirements of National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, NESHAP, Subpart JJJJJJ because this boiler will be located at an area source of HAP.

ii. Method of compliance: low/no-HAP coatings/materials
iii. Compliance demonstration
- Compliance with the VOC and HAP content and input limitations specified for the surface coating facilities (Unit 2, Unit 9, Unit 15, Unit 25, E1 through E4, and E6A and E6B) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets.

iv. Recordkeeping/reporting requirements: Emissions reported monthly with annual average calculated using rolling averages. The amount and VOC and HAP content of each coating material, dilution solvent, cleaning solvent and strippable booth coating used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- HAP waste shipped off site deducted from inputs

*d. General Observations from Reclassification*

i) Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the use of compliant coatings (no-HAP/low HAP), we don't expect emission increases resulting from the reclassification of this source to area source status.

**17) Precision Coatings, Inc., Walled Lake, MI**

a. *Status prior to 2018 MM2A Memo*

i. Precision Coatings owns four (4) webcoating lines used to apply specialty resins dissolved in organic or waterborne solvents to a polyester film substrate. Each webcoating line is equipped with a natural gas-fired oven to cure the coatings. VOC and HAP emissions from each coating head and oven are captured and controlled using Permanent Total Enclosures (PTEs) and three Regenerative Thermal Oxidizers (RTOs).
ii. Subject to Renewable Operating Permit MI-ROP-A5496-2014 Source-Wide Permit to Install MI-PTI-A5496-2014 effective Sept 2, 2014 (both voided March 22, 2019).
iii. Emissions sources include
- 4 Web Coating Lines configured as follows:
  *a.* 2 coating heads, 1 laminator, and 1 four-zone curing oven
  *b.* 2 coating heads, 1 laminator, and 1 five-zone curing oven

*c.* 2 coating heads, 1 laminator, and 1 four-zone curing oven
*d.* 1 coating head, 1 laminator, and 1 curing oven.

Each line is in an enclosed room and all exhaust air from web coating and curing goes to an RTO (Lines *b* and *d* share an RTO).

- One 0.125 MM BTU/hr natural gas SI RICE emergency generator
- 5 storage tanks:
  *a.* 6,000-gallon above ground Cyclohexanone
  *b.* 4,170-gallon above ground Toluene
  *c.* 4,170-gallon above ground Ethyl Acetate
  *d.* 6,000-gallon above ground MEK (Methyl Ethyl Ketone)
  - One wash tank which uses volatile organic solvents. Located in Coating Mix Room, with emissions discharged to ambient air without abatement.

iv. Webcoating Lines were subject to 40 CFR, Part 63, Subpart JJJJ (NESHAP for Paper and Other Webcoating), requiring that:
- all coating operations take place in the Permanent Total Enclosures (PTE) such that 100 percent of VOC & HAP are captured and delivered to the RTOs.
- HAP per kg coating per month was limited to 0.04 kg.
- process/operational restrictions applied to RTOs, including minimum operating temperatures, minimum retention time, and overall control efficiency.
- Compliance Assurance Monitoring (CAM) applied.
  - each RTO required to be equipped with a visible and audible alarm system and automatic coating process shut-off system. If solvent stream exceeds maximum VOC loading or if temperature falls below a minimum threshold, alarm and shut-off systems are activated. Bypass of RTOs is prohibited unless fire/explosion hazard.

v. The permittee shall not use cleaning solvents in the washtank containing more than five percent by weight: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1 trichloroethane, carbon tetrachloride, chloroform, or any combination thereof.

vi. NESHAP, Subpart ZZZZ: Existing reciprocating internal combustion engine (RICE), exempt from permit to install requirements pursuant to R 336.1285(g) must meet MACT process/operational restrictions (maintenance, inspection, operation limits, recordkeeping and reporting.

vii. 2017 NEI emissions for facility (total/single largest HAP): 1.91 tpy/1.39 tpy

b. *Status post-2018 MM2A Memo*

i. Michigan DEQ AQD received request to void Renewable Operating permit No. MI-ROP-A5496-2014) on March 29, 2018 and voided the ROP and a Source-Wide Permit to Install MI-PTI-A5496-2014 on March 22, 2019.

ii. MI DEQ determined that Precision Coatings has accepted legally enforceable PTE of HAP below major source thresholds, which are included in a Permit to Install No. 154-18, approved on January 29, 2019.

c. *Reclassification Details*

iii. MI DEQ Permit to Install

- Source is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210.
- Requirements under 40 CFR Part 63 Subparts A and ZZZZ (RICE) are included.

iv. New sourcewide PTE limits: 22.4 tpy combined HAP; 8.9 single HAP

v. Method of compliance: use of Permanent Total Enclosures (PTEs), three Regenerative Thermal Oxidizers (RTOs), and process/operations restrictions including:
- Capture and storage of waste using closed containers, disposal in compliance with applicable regulations.
- Meeting PTE requirements including lower-than ambient pressure in enclosure.
- Use and maintenance of alarm system and automatic shut-off if VOC loading exceeds a threshold or if RTO temperature falls below a threshold.
- Use of RTOs at all times within parameters during emission unless hazard exists.
- Submission, implementation, and maintenance of a Malfunction Abatement Plan for each RTO, PTE, and auto shut-off system.
- Handling of HAP to minimize generation of fugitive emissions, including use of covered containers.

vi. Compliance demonstration
- All solvent, coating and blending information (initial VOC & HAP content, density of each blending component, blending ratios or proportions) along with final composition (final VOC and HAP content) shall be kept on file.
- AQD may require HAP formulation data to be verified using EPA Test Method 311.
- AQD may require Capture Efficiency (CE) and Destruction Efficiency (DE) testing at owner's expense, and CE and DE testing is required if web coating lines and RTO are reconfigured.

vii. Recordkeeping/reporting requirements (maintain records for 5 years)
- Complete required calculations, maintain a current listing from the manufacturer of the chemical composition of each material, keep monthly record of coating line and RTO hours of operation, record mass of materials used and reclaimed, continuously monitor RTO combustion temperature (record at no more than 15 min intervals). Monitor PTE pressure differential, records of inspection, maintenance, malfunctions, and repairs. Record and report any reconfiguration activity and each occurrence of an RTO bypass.
- Keep monthly facility records of weight (with water) of each HAP containing paint, coating, reducer, purge and clean-up solvent, etc. (material) used and reclaimed and the individual and aggregate HAP emission calculations determining the monthly and 12-month rolling time period emission rate.

d. *General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the

use PTE and RTOs), we don't expect emission increases resulting from the reclassification of this source to area source status.

**18) Robert Weed Plywood Corporation, Bristol, IN**

a. *Status prior to 2018 MM2A Memo*
   i. Subject to Federally Enforceable State Operating Permit Program. FESOP Permit F039-39418-00178 issued on July 6, 2016 for a stationary veneered boards, panels, moldings, countertops, doors, and furniture parts manufacturer to limit HAP emissions to below major source thresholds.
      - PTE Limits: 9.9 tons/year single HAP; 24.5 tons/year total HAP
      - Total input of VOC and HAP are limited at coating applications (panel laminators, fan coating systems, Spray 2 staining systems, adhesive spray coating booths, edge spray operations, wood curtain coater, ink coater, profile wrappers, spray coating operation in manufacturing area Building 6 (HS-1), and backing machine (BM-1), including coatings, dilution solvents, and cleaning solvents.
      - Compliance with the VOC and HAP limitations is determined from copies of the "as supplied" and "as applied" VOC and HAP data sheets. The state of Indiana reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
        - A baghouse is required to meet particulate emission limitations for manufacturing processes.
   ii. Synthetic area source based on emission limits in permit
   iii. Attainment area for all NAAQS
   iv. Each of the surface coating operations at the source is considered part of an existing affected source under 40 CFR 63, Subpart JJ, National Emissions Standards for Wood Furniture Manufacturing Operations when applying surface coating to wood furniture and part of an existing affected source under 40 CFR 63, Subpart QQQQ, National Emission Standards for Surface Coating of Wood Building Products when applying surface coating to wood building products.
   v. Unrestricted HAP PTE = 33.82 total tons/year; 15.15 tons/year xylenes (single largest HAP)
   vi. Facility not listed in 2014 or 2017 NEI.

b. *Status post-2018 MM2A Memo*
   i. The application to reclassify (submitted in March 2017) is based on the facility's claim that the source has *always* been a minor (area) source of hazardous air pollutants because of a preexisting process bottleneck associated the hardwood finishing line emission units
   ii. Based on the information provided, IDEM agreed that the facility is not a major source of HAP emissions, meaning NESHAPs 40 CFR 63, Subpart JJ and Subpart QQQQ do not apply to the source. Permit 039-39418-00178 issued March 21, 2018.

c. *Reclassification Details*
   i. With new PTE calculations - Unrestricted total HAP PTE = 18.67 total tons/year; 7.33 tons/year xylenes (single largest HAP)

- Operating permit limit on HAP removed.
- Particulate matter will continue to be controlled from operations at the facility.

d. *General Observations from Reclassification*
   i. Based on the review of the permit documents associated to this reclassification, this source is a true area source and, we don't expect emission increases resulting from the reclassification of this source to area source status

**19) Stamas Yacht, Inc., Tarpon Springs, FL**

a. *Status prior to 2018 MM2A Memo*
   i. Stamas Yacht, Inc. is a fiberglass boat manufacturing facility. Volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions from the facility were generated from the gelcoat application, resin application, and other miscellaneous VOC/HAP based adhesives, putties, mold care, paints/solvents, cleanup and related materials used in the manufacture of fiberglass boats.
   ii. Title V Air Operation Permit Renewal No. 1030226-008-AV and incorporated terms and conditions of Air Construction Permit No. 1030226-009-AC was finalized by the state on January 7, 2014.
      - Facility was a major source of HAP.
      - Subject to NESHAP for Boat Manufacturing (VVVV).
      - HAP emissions (including for styrene, methyl methacrylate) were calculated based on amount of HAP-containing material used multiplied by an emission factor.
      - Monthly and 12-month rolling records of purchases of all VOC/styrene-containing materials, which include total quantities, percentage by weight of VOC/styrene, and method of application for each.
      - The only specific emission limitations in the Title V are for Styrene (24.9 tpy) and total VOC, which also includes HAP that are a VOC (49.9 tpy).
   iii. 2017 NEI emissions for facility (total/single largest HAP): 2.40 tpy/1.94 tpy

b. *Status post-2018 MM2A Memo*
   i. Effective August 22, 2018, the state issued a Federally Enforceable State Operation Permit (FESOP), Air Permit No. 1030226-010-AF, that changed the classification of the facility from Title V to a synthetic non-Title facility by establishing new allowable limits on facility pollutants.

c. *Reclassification Details*
   i. New sourcewide emission limits (Permit Specific Condition No. A.2.):
      - Styrene Emissions Standard: Styrene emissions from the emissions unit shall not exceed 8.0 tons per any consecutive 12-month period.
      - VOC Emissions Standard: VOC emissions from the emissions unit shall not exceed 14.0 tons per any consecutive 12-month period.
      - Permitting Notes: (1) Because styrene is the primary HAP component contained in the raw materials used in the manufacture fiberglass boats, limiting styrene emissions will also limit individual HAP emissions. (2) All HAP contained in the

raw materials are VOCs; therefore, limiting VOC emission will also limit the total HAP emissions.

ii. Method of compliance: compliant materials, limitation in styrene use

iii. Compliance demonstration; Recordkeeping/reporting requirements:

- To document compliance with Specific Condition No. A.2., the permittee shall maintain a monthly log tracking the usage and associated emissions of styrene and VOC-containing materials used in the manufacturing process. At a minimum, the logs shall contain the following:
  (a) Facility Name, Facility Number (1030226), Emission Unit ID No. (001), Month, Year.
  (b) For each type of raw material (resin, coating, solvent, chemical, etc.) used at the facility that contains Styrene and/or VOC, record the following:
    (i) The type of raw material (e.g., resin) and material identification or description;
    (ii) The quantity (in tons) of materials used (where usage may be determined based upon the beginning and ending inventory and receipt of materials);
    (iii) The styrene and VOC content;
    (iv) The method of application (where applicable) and the emission factor (note: same emission factors as Title V permit)
    (v) The total quantity (in tons) of styrene emissions for the month;
    (vi) The total quantity (in tons) of VOC emissions (including Styrene, Methyl Methacrylate (MMA) and Isocyanates) for the month.
  (c) For the emission unit:
    (i) The total quantity (in tons) of styrene emissions for the month;
    (ii) The total quantity (in tons) of VOC emissions (including Styrene, MMA and Isocyanates) for the month;
    (iii) The total quantity (in tons) of Styrene emissions for the most recent consecutive 12-month period;
    (iv) The total quantity of (in tons) of VOC emissions (including Styrene, MMA and Isocyanates) for the most recent consecutive 12-month period.

iv. State Observations – N/A

d. *General Observations from Reclassification*

i. Source took PTE limits from 25/50 tpy to 8/14 tpy. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant material), we don't expect emission increases resulting from the reclassification of this source to area source status.

**20) Tampa Fiberglass, Inc., Tampa, FL**

a. *Status prior to 2018 MM2A Memo*

i. Tampa Fiberglass manufactures custom fiberglass reinforced plastic products, such as septic tanks, small tanks for wastewater treatment plants, and pipes (12" in diameter),

etc. The facility also manufactures fiberglass reinforced plastic boats using the same types of materials used to make the other reinforced plastic products.

ii. The state issued Title V Air Operation Permit Renewal No. 0570472-008-AV (Renewal/Revision of Permit No. 0570472-007-AV, dated 6/9/2009) effective April 14, 2014.
   - Facility is a major source of HAP.
   - Subject to NESHAP for Reinforced Plastic Composites Production (WWWW) and Boat Manufacturing (VVVV).
   - 2014 permit revision included request by the permittee for a "federally enforceable emissions cap." The total maximum facilitywide emissions of HAP "shall not exceed 27.3 tons for any 12-consecutive month period." (Note: this was the same HAP limit in their previous 2009 permit, but the request for a federally enforceable cap was made in 2014.)
   - Monthly and 12-month rolling records of HAP emissions shall be kept at the facility and available for inspection upon request. The monthly records shall be completed by the 15th day of the following month. [Rules 62-210.200 (PTE) and 62-4.070(3), F.A.C.; and Air Construction Permit No. 0570472-009-AC]

iii. 2017 NEI emissions for facility (total/single largest HAP): 0.31 tpy/0.31 tpy

b. *Status post-2018 MM2A Memo*

i. On August 30, 2018, the state acknowledged a request by permittee to reclassify under an Air General Permit to operate a Reinforced Polyester Resin Operations facility under the authority of Rule 62-210.310(4)(d) 2., F.A.C., Air General Permit for Reinforced Polyester Resin Operations (see below).

ii. The state set the effective date for General Permit 0570472-010-AG as one month later, Sept. 30, 2018, unless permittee notified otherwise by the state. The above Title V permit expired on the same date (per FDEP website).

c. *Reclassification Details – Permit by Rule*

i. Rule 62-210.310(2)(a) includes eligibility requirements and the following emission limits: "The facility as a whole, including any emissions units or pollutant-emitting activities that are exempt from air permitting and any units or activities that are authorized under another air general permit, shall not emit nor have the potential to emit ten (10) tons per year or more of any hazardous air pollutant, twenty-five (25) tons per year or more of any combination of hazardous air pollutants, or one hundred (100) tons per year or more of any other regulated air pollutant."

ii. The rule also contains a special section (d) Air General Permit for Facilities Comprising Reinforced Polyester Resin Operations, which states:
   - A facility comprising one or more reinforced polyester resin operations shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C., and the following specific criteria.
     a. The facility shall use no other air general permit.

b. The facility shall not be subject to any unit-specific limitation or requirement other than any such limitation or requirement set forth in this air general permit.

- A facility using this air general permit shall comply with the general conditions given at subsection 62- 210.310(3), F.A.C., and the following specific conditions.
  a. The combined quantity of styrene-containing resin and gelcoat used shall not exceed 76,000 pounds (38 tons) in any consecutive twelve (12) months.
  b. The facility shall comply with the objectionable odor prohibition of subsection 62-296.320(2), F.A.C.
  c. The owner or operator shall maintain records to document the quantity of resin and gelcoat used on a monthly basis. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years.
- The registration for this air general permit shall include all the following information.
  a. For initial registrations, an estimate of the total quantity, in pounds, of styrene-containing materials (resin and gelcoat) expected to be used over a 12-month period.
  b. For re-registrations, the highest 12-month total quantity, in pounds, of styrene-containing materials (resin and gelcoat) used in the last five years, and the 12-month period over which this usage occurred.

d. *General Observations from Reclassification*
   i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant material), we don't expect emission increases resulting from the reclassification of this source to area source status.

**21) Tasman Leather Group, Hartland, Maine**

a. *Status prior to 2018 MM2A Memo*
   i. Leather tanning and finishing facility. Consists of boiler and process equipment.
   ii. Subject to Title V permit (Part 70 Air License A-252-70-C-R/M) March 6, 2015
   iii. Source was originally classified major for HAP
      - HAP emissions from Tasman shall not exceed
        a. 45 tpy of any one single HAP based on a 12-month rolling total
        b. 55 tpy of total HAP based on a 12-month rolling total
        c. Records documenting the finish formula using MSDS or manufacturing information, the beginning amount of finish material used, the end amount of finish material used.
   iv. Facility subject to 40 CFR Part 63, subpart TTTT (Leather Finishing Operations)

v. Facility subject to area source NESHAP for boilers: 40 CFR Part 63, Subpart JJJJJ (area source)
vi. 2017 NEI emissions for facility (total/single largest HAP): 10.81 tpy/10.41 tpy

b. *Status post-2018 MM2A Memo*
   i. On March 15, 2019, Tasman Leather submitted request a modification to Condition 29 in Part 70 (Title V) License A-252-70-C-R/M to reduce the maximum permitted emissions of HAP. Per request this minor modification would not result in any increase in emissions at the facility but instead lower HAP limits to reflect Tasman's operation. The facility has reformulated its finishing materials. The source has identified suitable non-HAP substitution for nearly all the glycol ether compounds listed HAP previous utilized at the leather finishing operations. These substitutions have resulted in lower HAP emissions.
      - (a) Request to reduce facilitywide limit of 45 tpy of any single HAP to 9.0 tpy on 12-month rolling total.
      - (b) Request to reduce facilitywide limit of 55 tpy of total HAP to 24 tpy on 12-month rolling total.
      - The source requested removal of 40 CFR 63, subpart TTTT from their Part 70 license
      - Maine issued a Title V Significant License Modification for Part 70 Air License A-252-70-C-R/M) in October 2019.

c. *Reclassification Details – 2019 Title V Significant License Modification*
   i. Previous HAP limits are replaced by:
      HAP emissions from Tasman shall not exceed:
      a. A facilitywide limit of 9 tpy of any one single HAP based on a 12-month rolling total.
      b. A facilitywide limit of 24 tpy of any one single HAP based on a 12-month rolling total.
      - Tasman shall utilize the Measure Finish as Applied or the Material Inventory Mass Balance method of calculating HAP emissions as outlined in permit.
   ii. Tasman is no longer subject to 40 CFR 63, subpart TTTT.

d. *General Observations from Reclassification*
   i. The modified Title V permit resulted in HAP reductions based on PTE limits lower than allowable emissions under previously applicable subpart TTTT. The compliance strategy is comparable to that under subpart TTTT. Reclassification did not result in the potential for HAP emissions increase, but rather resulted in HAP emissions decreases.

**22) The Woodworks Architectural Millwork, Inc., Londonderry, NH**

a. *Status prior to 2018 MM2A Memo*
   i. The Woodworks Architectural Millwork, Inc. (Woodworks) was issued a title V permit (TP-00-59) on June 30, 2010, for three spray booths. Woodworks was issued a title V permit renewal (TV-059) on October 6, 2015.

ii. Facility subject to 40 CFR 63, subpart QQQQ (Surface Coating of Wood Building Products). The facility's compliance strategy was the use of compliant materials (no-HAP/low-HAP). 2017 NEI emissions for facility (total/single largest HAP): 0.031 tpy/0.012 tpy

iii. As reported by the facility, the emission rates based on coatings use rates. The 2018 annual emissions report:
   - Largest single HAP: 0.014 tpy (xylene)
   - Total HAP: 0.0312 tpy (xylene, methanol, ethyl benzene, DGME)

b. *Status post-2018 MM2A Memo*

i. Woodworks submitted an application to the New Hampshire Department of Environmental Services on December 30, 2018, requesting enforceable limitations on the potential to emit to below the VOC major source threshold of 50 tpy, the VOC RACT threshold of 3 tons per consecutive 12-month period for flat wood paneling coating, and below the major source threshold of 10 tpy for any individual HAP and 25 tpy for combined for all HAP.

ii. The comment period on the proposed permit was July 25, 2019-August 26, 2019 and allowed for public hearing requests.

iii. The application was granted on August 28, 2019. The temporary permit was valid upon issuance and expires on February 28, 2021.

c. *Reclassification Details – Temporary Permit TP-0245*

i. Facility removed from title V requirements by temporary permit.

ii. As a compliance strategy, per the temporary permit, the facility must continue to use compliant (low- or no-HAP) coatings in their spray-painting process and document via reporting/record-keeping requirements.

iii. Per their permit, the facility has the potential to emit HAP above the major source thresholds. PTE limits of HAP to <10/25 tpy added to this permit, establishing the facility as a synthetic area source for HAP.

- Maintain monthly records of total quantity of coating, thinning and cleaning material containing VOCs, HAP and/or RTAPs; and SDS or other documentation containing the concentration of total VOCs, each HAP, and each RTAP in each coating, thinning and cleaning material used.
- Maintain a 12-month running total of the following emissions calculated pursuant to Env-A 705.03 for the purpose of demonstrating that the emissions of these pollutants are below the thresholds specified:
  a) Emissions of VOCs (<47 tpy);
  b) Emissions of VOCs from the coatings and thinners used in flat wood panel coating (<3 tons per consecutive 12-month period); and
  c) Emissions of HAP (<10/25 tpy).
- Submit an annual emissions report which shall include the following information:
  a) Actual calendar year emissions of 1) total VOCs; 2) each RTAP and each HAP reported by CASRN;
  b) The methods used in calculating such emissions in accordance with Env-A 705.03, *Determination of Actual Emissions for Use in Calculating Emission-Based Fee*;
  c) The emission factors and the origin of the emission factors; and

d) Total quantity of coating, thinning and cleaning material containing VOCs, HAP and/or RTAPs compiled on a monthly basis.

d. *General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the legally and practicably enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (the use of compliant no-HAP/low-HAP coatings), we do not expect emission increases resulting from the reclassification of this source to area source status.

**23) Valeo North America, Inc., Seymour, IN**

a. *Status prior to 2018 MM2A Memo*

i. The automotive plastic lighting assembly source was originally classified as a major source in April 2017.

- The source had a Part 70 Operating Permit, Minor Source Permit No 071-37124-00006.
- The source was subject to federally enforceable sourcewide conditions limiting VOC (PSD Minor Limit) and HAP (HAP Minor Limits for area source).
- The source took PTE limits in order to be an area source of HAP before the first compliance date 40 CFR part 63 subpart DDDDD for existing boilers. The source was subject to DDDDD for one boiler (272743).

(a) The VOC emissions from flow coating line unit # 6 shall be less than 47.51 tons per twelve (12) consecutive months period with compliance determined at the end of each month.

(b) The combined methanol emissions from thermal cure spray coating booths shall be less than nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(i) Compliance with these limits, combined with the potential to emit methanol from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period and render this source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA)

(ii) Compliance Demonstration for HAP included the overall control efficiency, which includes capture and destruction efficiencies of RTO1, RTO-2, RTO-3 and RTO-4.

1. The control efficiency values applied in this calculation shall be the values determined in the most recent valid compliance demonstration. Until the initial valid compliance test is performed, an overall control efficiency of 90% shall be used.
2. A continuous monitoring system shall be calibrated, maintained, and operated on regenerative thermal oxidizers for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system

shall be recorded as 3-hour average. The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits. On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the latest compliant stack test. If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. A 3-hour average temperature reading below the above mentioned 3-hour average temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(iii) To document the compliance status with the HAP limits, the Permittee shall be required to maintain records

1. The amount and methanol content of each coating material and solvent used. Records shall include inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used.
2. The total methanol usage for each month and each compliance period.
3. The overall control efficiency of RTOs

(iv) Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established for this source.

ii. Facility is subject to 40 CFR 63, subpart PPPP (Plastic Parts Surface Coating):
- Spray paint booth, Flow coating line, Paint Booth, Thermal cure spray booth and Lean lens coaters
- Control technology: Regenerative thermal oxidizer to reduce VOC emissions and exhausting to stacks; Overspray Collection and Recovery System for overspray control; High-volume/Low-pressure (HVLP) guns with a regenerative thermal oxidizer to control VOC and dry filters for particulate control; Use of low VOC/HAP coatings

iii. Restricted PTE
- Methanol 9 tpy
- Total HAP 16.56 tpy

iv. 2017 NEI emissions for facility (total/single largest HAP): 2.19 tpy/1.56 tpy

b. *Status post-2018 MM2A Memo*

i. Valeo North America, Inc. submitted a request for changes to the Title V Operating Permit on September 2017 relating to construction of two (2) thermal cure spray coating booths and one (1) regenerative thermal oxidizer and modification four (4) existing thermal cure spray coating booths, one (1) paint booth, and four (4) lean lens coaters. Due to these modifications Valeo has requested to decrease the existing PSD minor VOC limit for the existing flow coater (#6) in order to remain a PSD minor source.

ii. A Significant Permit Modification was approved in January 2018.
- Source will continue to be subject to HAP PTE limits so permit modification removes applicability of 40 CFR 63, subpart PPPP and subpart DDDDD.

c. *Reclassification Details – 2018 Significant Modification Part 70 Operating Permit, Minor Source Permit No 071-37124-00006*

i. HAP PTE limitations
- In order to assure this source is an area source of HAP under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following: (a) The combined methanol emissions from thermal cure spray coating booths AF-1, AF-2, AF-3, AF-4, AF-5, and AF-6 (Units #14, #25, #26, #27, #28, and #29) shall be less than nine and seventy-six hundredths (9.76) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits, combined with the potential to emit methanol from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period and render this source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).
  - Compliance Demonstration for HAP included the overall control efficiency, which includes capture and destruction efficiencies of RTO-2, RTO-3, RTO-4, RTO-5.
    1. The control efficiency values applied in this calculation shall be the values determined in the most recent valid compliance demonstration. Until the initial valid compliance test is performed, an overall control efficiency of 73% shall be used.
    2. A continuous monitoring system shall be calibrated, maintained, and operated on regenerative thermal oxidizers for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average. The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits. On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the latest compliant stack test. If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. A 3-hour average temperature reading below the above mentioned 3-hour average temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
  - To document the compliance status with the HAP limits, the Permittee shall be required to maintain records

1. The amount and methanol content of each coating material and solvent used. Records shall include inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used.
2. The total methanol usage for each month and each compliance period.
3. The overall control efficiency of RTOs

- Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established for this source.

d. *General Observations from Reclassification*

i. Source remains subject to the same RTO add-on control device and control efficiency requirements in the post-reclassification permit as were in the pre-reclassification permit, including continuous monitoring of the RTO operating temperature to ensure that it is maintained above the 3-hour average determined in the most recent valid stack test, with required corrective action if it falls below that 3-hour average temperature. Other parameters, such as duct pressure and fan amperage are also monitored daily against ideal operating parameters. Testing of the RTO control efficiency is still required every 5 years and the methanol emissions are required to be calculated monthly using the most recent tested control efficiency. There was an increase in allowable emissions (9.0 tpy methanol limit increased to 9.76 tpy) that was related to a modification project at the source, not to the reclassification. Therefore, we do not expect HAP emissions increases as a result of reclassification.

**24) Wayne Metals, LLC, Markle, IN**

a. *Status prior to 2018 MM2A Memo (Permit from May 2013)*

i. Facility is subject to Title V Operating Permit program

ii. Major Source for 40 CFR Part 63, subpart MMMM (Surface Coating for Miscellaneous Parts and Products). Method of compliance no-HAP coating materials.

iii. As of September 2008, the four paint booths, installed in 1978 and 1994, were removed. Current emission units are two powder coating booths – one installed in 2002, the other in 2013. These booths use HAP-free coatings.

- Cartridge filters capture and collect the powder and vent inside to comply with state requirements. Filters inspected daily, captured powder is evaluated for reuse.
- Fabric filters associated with grinding operations on site also are required to limit particles to comply with state laws. Filters inspected daily.

iv. Although, the potential to emit of any single HAP is less than ten (10) tons per year and/or the potential to emit of a combination of HAP is less than twenty-five (25) tons per year, however, the was subject to the requirements of Miscellaneous Metal Parts and Products Surface Coating NESHAP (40 CFR 63, Subpart MMMM) because this source was a major source on the first compliance date of this NESHAP standard. Since this source is considered major source under this NESHAP, based on the May 16, 1995 EPA memo PTE for MACT Standards – Guidance on Timing Issues (also known as Once In, Always In Interpretation).

v. Source located in an area that meets the National Ambient Air Quality Standards.

vi. Source also subject to a series of state requirements to control emissions.
vii. 2017 NEI emissions for facility: 0.0011 tpy/0.0010 tpy (2.16 pounds per year total HAP (toulene, formaldehyde, benzene, nickel)/1.96 pounds per year formaldehyde (single largest HAP))

b. *Status post-2018 MM2A Memo*
i. Operating Permit renewal application submitted to Indiana Department of Environmental Management Office of Air Quality on August 21, 2017.
ii. Email from Wayne Metals on February 22, 2018 requested transition from Part 70 Operating Permit to a Minor Source Operating Permit (MSOP) because the PTE of the entire source is less than Part 70 significant levels and the withdrawal of EPA's "once in always in policy".
iii. A notice was published on March 2018 regarding the replacement of the Part 70 operating permit with a MSOP. No external comments were received during the public notice period.
iv. IDEM issued a MSOP for the source on May 1, 2018.

c. *Reclassification Details – 2018 MSOP No. 179-38963-00016*
i. No major changes at the source including continued use of HAP-free coatings.
ii. SOB explains that the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included in the permit, because the source does not perform paint stripping; auto body refinishing; and does not spray apply any coatings containing chromium, lead, manganese, nickel, or cadmium to any part or product made of metal or plastic, or combinations thereof that are not motor vehicles or mobile equipment.
iii. The source remains subject to a series of state rules to control air emissions.
iv. The cartridge filters for PM control shall be in operation and control PM emissions at all time the powder coating booths are in operation.
v. Uncontrolled HAP PTE 0.69 tons/year (HAP Potential to Emit assuming 24 hour/day operation)
- 0.02 hexane from natural gas combustion,
- 0.07 manganese from welding equipment, and
- 0.60 from lab, cleaning, assembly (chromium is the single largest HAP emitted at 0.45 tons/year).

d. *General Observations from Reclassification*
i. Four paint booths, installed in 1978 and 1994, were removed. Current emission units are two powder coating booths – one installed in 2002, the other in 2013. These booths use HAP-free coatings. True area source, no emission increases due per reclassification.

**25) Gage Products Company, Ferndale, MI**

a. *Status prior to 2018 MM2A Memo*
i. Solvent blending and recycling facility.

ii. Source had a Renewable Operating Permit (ROP) MI-ROP-N0842-2013 and a Source-Wide Permit to Install- MI-PTI-N0842-2013.
   - Facility was subject to federally enforceable sourcewide conditions limiting emissions of HAP and VOC.
      a. Any individual HAP- 9.9 tpy; twelve-month rolling time period as determined at the end of each calendar month.
      b. Any combination of HAP- 24.9 tpy; twelve-month rolling time period as determined at the end of each calendar month.
      c. VOC- 89 tpy; twelve-month rolling time period as determined at the end of each calendar month.
   - Facility is subject to federally enforceable sourcewide conditions for material limits.
      a. 5,000,000 gallons of fuel blends used for automotive fuel with a RVP equal to or greater than 4.0 psia.
      b. 250,000 gallons of fuel blend used for internal combustion engines with a RVP equal to or greater than 4.0 psia.

iii. Facility was subject to 40 CFR Part 60, subpart Kb – tanks 69-81.

iv. Facility was subject to 40 CFR 63, subpart 6B- Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities for Area Sources (FGINK&SPECIALTY and FGFUELBLEND Groups)

v. Facility was subject to 40 CFR Part 63, subpart DD- for certain tanks, evaporators, distillation units. Tanks are subject to subpart DD only if they contain material subject to this subpart. Affected Units: FGSUBDDTANKS- EUSUBBBTANKS, EUTANKS, EULSF
   - Tanks 61-77; subject to tanks level 1 or 2 controls per 40 CFR 63, subpart OO (National Emissions Standards for Tanks)
   - EULSF- limited storage facility tanks
   - EULSF tanks- 72-76
      - Design/Equipment Parameters: Level 1 controls per subpart OO- Equipped with fix roofs, used to store off-site material with organic vapor pressure less than 76.6 kPa and be less than 75 cubic meters in capacity.
      a. Drums- equipped with level 1 controls in accordance with 40 CFR 63, subpart PP, National Emission Standards for Containers.
      b. Transfer system- consist of continuous hard-piping: all joints or seams between the pipe sections shall be permanently or semi-permanently sealed (e.g. a welded joint between two sections of metal pipe or a bolted and gasketed flange).
   - Equipment Leaks from pumps, valves, compressors
      Affected units: FGSUBDDLEAKS- EUSUBDDTANKS, EUOLDEVAPORATOR, EUNEWEVAPORATOR, EUDISTILLATION, EULSF

- LDAR per 40 CFR 63 subpart DD or as an alternative 40 CFR 63, subpart H- National Emission Standards for Organic Hazardous Air Pollutants from Equipment Leaks

- FGMANUFACTURE- Process vents
  a. Affected units: EUOLDEVAPORATOR, EUNEWEVAPORATOR, EUDISTILLATION.
     - two thin film evaporators used to recycle a variety of blended solvents, and one distillation unit for processing product from the thin film evaporators and for remanufacturing incoming material.
  b. The emission units in this flexible group are subject to 40 CFR 63 Subpart DD and exhaust through one process vent as described in 40 CFR 63.680(c)(2), which use a secondary condenser (CDFINALCOND) to control emissions.
  c. VOC limits- 3.5lb/hr daily avg determined by dividing daily emissions by hrs of operation and 12.1 tpy 12 month rolling avg as determined at the end of each calendar month
  d. The permittee must route the vent stream from each affected process vent through a closed-vent system to a control device that meets the standards specified in §63.693 of 40 CFR 63 Subpart DD. For the purpose of complying with 40 CFR 63.690(b), a primary condenser is not a control device; however, *a second condenser or other organic recovery device that is operated downstream of the primary condenser is considered a control device*. (40 CFR 63.690(b))
     - When processing off-site material that is subject to 40 CFR Part 63 Subpart DD, the final exhaust temperature of CDFINALCOND shall not exceed 42 degrees Fahrenheit based on a daily average. In lieu of monitoring the temperature of the exhaust flow from CDFINALCOND, the permittee may conduct performance tests and develop monitoring parameters in accordance with 40 CFR 63.694(1).2 40 CFR 63.693(e)(1)(i) and (ii) and (2)(i)
     - The permittee shall not process off-site material that is subject to 40 CFR 63 Subpart DD unless CDCONDENSERS is installed and operating properly. CDCONDENSERS shall be designed and operated to achieve 95 percent or greater recovery, on a weight-basis, of the design amount of total organic compounds (TOC), less methane and ethane, contained in FGREMANUFACTURE's vent streams.2 40 CFR 63.693(e)(1)(i)
     - Per permit the plant achieved synthetic minor status on April; 3, 2003, but remained subject to subpart DD because of the OIAI policy.

vi. 2017 NEI emissions for facility (total/single largest HAP): 4.87 tpy/1.66 tpy

b. *Status post-2018 MM2A Memo*

i. On April 2018, Gage Products Company submitted a Permit to Install Application to Michigan Department of Environmental Quality. Application was to change (ROP)

(MI-ROP-N0842-2013) to a synthetic minor permit due to EPA change in OIAI policy. MI received all information required on March 2019.

ii. Synthetic Minor Permit-Permit to Install (PTI) #64-18B was issued in May 2019 and ROP-N0842-2013 was voided

c. *Reclassification Details – Permit to Install-64-18B*

i. Facilitywide conditions- emission limits
   - Each individual HAP- 9.9 tpy; twelve month rolling time period as determined at the end of each calendar month.
   - Aggregate HAP- 24.9 tpy; twelve month rolling time period as determined at the end of each calendar month.
   - VOC- Less than 89.9 tpy; twelve month rolling time period as determined at the end of each calendar month.

ii. Monitoring and Recordkeeping
   - The permittee shall keep separate records of monthly calculations for each process's HAP emissions. These records shall include:
     a. A monthly calculation of individual HAP emissions in tons for each process.
     b. A monthly calculation of all combined HAP emissions in tons for each process.
     c. A monthly calculation of individual HAP emissions in tons from all processes based upon a twelve-month rolling time period.
     d. A monthly calculation of all combined HAP emissions in tons from all processes based upon a twelve-month rolling time period.
   - The permittee shall calculate the HAP emissions from all processes using a method acceptable to the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request.

iii. Permit removes applicability to NESHAP 40 CFR 63, subpart DD.

iv. Affected tanks: FGTANKFARM- 1-40, 52-71, 77-81, 90 and 91
   - tanks 69, 71, 78, 79, 80 and 81 continue to be subject to 40 CFR Part 60, subpart KB – pollution control equipment- condenser system- CDFUELSCOND- the permittee shall not operate any tank in FGNSPSLargeTanks unless the tank is equipped with a closed vent system and control device (CDFUELSCOND) meeting the specification of 40 CFR 60.112b.
   - Tanks 69, 70, 71, 78, 79, 80, 81, and EUTANKS (tanks numbers 1-24, 28, 32-40, 52-68, 77, 90 and 91), EUDRUMFILLING, EUTOTEFILLING, EUTANKERFILLING, permit includes new total throughput material limits - 58,124,000 gallons/yr; 12-month rolling time determined at the end of each calendar month

v. Tanks 2,3,6,7,8,9,10 and 11 – pollution control equipment- the permittee shall not operate the tank unless the tank's conservation vent, the closed vent system, and the vent condenser system- CDFUELSCOND- are installed, maintained and operated as specified in permit

vi. Facility continues to be subject to 40 CFR 63, subpart 6B- Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities for Area Sources. – ink manufacturing process- FGSPECIALTY and FGFUELBLEND

vii. FGMANUFACTURE- EUOLDEVAPORATOR, EUNEWEVAPORATOR, EUDISTILLATION
- Emission limits: VOC limits- 3.5lb/hr daily avg determined by dividing daily emissions by hrs of operation and 12.1 tpy 12 month rolling avg as determined at the end of each calendar month
- The permittee shall not process any material in FGREMANUFACTURE unless CDREMANFINALCOND (final condenser for EUOLDEVAPORATOR, EUNEWEVAPORATOR, and EUDISTILLATION) is installed, maintained, and operated as specified in permit.
- When processing material in FGREMANUFACTURE, the final exhaust temperature of
  CDREMANFINALCOND shall not exceed 42 degrees Fahrenheit based on a daily average.

d. *General Observations from Reclassification*

i. Based on the review of the compliance strategy for major source NESHAP, emissions prior to reclassification, and the legally and practicably enforceable emission limitations taken by the source to reclassify reflecting the same compliance strategy as prior to the reclassification (use of condenser, operational limitations). Source maintain VOC emission limits as well (HAP are VOCs). We do not expect emission increases resulting from the reclassification of this source to area source status.

**26) Holcim US Inc., Artesia, MS**

a. *Status prior to 2018 MM2A Memo*

i. Facility was a Portland cement plant that fueled its cement kiln using collected hazardous and nonhazardous waste. The facility operated under a Title V permit originally issued in 2004.

ii. In 2014, Holcim dismantled and removed all equipment associated with the Portland cement plant and issued a revised application in 2015 for renewal of the Title V permit for the remaining emission equipment associated with their new primary role as a hazardous waste storage/transfer facility.

iii. Subject to 40 CFR Part 63, subparts EEE (Hazardous Waste Combustors), LLL (Portland Cement Manufacturing), and PP (Containers) as well as 40 CFR 61, Subpart V (Emission Standard for Equipment Leaks). Subject to National Emission Standard for Benzene Waste Operations as defined in 40 CFR 61.340, Subpart FF.
- Waste fuel must meet heat content, ash percentage, and (for hazardous waste) PCB limits/thresholds.
- Feed rates of various HAP constituents restricted on a 12-hour rolling average basis (rates matching those in subpart EEE HWC MACT)
- Vapor recovery systems recover organic vapors at 95% efficiency or greater (as per part 61 subpart V)

iv. Unrestricted HAP PTE (total/single largest HAP, identified): N/A

v. 2017 NEI emissions for facility (total/single largest HAP): 9.16 tpy/4.20 tpy

b. *Status post-2018 MM2A Memo*

i. In 2014, Holcim dismantled and removed all equipment associated with the Portland cement plant. Holcim then submitted a revised application in 2015 for renewal of the Title V permit 1680-00025 for the remaining emission equipment. During state review of this application, Holcim reviewed the January 2018 MM2A memo and determined that by limiting the throughput of hazardous waste derived fuel, they can operate the remaining emission sources associated with the storage and transfer facility as a Synthetic Minor source. As such, Holcim submitted an application for an Air Synthetic Minor Operating Permit (SMOP Permit No.: 1680-00025) on November 13, 2018.

ii. State issued a draft Synthetic Minor Operating Permit on September 5, 2019 with a 30-day public notice period that ended October 12, 2019. The state did not receive any comments during the public notice period and issued the final permit on October 21, 2019.

c. *Reclassification Details*

i. PTE limitations

- Hazardous waste derived fuel throughput limitation of 22,152,000 gallons for any consecutive 12-month period
- A carbon adsorption system controls emissions from the storage and blending tanks. Tank emissions are routed to the carbon canisters when tank system pressure reaches 12 psig. The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater or shall recover or control the benzene emission vented to it with an efficiency of 98 weight percent or greater.
- Compliance demonstration: MRR to verify throughput limits and carbon adsorption efficiency
- Recordkeeping, reporting requirements:
    a. Maintain records for a minimum of 5 years
    b. Monitor and record waste fuel throughput; used to calculate monthly and rolling 12-month total throughputs
    c. Daily monitoring of benzene concentrations in exhaust stream from carbon adsorption system
    d. Determine annual average benzene quantity and flow-weighted benzene concentration at the point where the waste enters the storage facility
    e. Perform and record visual inspections quarterly and test storage tanks, containers and closed vent system per Method 21 of Appendix A of 40 CFR 60
- Operations at the facility remain subject to 40 CFR 61, subpart FF. Storage tanks now subject to subpart Kb. Not subject to subpart DD, NESHAP from Off-Site Waste and Recovery Operations because throughput limits will restrict potential HAP emissions below major source thresholds. No longer subject to subpart PP. Emergency engine subject to the requirements of Subpart ZZZZ that

are applicable to a new emergency engine located at an area source of HAP. As such, the engine will comply with Subpart ZZZZ by complying with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.

ii. State Observations:
- Per state SOB document: "With the throughput limit on waste derived fuel, coupled with federal regulatory requirements to install, operate, and maintain … the carbon adsorption system, the potential emissions of VOC and HAP will be well below major source thresholds."

d. *General Observations from Reclassification*

i. Holcim dismantled and removed all equipment associated with the Portland cement plant and the remaining emission equipment is associated with the waste storage/transfer. The facility is subject to operational limitations and enforceable conditions requiring the use of carbon adsorption system to with an efficiency of 95 weight percent or greater or shall recover or control the benzene emission vented to it with an efficiency of 98 weight percent or greater. Based on the review of the enforceable conditions associated with this reclassification, we don't expect emission increases resulting from the reclassification of this source to area source status.

**27) . Kinder Morgan Liquids Terminals-Argo, Argo, IL**

*a. Status prior to 2018 MM2A Memo*

i. Source status classification (major/area)

ii. Source has units subject to NESHAP Subpart R (Gasoline Distribution Facilities - Bulk Gasoline Terminals and Pipeline Breakout Stations). Affected emission units and basis for control are:

1. A number of storage tanks are used for non-gasoline materials so are not subject to Subparts BBBBBB or R.
2. For tanks/storage vessels for gasoline- floating roofs, closed vent system, and control device(s) must comply with Subpart R. (other sections are listed for compliance, such as 60.112b(a)(i), (ii)(C), and (iii), and 63.425(d).
3. Truck loading/unloading - submerged fill and vapor collection and transfer back to vapor recovery unit. Comply with 60.502 of NSPS.
4. Equipment leaks - monthly sensory leak checks (sight, sound, smell).
    a. Minimize gasoline spills
    b. Clean up spills as expeditiously as practicable
    c. Cover all open gasoline containers with a gasketed seal when not in use
    d. Minimize gasoline sent to open waste collection systems that collect and transport

iii. Source subject to 40 CFR 63 subpart Y (Marine Vessel Loading) work practice requirements that apply to existing sources with emission less than 10 and 25 tons-submerge fill standards of 46 CFR 153.282 (Coast Guard Standards).

iv. Source subject to 40 CFR 63 subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines-RICE)- Applicable requirements for stationary CI RICE and black start stationary CI RICE.
v. Source subject to 40 CFR 63 subpart CCCCCC for gasoline dispensing for area sources-work practice requirements
vi. Source is also subject to multiple requirements for volatile organic materials (VOM), including add-on control requirements, emission limits, work practice requirements and throughput limits.
vii. Source subject to NSPS subpart Kb
viii. Pursuant Construction Permit #06100078, HAP PTE limits from all operations performed at the source shall not exceed:
    1. Individual HAP: 1 tons/month; 8 tpy
    2. Total HAP: 2.50 tons/month; 20 tpy
    3. Total throughput of HAP containing material, excluding fuel grade ethanol and low vapor pressure petroleum oils shall not exceed 1,140,000 barrels/month and 9,100,000 barrels/year.
ix. Compliance is determined on a monthly basis and future annual HAP emissions must be predicted based on current and planned activities to ensure future compliance.
x. Recordkeeping is specified for HAP emissions, throughput of HAP containing materials, and implementation of HAP Management Program, and reporting is semi-annual.
xi. 2017 NEI emissions for facility (total/single largest HAP): 6.20 tpy/1.42 tpy

b. *Status post-2018 MM2A Memo*
    i. Permit Modification Application received in May 2018.
    ii. CAAPP was revised in March 2019 to remove requirements of 40 CFR 63 Subpart R (Gasoline Distribution (Stage 1)) and replaced with the requirements of the associated area source rule, 40 CFR 63 Subpart BBBBBB (6-B) Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

*c. Reclassification Details*
    i. Source continues to be subject to HAP PTE limitations pursuant Construction Permit #06100078
    ii. Source is no longer subject to subpart R but continues to be subject to subpart BBBBBB, NSPS Kb and NSPS XX, and multiple requirements for VOM, including requirements for vapor combustion with enclosed flare oxidation (VCU) and scrubbers. Marine vessel loading operations continue to be subject to subpart Y and Coast Guard Requirements including vapor collection equipment (overall efficiency of 95%)

*d. General Observations from Reclassification*
    i. This source was subject to enforceable conditions rendering the source an area source prior to the reclassification and continues to be subject to those conditions after reclassification. The source continues to be subject to multiple requirements for VOM that also control HAP for the units previously subject to subpart R. The source continues to be subject to subpart Y and Coast Guard requirements for marine vessel

loading operations. Based on the review of the enforceable conditions prior and after the reclassification we don't expect emission increases resulting from the reclassification of this source to area source status

**28) Newport Biodiesel, Newport, RI**

a. *Status prior to 2018 MM2A Memo*
   i. The permittee owns and operates process equipment (including pre-treatment condensers and a catalytic oxidizer) for converting used cooking oil into biodiesel fuel.
   ii. Permittee was under a consent decree and has been inquiring if a Title V permit is still required. They applied for a Title V permit in 2017.
   iii. Facility was subject to MON NESHAP (40 CFR Part 63 Subpart FFFF).
   iv. 2017 NEI emissions for facility (total/single largest HAP): 1.378 tpy/1.373 tpy
b. *Status post-2018 MM2A Memo*
   i. Rhode Island DEM provided a Minor Source permit on March 5, 2019.
   ii. Permit cover letter states that facility is subject to the Operating Permit Program as an Emissions Cap Source, with allowable emissions restricted to below major source threshold.
c. *General Observations from Reclassification*
   i. Total facility HAP emissions shall not exceed 1,000 lbs of any one HAP or combination of HAP per calendar month based (0.5 tons per month so 6 tons per year max).
   ii. Storage tanks have a vapor balance system and tank vents are routed to catalytic oxidizer. Pressure relief device on all tanks must always be set to no less than 1.25 psig.
   iii. Process vessels must be either totally closed or equipped with tightly fitted covers that vent to catalytic oxidizer.
   iv. The catalytic oxidizer must be operated according to design specifications and operating temperature shall be at or above 626°F or lower if demonstrated to achieve required 98% control efficiency. Bypass is prohibited when HAP are being sent to device. All HAP-containing process equipment shall be captured, contained and routed to the pre-treatment condensers prior to discharge to the catalytic oxidizer.
   v. Catalyst bed operating temperature must be continuously monitored with calibrated instrument (verified once per year or replaced), results must be indicated and recorded.
   vi. Oxidizer and monitoring equipment must be inspected at least once per month and results recorded.
   vii. Annual leak inspection of equipment in HAP service is required.
   viii. Pre-treatment condensers' outlet exhaust temperature must be monitored and recorded.
   ix. Recordkeeping and Reporting requirements are in place for operating, monitoring, and maintenance activity and for all facilitywide HAP emissions on a monthly and 12-month rolling basis. Equations are not specified.

x. RI OAR must be notified is HAP discharge exceeds 1000 lbs/month.
xi. RI OAR must be notified of any anticipated noncompliance with permit or other rules or of any operational or equipment changes covered in the approval.
xii. Records must be maintained for at least 5 years.

d. *General Observations from Reclassification*
   i. Source continues to be subject to enforceable conditions rendering the source an area source. Enforceable conditions continue to require sources previously subject to subpart FFFF to be routed to a catalytic oxidizer to achieve 98% control efficiency. We don't expect emission increases resulting from the reclassification of this source to area source status.

**29) South Bend Ethanol (Noble Americas), LLC, South Bend, IN**

a. *Status prior to 2018 MM2A Memo*
   i. The permittee owned and operated a stationary fuel-grade ethanol production plant. The facility consisted of two plants (Noble Americas South Bend Ethanol LLC and Linde LLC) on contiguous property owned by Noble Americas South Bend Ethanol LLC. Since Linde LLC would not have been located there without the former plant, they were considered one major source.
   ii. State issued Part 70 Operating Permit Renewal No. T141-32025-00033 on October 3, 2013 for a stationary fuel-grade ethanol production plant. Facility submitted application requesting changes to that permit on July 27, 2016. State approved that mod on Feb 21, 2017.
   iii. Major HAP source, subject to 40 CFR Part 63, subparts FFFF (MON), subpart VV (oil-water separators and organic-water separators), DDDDD (Boilers), and ZZZZ (RICE), plus several part 60 and part 61 regs.
      - Subpart FFFF sources are controlled by $CO_2$ scrubber (control efficiency equal or greater than 95%-LAER for VOC); two natural gas-fired regenerative thermal oxidizers (control efficiency no less than 98%-BACT for VOC), natural gas-fired flare controls VOC/HAP emissions from alcohol load-out operation (capture and destruction efficiency of at least 98%- BACT requirement)
      - Subpart DDDDD boilers are natural gas-fired boilers subject to PSD requirements including limits on amount of natural gas usage, NOX and CO emisisons
   iv. Controlled HAP PTE (total/single largest HAP) 26.18 tpy total, 12.36 single (acetaldehyde)
   vii. NEI emissions for facility (total/single largest HAP): 11.59 tpy/7.23 tpy

b. *Status post-2018 MM2A Memo*
   i. Indiana DEM received an application to modify the source on May 22, 2018 relating to the installation ot two new natural gas fired boilers and the removal of two natural gas boilers and one rental boiler. The application included revision of the emission limits on the scrubber and the RTO following a recent stack test of the control equipment.
      - Controlled HAP PTE after modification: 23.60 tpy total; 9.10 tpy single (now Hexane)

ii. IDEM issued a Title V significant medication on November 2018 and determined that the following major source NESHAP(s) are no longer applicable to this source and have been removed from the permit:
- National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, (40 CFR 63, Subpart FFFF)
- National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD
- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ (IDEM has reevaluated applicability for area source)

c. *Reclassification Details*

i. Revised Part 70 permit

D.3.4 Hazardous Air Pollutants [326 IAC 2-4.1] [40 CFR 63]
- In order to ensure this source is an area source of HAP under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:
  a. The single HAP emissions from the CO2 Scrubber (V-230), which controls the yeast propagation (EU-04), the fermentation operation (EU-05), and the beerwell (EU-07), are limited as follows:
     - The Acetaldehyde emissions from the CO2 Scrubber (V-230), shall not exceed 0.05 pounds per hour;
     - The Acrolein emissions from the CO2 Scrubber (V-230), shall not exceed 0.13 pounds per hour;
     - The Formaldehyde emissions from the CO2 Scrubber (V-230), shall not exceed 0.005 pounds per hour; and
     - The Methanol emissions from the CO2 Scrubber (V-230), shall not exceed 0.025 pounds per hour.
  b. The total HAP emissions from the CO2 Scrubber (V-230), which controls the yeast propogation (EU-04), the fermentation operation (EU-05), and the beerwell (EU-07), shall not exceed 0.22 pounds per hour.

ii. D.4.4 Hazardous Air Pollutants [326 IAC 2-4.1] [40 CFR 63]
  a. The single HAP emissions from the Thermal Oxidizers (RTO-1 and RTO-2) which controls the degasser and recovery column (EU-08), the stillage concentration and evaporation process (EU-09), the DDGS Dryers (EU-10), and the DDGS Cooler (EU-18), are limited as follows:
     - The Acetaldehyde emissions from the RTOs, shall not exceed 1.25 pounds per hour;
     - The Acrolein emissions from the RTOs, shall not exceed 0.69 pounds per hour;
     - The Formaldehyde emissions from the RTOs, shall not exceed 0.13 pounds per hour, and
     - The Methanol emissions from the RTOs, shall not exceed 0.87 pounds per hour.

b. The total HAP emissions from the Thermal Oxidizers (RTO-1 and RTO-2), which controls the degasser and recovery column (EU-08), the stillage concentration and evaporation process (EU-09), the DDGS Dryers (EU-10), and the DDGS Cooler (EU-18), shall not exceed 2.96 pounds per hour.

iii. D.5.3 Hazardous Air Pollutants [326 IAC 2-4.1] [40 CFR 63]

- The single HAP emissions from the alcohol loadout flare (G-602), which controls the alcohol loadout operation (EU-13), are limited as follows:
  a. The Hexane emissions from the alcohol loadout flare (G-602), shall not exceed 0.31 pounds per hour; and
  b. The total HAP emissions from the alcohol loadout flare (G-602), shall not exceed 0.35 pounds per hour.

iv. Compliance with the above HAP emission limits combined with the potential to emit HAP from all other emission units at the source, shall limit HAP emissions from the entire source to less than ten (10) tons for any single HAP and twenty-five (25) tons for any combination of HAP per twelve (12) consecutive month period and render this source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

v. Recordkeeping, reporting requirements:

- The requirements of 40 CFR Part 64, CAM, are applicable to the following emission units..

| **Emission Unit** | **Control Device Used** | **Pollutant** |
|---|---|---|
| DDGS Dryers (EU-10) & DDGS Coolers (EU-18) | RTO - 1 & 2 | VOC, CO, Single HAP, Total HAP |
| Yeast Propagation (EU-04) Beerwell (EU-0' Fermentation (EU-05) | CO2 Scrubber | VOC, Single HAP, Total HAP |
| Alcohol Load-out (EU-13) | Flare | VOC, Single HAP, Total HAP |

d. *General Observations from Reclassification*

i. Units previously subject to subpart FFFF continue to be subject to enforceable conditions for LAER, and BACT requiring the same method of compliance and control efficiency as prior the reclassification. In addition, new single HAP emissions limitations were established to ensure the source is an area source. New boilers continue to be subject to limitations on natural gas and NSPS subpart Db. The back-diesel fire pump continues to be subject to subpart ZZZZ. We don't expect emission increases resulting from the reclassification of this source to area source status.

**30) Stericycle Environmental Solutions, Inc., 421 Lycaste Street, Detroit, MI**

a. *Status prior to 2018 MM2A Memo*

i. RCRA Part B facility for storing hazardous waste. Major source with a Renewable Operating Permit (ROP) No. MI-ROP_N0737-2009 and Source-Wide Permit to Install (PTI) No. MI-PTI-N0731-2009.

ii. NESHAP subparts applicability
- Subject to 40 CFR 63, subpart DD (Off-site Waste and Recovery Operations).
- Storage tanks, tanker truck load/unloading pads (also subject to subpart EEEE (Organic Liquids Distribution [Non-Gasoline])).

iii. Method of compliance – Vapor balance system connecting all the tanks; vapor balance system for each transfer pad; for waste offloading, conservation vents on tanks that vent to permanganate scrubber under negative pressure.

iv. Other requirements
- Tanks also subject to 40 CFR 63, subpart Kb and 40 CFR 61, subpart FF (Benzene Waste Operations)
- Limits
  (a) Emission limits for Individual HAP -tpy (e.g., benzene, formaldehyde, methylene chloride, tetrachloroethylene, acetone)
  (b) Material limits for individual HAP: concentration limits (weight %) for tanks; offloading limits include number of containers processed and HAP content of offloaded material
    (i) Hazardous waste- limit for FG-TS1 Blending tanks: 20,075,000 gallons per year, based on a 12-month rolling time period determined at the end of each month

v. 2017 NEI emissions for facility (total/single largest HAP) $3.918 \times 10^{-7}$ lb Total, $3.918 \times 10^{-7}$ lb Benzo[a]pyrene

b. *Status post-2018 MM2A Memo*

i. In June 2019, source obtained Permit to Install (PTI) No. 6-19 with legally enforceable permit conditions limiting the PTE of HAP below CAA section 112 major source thresholds.

ii. In August 2019, the Air Quality Division (AQD) voided ROP No. MI-ROP-N0731-2009. AQD also voided the Source-Wide Permit to Install (PTI) No MI-PTI-N0731-2009 because all remaining applicable requirements are included within PTE No. 6-19 or obsolete.
- 2009 ROP included an RTO/Scrubber/MVRS system due to a consent decree. The RTO/Scrubber requirement was removed prior to PTI No. 6-19 was approved.

c. *Reclassification Details – PTI No. 6-19*

i. PTI establishes facilitywide permit conditions.

ii. Facility continues to be subject to 40 CFR 63 subpart Kb and 40 CFR 61, subpart FF. Some tanks are subject to RCRA.

iii. New facilitywide HAP emissions limits:
- Individual HAP < 8.9 tpy based on 12-month rolling period as determined at the end of each calendar month.
- Aggregate HAP <22.4 tpy based on 12-month rolling period as determined at the end of each calendar month.
- Benzene- Permittee shall not process more than 10 megagrams of benzene from facility waste.

iv. Material limits

- Truck transfer- permittee shall not transfer more than 43,404,000 gallons of material per year based on a 12-month rolling time period determined at the end of each calendar month. This restriction applies to the sum of the amount of material transferred to the facility through FG-TruckTransfer and the amount of material transferred from the facility through FG-TruckTransfer.
- Storage and blending tanks- material received by tanker truck limited to 21,702,000 gallons per year based on a 12-month rolling time period determined at the end of each calendar month.
- RCRA tanks material limits for formaldehyde- 0.06 weight %

v. Method of compliance – Vapor balance system connecting all the tanks; vapor balance system for each transfer pad.
- The permittee shall monitor emissions and operating and maintenance information in accordance with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 61 Subparts A and FF.

vi. Monitoring/Recordkeeping:
- Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- Individual and aggregate HAP emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.
- Emission calculations shall be based on actual throughput, information on the waste processed and sampling data, storage tank emission calculations such as those in AP-42 Chapter 7.1, transfer line clearing activity, and tank cleanout activity, or an acceptable alternative approach.

d. *General Observations from Reclassification*

i. Source continues to be subject to RCRA and also has enforceable conditions for operational limitations and requirement for vapor balance systems connecting all the tanks; vapor balance system for each transfer pad. We don't expect emission increases due to reclassification of this source to area source status.

**31) Valero Renewable Fuels Company, Mt. Vernon, IN**

a. *Status prior to 2018 MM2A Memo*

i. Valero Renewable Fuels Company, LLC, dba Valero Mount Vernon Plant was issued Part 70 Operating Permit Renewal No. T120-31281-00051 on Sept. 25, 2013 for a stationary ethanol plant.

ii. A Significant Modification to the Part 70 permit was received on May 24, 2017 and approved on January 26, 2018.

iii. Facility had taken enforceable PTE limits to reduce all HAP emissions under major source thresholds but was still subject to MACT standards under OIAI.

iv. Subject to 40 CFR 63 Subpart FFFF (NESHAP for Miscellaneous Organic Chemical Manufacturing).

v. Emissions controlled via two thermal oxidizers, a CO2 scrubber, a natural gas-fired flare system, and a cooling drum baghouse.
vi. HAP emissions are limited in the permit through max hourly emission rates for each of the HAP-emitting process units
- The permit states, "Compliance with the above HAP emission limits and the HAP emission limits, combined with the potential to emit HAP from all other emission units at the source, shall limit HAP emissions from the entire source to less than ten (10) tons for any single HAP and twenty-five (25) tons for any combination of HAP per twelve (12) consecutive month period and render this source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA)."

vii. 2017 NEI emissions for facility (total/single largest HAP): 11.76 tpy/3.20 tpy

b. *Status post-2018 MM2A Memo*
*i.* Effective November 16, 2018, the state renewed the FESOP/Title V noting that the source was no longer subject to subpart FFFF due to withdrawal of the OIAI policy.

c. *Reclassification Details*
i. Source has the same per-hour emission limits for each process unit for both single HAP and total HAP as permitted before reclassifying.
ii. Method of compliance/MRR requirements: Emissions controlled via two thermal oxidizers, a CO2 scrubber, a natural gas-fired flare system, and a cooling drum baghouse monitored under the same parameters as prior to reclassification.
iii. State Observations – Regarding this source and its applicability to OIAI, the agency wrote, "As a result of this change in U.S. EPA policy, IDEM, OAQ determined that the following major source NESHAP(s) is/are no longer applicable to this source and has/have been removed from the permit:
- 40 CFR 63, Subpart FFFF - National Emission Standards for Miscellaneous Organic Chemical Manufacturing."

d. *General Observations from Reclassification*
i. Source continued with existing PTE limits and control technologies after reclassifying. We don't expect emission increases due to reclassification of this source to area source status.

**32) World Energy Natchez LLC, Natchez, MS**

a. *Status prior to 2018 MM2A Memo*
i. Renewed Title V was issued in 2003 (permit no. 0040-00005). It was modified in 2015 and in 2016 due to ownership changes.
ii. World Energy is a biodiesel production facility. Biodiesel is produced from a reaction between soybean or vegetable oil, methanol, and sodium methylate. The process reaction can be either batch, semi-batch, or continuous. Glycerol (glycerin) and free fatty acids are byproducts of the production process. The two major processes at the facility are biodiesel/glycerol production and methanol recovery. Additional units and equipment supporting the manufacturing processes include process wastewater

pretreatment, steam generation, a cooling tower, storage tanks, loading/unloading facilities, and maintenance support activities.

iii. Facility subject to 40 CFR 63, subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing. The biodiesel production facility has a 72,000,000 gal/yr capacity.

iv. Facility subject to 40 CFR 63, subpart DDDDD: National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The facility has two natural gas-fired boilers: emission point AB-001, 59.64 MMBTU/hr boiler; and emission point AB-002, a non-operational 76.68 MMBTU/hr boiler.

v. 2017 NEI emissions for facility (total/single largest HAP): 3.52 tpy/3.52 tpy

b. *Status post-2018 MM2A Memo*

i. On April 2, 2019, the Mississippi Department of Environmental Quality granted World Energy Natchez LLC a synthetic minor operating permit (SMOP) No. 0040-00005. The public was given a 30-day comment period and the opportunity to request a public hearing.

c. *Synthetic Minor Operating Permit* No. 0040-00005

i. The permit set enforceable limitations on the potential to emit to below 9.9 tpy of a single HAP, specifically methanol, and 24.0 tpy of any combination of HAP for each consecutive 12-month period on a rolling basis. Also, the permit limits emissions of volatile organic compounds (VOC) to 95 tons per year for each consecutive 12-month period on a rolling basis. This is below the major source threshold of 10 tpy for any individual HAP and 25 tpy for combined for all HAP.

ii. The permitting action also removes the 76.68 MMBtu/hr boiler (AB-002) which was not operational.

iii. The permit includes a new scrubber (emission point AD-5300) which controls methanol emissions from two tanks (emission points AC-228 and AC-2006). Previously, emission point AC-2006 held biodiesel, but now stores methanol which was stored in emission point AC-2003 until it was permanently removed from service. While the facility will no longer be subject to the Miscellaneous Organic NESHAP, World Energy will continue utilizing the control equipment to keep the facility's methanol emissions below title V thresholds.

iv. Monitoring and Recordkeeping Requirements

- The permittee shall measure the methanol concentrations in the inlet and outlet of the cooling tower (AD-001) monthly and continuously monitor the flow through the cooling tower. The permittee shall use an EPA approved or ASTM method (having a detection limit of at least 10 ppm) to determine the methanol concentration in both the inlet and outlet streams. Three samples are to be taken and averaged at both locations. The averaged concentrations shall be used with the monthly flow of water through the cooling tower.
- The permittee shall continuously monitor the temperature at the top and bottom of the methanol recovery column (AD-751) to operate in such a manner in which the reflux control temperature shall maintain an operating temperature ≤ 162ºF,

and the bottom of the column's control temperature shall maintain an operating temperature between 182 and 206ºF.

- For the spray scrubber (AD-921) and the venturi packed column scrubber (AD-5300), the permittee shall continuously monitor (at least every 15 minutes) the liquid and gas flow to determine the daily (24-hr) average liquid to gas (L/G) ratio. The permittee shall operate in such a manner that the 24-hr average L/G ratio is greater than 109 for the spray scrubber and 214 for the venturi scrubber to achieve 95% methanol removal efficiency. If the L/G ratio falls below the design specifications, the permittee shall shut down the process and take immediate corrective action to return the scrubber to the designed L/G ratio. The permittee shall record the date, time, and duration when the scrubber L/G ratio is below the minimum design ratio and note any corrective actions taken. Also, the permittee shall monitor and record the methanol concentration in the scrubbing liquid daily using an EPA approved or ASTM method. If the methanol concentration is found to be above 30% by volume for AD-921 or 20% by volume for AD-5300, the permittee shall immediately add make-up water and remove scrubbing liquid to reduce the concentration below design standard.
- For process vessels and storage tanks, the permittee shall record the monthly throughput for each process vessel and storage tank and determine monthly emissions of methanol.

d. *General Observations from Reclassification*
   i. The facility installed a scrubber to control methanol emissions. Enforceable emission limitations and conditions on the operation of the new scrubber to achieve 95% methanol removal efficiency render the source an area source. We don't expect emission increases due to the reclassification of this source to area source status.

**33) Cook Property Inc. (previously GEA Bloomington Production Operations, LLC), Bloomington,** IN

a. *Status prior to 2018 MM2A Memo*
   i. The source removed several emission units (including a high solid paint system, painting booths, three boilers, and case foaming operation) from the source and transitioned from a Part 70 Operating Permit to a Registration. Registration number 105-38053–00003, dated February 14, 2017.
   ii. The only emission units left at the source are two natural gas fired boilers. The boilers continue to be subject to 40 CFR 63, Subpart DDDDD because of the OIAI.
   iii. The HAP PTE of the entire source before controls was 0.41 tons/year total and 0.39 tons/year Hexane.
   iv. 2017 NEI emissions for facility (total/single largest HAP): 0.144 tpy/0.136 tpy

b. *Status post-2018 MM2A Memo*
   i. Source submitted an application to change ownership on November 2019
   ii. Administrative Amendment of Registration (105-39357-00003) was issued on May 2018.

c. *Reclassification Details*

i. The facility name was changed from GEA Bloomington Production Operations, LLC to Cook Property, Inc.
ii. Facility is an area source of HAP emissions: total HAP PTE of 0.41 tons/year.
iii. 40 CFR 63, Subpart DDDDD was removed from permit.

d. *General Observations from Reclassification*

i. Prior to reclassification, the source removed several emission units rendering the source a true area source. We don't expect emission increases due to the reclassification of this source to area source status.

**34) Empire District Electric Company - Riverton, KS**

a. *Status prior to 2018 MM2A Memo*
   i. On September 27, 2016, PSD construction permit C-13534, originally issued in 2013, was revised for this power station. On March 30, 2018, the facility renewed a Class I Operating Permit O-12086 that was originally issued in 2003.
   ii. The construction permit was revised because the facility had converted a simple cycle combustion turbine to a combined cycle configuration and retired two coal/gas-fired boilers and one combustion turbine.
   iii. Facility remained subject to 40 CFR 63 Subpart YYYY (Turbines) and Subpart ZZZZ (RICE).
   iv. 2017 NEI emissions for facility (total/single largest HAP): 3.86 tpy/2.67 tpy
b. *Status post-2018 MM2A Memo*
   i. In October 2019, the source requested to reclassify as an area source based on emissions calculations that showed that, after the 2016 modifications, the facility was a true area source for HAP.
   ii. Subsequently, in January 2020, the source requested to make the same change to their Class I Operating Permit.
c. *Reclassification Details*
   i. In its 2019 request, the source calculated their facilitywide uncontrolled PTE to be 7.65 tpy for the single largest HAP (formaldehyde) and 11.09 tpy for combined HAP.
   ii. The application to reclassify was still pending as of February 2020.
d. *General Observations from Reclassification*
   i. Prior to reclassification, the source removed several emission units rendering the source a true area source. We don't expect emission increases due to the reclassification of this source to area source status.

**35) Innocor Foam Technologies ACP Inc., Tupelo, MS**

a. *Status prior to 2018 MM2A Memo*
   i. Flexible polyurethane foam and fiber products facility. The foam products are manufactured at this facility using flexible polyurethane foam manufacturing process
      - Emission units include slabstock flexible polyurethane foam production line, storage tanks, transfer pumps, flexible polyurethane fabrication gluing and bonding operations, natural gas fired oven

ii. Major Source of HAP subject to NESHAP Subpart III for Flexible Polyurethane Foam Production and authorized to operate under a Title V permit issued Sept. 25, 2015 with expiration Aug. 31, 2020.
- The Slabstock Flexible Polyurethane Foam Production Line (emission source AA-004) was prohibited from using HAP or VOC blowing agents.
- Diisocyanate storage vessels were required to be equipped with a carbon adsorption system with replacement requirements upon indication of breakthrough and before the next unloading event.
- Pumps shall be sealless pump or submerged pump.
- Leak detection and delay of repair requirements for components in diisocyanate service.
- Banned used of HAP or HAP-based material as an auxiliary blowing agent (ABA) or as an equipment cleaner).

iii. Facility also subject to PM/opacity standards and NSPS subpart Kb.

iv. 2017 NEI emissions for facility (total/single largest HAP): 1.03 tpy/0.45 tpy

b. *Status post-2018 MM2A Memo*

i. Innocor Inc. proposed to limit actual emissions below the Title V major source thresholds to become Synthetic Minor source. Innocor uses non-VOC/HAP based adhesive and solvents.

ii. 30-day public notice on draft permit was released on Dec. 17, 2018 by the MS DEQ.

iii. The State of Mississippi issued a State and Federally Enforceable Air Pollution Control Permit to operate air emissions equipment at a synthetic minor source on January 18, 2019 (expires December 31, 2023).

c. *Reclassification Details*

i. Facilitywide limitations
- HAP PTE
  (a) individual HAP are limited to < 9.0 tons/year and total HAP < 24.0 tons/year.
- Prohibits the use of VOC or HAP as a blowing agent
- PM, and VOC limits
- Opacity limits for soot blowing operations

ii. The facility is now subject to 40 CFR 63 Subpart OOOOOO (6-O) (Polyurethane Foam Production and Fabrication Area Sources).

iii. A diesel fired emergency fire pump is added to the permit (not in the original Title V) subject to MACT ZZZZ (Reciprocating Internal Combustion Engines- area source).

iv. Subpart 6-O
- Methylene Chloride use is specifically not allowed.
- For Flexible Foam Production requires Non-HAP blowing agents; storage vessel closed vent systems and adsorbers.
  (a) Through monitoring and reporting, any HAP-containing material used must be identified and the total gallons used must be reported. The HAP content must be calculated based on approved methods, material density recorded, and HAP emission rate in tons per 12-month period must be reported.

(b) Seven TDI (Diisocyanate) storage vessels are required to be equipped with a carbon adsorption.

- AA-031 is subject to 40 CFR 63, Subpart ZZZZ
- Records must be maintained for a minimum of 5 years.
- Permittee shall submit a certified annual synthetic minor monitoring and compliance report each year.

d. *General Observations from Reclassification*

i. The method of compliance in the post-2018 MM2A memo synthetic minor operating permit is equivalent to the requirements in the pre-reclassification Title V operating permit, as the applicable requirements of subpart OOOOOO for polyurethane foam production and fabrication area sources are equivalent to the previously applicable requirements of Subpart III for major Flexible Polyurethane Foam Production facilities. Therefore, no increases in HAP emissions are expected specifically due to reclassifying. The only pertinent change is the HAP PTE limits below major source thresholds, which allowed the source to reclassify to area source status.