Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

TITLE V (DRAFT PERMIT) NO. V-05-090
ARISTECH ACRYLICS LLC
FLORENCE, KENTUCKY
MAY 24, 2006
PREPARED BY KENVIRONS, INC.
REVIEWED BY RALPH E. GOSNEY, DAQ

SOURCE I.D. #:	021-015-00004
SOURCE A.I. #:	141
ACTIVITY #:	APE20050003

SOURCE DESCRIPTION:

Aristech Acrylics LLC in Florence, Kentucky, manufactures acrylic sheets by polymerization of methyl methacyrlate (MMA) monomer. Prior to the polymerization step, pigments and other additives are mixed with the MMA to produce different colors and product grades. The pigments that are received in powder form are mixed with epoxidized linseed oil (drying oil) in the Pigment Room to produce concentrated pigment mixture.

MMA is brought into the plant by rail car or tank truck and transferred to four outdoor tanks, EP 40(40) for storage. Vapor balancing is not currently used for MMA unloading. The storage tanks are maintained at a temperature of 47°F to aid in processing the MMA in the plant. They are vented to the atmosphere. Butyl acrylate (BA), used in some products, is also unloaded from railcars (using vapor balancing) and stored in an outdoor tank, EP 142(143). EP 142(143) is not temperature controlled and is vented to the atmosphere.

One type of acrylic sheet uses alumina trihydrate (ATH) which is unloaded from rail cars and air conveyed into four storage silos. Each silo is equipped with a bin filter. In producing synthetic stone, the ATH is sent to the suspension mix tanks where it is mixed with MMA monomer and syrup, then transferred to the suspension storage tank prior to being degassed. The suspension mix tank and storage tank are jacketed with chilled water to maintain a temperature of 70°F. During raw material transfer, the suspension mix tanks are maintained under negative pressure by being connected to the plant vacuum header system that vents to one of the three plant boilers for destruction of emissions.

MMA syrup is produced by partial polymerization of MMA in any of 20 reactors; EP 05(06) consists of eighteen 500 - gallon vessels and EP 48(46) consists of two 1285 - gallon vessels. Theses reactors are blanketed with nitrogen at 1-2” w.g. The syrup is sent to one of two blend tanks EP 05(07) and EP 50(50) for homogenization, to the promoters or suspension mix tanks. The 17 promoters are kept under vacuum to remove gases in the syrup before final polymerization.

The vacuum system is vented to the facility’s three 31.4 mmBtu/hr natural gas boilers (#2 and #6 fuel oil is used as back-up fuel). The blowdown from the vacuum pump is sent to the publicly owned treatment works.

Housekeeping procedures account for most of the significant fugitive emissions at the plant. Some of the equipment in the process must be wiped down periodically using MMA solvent, recycling liquids with colorants to the process, and MMA transfer filters are periodically changed, these activities result in fugitive MMA emissions. MMA used to clean promoters and other waste MMA is collected in two MMA2 (offspec MMA) tanks. A reclaim system installed in 2004 is used to filter waste MMA for reuse. The waste MMA is pulled under vacuum through the filter, and a slip stream from the system is sent to the boilers for destruction.

Aristech is considered a major source due to potential emissions of a hazardous air pollutant (methyl methacyrlate) greater than ten (10) tons per year. The facility is currently operating under Title V Permit No. V-00-035 (Revision 1). Aristech Acrylics has applied for renewal of the operating permit, with the renewal application received at the Division on July 29, 2005. The Division issued a Notice of Deficiency on September 28, 2005 in which Aristech submitted a response on November 1, 2005. The Division recognizes the application complete date of December 31, 2005, 60 days following the receipt of the NOD response.

Several changes to emission point identifications have been incorporated in the renewal due to the facility becoming subject to 40 CFR 63 Subpart FFFF. Some existing process equipment were divided appropriately into equipment regulated and not regulated under Subpart FFFF. Equipment leak emission points were appropriately combined into F-1, F-2, and F-3. F-2 is subject to Subpart FFFF.

Several processes were discontinued or removed from the facility, therefore the associated emission points were deleted from the permit.

Aristech Acrylics has become subject to two NESHAP regulations since the initial permit was issued, 40 CFR 63 Subpart FFFF and Subpart DDDDD. The facility has submitted Initial Notifications for both regulations as required. The notification is the only compliance activity required under Subpart DDDDD for existing large (>10 mmBtu/hr) gaseous fuel boilers. The facility is subject to a compliance date pursuant to Subpart FFFF of May 10, 2008 for existing sources.

COMMENTS:

The following is a list of significant sources:

EP 02(02), EP 03(03) — Boiler #2 and Boiler #3, consists of two 31.4 mmBtu/hr natural gas fired steam generators (#2 and #6 fuel oils are burned used as secondary fuels). The boilers are used as emission control to burn methyl methacrylate.

EP 04(04) — Boiler #1 is a 31.4 mmBtu natural gas fired steam generator (#2 and #6 fuel oils are used as secondary fuels). The boiler is used as emission control to burn methyl methacrylate.

EP 11(11) — Railcar Unloading ATH and four Storage Silos, consists of 4 – 6000 ft3 storage silos. Each silo has a 40,000 lbs/hr maximum input and output. A dust collector controls particulate emissions.

EP 12(12) ATH/MMA two Suspension Mix Tanks, consists of 2 – 540 gallon mix tanks. Each tank has a maximum 10,800 lbs/hr ATH input and 7,200 lbs/hr MMA input and 18,000 lbs/hr output. A dust collector transfer ATH to the mix tanks. MMA is vented to one of the boilers for destruction.

EP 95(95) Hyrizon Spray Booth (R & D), consists of a Binks Model PFA-12-8-T-LH. The spray booth is used to apply polyester resin coating for research and developmental purposes. The booth has maximum inputs of 1000 lbs/month polyester resin, 210 lbs/month ATH, and 90 lbs/month calcium carbonate. The unit operates 4 hours/day and 25 days/year. Fabric filters control particulate emission from the booth.

EP 55(55) Process Saw Casting Machine #1, consists of an electric saw that processes 3.84 tons acrylic sheets/hr. Particulate emissions are controlled by an air filter baghouse.

EP 56(106) Adding Acrylic Chips in Degassing Process Vessels, has a processing rate of 1000 lbs/hr acrylic chips. Particulate matter emissions are controlled by a DCE Unimaster baghouse.

EP (142) Dry Sander with Dust Transfer System, consists of a 4-head dry sander equipped with dust capture/transfer system. The sander has a maximum output of 12,600 ft^2/hr. Particulate emissions are controlled by baghouse #1.

EP 146(146) Monomer Reclaim System, reclaims MMA for reuse from waste MMA2 (offspec MMA) from cleaning and other auxiliary operations by drawing the waste MMA through a perlite filter by vacuum. A slipstream of MMA is vented to one of the boilers for destruction.

F-3 Fugitive Emission Sources, equipment leaks associated with the Monomer Reclaim System EP 146. These consist of flanges, pumps, sealless pumps, open-ended lines, and valves in light liquid service, and pump seals and valves in gas service. F-3 is not subject to 40 CFR 63 Subpart FFFF.

EP 05(06) MMA Process Equipment, consists of 18 – 500 gallon batch reactors. A maximum of 6.6 tons MMA/hr is degassed in EP 06. MMA emissions are controlled by a closed vent system to Boilers #1 - #3.

EP 48(46) MMA Process Equipment, consists of 2 – 1,285 gallon batch reactors. A maximum of 1,285 gal/hr of MMA/additive/pigments are processed in EP 46. MMA emissions are controlled by a closed vent system to Boilers #1 - #3.

EP 05(07) MMA Process Equipment, consists of 1 – 500 gallon blend tank. A maximum 500 gallon MMA/hr is processed in EP 07. MMA emissions are controlled by a closed vent system to Boilers #1 - #3.

EP 50(50) MMA Process Equipment, consists of 1 – 5,575 gallon blend tank. A maximum of 5,575 gallons of MMA/hr is processed in EP 50. MMA emissions are controlled by a closed vent system to Boilers #1 - #3.

F-2 MMA Fugitive Emission Sources, equipment leaks associated with the MMA chemical processing units, EP's 06, 46, 07, and 50. Consists of flanges, pumps, sealless pumps, open-ended lines, and valves in light liquid service, and pump seals and valves in gas service. F-2 is subject to 40 CFR 63 Subpart FFFF.

EP 40(40) MMA Storage Tanks 1, 2, 3, 4, consists of 4 - 27,500 gallon MMA storage tanks. The tanks are aluminum-jacketed, carbon steel, fixed-roof tanks. Maximum annual throughput is 14.7 million gallons

EP 05(05) MMA Degassing Process Vessels, consists of 12 – 500 gallon degassing Promoters. A maximum of 6.6 tons MMA/hr is degassed from the promoters. EP 05 vents to boilers 1-3.

EP 14(14) ATH/MMA Suspension Process Storage Tanks, consists of 2 – 2900 gallon storage tanks with a maximum capacity of 18,000 lbs/hr ATH/MMA suspension. EP 14 vents to boilers 1-3.

EP 76(76) Letdown Mixers, consists of 2 MMA/Pigment Paste mixers with a maximum output of 3160 lbs/hr.

EP 48(48) Degassing MMA Process Vessels, consists of 5 – 1285 gallon batch process vessels with a maximum output of 1285 gal/hr MMA/additive/pigments each. EP 48 vents to boilers 1-3.

EP 49(49) Letdown Mixers process 7,000 batches per year. The maximum input is 70 gal MMA/batch, 240 lbs pigment paste/batch and the maximum output is 3160 lbs/hr.

F-1 Pipeline Fugitives, consists of fugitive emissions from valves, flanges, open-ended lines, and gas valves with a maximum output of 0.55 lb/hr VOC. F-1 is not subject to 40 CFR 63 Subpart FFFF.

EP 51(63) Wipe Rag Evaporation, consists of fugitive MMA evaporation loss from cleaning operations in the roll mill pigment room. 4 roll mills are cleaned per day.

EP 90(90, 94) Filter Change Fugitives, consists of MMA evaporation loss from solvent used to clean processes. 9,542 filter changes per year.

EP 53(53) Letdown Pot Cleaning Fugitives, consists of MMA evaporation loss from solvent wash (4 washes/hour).

Type of control and efficiency:

Boilers

MMA and VOC emissions from each affected facility such as the suspension storage tanks (EP 14(14)), suspension mixing tanks (EP 12(12)), degassing process vessels (EP's 05(05), 05(06), 05(07), 48(46), 48(48), etc.) are piped by the plant vacuum header system to the boilers for destruction. The facility has estimated that the boilers have a minimum control efficiency of 96%. Per EPA Publication 625/6-86/014 Control Technologies for Hazardous Air Pollutants, boilers or

process heaters can provide destruction efficiencies greater than 98%. The facility shall be required to control MMA emissions from Group 1 process vents subject to 40 CFR 63 Subpart FFFF by 98%.

The current configuration of the MMA storage tanks does not require control as they are defined as Group 2 storage tanks.

Dust Collectors
Baghouses, with a control efficiencies of 95%, are used to control particulate emissions which are released during the unloading of ATH from the railcar to the storage silos (EP 11(11)), casting machine #1 (EP 55(55)), and acrylic chip handling (EP 56(106)). Particulate emissions from the Hyrizon spray booth (EP 95(95)) are also controlled by baghouse with a control efficiency of 85%.

Emission factors and their source:
Emission factors were derived from AP-42 and engineering calculations.

This source is subject to:

1. 401 KAR 61:015, Existing Indirect Heat Exchangers, applies to heat exchangers with a capacity of 250 mmBtu/hr or less, which were constructed prior to April 9, 1972.

2. 401 KAR 59:015, New Indirect Heat Exchangers, applies to heat exchangers with a capacity of 250 mmBtu/hr or less that were constructed on or after April 9, 1972.

3. 40 CFR 63 Subpart DDDDD applies to the hazardous air pollutant emissions (subject to initial notification only – completed).

4. 401 KAR 59:010, New Process Operations, applies to particulate matter emissions.

5. 401 KAR 63:002 Section 3(1)(mmm), incorporating by reference 40 CFR 63 Subpart FFFF, applies to the emission of hazardous air pollutants.
   a. Referenced by Subpart FFFF:
      i. 401 KAR 63:002 Section 3(1)(kk), incorporating by reference 40 CFR 63 Subpart SS, applies to HAP emissions and fugitive equipment leaks.
      ii. 401 KAR 63:002 Section 3(1)(mm), incorporating by reference 40 CFR 63 Subpart UU, applies to fugitive equipment leaks.

6. 401 KAR 63:020, Potentially hazardous matter or toxic substances applies to all hazardous or toxic air pollutants.

Applicable requirements specific to each emission unit are listed as follows:

EP 02(02), EP 03(03) — Boiler #2 and Boiler #3

401 KAR 61:015, Existing Indirect Heat Exchangers Constructed Prior to April 9, 1972 applies to particulate, sulfur dioxide, and visible emissions from Boilers #2 and #3. Compliance assurance with particulate and opacity limits is met by combusting only fuels listed in the permit. Compliance assurance with sulfur dioxide limits may be demonstrated by fuel sampling and testing by the permittee or certification by the supplier. The permittee shall perform weekly qualitative visual opacity observations when burning No. 2 or No. 6 fuel oil. If visible emissions are observed, the

permittee shall perform Reference Method 9 opacity testing.

40 CFR 63 Subpart DDDDD applies to the hazardous air pollutant emissions. Aristech is only subject to the Initial Notification requirements in 40 CFR 63.9(b). This notification has been properly submitted.

EP 04(04) Boiler #1

401 KAR 59:015, *New Indirect Heat Exchangers Constructed On or After April 9, 1972* applies to particulate, sulfur dioxide, and visible emissions from Boiler #1. Compliance assurance with particulate and opacity limits is met by combusting only fuels listed in the permit. Compliance assurance with sulfur dioxide limits may be demonstrated by fuel sampling and testing by the permittee or certification by the supplier. The permittee shall perform weekly qualitative visual opacity observations when burning No. 2 or No. 6 fuel oil. If visible emissions are observed, the permittee shall perform Reference Method 9 opacity testing.

40 CFR 63 Subpart DDDDD applies to the hazardous air pollutant emissions. Aristech is only subject to the Initial Notification requirements in 40 CFR 63.9(b). This notification has been properly submitted.

The following sources are subject to 401 KAR 59:010

EP 11(11) Railcar Unloading ATH and four Storage Silos
EP 12(12) ATH/MMA two Suspension Mix Tanks
EP 95(95) Hyrizon Spray Booth (R & D)
EP 55(55) Process Saw Casting Machine #1
EP 56(106) Adding Acrylic Chips in Degassing Process Vessels
EP 142(142) Dry Sander with Dust Transfer System

401 KAR 59:010, *New Process Operations* applies to the aforementioned emission units that have the potential for visible emissions and to emit particulate matter. PM emissions are limited in accordance with 401 KAR 59:010 Section 3(2), and visible emissions limited to less than 20% opacity. All units are equipped with control equipment including fabric filters, dust collectors, and baghouses depending on the unit. Compliance assurance with particulate emissions is met by monitoring process weight, hours of operation, and emissions calculations as applicable. The facility shall perform weekly operating observations on the control equipment, or when an emission unit is only periodically in operation, the observations shall be performed when the equipment is operating. For compliance assurance with opacity limits, the permittee shall perform weekly qualitative visual opacity observations. If visible emissions are observed, the permittee shall perform Reference Method 9 opacity testing.

The following sources have taken self-imposed limits to preclude 401 KAR 63:105:

EP 146(146) Monomer Reclaim System
F-3 Fugitive Emission Sources

401 KAR 63:105, Requirements for control technology determinations for major sources in accordance with Clean Air Act section 112(g) and (j) for methyl

methacrylate. The facility has elected to accept annual limits for the Monomer Reclaim System (EP146) and associated fugitive equipment leaks (F-3) in order to preclude the applicability of 401 KAR 63:105. See **Emission and Operating Caps Description** below.

The following units are subject to 40 CFR 63 Subpart FFFF: (Subject to a compliance date of May 10, 2008.)

EP 05(06) MMA Process Equipment: Batch Reactors
EP 48(46) MMA Process Equipment: Batch Reactors
EP 05(07) MMA Process Equipment: Blend Tank
EP 50(50) MMA Process Equipment: Blend Tank

401 KAR 63:002 Section 3(1)(mmm), incorporating by reference 40 CFR 63 Subpart FFFF, applies to the emission of hazardous air pollutants. 40 CFR 63 Subpart SS is referenced by Subpart FFFF, and applies to HAP emissions and fugitive equipment leaks. The facility shall determine the group status of the batch process vents by calculating and summing the uncontrolled organic HAP emissions from each of the batch process vents within the process. If the sum of the uncontrolled emissions is 10,000 lbs/yr or greater for the existing sources, the process vents will be designated as Group 1. Group 1 process vents are required to control HAP emissions by $\geq$ 98% by weight. If the process vents are subject to the control requirement, then the facility shall also be subject to 40 CFR 63.982(c) of Subpart SS. Performance testing on Boilers 1 – 3 under hypothetical worst case conditions shall be conducted to demonstrate 98% control of methyl methacrylate emissions. The facility shall be required to develop a start-up, shutdown, malfunction plan (SSMP) of Group 1 emission points per 40 CFR 63.6. Recordkeeping and reporting during SSM per 40 CFR 63.6 is not required. Recordkeeping specified in 40 CFR 63.998(d) and (c), and reporting requirements are specified in 40 CFR 63.2520(e)(4) for SSM events.

EP 40(40) MMA Storage Tanks 1, 2, 3, 4

401 KAR 63:002 Section 3(1)(mmm), incorporating by reference 40 CFR 63 Subpart FFFF, applies to the emission of hazardous air pollutants. The four storage tanks included in EP40 are existing tanks that store methyl methacrylate which has a true vapor pressure of 1.912 kPa. Therefore, the tanks are currently determined to be Group 2 storage tanks.

a. 40 CFR 63.2550(i) "Group 1 storage tank" means a storage tank with a capacity greater than or equal to 10,000 gallons that is storing material that has a maximum true vapor pressure or total HAP greater than or equal to 6.9 kPa for an existing source.
b. 40 CFR 63.2550(i) "Group 2 storage tank" does not meet the definition of a Group 1 storage tank.

There is no emission limitation for Group 2 storage tanks, but to maintain Group 2 status, EP 40(40) must maintain vapor pressure less than 6.9 kPa.

If the facility commences storage activities that meet the criteria of a Group 1 storage tank, the storage tanks will be subject to a 95% emission control requirement. If this control requirement becomes applicable, the source shall be subject to operating,

testing, monitoring, recordkeeping, and reporting requirements specified in 40 CFR 63.982(c) for storage vessels and closed vent systems.

F-2 MMA Fugitive Emission Sources

40 CFR 63 Subpart FFFF applies to equipment leaks from pipeline equipment. For compliance with equipment leak standards, 40 CFR 63.2480 states that the facility must comply with 40 CFR 63 Subpart TT, 40 CFR 63 Subpart UU, or 40 CFR 65 Subpart F. Subpart UU was included in the permit since there is specific language for batch process equipment. Compliance shall be demonstrated with the implementation of a leak detection and repair (LDAR) program and the recordkeeping and reporting requirements in Subpart UU and Subpart FFFF.

The following emission units are subject to 401 KAR 63:020:

EP 05(05)	MMA Degassing Process Vessels
EP 12(12)	ATH/MMA two Suspension Mix Tanks
EP 14(14)	ATH/MMA Suspension Process Storage Tanks
EP 76(76)	Letdown Mixers
EP 48(48)	Degassing MMA Process Vessels
EP 49(49)	Letdown Mixers
F-1	Non - MMA Pipeline Fugitives
EP 51(63)	Wipe Rag Evaporation
EP 90(90, 94)	Filter Change Fugitives
EP 53(53)	Letdown Pot Cleaning Fugitives
EP 146(146)	Monomer Reclaim System
F-3	Fugitive Emission Sources

Pursuant to 401 KAR 63:020, Section 3:
Persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide the utmost care and consideration, in the handling of these materials, to the potentially harmful effects of the emissions resulting from such activities. No owner or operator shall allow any affected facility to 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. Evaluation of such facilities as to adequacy of controls and/or procedures and emission potential will be made on an individual basis by the cabinet.

Aristech Acrylics has previously submitted to the Division screening modeling using EPA approved SCREEN3 dispersion model. Therefore no modeling requirements have been included in the draft renewal.

Non-Applicable Regulations:

401 KAR 60:005, Section 3(1)(q), *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984* [40 CFR 60 Subpart Kb] does not apply to the storage tanks with a storage capacity greater than 75 m^3 (19,800 gallons) but less than 151 m^3 (39,980 gallons) storing a liquid with a maximum true vapor pressure less than 15.0 kPa. The MMA storage tanks are all 104 m^3 and MMA has a maximum true vapor pressure of 1.912 kPa. The butyl acrylate storage tank is 117 m^3 and BA has a maximum true vapor pressure of 0.64 kPa.

401 KAR 60:005, Section 3(1)(e), *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* [40 CFR 60 Subpart Dc] applies to Steam generating units with capacities between 10 and 100 mmBtu/hr constructed after June 9, 1989. The existing boilers were constructed prior to 1989.

401 KAR 63:105, Requirements for control technology determinations for major sources in accordance with Clean Air Act section 112(g) and (j) for methyl methacrylate. The facility has elected to accept annual limits for the Monomer Reclaim System (EP 146(146)) and associated fugitive equipment leaks (F-3) in order to preclude the applicability of 401 KAR 63:105. See **Emission and Operating Caps Description** below.

EMISSION AND OPERATING CAPS DESCRIPTION:

MMA Monomer Reclaim System:

Emissions from the process were calculated using engineering estimates and EPA equipment leak emission factors. It was assumed that the process runs continuously, 8,760 hours per year. The emissions are controlled by venting the slipstream to the boilers having a minimum of 96% destruction efficiency. The flow rate of MMA stream venting to the boilers must be monitored at all times the system is operational to not exceed 2.5% of the purge stream from the vacuum receiver in any 12-month rolling period.

To preclude the applicability of case by case MACT, the source proposed to take voluntary emission limits of 0.96 tons per year from the purge stream by limiting methyl methacrylate in the purge stream to 2.5%. MMA emissions as fugitive from equipment leaks shall not exceed 8.03 tons per year. These limits were revised since permit V-00-035 (Revision 1) was issued due to minor changes in design parameters, final design and testing of the equipment. The affected facility shall remain under 9 tons per year regardless of the revised distribution of emissions.

PERIODIC MONITORING:

PM/PM10

The permittee shall monitor the monthly (calendar month) fuel usage rate (cubic feet per month or gallons per month) of the natural gas or No. 2 or No. 6 fuel oil, and the monthly hours of operation of each boiler.

The permittee shall visually inspect the operation of the dust collectors, baghouses, and fabric filters on a weekly basis. When an emission unit is only periodically in operation, the observations shall be performed when the equipment is operating.

SO2

The permittee shall monitor the monthly fuel usage rate of the natural gas or No. 2 or No. 6 fuel oil, and the monthly hours of operation of each boiler. The sulfur content of the No. 2 or No. 6 fuel oil shall be monitored by supplier certification.

MMA

The flow rate of the MMA stream vented to boilers from the Monomer Reclaim System must be monitored at all times the system is operational to assure MMA does not to exceed 2.5% of the purge stream from the vacuum receiver in any 12 month rolling average.

As of November 10, 2003 Aristech Acrylics is subject to 40 CFR 63 Subpart FFFF. Aristech Acrylics is subject to a compliance date of May 10, 2008. The following periodic monitoring will apply at the compliance date.

a. Except for closed vent systems that are designated unsafe or difficult to inspect, each system shall be initially inspected as specified in 40 CFR 63.983(c). Annual inspections for visible, audible, or olfactory indications of leaks shall subsequently be performed. If an equipment leak is detected within the closed vent system, the leak repair shall be conducted.

b. A temperature monitoring device capable of providing a continuous record shall be installed in the fire box as specified in 40 CFR 63.988(c)(3).

c. If flow to the boilers from the process vents could be intermittent, a flow indicator must be installed, calibrated, and operated at the inlet and or outlet to identify periods of no flow. Periods of no flow may not be used in daily or block averages, or be used in fulfilling a minimum data availability requirement.

d. Equipment Leaks shall be monitored and repaired as specified in 63 Subpart UU for equipment in light liquid and gas service.

e. Group 2 Storage Tanks are those that are below 10,000 gallon capacity and/or have a maximum true vapor pressure of the contents less than 6.9 kPa. The true vapor pressure for the storage tanks (EP 40(40)) shall be monitored.

OPERATIONAL FLEXIBILITY: N/A

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.