TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 96OPWE128

to be issued to:

Kodak Colorado Division - Eastman Kodak Co.
Weld County
Source ID 1230003

Prepared by Cathy Rhodes
April, 1999

I. Purpose:

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. The conclusions made in this report are based on information provided in the original application submittal of February 15, 1996, subsequent additional technical submittals, previous inspection reports, and discussions with the applicant.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or an additional or revised Construction Permit.

II. Source Description

This source is classified as a manufacturer of photographic supplies under the Standard Industrial Classification code 3861. The facility uses such processes as plastic extrusion and coating to produce light-sensitive films and papers for use in photography. Two natural gas fired 206 mmBtu/hour steam generators provide building and process heat throughout the facility. Two other boilers are used as back-up sources only.

The facility is located near Windsor, an attainment area for all pollutants. This facility is within 100 km of two Class I areas, Rocky Mountain National Park, and Rawah National Wilderness Area. Wyoming is an affected state within 50 miles of the facility.

The applicant certified that the facility is not a 112(r) source. The source is considered a major stationary source for Prevention of Significant Deterioration/New Source Review purposes. A coating line in Building 29B is subject to the Maximum Achievable Control Technology (MACT) standard for Printing and Publishing.

The facility was originally issued five construction permits, one for each Building activity. KCD requested that the five permits be combined into one construction permit, which would contain an over-all total emission limit (a plant wide limit) for all sources at the facility. Instead of issuing a new Construction Permit, the plant wide limit is incorporated directly into the Operating Permit. This avoids duplication of Division effort and public notice requirements. The plant wide limit gives KCD the flexibility to allow for fluctuations in production rates at the various processes within the facility without undergoing New Source Review (PSD/NSR), as long as the overall plant emission limit is not exceeded. The Construction Permits have not been granted Final Approval, and KCD will use the self-certification procedure described later in this document.

Facility wide emissions are as follows:

Pollutant	Potential to Emit (TPY)	Actual Emissions (TPY)
VOC	296.6	64.1
PM	24.1	12.0
PM_{10}	24.1	12.0
NO_x	230.0	126.3
CO	200.0	23.0
SO_2	2,680	Negligible
Total HAPs	N/A	38.1

(Note: The HAPs consist mostly of Methanol and Toluene)

Potential emissions for VOC, PM, PM_{10}, and NO_x, are as permitted in the Construction Permits. Potential emissions of CO are as modified and incorporated directly into the Operating Permit. SO_2 potential emissions are based on the applicable requirement of 1.5 lbs/mmBtu heat input (for oil burning at the boilers). Actual emissions estimates are based on 1997 AIRS data. Note that oil is used only as a backup fuel at the boilers, and SO_2 emissions have historically been below APEN reporting de minimis levels.

III. Equipment Replacement

The Construction Permits allowed the replacement and addition of equipment. The Division has reviewed this allowance and has determined that since the source is now a major source for purposes of PSD/NSR and MACT review, it is not appropriate to allow the replacement or addition of equipment without prior Division review. Some existing equipment at the facility, such as the boilers, could become subject to New Source Performance Standards (NSPS) if modified or reconstructed. In addition, reconstruction of equipment at the facility could possibly trigger case-by-case MACT determinations under the 112(g) requirements of the Clean Air Act (40 CFR Part 63, Subpart B, as adopted by reference in Colorado Regulation No. 8, Part E).

Reconstruction of a source triggers NSPS requirements regardless of the change in emissions. Reconstruction occurs if the cost of the replaced parts or equipment is greater than 50% of the cost of purchasing new equipment. A physical change or change in method of operation that results in an increase in emissions (based on kg/hr) for a piece of equipment can also trigger NSPS requirements.

Under 112(g), if the cost of replacing parts or equipment exceeds 50% of the cost of new equipment, and if the change in emissions due to the change exceeds 10 tons per year of an individual HAP or 25 tons per year of a combination of HAPs, the Division must make a case-by-case MACT determination before the change occurs.

The Division believes it is necessary to review new equipment to ensure PSD/NSR requirements are not triggered. The plant wide limits require that existing activities covered by the permits comply with the overall limits as demonstrated by the monitoring/reporting requirements which are included as an Appendix as part of the operating permit. The permit <u>does not</u> cover new equipment which may be brought into the facility at a later date. The permit does not allow new equipment to be installed without Division review even though the plant wide limits are not exceeded. The KCD facility is considered a major stationary source for PSD purposes, since the potential to emit is over 250 tons per year for VOCs. As a major source the Division will review any proposed emission change from new or modified equipment for construction permit applicability. If the proposed change in itself is significant the Division will then look at associated contemporaneous changes to determine if a significant net emission increase has occurred. In this manner KCD can internally net out of PSD review. This situation exists regardless of whether a plant wide limit is used.

KCD is required to undergo any applicable pre-construction review procedures through the construction permit, combined construction/operating permit, or operating permit modification procedures before replacing or reconstructing existing equipment, or adding new equipment. Note that the Operating Permit regulations provide KCD with flexibility to make some modifications at the facility in a reasonably expedient manner.

IV. Compliance Monitoring Plan

Regulation No. 3, Part C and 40 CFR Part 70 require the Operating Permit to contain specific procedures and methods for demonstrating and monitoring compliance. KCD submitted a comprehensive Compliance Monitoring Plan for Division approval, which sets forth emissions calculation procedures, the baseline operating parameters for control equipment and associated monitoring methods to ensure proper operation of the equipment, and how compliance with specific regulations such as MACT will be monitored and demonstrated. This document is included as an Appendix to the Operating Permit. The specific conditions in the Operating Permit reference the most recent Division-approved Compliance Monitoring Plan. The permit provides that this Plan may be updated as KCD gains additional knowledge with regard to sources at the facility, or as the Division and/or KCD deem necessary to ensure compliance.

Regarding emission calculation procedures, AP-42 factors, or KCD's knowledge regarding emissions, may change based on new or improved data. A logical concern is what happens if the use of the new emission factor or calculation procedure results in the source being out of compliance with a permit limit. For this operating permit, the emission calculation procedures contained in the Plan are considered to be fixed until changed through the proper procedures. This does not include obvious factors dependent of the fuel sulfur content or heat content that can not be fixed and will vary with the test results. It is the responsibility of the permittee to be aware of changes in the factors and procedures and to notify the Division in writing of impacts on the permit requirements when there is a change in factors or procedures. For changes regarding emission calculation procedures or factors, the Division will work with the permittee to address the situation.

The Division will review for approval any future proposed changes to the Plan, and the changes will be processed through the applicable permit modification procedures (administrative, minor, or significant modification). This will ensure that any significant modifications to the compliance demonstration procedures will undergo public review.

V. Emission Sources:

The following sources are specifically regulated under terms and conditions of the Operating Permit for this site:

Facility-Wide Limit

Activities occurring at this facility are as follows.

Chemical Manufacturing (P029) - Building C-29 houses a small chemical manufacturing reactor room which is utilized for the production of various

aqueous polymers. A wet scrubber controls odor and PM emissions.

Thermal Media Manufacturing (P29B) - Thermal media are manufactured in Building C29B. The product is used in color printers to transfer color and clear laminate onto paper or other surfaces. The process starts with weighing of dry dye powder and dissolving the powder in appropriate solvents. The “Making” process results in production of coating solutions eventually used to print all colors. The coating solutions are piped to the coating machine where they are applied to the plastic substrate material.

Sensitizing Complex (P040) - The products sensitized at KCD are medical x-ray films, Duratrans, graphic arts film and color photographic paper. The process takes place in Buildings C-40, C-41, C-42, C-43, and C-46. The process is continuous and involves application of light sensitive emulsions to a support material to produce film and photographic paper. Silver nitrate is reacted with other chemicals to form silver halide. Specific chemicals are then added to this compound to additionally increase its sensitivity to light. The resulting crystals are finally suspended in a purified gelatin, which , when liquefied, can be applied to the appropriate support material. After the film or paper is coated, it is chilled to harden the emulsion, dried to restore the material to the correct relative humidity, then wound into large rolls. A wet scrubber controls PM emissions. The product is then packaged for consumer delivery. Water Treatment Plant emissions are included in the mass balance for sensitizing operations.

Support Manufacturing (P050) - KCD’s production of plastic support material upon which light-sensitive emulsion is applied is called support manufacturing. This product is trademarked as Estar and is a flexible, thermoplastic material of high molecular weight. To manufacture this product, plant personnel extrude the polyester material and allow it to cool and harden. The plastic is then reheated, processed and wound into large rolls. The Estar is coated with several sublayers, cooled and wound into large rolls. Rail cars deliver polyester material. A High Efficiency Particulate Air (HEPA) filter controls PM emissions when the material is unloaded from the rail cars.

Boiler House (P070) - The boiler house consists of two boilers in Building C-70. The boilers are natural gas fired, each rated at 206 mmBtu/hour. The boilers provide steam for building and process heat throughout the facility. Two grandfathered boilers, #35 and #36, located in Building C-30, are used as back-up sources of steam when the C-70 boilers are down. No. 2 fuel oil is used as a backup fuel.

1. Applicable Requirements - Applicable requirements are set forth in the following Construction Permits: 10WE375, 90WE467, 91WE413, 90WE464, 10WE375, and 10WE593. The Construction Permit applicable requirements

were modified or deleted as necessary, as described below, and incorporated directly into the Operating Permit.

Colorado Regulation No. 1, II.A.1 & 4

Not to exceed 20% opacity, except during special conditions, when opacity is not to exceed 30% (Section II.A.1 & 4, 20% opacity also in Construction Permits)

Construction Permits

Emission limits for criteria pollutants - Criteria pollutant emission limits from the Construction Permits were totaled and listed as an overall facility wide emission limit in the Operating Permit. The Construction Permit for Building C-29B incorrectly listed the PM and PM_{10} emission limits as .015 tons per year. This limit is corrected to .15 tons per year in the Operating Permit. The Construction Permits do not include PM_{10} emission limits for other sources at the facility. AP-42 indicates that the emission factor for natural gas burning at the boilers and the oxidizer are used to estimate all fractions of PM emissions, therefore for these sources PM_{10} emissions equal PM emissions. The Division assumes PM_{10} emissions equal PM emissions for all other sources. These PM_{10} emissions are incorporated directly into the Operating Permit. KCD requested the CO emission limit for the boilers (Construction Permit 10WE375) be increased from 36.0 tons per year to 200 tons per year, based on the results of stack tests, and to provide for CO emissions from other sources at the facility. The 200 ton per year limit is incorporated directly into this Operating Permit.

Emission limits for toxic pollutants. (*This requirement is not included in the Operating Permit.“Toxic pollutants” are no longer defined under the Colorado Regulations, and have been replaced by “Hazardous Air Pollutant” (HAP) emission requirements. Sources are required to report their HAP emissions. It is currently the Division’s policy not to limit emissions of non-criteria pollutants, unless the source voluntarily requests such a limit, or is subject to a HAP emission limit under an applicable MACT standard)*

Maintain records of actual consumption rates of materials as identified in a Compliance Monitoring Plan.

Submit an annual emission update of air pollutants by type and quantity, to demonstrate compliance with emissions limits. Submit an

emission calculation procedure. (*A portion of this requirement was designed for purposes of reporting any new "toxic pollutants" used by the permittee. This portion is not included in the Operating Permit as written in the Construction Permits, but is covered under the General Conditions referring to APEN reporting of HAP emissions. KCD has submitted a calculation procedure in the Compliance Monitoring Plan)*

Submit an APEN prior to replacement of existing equipment or addition of new equipment. (*This provision is not included in the Operating Permit. See discussion above, under Equipment Replacement.)*

Submit a summary of additions or deletions to an attached toxic chemical and/or equipment list annually. *(This provision is deleted. HAPs are reported annually in APENs, and replacement and addition of equipment is no longer allowed without prior approval.)*

Each piece of equipment is subject to any specific regulation that applies. *(This requirement is deleted from the Operating Permit. The Operating Permit must include all applicable requirements. As described under Equipment Replacement, above, KCD must undergo pre-construction review prior to any changes that will trigger new applicable requirements, and any new applicable requirements must be added to the Operating Permit through the proper procedures.)*

Compliance with annual emission limits to be determined on a rolling 12 month total.

Conduct performance tests to establish baseline parameters to be monitored to ensure proper operation of control equipment. *(This requirement is not included in the Operating Permit. KCD has performed the required tests and established the baseline parameters. The Compliance Monitoring Plan describes the parameters and the monitoring procedures.)*

The Construction Permits include Equipment Lists. The following equipment/processes are removed from the Equipment List and listed as Insignificant Activities in the Operating Permit: C50-73, Quality Lab; C41-8, Welding Booth; and C42 - FUG, Plate Testing Room.

2. Emission Factors - Emission Factors and procedures are set forth in the Compliance Monitoring Plan, which is an Appendix of the permit. The Compliance Monitoring Plan may be revised as KCD gains additional knowledge regarding emissions from their processes. Changes to emission

calculation procedures must be submitted to the Division for approval and undergo public review, if required under the permit modification regulations. The current Plan sets forth the following procedures for estimating emissions.

VOC emissions result from many various processes throughout the facility. Emissions are estimated using a combination of mass balance calculations (quantity used minus quantity shipped offsite), assumptions that quantity emitted equals quantity of materials used, assumed reaction completion rates, and AP-42 factors for fuel burning at the boilers and the regenerative thermal oxidizer. A control efficiency of 95% is used for emissions from the thermal oxidizer. AP-42 tank equations are used to estimate emissions from Building C29 storage tanks.

PM and PM_{10} emissions are estimated assuming grain loading rates for wet scrubbers and HEPA filters, multiplied by the flow rates and operating times. Conservative grain loading rates of .01, .02, or .04 grains per dry standard cubic foot are used. These grain loadings are used for significant PM sources such as mineral processing. AP-42 factors are used to estimate fuel burning emissions from the boilers and regenerative thermal oxidizer.

NO_x emissions result from burning natural gas or fuel oil at the boilers, and from burning natural gas at the thermal oxidizer. KCD performed a performance test at the C-70 boilers and used the results to develop an emission factor for NO_x of 220 lbs/mmscf when natural gas is burned. AP-42 factors are used for estimating emissions from the thermal oxidizer, from the C-30 boilers, and when fuel oil is burned at the boilers.

CO emissions result from burning natural gas or fuel oil at the boilers and from burning natural gas at the thermal oxidizer. KCD developed a relationship between CO emissions and boiler load when natural gas is burned, based on results of the performance test for the C-70 boilers. AP-42 factors are used for estimating emissions from the thermal oxidizer, from the C30 boilers, and when fuel oil is burned at the boilers.

SO_2 emissions result from burning fuel oil at the boilers. SO_2 emissions are determined by mass balance using the sulfur content of the fuel oil. Historically, SO_2 emissions have been below Air Pollution Emission Notice (APEN) reporting de minimis levels, since natural gas is the main fuel used at the boilers.

3. Monitoring Plan - The Compliance Monitoring Plan sets forth the monitoring procedures used to demonstrate compliance with the applicable requirements. The plan is included as an Appendix to the permit. The Plan may be revised as KCD gains additional knowledge regarding their

operations. Changes must be approved by the Division and must undergo public review if required under the permit modification regulations. The current Plan sets forth the following procedures.

KCD completed performance tests for the wet scrubbers and regenerative thermal oxidizer to establish baseline operating parameters. The operating parameters are monitored to ensure proper operation of the control equipment. KCD monitors the thermal oxidizer gas temperature on a daily basis to ensure control efficiency of 95%. KCD monitors the wet scrubber water flow rates on a daily basis. The HEPA filter is replaced annually.

Compliance with the opacity standards of 20% and 30% is assumed when natural gas is used. If No. 2 fuel oil is used at the boilers, a Method 9 opacity observation is required if fuel oil is used for an extended period of time.

4. Compliance Status - The Division considers the facility to be in compliance with all current applicable requirements.

S070 - Boiler House

1. Applicable Requirements - In addition to the facility wide applicable requirements, the following apply:

Colorado Regulation No. 1, II.A.1.b

PM emissions shall not exceed:

$PE = 0.5(FI)^{-0.26}$ lbs/mmBtu

where PE = particulate limit (lb/mmBtu) and FI = fuel input (mmBtu/hr)

This requirement was not included in the Construction Permit, and is incorporated directly into the Operating Permit.

Construction Permit 10WE375

Total consumption of natural gas for boilers #35, 36, 71 and 72 shall not exceed 1800×10^6 scf/year.

Boilers #35 and 36 shall not operate unless one or both of the #71 or #72 boilers are down. (Note: These boilers were constructed prior to requirements for Construction Permits, however, when Kodak requested emission limits to avoid PSD/NSR requirements, the boilers were included in this Construction Permit and emissions from the boilers are counted towards PSD/NSR applicability, therefore, the boilers are no longer

Grandfathered from Construction Permit requirements.)

Conduct a source compliance test for NO_x and CO (*This requirement is not included in the Operating Permit. KCD has completed the required testing.)*

To ensure NO_x emissions are less than the tons per year limit, install and operate a Continuous Emission Monitor. Alternatively, if KCD can demonstrate during the stack tests that a method other than CEMs can accurately demonstrate compliance, the Division will consider such alternative method for demonstrating compliance. *(This requirement is not included in the Operating Permit. KCD completed the required test and established an alternative monitoring procedure that is included in the Compliance Monitoring Plan.)*

Fuel oil shall be used as a back-up fuel only.

Sulfur dioxide emissions shall not exceed 1.5 lbs/mmBtu (also Colorado Regulation No. 1. IV.B.2). Records of the actual amounts of fuel used and sulfur content shall be maintained.

2. Emission Factors -The emissions from this source are included towards the overall emission total for the entire facility. Emissions are estimated using the procedures described above and in the Compliance Monitoring Plan.

3. Monitoring - The permittee maintains records of fuel use, and inspects and calibrates the natural gas meter annually. The permit requires KCD to monitor the times that fuel oil is used. KCD will maintain records of the times when the C-30 boilers are used. In addition, KCD maintains records of the sulfur content and heat content of the fuel oil. Compliance with the Regulation No. 1 PM emission limit is demonstrated using the manufacturer's maximum rated heat input of each of the boilers, the actual fuel heat inputs, and AP-42 emission factors.

4. Compliance Status - The Division considers the boilers to be in compliance with all current applicable requirements.

Building 29B - #291 Coating Line
Coating solutions are piped to the #291 coating machine where they are applied to plastic substrate material.

1. Applicable Requirements - In addition to the facility wide applicable requirements, the following apply:

Construction Permit 91WE413

The thermal regenerative incinerator which controls VOC emissions from the coating line shall be operated at all times during which pollutants are emitted from the coating line, and shall have a minimum capture and control efficiency of 95%.

The applicant shall install, calibrate, and operate a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Conditions 5 & 13 (TO 95% and emission limit). This device shall have an accuracy of ±2.5 °C or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with...was demonstrated during most recent measurement of efficiency. Records...3 years.(*This requirement was included in t he Construction Permit to ensure proper operation of the oxidizer, and was not taken from a specific regulation. The Division determined that the MACT monitoring requirements are sufficient to demonstrate compliance with the Construction Permit limit, thus this monitoring requirement is replaced in the Operating Permit by the monitoring requirements for MACT. See discussion under Monitoring, below for comparison of parameters*).

Submit APENs and compliance demonstration plan for new control equipment added (*This provision is not included in the Operating Permit. Replacement or addition of control equipment is no longer allowed without prior approval.)*

40 CFR Part 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (as adopted by reference in Colorado Regulation No. 8, Part E)

This regulation was promulgated in 1996, after issuance of the Construction Permit. Subject sources must come into compliance with the regulation by May 30, 1999. The requirements are incorporated directly into the Operating Permit.

The regulation provides the source with options for reducing HAP emissions. KCD chose to reduce HAP emissions to 5% of organic HAPs used. This is accomplished using the existing regenerative thermal oxidizer.

KCD is required to submit initial notification no later than one year before the compliance date. The Title V application may serve as such notification. KCD has met this requirement.

The regulation requires an initial compliance test within 180 days of the compliance date. If an oxidizer is already in place, the test is not required if tests to establish baseline monitoring parameters have already been conducted.

This process was designed with a fail-safe. If the thermal oxidizer shuts down, the coating line will automatically shut down.

2. Emission Factors -The emissions from this source are included towards the overall emission total for the entire facility. Emissions are estimated using the procedures described above and in the Compliance Monitoring Plan.

3. Monitoring - The MACT requires the permittee to install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of $\pm$ 1 percent of the temperature being monitored in °C or $\pm$ 1 °C, whichever is greater (compare this to the Construction Permit requirement, listed above).

4. Compliance Status KCD is currently meeting all of the Construction Permit and MACT requirements, therefore this source is considered to be in compliance with all current applicable requirements.

VI. Alternate Operating Scenarios

No alternate operating scenarios were requested.

VII. Short Term Limits

On April 16, 1998 the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction Permits. These procedures are being directly implemented in all operating permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/throughput limits that appeared in the construction permits associated with this facility that are not required by a specific State or Federal standard or by the above referenced Division procedures have been deleted and all annual emission and production/throughput limits converted to a rolling 12 month total. Note that, if applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison with annual emission limits unless there is a specific condition in the

permit restricting hours of operation.

This new procedure has no effect on this facility, since the Construction Permits did not contain short term limits, and compliance was determined on a rolling twelve month total.

VIII. Permit Shield

The Operating Permit includes requests for the permit shield for regulations that the Division determined were not applicable to the facility, including: the NSPS for boilers, storage tanks, and printing; acid rain provisions; MACT standards for woodworking, elastomer products, epoxy resins, and PET manufacturers; and NESHAP provisions.

IX. Final Approval for Construction Permits

The Construction Permits have not been granted Final Approval. Since the facility will have been in operation for more than 180 days by the due date of the first semi-annual monitoring required by the operating permit, the Division will consider the Responsible Official certification submitted with that report to serve as the self-certification for Final Approval for this facility.

X. Increased CO Emission Limit and Prevention of Significant Deterioration

Construction Permit 10WE375 limits CO emissions from the boilers to 36 tons per year. This emission limit was based on standard AP-42 emission factors. KCD performed a compliance test for CO emissions, and it was discovered that the AP-42 factors underestimated actual CO emissions. KCD has requested that the CO limit be increased to 200 tons per year, based on the test results, and allowing for CO emissions from other sources at the facility. The Division has determined that this request for an increase in CO emissions does not trigger Prevention of Significant Deterioration (PSD) review.

At the time the test was performed, KCD had agreed to obtain enforceable permit conditions that limited the facility to minor source status. Without the enforceable limits, KCD would have been an existing major stationary source (i.e., PSD would not have applied to the existing facility, but any significant modifications would be subject to PSD). KCD chose to limit their emissions in order to obtain flexibility in moving equipment and processes within the facility without undergoing New Source Review, and to ensure that PSD would not be triggered. NO_x and VOC emissions were limited to emissions levels below 250 tons per year, and the CO emissions were limited to 36 tons per year. The test was then performed, and it was discovered actual CO emissions were 132 tons per year. This emission level was less than the major stationary source threshold of 250 tons per year. Thus, based on enforceable limits and the actual CO emission estimate, KCD was still a minor

stationary source.

KCD subsequently added a new coating line at Building 29B, which made the facility an existing major stationary source based on VOC emissions greater than 250 tons per year (PSD still did not apply to the existing facility). KCD chose the new requested CO emission limit of 200 tons per year to allow for the 132 tons per year of emissions from the boiler, as well as CO emissions from other small emission sources at the facility. The requested allowable increase in emissions is 68 tons per year (200 minus 132 tons), which is below the significant CO emission level of 100 tons per year, therefore PSD is not triggered. A review of the modeling results indicates that no exceedance of the National Ambient Air Quality Standards is expected from the increased emissions.

XI. Non-Reactive Volatile Organic Compounds (NRVOCs)

Two ozone depleting compounds, Refrigerant #11 and Refrigerant #12 are used at this facility. These chemicals are classified as non-criteria reportable pollutants. There are no maximum allowable emission limits for these compounds. For APEN reporting purposes, KCD assumes the amount emitted to the air equals the amount of NRVOCs consumed.