

Louisville Metro Air Pollution Control District : The STAR Program

Air Pollution Control District
May 30, 2017



Beyond Federal Regs

- Clean Air Act delegation from the U.S. Environmental Protection Agency (EPA)
- Concurrent jurisdiction from the Kentucky Division for Air Quality (DAQ)
- Must be at least as stringent as state and federal laws, but can be more stringent where needed.



Air Toxics

Responding to growing concerns about toxic emissions in Western Louisville, in 2005 the APCD developed and implemented the Strategic Toxic Air Reduction (STAR) program.



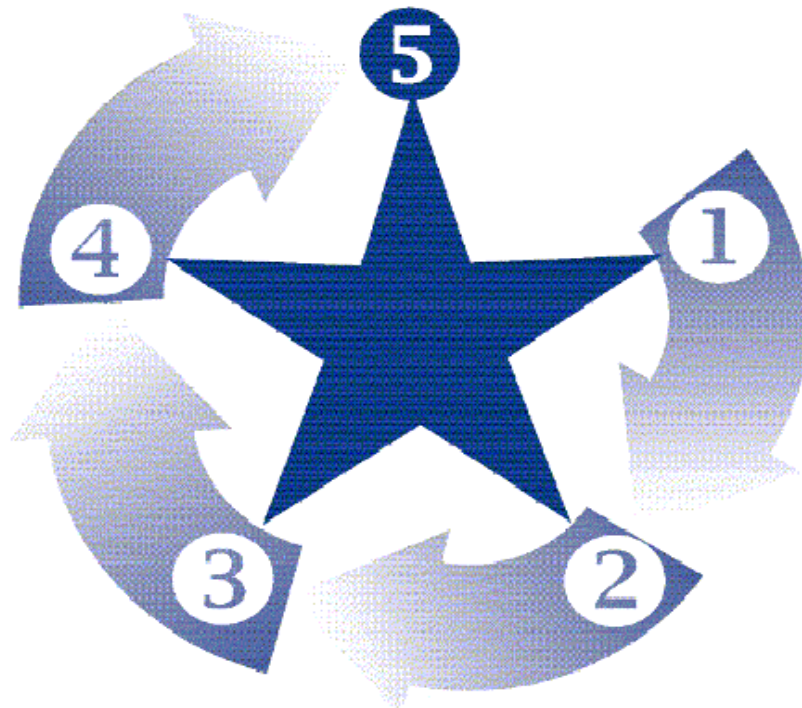
An air toxics program designed to regulate the emission of toxic chemicals by large industries located in Jefferson County, STAR was created after a monitoring study in 2000-2001 found unsafe levels of toxic chemicals present in and around the Rubbertown industrial complex.

Development of the STAR program followed a robust public engagement process



STAR Program

Strategic Toxic Air Reduction

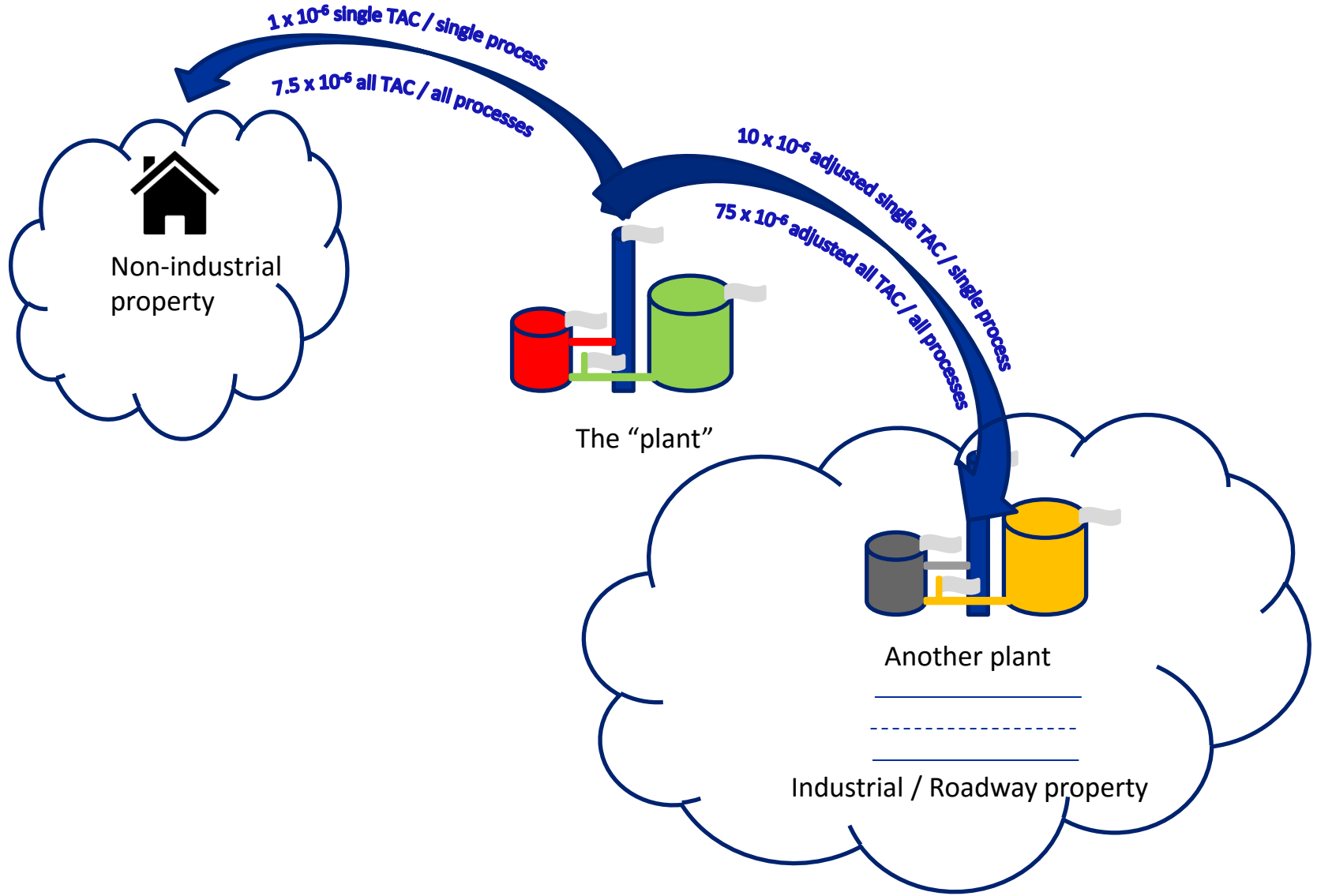


- 1 Emissions levels**
- 2 Release points**
- 3 Modeling**
- 4 Reduction plan**
- 5 Compliance**

Environmental Acceptability Goals

	Process or Process Equipment (P/PE)	Applicable TACs	General EA Goals EAG _C Risk (x10 ⁻⁶)	General EA Goals EAG _{NC} HQ
	Individual stationary source, individual P/PE	Individual TAC	1.0	1.0
	Individual stationary source, all P/PE	Individual TAC		1.0
	Individual stationary source, all P/PE	Total for all applicable TACs	7.5	
	Individual stationary source, all new and modified P/PE	Total for all applicable TACs	3.8	
See Appendix for explanation of notes and equations.				

General Goals



Total Air Toxics 2004 - 2015

Jefferson County, KY Sources	2004 Air Releases in Pounds	2015 Air Releases in Pounds	% Change
Electric Generating Utilities (NAICS 2211)	4,710,016	2,076,785	-56% Decrease
All Other Sources	5,141,564	2,659,926	-48% Decrease
Total	9,851,580	4,736,711	-52% Decrease

Source: EPA Toxics Release Inventory

ASRC

1,3-Butadiene Emissions

- Pre-STAR average 104,824.67 lbs
- Pre-STAR high in TRIs - 231,000 lbs in 1999

- Post-STAR average - 8,895.88 lbs
- 91.51% Reduction

Request for Modification

Regulation 5.21, *Environmental Acceptability of Toxic Air Contaminants*

- *Compliance Plans – Section 4*
- *Request for Modification – Section 5*
 - *Environmental Acceptability Goals – up to 100 in a million*
 - *Requires Best Available Technology for Toxics (T-BAT)*
 - *Resulting Goal provides an “ample margin of safety to the exposed population*
- *Risk Reduction Plan – Section 6*

Request for Modification

Best Available Technology for Toxics (T-BAT)

Steps in the process:

1. Written Request for Modification and T-BAT Demonstration
2. Opportunity for Public Review and Comment and a Public Hearing
3. If approved by the District, issuance of a permit with conditions designed to ensure compliance
4. Required re-evaluation of T-BAT

ASRC's Request for Modification

Background

- Sept. 21, 2015 - NOV 02612 issued to ASRC for fugitive emissions
- Dec. 7, 2015 – ASRC submits its first Request for Modification
- May 18, 2016 – Interim Agreed Board Order with ASRC implementing enhanced LDAR and reporting requirements for fugitive emissions
- June 15, 2016 – Public comment period began on ASRC's Request for Modification
- July 18, 2016 – Written public comment period ended

ASRC's Request for Modification

Background

- March 11, 2017 – second public comment period on ASRC's first Request for Modification
- April 19, 2017 – first public hearing on ASRC's first Request for Modification
- May 12, 2017 – Extended public comment period ends
- May 16, 2017 – ASRC submits a second Request for Modification
- May 17, 2017 – second public hearing on ASRC's first Request for Modification

ASRC's Request for Modification

Next Steps

- Response to Comments on ASRC's first Request for Modification
- Final determination on ASRC's first Request for Modification
- APCD review of ASRC's second Request for Modification
- Public comment period and public hearing
- Final decision on ASRC's second Request for Modification and resolution of NOV 02612

Questions?

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