

To: File  
From: John Legg  
Date: 11/16/16

*John Legg*  
*11/16/16*

Subj: R13-2156Y (Class I Administrative Update)  
Cytec Industries Inc., Willow Island Plant, Pleasants County, WV  
Permit Application R13-2156Y; Plant ID No. 073-00003

**This update application results in no changes to previous permitted emission limits.**

### **Background Information**

On August 15, 2016, the Division of Air Quality (DAQ) received permit application R13-2156Y for a Class I Administrative Update.

(Note: A Class I Administrative Update does not require the company/permittee to:  
- pay a permitting fee or  
- run a legal advertisement in a newspaper.)

This application updates permit R13-2156X based on revisions made to the Polymer Additives Manufacturing Unit (Building 82) in the 1<sup>st</sup> half of 2016. It is required per Section 4.5.5. of permit R13-2156W:

- 4.5.5. Written notification of any revisions of the Building 82 Manufacturing Unit equipment/emission units, control devices, or emissions points as listed in Sections 1.0, 4.1.6, and 4.1.17, or Appendix A of this permit, shall be submitted to the Director of the Division of Air Quality by August 15<sup>th</sup> for the calendar semi-annual time period of January 1<sup>st</sup> through June 30<sup>th</sup>, and by February 15<sup>th</sup> for the calendar semi-annual time period of July 1<sup>st</sup> through December 31<sup>st</sup> in which the revision occurred.

The Polymer Additives Manufacturing Unit (Building 82) manufactures ultraviolet light absorbers, antioxidants, anti-static agents, depressant reagents and phenolic resins.

### **Changes to R13-2156X**

Changes made to the permit R13-2156X are summarized in Table 1 below:

**Table 1: Summary of Changes Made During 1st Half of 2016.**

<b>Permit Section</b>	<b>Revisions</b>
1.0	- Add the new Product/Process Area Solid Acid utilizing existing equipment and existing vents.
2.0	- Permit revision level updates to Sections 2.4.1 and 2.5.1.
3.0	- No changes.
4.0	- Minor revision to Section 4.1.6 to add the new Product/Process Area Solid Shell Acid to existing vent 26GE.

**Table 1: Summary of Changes Made During 1st Half of 2016.**

Permit Section	Revisions
Appendix A	- Minor revision to add the new Product/Process Area Solid Shell Acid to existing control device 26GX.
Appendix B	- No changes.

Cytec provided a complete, unabridged draft permit in their application (Appendix 2, Attachment 2 in the permit application). An abridged compare file showing only the changes made to the permit since last time is given in Attachment 1 to this evaluation.

**Permit**

**Section 1.0 - Add the new Product/Process Area: “Solid Shell Acid” utilizing exiting equipment (R13-2156Y – Appendix 1, Attachment G).**

Cytec added the new product Solid Shell Acid to its Polymer Additives manufacturing business within Building 82, utilizing existing process equipment, control device and vent points as follows:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
20KX	20KE	Reactor 2-19K1 with Condenser 3-19CD1	--	--	NA
20RX	20KE	Knock-out Pot	--	--	NA
22CX	22BE	Condensate Receiver	--	--	NA
22PX	22BE	Vacuum Pump	--	--	NA
24BX	24BE	Wash Tank	--	--	NA
24JX	24GE	Splitter Bowl	--	--	NA
24MX	24ME	Strip Kettle (2-24K1) with Condenser 3-25CD2	--	--	NA
24QX	24RE	Reactor (2-24K2) with Condenser 3-25CD1	--	--	NA
24PX	24PE	Vacuum Jet (LR-24VJ1)	--	--	NA
24NX	24ME	Condensate Receiver	--	--	NA
24RX	24RE	Condensate Receiver	--	--	NA
26FX	22BE	Agitated Filter Dryer (2-26F1)	--	--	NA
26HX	26GE	Package Unit (2-26BAG1)	--	--	26GX
26GX	26GE	Dust Collector	--	--	NA

Per R13-2156X, Section 4.1.5, compliance with the emission limits set forth in Section 4.1.1 are demonstrated by calculating emissions for every product in the Building 82 Manufacturing Unit using Emission Master®, emission modeling software, or other appropriate emission/discharge estimation models or calculation methodologies (e.g., ChemCAD®, PlantWare®, USEPA’s Tanks 4.0, etc.). The emission models and other calculation methods are maintained current for all processes, process modifications and new product variants.

The emission/discharge estimation models and calculation methodologies developed in Section 4.1.5, as well as production records for each calendar month are maintained on site for a period of five (5) years.

Product MSDS

The MSDS for new product “Solid Shell Acid” is provided in the permit application (Appendix 1, Attachment H). The product MSD is summarized in Table 3 below:

<b>Table 3 - MSDS Summary for Solid Shell Acid (WI) (See Appendix 1, Attachment H, pages 1-9 in Permit Application R13-2156Y.)</b>				
<b>Product Name:</b>		Solid Shell Acid (WI)		
<b>Product Description:</b>		Not Given		
<b>Synonyms:</b>		None		
<b>Molecular Weight:</b>		Not Given		
<b>Physical &amp; Chemical Properties</b>	<b>Color:</b>	White or Slightly Yellow		
	<b>Appearance:</b>	Powder		
	<b>M e l t i n g Point</b>	402.8 – 408.2 Degree F		
<b>Intended/ Recommended Use:</b>		Isolated Intermediate		
<b>Components</b>		<b>Component</b>	<b>CAS No.</b>	<b>%</b>
<b>Substance, Mixture or Article? Substance</b>		3,5-Di-(t-butyl)-4-hydroxy benzoic acid	1421-49-4	98-99.5
		N,N-dimethylformamide	68-12-2	<0.2

**Supporting Emission Calculations (see Appendix 1, Attachment N of Permit Application R13-2156Y)**

The maximum emission estimates for every product and associated process in the polymer Additives Manufacturing Unit were calculated using either Emission Master™ emission modeling software, or other appropriate emission estimation models and calculations methodologies, as required by R13-2156X, Section 4.1.5:

- 4.1.5. Compliance with the emission limits set forth in Section 4.1.1, shall be demonstrated by calculating emissions for every product in the Building 82 Manufacturing Unit using Emission Master®, emission modeling software, or other appropriate emission/discharge estimation models or calculation methodologies (e.g., ChemCAD®, PlantWare®, USEPA’s TANKS 4.0, etc.). When these emissions are calculated, each emission point listed in Section 1.0 with emissions of regulated air pollutants listed in Section 4.1.1 shall be included in the calculations and accounted for in the emission estimates. The emission models and other calculation methods shall be maintained current for all processes, process modifications and new product variants. The Director of the Division of Air Quality may specify or may approve other valid methods for compliance determination when he or she deems it appropriate and necessary.

Cytec has determined the maximum potential annual emissions of the new “Solid Shell Acid” product to be the following, based upon forecasted maximum annual production:

Table 4: “Solid Shell Acid” Potential Emissions Based Upon Forecasted Maximum Annual Production.

Pollutant	CAS No.	HAP?	Maximum Emission Rate	
			Hourly (lb/hr)	Annual (lb/yr)
Total PM	-	-	0.06	20
Total VOC	-	-	1.82	550
Total HAP	-	Y	1.81	545

## REGULATORY APPLICABILITY

### State Regulations:

45CSR7 To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations

This rule applies to the facility. The new “Solid Shell Acid” manufacturing process emits a trivial quantity of solid shell acid product (<0.06 lb/hr and <20 lb/yr). Cytec believes this extremely low emission rate of PM is not subject to 45CSR7-4.1 because of the exemption listed in 45CSR7-10.5:

45CSR7-10.5. The owner or operator of a manufacturing process shall be exempt from subsection 4.1 for source(s) of emissions that have a potential to emit less than one (1) pound per hour of particulate matter and an aggregate of less than one thousand (1,000) pounds per year for all such sources of particulate matter located at the stationary source. Particulate matter, for the purposes of this subsection, will not include particulate matter classified as hazardous air pollutants pursuant to 42 U.S.C. §7412(b).

45CSR7-4.1. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation.

Cytec submitted an application for a Class I Administrative Update. Class I Administrative Updates do not required the company to pay a permitting fee or to ran a legal advertisement.

The new Solid Shell Acid process emits a very small quantity (1.82 lb/hr and 550.0 lb/yr) of volatile organic compounds (VOC). The new process was added to R13-2156Y. The monitoring, recordkeeping and reporting requirements of the previous permit were deemed adequate to ensure compliance with all applicable requirements and were not changed in R13-2156Y.

40CSR30 Requirements for Operating Permits

Cytec Industries is a Title V source. The Company submitted a combined permit application for a minor modification to their Title V permit [R30-07300003-2016 (Part 2 of 3); February 9, 2016] at the same time this Rule 13 permit application was submitted.

See Attachment S in the permit application for the form entitled: "Title V Permit Revision Information."

45CSR34 Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 CFR, Part 63.

Cytec is subject to WV State Rule 34 because their facility is subject to MACT regulations.

#### Federal Regulations:

40CFR63,  
Subpart FFFF

National Emission Standards for Hazardous Air Pollutions:  
Miscellaneous Organic Chemical Manufacturing (MON)

The new "Solid Shell Acid" manufacturing process is subject to the Miscellaneous Organic NESHAP (MON MACT) Subpart FFFF because the process does utilize and emits a small amount of hazardous air pollutants (Dimethylformamide, Methanol and Toluene). Solid Shell Acid will be a Group 2 batch vents unit and has been designated as MCPU#26.

### Site Inspection

No site inspection was conducted for this update. The facility's location is known to the Enforcement Section of the DAQ who conducts periodic inspections. The last targeted full onsite inspection of the Polymers Additives Unit was conducted in April 30, 2015 by Dan Bauerle. That inspection found the facility in compliance (status code 30).

The plant is located on State Route 2, two miles south of Belmont, WV.

Attachment 1

**Changes Make to Permit R13-2156X  
to Arrive at Permit R13-2156Y**

*West Virginia Department of Environmental Protection  
Division of Air Quality*

*Earl Ray Tomblin  
Governor*

*Randy C. Huffman  
Cabinet Secretary*

## Class I Administrative Update



**R13- ~~2156X~~2156Y**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

*Issued to:*

**Cytec Industries, Inc.  
Willow Island, WV  
073-00003**

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*William F. Durham  
Director*

*Issued: ~~April 4~~November 16, 2016*

This permit will supersede and replace Permit R13-~~2156W~~2156X approved ~~October 16, 2015~~ April 4, 2016.

Facility Location: Willow Island, Pleasants County, West Virginia  
Mailing Address: #1 Heilman Avenue, Willow Island, WV 26134  
Facility Description: Building 82 Manufacturing Unit  
SIC Codes: 2869: Chemicals and Allied Products – Industrial Organic Chemicals, NEC  
2899: Chemicals and Allied Products – Chemical Preparations, NEC  
2843: Surface Active Agents, Finishing Agents, Sulfonated Oils, and Assistants  
UTM Coordinates: 473.4 km Easting • 4,356.2 km Northing • Zone 17  
Permit Type: Class I Administrative Update  
Description of Change: Revisions made in the Polymer Additives manufacturing unit during the ~~second~~first half of ~~2015~~2016 and updated per semiannual reporting requirement of Section 4.5.5.

- Add the new ~~Product/Process Area UHX-2000 and UHX-3000~~ Solid Shell Acid manufacturing process which utilizes existing equipment.

~~Correct typos.~~

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.*

*The source is subject to 45 C.S.R. 30. The permittee has the duty to update the facility's Title V (45 C.S.R. 30) permit application to reflect the changes permitted herein.*

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
14CX	14CE	Wash Tank (3-14T1)	--	--	NA
14FX	14BE	Reactor (2-14K2) and Condensers (3-14CD2 & 3-14CD4)	--	--	NA
14FX	14EE	Industrial hygiene vent on Reactor (2-14K2)	--	--	NA
14GY	14GE	Condensate Receiver and Condenser (1-14CD1)	--	--	NA
14HX	14DE	Tank and Condensers (3-14CD1 & 3-14CD3)	--	--	NA
14JX	15EE	Industrial hygiene vent on Sparkler Filter	--	--	NA
15BX	13JE	Industrial hygiene vent on Dryer	--	--	13JC
15BX	14GE	Vacuum Dryer	--	--	NA
15CX	14GE	Vacuum Pump	--	--	NA
15EX	15EE	Centrifuge	--	--	NA
15EY	NA	Wet Bin	--	--	NA
15FX	15FE	Wash Tank	--	--	NA
15PX	NA	Dry Bin	--	--	NA
15QX	NA	Screener	--	--	NA
16UX	16CE	Reactor with Condenser (3-16CD1 & 3-16CD5)	--	--	NA
16UX	18JE	Industrial hygiene vent on Reactor (16UX)	--	--	NA
16WX	16BE	Vacuum Strip Crystallizer with Condenser (3-16CD2)	--	--	NA
16WX	18JE	Industrial hygiene vent on Vacuum Strip Crystallizer	--	--	NA
16YX	NA	Conveyor	--	--	NA
16ZX	13JE	Industrial hygiene vent on Bagger	--	--	13JC
17AX	17AE	Methanol Drown Tank	--	--	18VC, 11VC
17JX	17QE	Mix Tank	--	--	17VC
17PX	17QE	Condensate Receiver and Condensers (3-16CD3 & 3-16CD4)	--	--	17VC
17PX	18JE	Industrial hygiene vent on Condensate Receiver (17PX)	--	--	NA
17QX	17QE	Vacuum Pump	--	--	NA
18SX	18ME	Hold Tank with Condenser (3-18CD1)	--	--	18VC
20BX	22BE	Condensate Receiver	--	--	NA
20KX	20KE	Reactor (2-19K1)	--	--	NA
20KX	21DE	Industrial hygiene vent on Reactor (2-19K1)	--	--	NA
<del>20KX</del>	<del>20KE</del>	<del>Centrifuge Feed Tank</del>	<del>--</del>	<del>--</del>	<del>NA</del>
<del>20KX</del>	<del>21DE</del>	<del>Industrial hygiene vent on Centrifuge Feed Tank</del>	<del>--</del>	<del>--</del>	<del>NA</del>
20PX	20PE	Split Receiver	--	--	NA
21AX	21AE	Centrifuge	--	--	NA
21AY	22QE	Industrial hygiene vent on Wet Bin	--	--	22QC
21WX	22QE	Industrial hygiene vent on Bagger	--	--	22QC
24MX	24ME	Strip Kettle (2-24K1)	--	--	NA

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
25EX	22QE	Industrial hygiene hood over Wet Bin	--	--	22QC
26FX	22BE	Agitated Filter Dryer (2-26F1)	--	--	NA
26HX	26GE	Packaging Unit (1-26BAG1)	--	--	26GX
Control Device ID	Emission Units Controlled	Emission Point	Control Device Description		Next Control Device in Series
22QC	21AY, 22BX, 21WX, 22DX, 23AX, 25EX	22QE	Dust Collector (RF-22DC1)		NA
26GX	26HX	26GE	Dust Collector		NA
<b>Product/Process Area – Aerosol GPG-N</b>					
21DX	20BE	Reactor with condensers 3-22CD1 and 3-22CD1A	--	--	NA
	21DE	Industrial hygiene hood over reactor	--	--	NA
22KX	20BE	Splitter Bowl	--	--	NA
20PX	20PE	Split Receiver	--	--	NA
20EX	20EE	Condensate Receiver	--	--	NA
20FX	20DE	Vacuum Jet (3-19VJ1)	--	--	NA
24TX	24FE	Drumming Station	--	--	NA
<b>Product/Process – UHX-2000 and UHX-3000</b>					
20EX	20EE	Condensate Receiver (3-20T1)	--	--	NA
20FX	20DE	Vacuum Jet (3-19VJ1)	--	--	NA
20LX	20AE	Splitter Bowl (2-19SB1)	--	--	NA
20NX	20AE	Strip Kettle (2-19K2) with Condensers 3-20CD1 & 3-20CD1A	--	--	NA
20PX	20PE	Split Receiver (1-20T1)	--	--	NA
21DX	21DE	Industrial Hygiene Hood Over Reactor 21DX	--	--	NA
	20BE	Reactor (2-20K1) with Condensers 3-22CD1 & 3-22CD1A	--	--	NA
22KX	20BE	Splitter Bowl (2-20SB1)	--	--	NA
24TX	24FE	Drumming Station (1-24D1)	--	--	NA
<b>Product/Process – Solid Shell Acid</b>					
<u>112X</u>	<u>11ME</u>	<u>Mother Liquor Storage Tank</u>	<u>--</u>	<u>--</u>	<u>10VC, 15VC</u>
<u>153X</u>	<u>11ME</u>	<u>Mother Liquor Storage Tank</u>	<u>--</u>	<u>--</u>	<u>14VC, 15VC</u>
<u>20KX</u>	<u>20KE</u>	<u>Reactor 2-19K1 with Condenser 3-19CD1</u>	<u>--</u>	<u>--</u>	<u>NA</u>
<u>20RX</u>	<u>20KE</u>	<u>Knock-out Pot</u>	<u>--</u>	<u>--</u>	<u>NA</u>
<u>22CX</u>	<u>22BE</u>	<u>Condensate Receiver</u>	<u>--</u>	<u>--</u>	<u>NA</u>
<u>22PX</u>	<u>22BE</u>	<u>Vacuum Pump</u>	<u>--</u>	<u>--</u>	<u>NA</u>
<u>24BX</u>	<u>24BE</u>	<u>Wash Tank</u>	<u>--</u>	<u>--</u>	<u>NA</u>
<u>24JX</u>	<u>24GE</u>	<u>Splitter Bowl</u>	<u>--</u>	<u>--</u>	<u>NA</u>

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
<u>24MX</u>	<u>24ME</u>	<u>Strip Kettle (2-24K1) with Condenser 3-25CD2</u>	--	--	<u>NA</u>
<u>24QX</u>	<u>24RE</u>	<u>Reactor (2-24K2) with Condenser 3-25CD1</u>	--	--	<u>NA</u>
<u>24PX</u>	<u>24PE</u>	<u>Vacuum Jet (LR-24VJ1)</u>	--	--	<u>NA</u>
<u>24NX</u>	<u>24ME</u>	<u>Condenser Receiver</u>	--	--	<u>NA</u>
<u>24RX</u>	<u>24RE</u>	<u>Condenser Receiver</u>	--	--	<u>NA</u>
<u>26FX</u>	<u>22BE</u>	<u>Agitated Filter Dryer (2-26F1)</u>	--	--	<u>NA</u>
<u>26HX</u>	<u>26GE</u>	<u>Packaging Unit (1-26BAG1)</u>	--	--	<u>26GX</u>

  

Control Device ID	Emission Units Controlled	Emission Point	Control Device Description	Next Control Device in Series
<u>26GX</u>	<u>26HX</u>	<u>26GE</u>	<u>Dust Collector</u>	<u>NA</u>
<u>10VC, 15VC</u>	<u>112X</u>	<u>11ME</u>	<u>Vapor Return</u>	<u>11MV</u>
<u>14VC, 15VC</u>	<u>153X</u>	<u>11ME</u>	<u>Vapor Return</u>	<u>11MV</u>

  

**Product/Process Area – Batch Column**

141X	NA	Still Pot	--	--	NA
142X	NA	Batch Column with Condenser (S-14CD1)	--	--	NA
154X	11ME	Reflux Drum with Condenser (S-14CD1)	--	--	11MV
162X	11ME	Recovered Solvent Receiver	--	--	16VC, 11VC
163X	11ME	Wet Solvent Receiver	--	--	16VC, 11VC
S-15EX1	NA	Reboiler	--	--	NA

  

Control Device ID	Emission Units Controlled	Emission Point	Control Device Description	Next Control Device in Series
11MV	154X, 162X, 163X	11ME	Water Scrubber	NA
16VC, 11VC	162X, 163X	11ME	Vapor Return	11MV

  

**Product/Process Area – Methanol Column**

074X	11ME	Intermediate Methanol Storage Tank	3/1998	12,000 gal	11VC, 15VC
121A	11ME	Bulk Methanol Storage Tank	1/1988	39,780 gal	11VC, 15VC
112X	11ME	Mother Liquor Storage Tank	--	--	10VC, 15VC
144X	11ME	Mother Liquor Storage Tank	--	--	14VC, 15VC
153X	11ME	Mother Liquor Storage Tank	--	--	14VC, 15VC
193X	193E	Methanol Column with Condenser (S-20CD1)	--	--	NA
203X	193E	Reflux Drum	--	--	NA

  

Control Device ID	Emission Units Controlled	Emission Point	Control Device Description	Next Control Device in Series
10VC, 15VC	112X	11ME	Vapor Return	11MV
11VC, 15VC	074X, 121A, 163X	11ME	Vapor Return	11MV
14VC, 15VC	144X, 153X	11ME	Vapor Return	11MV

  

**Product/Process Area – Hazardous Waste Storage Tank**

### 2.3. Authority

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

### 2.4. Term and Renewal

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-~~2156W~~2156X. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

### 2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Applications R13-0190, R13-0671, R13-0794, R13-1006, R13-1018, R13-1082B, R13-1114C, R13-1535C, R13-1735, R13-2156, R13-2156A, R13-2156B, R13-2156C, R13-2156D, R13-2156E, R13-2156F, R13-2156G, R13-2156H, R13-2156I, R13-2156J, R13-2156K, R13-2156L, R13-2156M, R13-2156N, R13-2156O, R13-2156P, R13-2156Q, R13-2156R, R13-2156S, R13-2156T, R13-2156U, R13-2156V, R13-2156W, R13-2156X, R13-2156Y and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;  
[45CSR§§13-5.11 and -10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

### 2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

Product or Process Name	Emission Point ID	Source ID	Pollutant
UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460	10IE	10CX (2-10K3)	PM <sub>10</sub> Opacity
UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460	07CE	07AX (3-7K4)	PM <sub>10</sub> Opacity
UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460	07FE	08AX, 07KX (2-7K8)	PM <sub>10</sub> Opacity
UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460	08RE	09CX (2-9K4)	PM <sub>10</sub> Opacity
UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460	08RE	DRUM08	PM <sub>10</sub> Opacity
UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460	08RE	10TX	PM <sub>10</sub> Opacity
UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460	12DE	11AX (2-11K1)	PM <sub>10</sub> Opacity
A1790, A2777, UV3638, UV2908	13JE	DRUM13	PM <sub>10</sub> Opacity
A1790, UV2908	14EE	14HX (2-14K1)	PM <sub>10</sub> Opacity
A1790, UV2908	14EE	14FX (2-14K2)	PM <sub>10</sub> Opacity
A1790, UV2908, UV3638	18JE	16UX (2-16K1)	PM <sub>10</sub> Opacity
UV3638	18JE	16WX (2-16K2)	PM <sub>10</sub> Opacity
UV3638	18JE	16JX (3-16K1)	PM <sub>10</sub> Opacity
UV2908, S-10333	21DE	20KX (2-19K1)	PM <sub>10</sub> Opacity
Aerosol GPG-N	21DE	21DX(2-20K1)	PM <sub>10</sub> Opacity
A1790, A2777, UV416	22QE	22BX (1-21D1)	PM <sub>10</sub> Opacity
Triazines Solids (UV1164), A425, A1790, A2777, UV416, UV1164, UV2126, UV2908, UV3638	22QE	21WX, 23AX, DRUM22	PM <sub>10</sub> Opacity
CA-150, UV2908	23AE	DRUM23	PM <sub>10</sub> Opacity
A1790, CIP200, UV2908	24FE	24MX (2-24K1)	PM <sub>10</sub> Opacity
A425, A1790, CIP200, UV1164, UV3638, UV416, UV2908	24FE	24QX (2-24K2)	PM <sub>10</sub> Opacity
UV2126	24GE	LIQUI-PAK	PM <sub>10</sub> Opacity
Aero 7260HFP, Aero 8860GL, ACCO-PHOS 950, S-10333	23ME	23LX (3-23K2)	PM <sub>10</sub> Opacity
CA-150	25BE	25BX(2-25D1)	PM <sub>10</sub> Opacity
A425, A1790, CA-150, UV1164, UV2908, UV3638, UV36381A, <u>Solid Shell Acid</u>	26GE	26GX	PM <sub>10</sub> Opacity
A1846, UV2908, UV3638	05LE	05LX (2-5K8)	HCl Opacity
Waste Trailer	0T2E	0T2X (T/T)	H <sub>3</sub> PO <sub>4</sub> Opacity
A1790	12CE	12LX (2-12K2)	H <sub>3</sub> PO <sub>4</sub> Opacity

Control Device ID	Description	Applicable Regulations	Emission Group(s) *	Monitoring Parameter	Parameter Value	Data Collection Frequency	Data Averaging Period	Inspection/ Preventative Maintenance Frequency
17VC	Vapor return line	NA	A1790, UV3638	NA	NA	NA	NA	Annual
18VC	Vapor return line	NA	A1790, UV2908, UV3638	NA	NA	NA	NA	Annual
22QC	Dust Collector	45CSR7 – PM	A425, A1790, A2777, CA150, CIP2 00, UV416, UV1164, UV2126, UV2908, UV3638, UV-3638 IA	Section 4.2.2 <sup>2</sup>	≤ 20%	Monthly <sup>2</sup>	NA	Annual
23AC	Dust Collector	45CSR7 – PM	CA-150, UV2908	Section 4.2.2 <sup>2</sup>	≤ 20%	Monthly <sup>2</sup>	NA	Annual
23HC	Vapor return line	NA	UV3638	NA	NA	NA	NA	Annual
26GX	Dust Collector	45CSR7-PM	A425, A1790, CA-150, UV1164, UV2908, UV3638, UV36381A, <u>Solid Shell Acid</u>	Section 4.2.2 <sup>2</sup>	≤ 20%	Monthly <sup>2</sup>	NA	Annual
27VC	Vapor return line	NA	Hazardous Waste Storage Tank	NA	NA	NA	NA	Annual

\* The control device requirements apply when the listed emission group(s) are operating and venting to the control device.

<sup>1</sup> Data logging of flow rate at least once every fifteen (15) minutes.

<sup>2</sup> Visual observations/Method 9 opacity reading per the conditions and requirements of and at the frequency specified in Section 4.2.2.

<sup>3</sup> Scrubber 11MZ is an installed spare scrubber, to be used only if one of these scrubbers is non-operational: 11MV, 11MW, 11MX, or 11MY.