west virginia department of environmental protection

Division of Air Quality
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Charleston, WV 25304-2345
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

October 13, 2016

CERTIFIED MAIL
91 7199 9991 7034 1376 2731

Mr. Rocky Romine
Director of Operations
Stockmeier Urethanes U.S.A. Inc.
P.O. Box 1456
Clarksburg, WV 26302-1456

Re: Stockmeier Urethanes U.S.A. Inc.
Clarksburg
Permit No. R13-2581B
Plant ID No.033-00150

Dear Mr. Romine:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-2581B is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

The source is not subject to 45CSR30.

In accordance with 45CSR30- Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

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.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1214.

Edward S. Andrews, P.E.
Engineer

Enclosures

ec. Rocky Romine, r.romine@stockmeier.us.com
Karl Dettinger, Karl.L.Dettinger@wv.gov
Lori Steele, lsteele@msesinc.com
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West Virginia Department of Environmental Protection

Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit to Modify

R13-2581B

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:
Stockmeier Urethanes U.S.A. Inc.
Clarksburg
033-00150

William F. Durham
Director

Issued: October 13, 2016

This permit will supercede and replace Permit R13-2581.

Facility Location:	20 Columbia Boulevard Clarksburg, Harrison County, West Virginia
Mailing Address:	P.O. Box 1456 Clarksburg, WV 26302-1456
Facility Description:	Chemical Blending Facility
NAICS Codes:	325211
UTM Coordinates:	560.882 km Easting • 4,348.122 km Northing • Zone 17
Permit Type:	Modification
Description of Change:	This action is for the installation of three additional storage tanks, eight reactors, and two emergency generators.

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 not subject to 45CSR30.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
S1	E1	Isocyanate Storage Tank Iso08	2004	12,000 gal	C2
S2	E1	Isocyanate Storage Tank Iso03	2004	8,000 gal	C2
S3	E1	Isocyanate Storage Tank Iso02	2004	8,000 gal	C2
S4	E1	Isocyanate Storage Tank Iso01	2004	8,000 gal	C2
S5	E1	Isocyanate Storage Tank Iso08	2004	8,000 gal	C2
S6	E1	Isocyanate Storage Tank TDI Intermediate	2004	5,000 gal	C3
S7	E1	Polyol Storage Tank Polyol05	2004	12,000 gal	C1
S8	E1	Polyol Storage Tank Polyol06	2004	8,000 gal	C1
S9	E1	Polyol Storage Tank Polyol02	2004	8,000 gal	C1
S10	E1	Polyol Storage Tank Polyol06	2004	8,000 gal	C1
S11	E1	AD-144233_PLS Storage Tank Soy	2004	8,000 gal	C1
S13	E7	Polyol Storage Tank ES02	2015	6,000 gal	None
S12	E6	Isocyanate Storage Tank MDI	201	6,700 gal	C8
S14	E10	Polyol Storage Tank	2017	20,000 gal	None
D1	None	Dispersion Machine 1	2004	N/A	D1VP & C9
D1VP	E3	Vacuum Pump for D1	2004	N/A	C5
D2	Bldg.	Dispersion Machine 2	2004		C9
D3	Bldg.	Dispersion Machine 3	2004		C9
D4		Dispersion Machine 4 for (R&D purposes)	2004		
D5	Bldg.	Dispersion Machine 5	2016	4,000 gal	C9
R1	E1	Reactor 1	2004	3,000 gal	C3
R2	E1	Reactor 2	2004	3,000 gal	C3
R3	E1	Reactor 3	2004	1,500 gal	C3
R5	E6	Reactor 5 w/vacuum pump	2015	675 gal	C8
R6	E6	Reactor 6 w/vacuum pump	2015	600 gal	C8
R7	E6	Reactor 7 w/vacuum pump	2015	1,718 gal	C8
R7DV	E5	Reactor 7 Drum Vent	2015	N/A	C7
R8	E6	Reactor 8	2015	6,250 gal	C8
R9	E6	Reactor 9	2016	6,250 gal	C8
R10	E6	Reactor 10 w/vacuum pump	2015	1,000 gal	C8
R11	E5	Reactor 11	2015	5,000 gal	C7
R12	E5	Reactor 12	2015	5,000 gal	C7
R13	E5	Reactor 13 w/vacuum pump	2015	275 gal	C7

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
FS4	Bldg.	Filling Station 4	2004	N/A	None
FS6	Bldg.	Filling Station 6	2004	N/A	None
M1	Bldg.	Mixing Machine 1	2004		None
M2	Bldg.	Mixing Machine 2	2004		None
M3	Bldg.	Mixing Machine 3	2004		None
M4	Bldg.	Mixing Machine 4	2004		None
BFS	E4	Bulk Filing Station Tanker Trucker Loading Station	2015	1 Bay	C6 & Covered
O1	Bldg.	Electric Oven	2015		Bldg.
O2	Bldg.	Electric Oven	2015		Bldg.
O3	Bldg.	Electric Oven	2015		Bldg.
EG51	51E	100 kW Emergency Generator Generac QT100 w/NG Fired Engine EPA Certification #EGNXB06.82-029	2014	149 bhp	
EG52	52E	600 kW Emergency Generator Generac Generator Set Perkins Compression Ignition Engine Manufactured Date: Nov 2015 EPA Certification #FCPXL18.1NYS-010	2016	909 bph	None

Table 1.1. – Control Devices

Control Device ID No.	Control Device	Type of Control	Emission Point ID No.
C1	Carbon Drum	Granular Activated Carbon Absorber	E1
C2	Carbon Drum	Granular Activated Carbon Absorber	E1
C3	Carbon Drum	Granular Activated Carbon Absorber	E1
C4	Carbon Drum	Granular Activated Carbon Absorber	E2
C5	Carbon Drum	Granular Activated Carbon Absorber	E3
C6	Carbon Drum	Granular Activated Carbon Absorber	E4
C7	Carbon Drum	Granular Activated Carbon Absorber	E5
C8	Carbon Drum	Granular Activated Carbon Absorber	E6
C9	Dust Collector	4 Cartridge Fabric Filter Dust Collector	Bldg.

C9 only controls particulate matter emissions from the dispersion machines when solids are being added during the process. The discharge of this control device is released within the building.

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments
CBI	Confidential Business Information
CEM	Continuous Emission Monitor
CES	Certified Emission Statement
C.F.R. *or* CFR	Code of Federal Regulations
CO	Carbon Monoxide
C.S.R. *or* CSR	Codes of State Rules
DAQ	Division of Air Quality
DEP	Department of Environmental Protection
dscm	Dry Standard Cubic Meter
FOIA	Freedom of Information Act
HAP	Hazardous Air Pollutant
HON	Hazardous Organic NESHAP
HP	Horsepower
lbs/hr	Pounds per Hour
LDAR	Leak Detection and Repair
M	Thousand
MACT	Maximum Achievable Control Technology
MDHI	Maximum Design Heat Input
MM	Million
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAPS	National Emissions Standards for Hazardous Air Pollutants
NO_X	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter less than 2.5 μm in diameter
PM_{10}	Particulate Matter less than 10μm in diameter
Ppb	Pounds per Batch
Pph	Pounds per Hour
Ppm	Parts per Million
Ppm_V or ppmv	Parts per Million by Volume
PSD	Prevention of Significant Deterioration
Psi	Pounds per Square Inch
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulate
USEPA	United States Environmental Protection Agency
UTM	Universal Transverse Mercator
VEE	Visual Emissions Evaluation
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquids

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Act 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 R13-2581. 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 Application R13-2581. R13-2581B, 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.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by

improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1.]**

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] ***[State Enforceable Only]***

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling

connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for

continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State Enforceable Only.*]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:
Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal

requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Emissions of VOC from the facility, shall not exceed 6.00 tpy. Compliance with this emission limit is satisfied through complying with Condition 4.1.3.

4.1.2. Emissions of Methylene diphenyl diisocyanate (MDI) and 2,4-Toluene diisocyanate (TDI)from the facility process units, which shall include storage vessels, reactors, filling stations, and fugitives sources, shall not exceed 0.60 tons per year of each of these two hazardous air pollutants. Compliance with this emission limit is satisfied through complying with Condition 4.1.3.

4.1.3. The permittee shall comply with the following work practice requirements:

a. All storage vessels shall be operated with a blanketing system using either dry air or nitrogen. Expect for S13 and S14, the discharge side of the blanketing system from the storage vessels shall be vented to a control device.

b. All pressure relief devices on all storage vessels and reactors shall be monitored for the purpose of detecting releases or depressurization of the monitored vessel.

c. The piping or ducting connecting the emission sources to be vented to control device as noted in Table 1.0 of this permit shall be referred as the closed vent system in this permit.

d. For all bulk tanker trailer loadout, the vapor return from the tanker line shall be connected to C6.

e. Overhead ventilation drops above or near the following process equipment shall be connected to a control device identified as C4 through a closed vent system:

i. Reactors 2 and 3;

ii. Storage Vessel S6;

iii. Dispersion Machines D1 and D5; and

iv. Fill Station 4 (FS4).

f. These closed vent systems as required in this condition shall meet the following:

i. The system shall be constructed and maintained free of leaks. A leaking component is defined as a measured instrument reading greater than 500 ppm above background or by audio, visual, or olfactory inspection techniques.

ii. Detected leaks shall be repaired as soon as practicable with the first attempt at repair within 5 calendar days after detecting the leak. Repair shall be completed no later than 15 calendar days after the leak is detected.
[45 CSR §13-5.11.]

g. Each of the activate carbon drum control devices (C1 through C8) shall be maintained in accordance with the following:

i. Each carbon drum control device shall be equipped with a visual color indicator that detects breakthrough of organic compounds has occurred for the device.

ii. Once breakthrough has occurred for a carbon drum control device has been detected, the saturated carbon in the control device shall be replaced as soon as possible but no later than 2 days after detecting that breakthrough of the particular control device has occurred except for C6. If breakthrough has occurred for C6, the saturated carbon in the control device shall be replaced prior to loading the next tanker trailer.

h. The process piping at the facility to include the connected process equipment shall be maintained in such a manner to be free of leaks. If a leak is detected, it shall be repaired in accordance with the timing outline in Condition 4.1.3.e.ii.

i. When adding solids to the dispersion machines (D1, D2, D3 and D5), the permittee shall control fugitive particulate matter by routing the vapor return line from the machine to dust collector C9.
[45 CSR §7-5.1]

4.1.4. The facility may change the product recipes if the changes do not exceed the VOC and HAP emissions specified in this permit and the Toxic Air Pollutants rates listed in Table A to 45 CSR 27.
[45 CSR §13-2.17.c.]

4.1.5. The following conditions and requirements are specific to the engine for generator set identified as EG51:

a. The permittee shall purchase an engine that has been certified to meet the emission standards in 40 CFR §60.4231(e).
[40 CFR §60.4243(b)]

b. The permittee shall operate and maintain the certified engine in accordance with the manufacturer's emission-related written instruction. If the permittee makes an adjustment to the engine's settings according to and consistent with the manufacturer's instruction, the engine is not considered out of compliance with item a of this condition.
[40 CFR §60.4243(a)(1)]

c. There is no time limit on the use of the engine in emergency situations. The engine can operate for combined non-emergency purposes, which include emergency demand response, maintenance and testing, and other non-emergency use for a maximum of 100 hours per year. Within the 100 hours per year, the engine can only operate:

i. 50 hours per year for maintenance, testing or readiness checks;

ii. 15 hours per year for emergency demand response. Emergency demand response is determined by the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3 or other authorized entity as determined by the Reliability Coordinator; and

iii. 50 hours per year for non-emergency use. The non-emergency situations cannot be used for peak shaving or to generate income for the facility to supply power to an electric gird or otherwise supply power as part of a financial arrangement with another entity.

The operating limits imposed in this condition are on a calendar year basis.
[40 CFR §60.4243(d]

d. The engine shall be equipped with a non-resettable hour-meter prior to initial start-up of the engine.
[40 CFR §60.4237(a)]

e. The engine shall only be fired with pipeline quality natural gas. This condition satisfies compliance with the limitation of 45CSR§10-3.1.e.
[45 CSR §10-10.3., and 45 CSR §10A-3.1.b.]

4.1.6. The following conditions and requirements are specific to the engine for generator set identified as EG52:

a. The generator set shall be used as an emergency stationary generator and be limited to non-emergency operation of no more than 100 hours per year. Non-emergency operation shall be for maintenance checks and readiness tests. Emergency operation is defined when electric power from the local utility is interrupted.
[40 CFR §60.4211(f)]

b. The generator set shall be equipped with an engine or engine configuration that has been certified by the manufacturer to comply with either 40 CFR §60.4205(b)(2), which referred to 40 CFR §§89.111 and 112 or 40 CFR Part 60.
[40 CFR §§60.4211(a)(3) and (c)(1)]

c. The permittee shall maintain the engine for generator set according to the manufacturer's emission-related written instructions.
[40 CFR §60.4211(a)(1)]

d. The permittee shall only change those emission-related settings of the generator set that are permitted by the manufacturer.
[40 CFR §60.4211(a)(2)]

e. The maximum name plate power output of the engine for each generator set shall not be greater than listed in Table 1.0 of this permit.

f. The engine will be equipped with a non-resettable hour meter.

g. Diesel fuel consumed in EG52 shall have a maximum sulfur content no greater than 15 ppm (ultra-low sulfur diesel) and with either a minimum centane index of 40 or a maximum aromatic content of 35 volume percent. Diesel meeting the specifications of Nonroad diesel under 40 CFR §80.510(b) is equivalent.
[40 CFR §60.4207(b)]

4.1.7. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

4.2.1. The permittee shall inspect the visual indicators on each activate carbon drum control device, except for C6. in service at least once per week and determine if breakthrough has occurred. Indicator for Control Device C6 shall be inspected and determine if breakthrough has occurred within 24 hours of before engaging in tanker truck loading operations. Records of inspections shall be maintained in accordance with Condition 3.4.1.

4.2.2. The permittee shall sample and measure the outlet of each activate carbon drum control device in service at least once per calendar quarter determine if breakthrough has occurred using either IsoSense Sampling unit or other equivalent means that can detect MDI and TDI vapors down to at least 1 part per billion. Records of the results of measurements shall be maintained in accordance with Condition 3.4.1.

4.2.3. For the purposes of demonstrating compliance with the requirements of the closed vent system in Condition 4.1.3.f., the permittee shall conduct the following:

a. Conduct an initial visual, olfactory, and auditory inspection for defects that could result in air emissions within 180 days after issuance of this permit. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices.

b. After the initial, subsequent annual visual, olfactory, and auditory inspections shall be conducted for defect that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices.

c. Detected leaks shall be repaired in accordance timing stated in Condition 4.1.1f.ii.

d. Records of such inspections shall be maintained in accordance with 3.4.1.

e. The use of the procedures listed as Alternative Methods to Method 21 (i.e. soapy water) to determine a leak or a leak has been repaired is acceptable.

4.2.4. The permittee shall monitor the process piping for equipment leaks in accordance with the following requirements:

a. Conduct an initial visual, olfactory, and auditory inspection for defects that could result in air emissions within 180 days after issuance of this permit. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices.

b. After the completion of the initial inspection, subsequent inspections shall be conducted in accordance with the following:

i. Visual inspection of the pump seals for visual indicators of leaking seals once per month.

ii. Conduct a visual, olfactory, and auditory inspection for defects that could result in air emissions within 13 months of the previous inspection of all of the process piping at the facility.

c. Detected leaks shall be repaired in accordance timing stated in Condition 4.1.3.f.ii.

d. Records of such inspections and any repaired made shall be maintained in accordance with Condition 3.4.1.

4.2.5. The permittee shall monitor pressure relief devices on continuous basis. The permittee shall record the date and time the release occurred at, duration of the release, the chemical(s) released, and amounts. Such records shall be maintained in accordance with Condition 3.4.1.

4.3. Testing Requirements

[Reserved]

4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit, and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. The permittee shall keep records of the hours of operation for the engines for the generator sets identified as EG51 and EG52. The records must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours were spent for non-emergency operation. Such records shall be maintained in accordance with Condition 3.4.1. and must be in a manner to demonstrate compliance with the operating limits of Condition 4.1.4.c. **[40 CFR §60.4245(b) for EG51 and 40 CFR §60.4214(b) for EG52]**

4.4.5. The permittee shall maintain records of MDI and TDI deliveries, production data, and any other information needed to determine MDI and TDI emissions on a calendar year basis using the latest emission calculators published by the American Chemistry Council and/or good engineering calculations.

4.5. Reporting Requirements

[Reserved]

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] (please use blue ink) _____ Responsible Official or Authorized Representative _____ Date

Name & Title (please print or type) _____ Name _____ Title

Telephone No. _____ Fax No. _____

[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

(ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.