West Virginia Department of Environmental Protection
Division of Air Quality

Joe Manchin, III
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Operate

Pursuant to
Title V
of the Clean Air Act

Issued to:

E. I. du Pont de Nemours and Company
Washington Works
Acrylic Resin Production (Part 1 of 14)
R30-10700001-2010 ~~(RE01)~~

John A. Benedict
Director

Issued: October 1, 2010 • Effective: October 15, 2010
Expiration: October 1, 2015 • Renewal Application Due: April 1, 2015

Permit Number: **R30-10700001-2010 ~~(RE01)~~**
Permittee: **E. I. du Pont de Nemours and Company**
Facility Name: **Washington Works**
Business Unit: **Acrylic Resin Production (Part 1 of 14)**
Permittee Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	Washington, Wood County, West Virginia
Facility Mailing Address:	P. O. Box 1217, Washington, WV 26181-1217
Telephone Number:	(304) 863-4240
Type of Business Entity:	Corporation
Facility Description:	Production of a series of acrylic resins from acrylic monomers
SIC Codes:	2821
UTM Coordinates:	442.368 km Easting • 4,346.679 km Northing • Zone 17

Permit Writer: Carrie McCumbers

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.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Table of Contents

1.0 Emission Units and Active R13, R14, and R19 Permits 4
1.1. Emission Units 4
1.2. Active R13, R14, and R19 Permits 6

2.0 General Conditions 7
2.1. Definitions 7
2.2. Acronyms 7
2.3. Permit Expiration and Renewal 8
2.4. Permit Actions 8
2.5. Reopening for Cause 8
2.6. Administrative Permit Amendments 9
2.7. Minor Permit Modifications 9
2.8. Significant Permit Modification 9
2.9. Emissions Trading 9
2.10. Off-Permit Changes 9
2.11. Operational Flexibility 10
2.12. Reasonably Anticipated Operating Scenarios 11
2.13. Duty to Comply 11
2.14. Inspection and Entry 11
2.15. Schedule of Compliance 12
2.16. Need to Halt or Reduce Activity not a Defense 12
2.17. Emergency 12
2.18. Federally-Enforceable Requirements 13
2.19. Duty to Provide Information 13
2.20. Duty to Supplement and Correct Information 13
2.21. Permit Shield 14
2.22. Credible Evidence 14
2.23. Severability 14
2.24. Property Rights 14
2.25. Acid Deposition Control 14

3.0 Facility-Wide Requirements 16
3.1. Limitations and Standards 16
3.2. Monitoring Requirements 19
3.3. Testing Requirements 20
3.4. Recordkeeping Requirements 21
3.5. Reporting Requirements 22
3.6. Compliance Plan 25
3.7. Permit Shield 25

4.0 Source-Specific Requirements [Acrylic Resin Production Requirements] 28
4.1. Limitations and Standards 28
4.2. Monitoring Requirements 32
4.3. Testing Requirements 33
4.4. Recordkeeping Requirements 34
4.5. Reporting Requirements 35
4.6. Compliance Plan 35

5.0 Source-Specific Requirements [Metal Parts Degreaser (A900S)]..... 36
5.1. Limitations and Standards..... 36
5.2. Monitoring Requirements..... 36
5.3. Testing Requirements..... 36
5.4. Recordkeeping Requirements..... 36
5.5. Reporting Requirements..... 36
5.6. Compliance Plan..... 37

Appendix A: R13-0181C Attachments
Appendix B: R13-~~2617E~~3223 Attachment

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
A010.1S	A010E	1A EA Storage Tank	1947	A010C Carbon Adsorber
A010.2S	A010E	1B EA Storage Tank	1975	A010C Carbon Adsorber
A020S	A020E	7E Storage Tank	1947	None
A030S	A030E	6W Storage Tank	1946	None
A040S	A040E	4W Storage Tank	1946	None
A050S *(Idled)*	A050E	3S Storage Tank	1948	A050C Carbon Adsorber
A060S	A060E	3 N Storage Tank	1946	None
A070S	A070E	2 Storage Tank	1946	None
A080.1S	A080E	5 Storage Tank	1963	None
A080.2S	A080E	4E Storage Tank	1946	None
A090S	A090E	Storage Tank	1946	None
A100S	A100E	Storage Tank	1946	None
A110S	A110E	Indoor Storage Tank #6	1946	None
A110.1S	A110E	Indoor Storage Tank #5	2010	None
A130.2S	A130E/A140E	Indoor Storage Tank #4	1946	None
A130.3S	A130E/A140E	Indoor Storage Tank #2	1946	None
A130.5S *(Idled)*	A130E/A140E	DDM Indoor Storage Tank	1946	None
A130.6S	A130E/A140E	DDM Indoor Storage Tank	1975	None
A220S	A130E/A140E	Ingredient 12 Run Tank	1975	None
A220.1S	A200E	Ingredient 12 Hold Tank	1946	None
A220.2S	A200E	Ingredient 12 Make Tank	1946	None
A150S	A150E	Ingredient 10 Storage Tank	1946	None
A160.1S	A160E	Solids Storage Hopper	1968	None
A160.2S	A160E	Solids Storage Hopper	1968	None
A160.3S	A160E	Solids Storage Hopper	1968	None
A160.4S	A160E	Solids Storage Hopper	1968	None
A290.4S	A160E	Solids Microscale Tank	1975	None
A180S	A180E	Catalyst Mix Tank	1980	None

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
A190S *(Idled)*	A190E	Catalyst Run Tank	1966	None
A191S	A191E	Catalyst Run Tank	2010	None
A200S	A200E	Ingredient 11 Run Tank	1975	None
A260S	A260E	Ingredient 22 Storage Silo	1975	A260C Bag Filter
A260.1S	A200E	Ingredient 22 Mix Tank	1969	None
A260.2S	A200E	Ingredient 22 Storage Tank	1947	None
A280S	A290E	Water Phase Tank	1946	None
A290.1S	A290E	Monomer Phase Tank	1946	None
A290.2S	A290E	Microscale Tank	1975	None
A290.4S	A160E	Dry Ingredient Solids Microscale	1975	None
A300S	A300E	North Polykettle Room Exhaust	1947	None
A310.1S	A310E	#1 Slurry Tank	1958	None
A310.2S	A310E	#3 Slurry Tank	1965	None
A320S	A320E	#4 Blend Tank	1969	None
A340S	A340E	#1 Centrifuge	1946	None
A350.1S	A350E	#1 Predryer	1958	A350.1C Bag Filter
A350.2S	A350E	#1 Predryer Cyclone	1969	A350.1C Bag Filter
A350.3S	A350E	#1 Dryer	1947	A350.1C Bag Filter
A350.4S	A350E	#1 Dryer Fines Cyclone	1947	A350.1C Bag Filter
A350.5S	A350E	#1 Screener	1990	A350.2C Bag Filter
A350.6S	A350E	#1 Screener Overs Hopper	1991	A350.2C Bag Filter
A350.7S	A350E	#1 Product Transfer Cyclone	1969	A350.2C Bag Filter
A350.8S	A350E	#1 Packout	1968	A350.2C Bag Filter
A390.7S	A350E	#2 Packout	1969	A350.2C Bag Filter
A380S	A380E	#2 Centrifuge	1975	None
A390.1S	A390.1E/A390.2E	#2 Predryer	1975	A390.1C/A390.2C Water Scrubber/ Bag Filter
A390.2S	A390.1E/A390.2E	#2 Predryer Cyclone	1975	A390.1C/A390.2C Water Scrubber/ Bag Filter

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
A390.3S	A390.1E/A390.2E	#2 Dryer	1996	A390.1C/A390.2C Water Scrubber/ Bag Filter
A390.4S	A390.8E	#2 Screener	2003	A390.8C Bag Filter
A390.8S	A390.8E	#2 Product Transfer Cyclone	2003	A390.8C Bag Filter
A390.6S	N/A (Inside Vent)	Manual Bagger	1975	A390.6C Bag Filter
A440.1S	A290E/A450E/A460E	#1 Polykettle	1975	None
A440.2S	A290E/A450E/A460E	#2 Polykettle	1975	None
A440.3S	A290E/A450E/A460E	#3 Polykettle	1975	None
A440.4S	A300E/A450E/A460E	#4 Polykettle	1975	None
A440.5S	A300E/A450E/A460E	#5 Polykettle	2007	None
A470S	A470E	Acrylics Lab	1946	None
A900S	A900E	Metal Parts Degreaser	1999	None

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-0181C	October 12, 2005
~~R13-2617E~~	~~November 30, 2010~~
R13-3223	December 8, 2014

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.

2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NO_x**	Nitrogen Oxides
CBI	Confidential Business Information	**NSPS**	New Source Performance Standards
CEM	Continuous Emission Monitor		
CES	Certified Emission Statement	**PM**	Particulate Matter
C.F.R. *or* CFR	Code of Federal Regulations	**PM_{10}**	Particulate Matter less than 10μm in diameter
CO	Carbon Monoxide		
C.S.R. *or* CSR	Codes of State Rules	**pph**	Pounds per Hour
DAQ	Division of Air Quality	**ppm**	Parts per Million
DEP	Department of Environmental Protection	**PSD**	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	**psi**	Pounds per Square Inch
HAP	Hazardous Air Pollutant	**SIC**	Standard Industrial Classification
HON	Hazardous Organic NESHAP		
HP	Horsepower	**SIP**	State Implementation Plan
lbs/hr *or* lb/hr	Pounds per Hour	**SO_2**	Sulfur Dioxide
LDAR	Leak Detection and Repair	**TAP**	Toxic Air Pollutant
m	Thousand	**TPY**	Tons per Year
MACT	Maximum Achievable Control Technology	**TRS**	Total Reduced Sulfur
		TSP	Total Suspended Particulate
mm	Million	**USEPA**	United States Environmental Protection Agency
mmBtu/hr	Million British Thermal Units per Hour		
$mmft^3$/hr *or* mmcf/hr	Million Cubic Feet Burned per Hour	**UTM**	Universal Transverse Mercator
NA *or* N/A	Not Applicable	**VEE**	Visual Emissions Evaluation
NAAQS	National Ambient Air Quality Standards	**VOC**	Volatile Organic Compounds
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Permit Expiration and Renewal

2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]

2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]

2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]

2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

2.5.1. This permit shall be reopened and revised under any of the following circumstances:

a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.

c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

a. The change must meet all applicable requirements and may not violate any existing permit term or condition.

b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield.

d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9.]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.
[45CSR§30-5.8]

2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.
[45CSR§30-5.8.a.]

2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or

b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.

b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. 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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. 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;

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.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would 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.
[45CSR§30-5.1.f.2.]

2.17. Emergency

2.17.1. An "emergency" means any situation arising from sudden and reasonably 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.
[45CSR§30-5.7.a.]

2.17.2. 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 45CSR§30-5.7.c. are met.
[45CSR§30-5.7.b.]

2.17.3. 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. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, 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, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]

2.18.2. Those provisions specifically designated in the permit as “State-enforceable only” shall become “Federally-enforceable” requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

2.19.1. 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 modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required 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.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. 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.
[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. 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 defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.

b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.
[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person 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 or allow 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.
[40 C.F.R. §61.145(b) and 45CSR34]

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. **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]

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.8. **Risk Management Plan.** This stationary source, as defined in 40 C.F.R. § 68.3, is subject to Part 68. This stationary source shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. Part 68.10. This stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.1.9. **45CSR21.** The permittee shall comply with all hourly and annual emission limits set forth by the affected 45CSR13 permits, for each of the sources and associated emission points identified in Attachment A of Permit R13-~~2617~~ 3223 (Appendix B of this Permit).

Note: For the Acrylic Resin Production Area, the affected permit is R13-0181C and the Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B. The hourly and annual emission limits for the affected sources are provided in 4.1.1.

[45CSR13, R13-~~2617~~ 3223, 4.1.1]

3.1.10. **45CSR21.** The permitted sources identified in Appendix B and recognized as being subject to 45CSR21 shall comply with all applicable requirements of 45CSR21 – "Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds" provided, however, that compliance with any more stringent requirements under the affected 45CSR13 permit identified in Appendix B, are also demonstrated. The applicable requirements set forth by 45CSR21 shall include, but not be limited to, the following: **[45CSR13, R13-~~2617~~ 3223, 4.1.2]**

3.1.10.1. The permittee shall maintain the aggregated hourly and annual VOC control efficiency of 90% or greater, on a site-wide basis, for all existing sources listed or required to be listed as part of the original facility-wide Reasonably Available Control Measures (RACM) plan, as identified in Appendix B. **[45CSR13, R13-~~2617~~ 3223, 4.1.2.1; 45CSR§21-40.3.a.1 (State-Enforceable only)]**

3.1.10.2. On or after May 1, 1996, construction or modification of any emission source resulting in a maximum theoretical emissions (MTE) of VOCs equaling or exceeding six (6) pounds per hour and not listed or required to be listed in the facility-wide RACM plan shall require the prior approval by the Director of an emission control plan that meets the definition of reasonable available control technology (RACT) on a case-by-case basis for both fugitive and non-fugitive VOC emissions from such source. All sources constructed or modified on or after May 1, 1996 shall be subject to the following: **[45CSR13, R13-~~2617~~ 3223, 4.1.2.2; 45CSR§21-40.3.c (State-Enforceable only)]**

a. The RACT control plan(s) shall be embodied in a permit in accordance to 45CSR13. **[45CSR13, R13-~~2617~~ 3223, 4.1.2.2.a; 45CSR§21-40.4.e (State-Enforceable only)]**

b. The MTE and associated emission reductions of the constructed or modified source will not be calculated into the site-wide aggregate hourly and annual emissions reduction requirements set forth in Section 3.1.10.1. **[45CSR13, R13-~~2617~~ 3223, 4.1.2.2.b]**

3.1.10.3. If a modification to an existing source with current MTE below the threshold of six (6) pounds per hour of VOCs causes an increase in the MTE that results in the source exceeding the six (6) pounds per hour threshold for the first time, the source shall be subject to RACT in accordance to Section 3.1.10.2. **[45CSR13, R13-~~2617~~ 3223, 4.1.2.3; 45CSR§21-40.3.c (State-Enforceable only)]**

3.1.10.4. Physical changes to or changes in the method of operation of an existing emission source listed or required to be listed as part of the facility-wide RACM plan, that results in an increase in VOC emissions of any amount, shall require the prior approval by the Director of an emission control plan

that meets the definition of RACT on a case-by-case basis for both fugitive and non-fugitive VOC emissions from the source. All sources modified on or after May 1, 1996 shall be subject to the following; **[45CSR13, R13-~~2617~~ 3223, 4.1.2.4; 45CSR§21-40.3.c (State-Enforceable only)]**

a. The RACT control plan (s) shall be embodied in a permit in accordance to 45CSR13. **[45CSR13, R13-~~2617~~ 3223, 4.1.2.4.a; 45CSR§21-40.4.e (State-Enforceable only)]**

b. The facility-wide RACM plan shall be modified to include the RACT analysis conducted on the modified source(s). **[45CSR13, R13-~~2617~~ 3223, 4.1.2.4.b]**

c. The MTE and associated emission reductions of the modified source shall be recalculated as part of the site-wide aggregate hourly and annual emissions reduction requirements to demonstrate compliance with the minimum 90% reduction rate as set forth in 3.1.10.1 of this permit. **[45CSR13, R13-~~2617~~ 3223, 4.1.2.4.c]**

3.1.10.5. In the event the facility-wide RACM plan is modified to delete an existing emission source, and any associated pollution control equipment, due to the source being permanently removed from service or reassigned to service not subject to the requirements of 45CSR§21-40, the MTE shall be recalculated to demonstrate that the 90% facility-wide VOC reduction requirement set forth in Section 3.1.10.1 is still being met. In the event such a modification results in the site-wide aggregate hourly and annual emissions reduction being recalculated to a rate less than 90%, the RACM plan shall be revised to include all new and/or modified sources and their associated control technologies constructed on or after May 1, 1996, in order to meet the requirements set forth in 3.1.10.1. **[45CSR13, R13-~~2617~~ 3223, 4.1.2.5]**

3.1.10.6. In the event a source and associated emission point identified in Appendix B is subject to the New Source Performance Standards (NSPS) of 40 C.F.R. 60, the National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40 C.F.R. 61, or the Maximum Achievable Control Technology (MACT) standards of 40 C.F.R. 63, then compliance with such requirements as defined in the affected 45CSR13 permit shall demonstrate compliance with the RACT requirements set forth in R13-~~2617~~ 3223. **[45CSR13, R13-~~2617~~ 3223, 4.1.2.6]**

Note: For the Acrylic Resin Production Area, the affected permit is R13-0181C and the Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

3.1.11. **45CSR27.** The permitted sources identified in Appendix B and recognized as being subject to 45CSR27 shall comply with all applicable requirements of 45CSR27 – "To Prevent and Control the Emissions of Toxic Air Pollutants" provided, however, that compliance with any more stringent requirements under the affected 45CSR13 permit identified in Appendix B are also demonstrated. The applicable requirements set forth by 45CSR27 shall include, but not be limited to, the following: **[45CSR13, R13-2617, 4.1.3]**

3.1.11.1. The permittee shall employ the best available technology (BAT) for the purpose of reducing toxic air pollutants (TAP) associated with the applicable sources and emission points identified in Appendix B. **[45CSR13, R13-~~2617~~ 3223, 4.1.3.1; 45CSR§27-3.1 (State-Enforceable only)]**

3.1.11.2. The permittee shall employ BAT for the purpose of preventing and controlling fugitive emissions of TAP to the atmosphere as a result of routing leakage from those sources and their associated equipment identified in Appendix B as operating in TAP service. **[45CSR13, R13-~~2617~~ 3223, 4.1.3.2; 45CSR§27-4.1 (State-Enforceable only)]**

Note: For the Acrylic Resin Production Area, the affected permit is R13-0181C and the Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

3.1.12. **45CSR27.** In the event a source and associated emission point identified in Appendix B are subject to the MACT standards of 40 C.F.R. 63, then compliance with the applicable MACT requirements identified in the affected 45CSR13 permit shall demonstrate compliance with the BAT requirements set forth in 3.1.11.

Note: For the Acrylic Resin Production Area, the affected permit is R13-0181C and the Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

[45CSR13, R13-~~2617~~ 3223, 4.1.4; 45CSR§27-3.1 (State-Enforceable only)]

3.1.13. When emissions on an annual basis of one or more of the greenhouse gases listed below are greater than the *de minimis* amounts listed below, all greenhouse gases emitted above the *de minimis* amounts shall be reported to the Secretary under 45CSR§42-4. (see Section 3.5.):

Greenhouse Gas Compound	tons/year
carbon dioxide	10,000
methane	476
nitrous oxide	32.6
hydrofluorocarbons	0.855
perfluorocarbons	1.09
sulfur hexafluoride	0.42

[45CSR§42-3.1., State-Enforceable only.]

3.2. Monitoring Requirements

3.2.1. **45CSR21.** The permittee shall implement and maintain leak detection and repair (LDAR) programs for the reduction of fugitive VOC emissions in all manufacturing process units subject to 45CSR§21-40 producing a product or products intermediate or final, in excess of 1,000 megagrams (1,100 tons) per year in accordance with the applicable methods and criteria of 45CSR§21-37 or alternate procedures approved by the Director. Procedures approved by the Director, 40 C.F.R. 60, Subpart VV, 40 C.F.R. 61, Subpart V, 40 C.F.R. 63, Subpart H, 40 C.F.R. 63, Subpart TT, 40 C.F.R. 63, Subpart UU, 40 C.F.R. 65, Subpart F, and 40 C.F.R. 265, Subpart CC. This requirement shall apply to all units identified in Appendix B irrespective of whether or not such units produce as intermediates or final products, substances on the lists contained with 40 C.F.R. 60, 40 C.F.R. 61, or 40 C.F.R. 63.

Note: The Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

[45CSR13, R13-~~2617~~ 3223, 4.2.1; 45CSR§21-40.3.a.2 (State-Enforceable only)]

3.2.2. **45CSR27.** The permittee shall implement and maintain a LDAR program for the applicable sources and emission points identified in Appendix B in order to reduce the emissions of TAP in accordance with the requirements of 40 C.F.R. 63, Subpart H – "National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks." Compliance with 40 C.F.R. 63, Subpart H shall be considered demonstration of compliance with the provisions of 45CSR§27-4 – "Fugitive Emissions of Toxic Air Pollutants."

Note: The Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

[45CSR13, R13-~~2617~~ 3223, 4.2.2; 45CSR§27-4.1 (State-Enforceable only)]

3.2.3. **45CSR21.** In the event a source and associated emission point identified in Appendix B are subject to the MACT standards of 40 C.F.R. 63, then compliance with any applicable LDAR program set forth by the MACT and identified in the affected 45CSR13 permit shall demonstrate compliance with the monitoring requirements set forth in this permit.

Note: For the Acrylic Resin Production Area, the affected permit is R13-0181C and the Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

[45CSR13, R13-~~2617~~ 3223, 4.2.3; 45CSR§21-37.1.c (State-Enforceable only); 45CSR§27-4.1 (State-Enforceable only)]

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, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are 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.

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.

[WV Code § 22-5-4(a)(15) and 45CSR13]

3.3.2. **45CSR21.** Manufacturing process units may be exempted upon written request of the permittee to the Director. Exempted units are exempted from the frequency of testing as described in 45CSR§21-37, however, LDAR testing of this unit or certification of emission using approved fugitive emission factors will be required every three years, or upon request by the Director or his duly authorized representative. Waiver or scheduling of LDAR testing every three years may be granted by the Director if written request and justification are submitted by the permittee. Units exempted from testing are not exempted from testing which may be required under any other applicable State or Federal regulations, orders, or permits. The Director may periodically require verifications by the permittee that maintenance and repair procedures associated with approved exemptions are continued and practiced.

[45CSR13, R13-~~2617~~ 3223, 4.3.1; 45CSR§21-40.3.a.2 (State-Enforceable only)]

3.3.3. **45CSR21.** In the event a source and associated emission point identified in Appendix B are subject to the MACT standards of 40 C.F.R. 63, then compliance with the applicable LDAR testing requirements set forth by the MACT and identified in the affected 45CSR13 permit shall demonstrate compliance with the LDAR testing requirements set forth in this permit.

Note: For the Acrylic Resin Production Area, the affected permit is R13-0181C and the Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

[45CSR13, R13-~~2617~~ 3223, 4.3.2; 45CSR§21-37.1.c (State-Enforceable only); 45CSR§27-4.1 (State-Enforceable only)]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** 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.

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-0181, 4.4.1; 45CSR13, R13-~~2617~~ 3223, 4.4.1]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

3.4.3. **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§30-5.1.c. State-Enforceable only.]

3.4.4. **45CSR21.** Unless granted a variance pursuant to 45CSR§21-9.3, or as approved by the Director as part of a required Start-up, Shutdown, and Malfunction (SSM) Plan mandated under 40 C.F.R. §63.6(e) or another applicable Section of 40 C.F.R. 63, the owner or operator of the facility shall operate all emission control equipment listed in Appendix B as part of the facility-wide control efficiency plan at all times the facilities are in operation or VOC emissions are occurring from these sources or activities. In the event of a malfunction, and a variance has not been granted, the production unit shall be shutdown or the activity discontinued as expeditiously as possible. The permittee shall comply with 45CSR§21-9.3 with respect to all periods of non-compliance with the emission limitations set forth in the affected 45CSR13 permits and the emissions reduction requests set forth in the facility-wide control efficiency plan resulting from unavoidable malfunctions of equipment.

Note: For the Acrylic Resin Production Area, the affected permit is R13-0181C and the Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

[45CSR13, R13-~~2617~~ 3223, 4.4.4]

3.4.5. **45CSR27.** The permittee shall maintain records of the results of all monitoring and inspections, emission control measures applied, and the nature, timing, and results of repair efforts conducted in accordance to 45CSR§27-10 and set forth in the affected 45CSR13 permits as identified in Appendix B.

Note: For the Acrylic Resin Production Area, the affected permit is R13-0181C and the Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

[45CSR13, R13-~~2617~~ 3223, 4.4.5.]

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.
[45CSR§§30-4.4. *and* 5.1.c.3.D.]

3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]

3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, 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, mailed first class or by private carrier 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 SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review (3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Certified emissions statement.** 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. **[45CSR§30-8.]**

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. **[45CSR§30-5.3.e.]**

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. **[45CSR§30-5.1.c.3.A.]**

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.
[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.5.10. **45CSR21.** The permittee shall submit to the DAQ a plan for complete, facility-wide implementation of RACT requirements within one hundred eighty (180) days of notification by the Director that a violation of the National Ambient Air Quality Standards (NAAQS) for ozone (that were in effect on or before May 1, 1996) has occurred. Such plan shall include those sources listed in Appendix B as part of the site-wide control efficiency requirement and may contain an update of existing RACT analyses. Full implementation of such plan shall be completed within two (2) years of approval of the RACT plan by the Director.

Note: The Attachment A listing only for those sources in the Acrylic Resin Production Area is provided in Appendix B.

[45CSR13, R13-~~2617~~ 3223, 4.5.1; 45CSR§21-40.4.c.1 (State-Enforceable only)]

3.5.11. **Greenhouse Gas Reporting Requirements**. When applicable, as determined in permit section 3.1., greenhouse gas emissions shall be reported pursuant to 45CSR§42-4. as follows:

a. In accordance with a reporting cycle provided by the Secretary, affected sources shall report to the Secretary the quantity of all greenhouse gases emitted above *de minimis* amounts in the years specified by the Secretary.
[45CSR§42-4.1., State-Enforceable only.]

b. Affected sources shall only be required to report annual quantities of anthropogenic non-mobile source greenhouse gases emitted at the stationary source, and shall not be required to report biogenic emissions of greenhouse gases.
[45CSR§42-4.2., State-Enforceable only.]

c. Reports of greenhouse gas emissions submitted to the Secretary under 45CSR§42-4. shall be signed by a responsible official and shall include the following certification statement: "I, the undersigned, hereby certify that the data transmitted to the West Virginia Department of Environmental Protection is true, accurate, and complete, based upon information and belief formed after reasonable inquiry.
[45CSR§42-4.5., State-Enforceable only.]

3.6. Compliance Plan

3.6.1. None.

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

a. 40 C.F.R. 60, Subpart K - "Standards of Performance For Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978." There are no petroleum liquid storage tanks in the Acrylic Resin Production Area.

b. 40 C.F.R. 60, Subpart Ka - "Standards of Performance for Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984." There are no petroleum liquid storage tanks in the Acrylic Resin Production Area.

c. 40 C.F.R. 60, Subpart Kb - "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." There are no volatile organic liquid storage tanks in the Acrylic Resin Production Area constructed after July 23, 1984 with a design capacity equal to or greater than 75 cubic meters (m^3).

d. 40 C.F.R. 60, Subpart VV - "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry." The Acrylic Resin Production Area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.

e. 40 C.F.R. 60, Subpart DDD - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry." The Acrylic Resin Production Area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.

f. 40 C.F.R. 60, Subpart RRR - "Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes." The Acrylic Resin Production Area does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.

g. 40 C.F.R. 61, Subpart V - "National Emission Standards for Equipment Leaks (Fugitive Emissions Sources)." Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Acrylic Resin Production Area.

h. 40 C.F.R. 63, Subpart H - "National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks." 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).

i. 40 C.F.R. 63, Subpart JJJ - "National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins." The Acrylic Resin Production Area does not produce the materials listed in 40 C.F.R. §63.1310.

j. 40 C.F.R. 60, Subpart EEEE – "National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)." The Acrylic Resin Production Area does not distribute organic liquids as defined by 40 C.F.R. §63.2406.

k. 40 C.F.R. 63, Subpart PPPP – "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products." The Acrylic Resin Production Area does not produce as an intermediate or final product that meets the definition of "surface coated" plastic part.

l. 40 C.F.R. 63, Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." The Acrylic Resin Production Area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.

m. 40 C.F.R. 63, Subpart ZZZZ – "National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines." The Acrylic Resin Production Area does not have a stationary Reciprocating Internal Combustion Engine (RICE) as defined by 40 C.F.R. §63.6675.

n. 40 C.F.R. 63, Subpart DDDDD – "National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters." The Acrylic Resin Production Area does not own or operate an industrial, commercial, or institutional boiler or process heater as defined in 40 C.F.R. §63.7575 of the proposed rule.

o. 40 C.F.R. 63, Subpart HHHHH – "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing." The Acrylic Resin Production Area does not produce, blend, or manufacture coatings as part of the manufacturing process.

p. 40 C.F.R. 82, Subpart B - "Protection of Stratospheric Ozone." Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. The Acrylic Resin Production Area does not conduct motor vehicle maintenance involving CFCs on site.

q. 40 C.F.R. 82, Subpart C – "Protection of Stratospheric Ozone." Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The Acrylic Resin Production Area does not use, manufacture, nor distribute these materials.

r. 45CSR2 – "To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers." The Acrylic Resin Production Area does not contain any fuel burning units.

s. 45CSR10 – "To Prevent and Control Air Pollution from the Emission of Sulfur Oxides." The Acrylic Resin Production Area does not contain any fuel burning units subject to the sulfur dioxide weight emission standards of 45CSR§10-3. Also, per 45CSR§10-4.1.e, manufacturing process source operations in the Acrylic Resin Production Area are exempt from the sulfur dioxide concentration limits of 45CSR§10-4.1 because the potential to emit of sulfur dioxide is less than 500 pounds per year.

t. 45CSR16 – "Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60." The Acrylic Resin Production Area is not subject to any requirements under 40 C.F.R. 60.

u. 45CSR17 – "To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter." Per 45CSR§17-6.1, the Acrylic Resin Production Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.

4.0 Source-Specific Requirements [Acrylic Resin Production Requirements]

4.1. Limitations and Standards

4.1.1. Maximum allowable hourly and annual emissions from the "A" Area – Acrylic Resins, shall not exceed the limitations set forth in Table 4.1.1.

Table 4.1.1. Emission Limits for "A" Area – Acrylic Resins

Emission Point	Pollutant	Emission Limit	
		pph	tpy
A010E	VOC	0.2	0.02
	Ethyl Acrylate	0.17	0.011
A020E	VOC	2.5	0.04
A030E	VOC	1.7	0.04
A040E	VOC	1.7	0.04
A050E	VOC	7.2	0.30
	Methanol	7.17	0.298
A070E	VOC	5.3	0.14
A080E	VOC	4.2	1.41
	Methyl Methacrylate	4.16	1.408
A110E	VOC	0.1	0.01
A120E	VOC	1.9	0.021
	Ethyl Acrylate	1.83	0.021
A130E	VOC	1.5	0.10
	Methyl Methacrylate	0.81	0.09
A140E	VOC	1.5	0.10
	Methyl Methacrylate	0.81	0.09
A160E	PM_{10}	1.3	0.10
A180E	VOC	2.2	0.103
	Methanol	2.13	0.103
A190E	VOC	4.6	0.09
	Methanol	4.56	0.09
A260E	PM_{10}	0.6	0.01
A290E	VOC	11.8	29.4
	Acrylic Acid	0.01	0.016
	Ethyl Acrylate	1.20	3.0
	Methyl Methacrylate	8.82	22.1
A300E	VOC	0.6	1.360
	Acrylic Acid	0.01	0.001
	Ethyl Acrylate	0.06	0.134
	Methyl Methacrylate	0.41	1.025
A310E	VOC	0.30	0.720
	Acrylic Acid	0.01	0.001
	Ethyl Acrylate	0.03	0.060
	Methanol	0.06	0.133
	Methyl Methacrylate	0.18	0.441

Emission Point	Pollutant	Emission Limit	
		pph	tpy
A320E	VOC	0.20	0.360
	Acrylic Acid	0.01	0.001
	Ethyl Acrylate	0.02	0.030
	Methanol	0.03	0.070
	Methyl Methacrylate	0.09	0.221
A350E	PM_{10}	1.8	4.36
	VOC	0.1	0.13
	Acrylic Acid	0.01	0.001
	Ethyl Acrylate	0.01	0.024
	Methanol	0.02	0.051
	Methyl Methacrylate	0.02	0.042
A390.1E	PM_{10}	1.1	3.84
	VOC	0.1	0.09
	Acrylic Acid	0.01	0.001
	Ethyl Acrylate	0.01	0.016
	Methanol	0.01	0.033
	Methyl Methacrylate	0.01	0.027
A390.2E	PM_{10}	1.1	3.84
	VOC	0.1	0.09
	Acrylic Acid	0.01	0.001
	Ethyl Acrylate	0.01	0.016
	Methanol	0.01	0.033
	Methyl Methacrylate	0.01	0.027
A390.8E	PM_{10}	0.1	0.13
A450E	VOC	0.3	0.72
	Acrylic Acid	0.01	0.001
	Ethyl Acrylate	0.03	0.060
	Methanol	0.06	0.133
	Methyl Methacrylate	0.18	0.441
A470E	Methylene Chloride	0.01	0.001

Compliance with the above hourly particulate matter emission limits shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate matter emission limits for emission points A160E, A260E, A350E, A390.1E, A390.2E, and A390.8E. **[45CSR13, R13-0181, 4.1.1; 45CSR§7-4.1]**

4.1.2. The emission units listed in Table 4.1.2 have minor PM_{10} and VOC emissions, not to exceed a combined 10 pounds per year of PM_{10} and 50 pounds per year of VOC.

Table 4.1.2. Insignificant Sources and Activities

Emission Unit ID	Emission Point ID
A130.6S	A130E & A140E
A150S	A150E
A200S	A200E
A220S	A130E & A140E
A260.1S	NA

Emission Unit ID	Emission Point ID
A270S	A270E
A280S	A290E
A340S	A340E
A380S	A380E
A470S	A470E
A480S	A480E
A440.1-.5S	A460E

[45CSR13, R13-0181, 4.1.2]

4.1.3. The permittee shall not cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in 4.1.4. *(A160E, A350E, A390.1E, A390.2E, and A390.8E)* **[45CSR13, R13-0181, 4.1.3; 45CSR§7-3.1]**

4.1.4. The provisions of 4.1.3 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. *(A160E, A350E, A390.1E, A390.2E, and A390.8E)* **[45CSR13, R13-0181, 4.1.4; 45CSR§7-3.2]**

4.1.5. The permittee shall not cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to 4.1.6 is required to have a full enclosure and be equipped with a particulate matter control device. *(A260E)* **[45CSR13, R13-0181, 4.1.5; 45CSR§7-3.7]**

4.1.6. The permittee shall not cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. *(A260.1S and A390.6S)* **[45CSR13, R13-0181, 4.1.6; 45CSR§7-5.1]**

4.1.7. The permittee shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. **[45CSR13, R13-0181, 4.1.7; 45CSR§7-5.2]**

4.1.8. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. **[45CSR§7-9.1.]**

4.1.9. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, operate, and maintain 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. **[45CSR13, R13-0181, 4.1.8; 45CSR13, R13-~~2617~~ 3223, 4.1.5]**

4.1.10. **40 C.F.R. 63, Subpart FFFF.** The Acrylic Resin Production Unit has been determined to be subject to the following requirements of 40 C.F.R. 63, Subpart FFFF – "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing."

a. **General Requirements.** The permittee shall comply with all applicable general requirements specified in Table 12 to 40 C.F.R. 63, Subpart FFFF and 40 C.F.R. §§63.2450 and 63.2540. **[45CSR34; 40 C.F.R. §§63.2450 and 63.2540; Table 12 to 40 C.F.R. 63, Subpart FFFF]**

b. **Storage Tanks.** The permittee shall comply with each emission limit in Table 4 of 40 C.F.R. 63, Subpart FFFF that applies to each storage tank and shall meet each applicable requirement specified in 40 C.F.R. §§63.2470(b) through (e).

i. **Group 1 Storage Tanks with a maximum true vapor pressure greater than 6.9 kPa, but less than 76.6 kPa.** For each Group 1 Storage Tanks with a maximum true vapor pressure of total HAP at the storage temperature of less than 76.6 kilopascals, the permittee has chosen to reduce total HAP emissions by $\geq$ 95 percent by weight or to $\leq$ 20 ppm_v of TOC or organic HAP and $\leq$ 20 ppm_v of hydrogen halide and halogen HAP by venting emissions through a closed vent system to any combination of control devices (excluding a flare).

ii. **Planned routine maintenance.** The emission limits in Table 4 of 40 C.F.R. 63, Subpart FFFF for control devices used to control emissions from storage tanks do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of each control device, during which the control device does not meet the emission limit specified in Table 4 of 40 C.F.R. 63, Subpart FFFF, must not exceed 240 hours per year (hr/yr). The permittee may submit an application to the Administrator requesting an extension of this time limit to a total of 360 hr/yr. The application must explain why the extension is needed, it must indicate that no material will be added to the storage tank between the time the 240-hr limit is exceeded and the control device is again operational, and it must be submitted at least 60 days before the 240-hr limit will be exceeded.

iii. The carbon canisters, A010C, shall be operated in accordance with the following alternative methods approved by US EPA Region III on February 16, 2011:

A. Replacement of the canisters shall occur prior to reaching 95% of the demonstrated maximum loading or 6 months, whichever occurs first.

B. In addition to 4.1.10.b.iii.A, replacement of the carbon canisters shall also be upon any detection by olfactory means during routine operator patrols that indicates the carbon canister is malfunctioning.

C. The permittee shall insure that no material is added to storage during carbon canister replacement activities. These carbon canister replacement activities shall be limited to 240

hours per year.

(*A010.1S and A010.2S)* **[45CSR34; 40 C.F.R. §63.2470; Table 5 to 40 C.F.R. 63, Subpart FFFF; Letter from Diana Esher, Director, Air Protection Division, US EPA Region III to David F. Altman, Environmental Control Consultant, E. I. Du Pont de Nemours and Company, dated February 16, 2011]**

c. **Equipment Leaks.** The permittee shall comply with each applicable requirement of 40 C.F.R. §63.2480 and Table 6 of 40 C.F.R. 63, Subpart FFFF, and either 40 C.F.R. 63, Subpart H, 40 C.F.R. 63, Subpart UU, or 40 C.F.R. 65, Subpart F for the applicable Acrylic Resin Production equipment components that are in organic HAP service. **[45CSR34; 40 C.F.R. §63.2480; Table 6 to 40 C.F.R. 63, Subpart FFFF]**

d. **Wastewater Streams.** The permittee shall comply with the applicable requirements of 40 C.F.R. §§63.105, 63.132 through 63.148, 63.2485, and Table 7 to 40 C.F.R. 63, Subpart FFFF for the Acrylic Resin Production wastewater streams. **[45CSR34; 40 C.F.R. §63.2485; Table 7 to 40 C.F.R. 63, Subpart FFFF]**

e. **Heat Exchange System Leaks.** The permittee shall comply with all applicable requirements for heat exchange systems as referenced in 40 C.F.R. §63.2490, 40 C.F.R. §63.104, and in Table 10 of 40 C.F.R. 63, Subpart FFFF for the Acrylic Resin Production wastewater streams. **[45CSR34; 40 C.F.R. §63.104; 40 C.F.R. §63.2490; Table 10 to 40 C.F.R. 63, Subpart FFFF]**

4.2. Monitoring Requirements

4.2.1. For the purpose of determining compliance with the opacity limits set forth in 4.1.3, 4.1.4 and 4.1.5, the permittee shall conduct opacity monitoring for all emission points and equipment subject to an opacity limit under 45CSR7 and for which particulate emission limits have been set in 4.1.1.

Monitoring shall be conducted at least once per month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct a visual emission evaluation per 45CSR7A within three (3) days of the first identification of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions.
[45CSR13, R13-0181, 4.2.1; 45CSR§30-5.1.c]

4.2.2. **40 C.F.R. 63, Subpart FFFF.** The permittee shall perform all required monitoring in compliance with the applicable general provisions of 40 C.F.R. 63, Subpart FFFF, per 40 C.F.R. §§63.2450 and 63.2540; Table 12 to 40 C.F.R. 63, Subpart FFFF; and 40 C.F.R. 63, Subpart A. **[45CSR34; 40 C.F.R. §§63.2450 and 63.2540; Table 12 to 40 C.F.R. 63, Subpart FFFF; 40 C.F.R. 63, Subpart A]**

4.2.3. **40 C.F.R. 63, Subpart FFFF.** The permittee shall calculate, at least monthly, using TANK4, the amount of Ethyl Acrylate emitted from storage vessels A010.1S and A010.2S to the carbon canisters A010C. **[Letter from Diana Esher, Director, Air Protection Division, US EPA Region III to David F. Altman, Environmental Control Consultant, E. I. Du Pont de Nemours and Company, dated February 16, 2011]**

4.2.4. **40 C.F.R. 63, Subpart FFFF – Heat Exchange System Leaks:** The permittee shall monitor applicable heat exchange systems for leaks as specified in Table 10 of 40 C.F.R. 63, Subpart FFFF and as specified in 40 C.F.R. § 63.104(c) of 40 C.F.R. 63, Subpart F. **[45CSR34; 40 C.F.R. §63.2490; Table 10 to 40 C.F.R. 63, Subpart FFFF, 40 C.F.R. §63.104(c)]**

4.3. Testing Requirements

4.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director 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. **[45CSR§7-8.1]**

4.3.2. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions. **[45CSR§7-8.2]**

4.3.3. Any stack serving any process source operation or air pollution control device on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. **[45CSR§7-4.12]**

4.3.4. Any test to determine compliance with the visible emission (opacity) limitations set forth in 4.1.3, 4.1.4, and 4.1.5 shall be conducted by personnel appropriately trained for the task. Personnel performing the visual emissions observation shall be trained and familiar with the limitations and restrictions associated with 40 C.F.R. 60, Appendix A, Method 22. Any person performing an opacity observation for compliance assessment in the event of visible emissions must be a certified visible emission observer in accordance with 45CSR7A – "Compliance Test Procedures for 45CSR7 – *To Prevent and Control Particulate Air Pollution from Manufacturing Process Operation*" and Method 22 of 40 C.F.R. 60, Appendix A. Nothing in this section, however, shall preclude any permittee or the Secretary from using opacity data from a properly installed, calibrated, maintained and operated continuous opacity monitor as evidence to demonstrate compliance or a violation of visible emission limitations for a period of time during which 45CSR7A or Method 22 data indicates noncompliance, the 45CSR7A or Method 22 data shall be used to determine compliance with the visible emission limitations. **[45CSR§30-5.1.c.]**

4.3.5. For any compliance test to be conducted by the permittee as set forth in Section 4.3, a test protocol shall be submitted to the Secretary at least thirty (30) calendar days prior to the scheduled date of the test. Such compliance test protocol shall be subject to approval by the Secretary. The permittee shall notify the Secretary at least fifteen (15) days in advance of actual test dates and times during which the test (or tests) will be conducted. **[45CSR§30-5.1.c.]**

4.3.6. **40 C.F.R. 63, Subpart FFFF – Heat Exchange System Leaks:** The permittee shall perform testing as required under 40 C.F.R. § 63.104(c) to monitor the applicable heat exchange systems for potential Hazardous Air Pollutant leaks. **[45CSR34; 40 C.F.R. §63.2490; Table 10 to 40 C.F.R. 63, Subpart FFFF, 40 C.F.R. §63.104(c)]**

4.4. Recordkeeping Requirements

4.4.1. The permittee shall maintain monthly records of monitoring parameters on forms equivalent to the example form supplied as Appendix A, Attachment A. **[45CSR13, R13-0181, 4.4.4]**

4.4.2. The permittee shall maintain records equivalent to the example emission reports supplied as Appendix A, Attachments B and C. **[45CSR13, R13-0181, 4.4.5]**

4.4.3. The permittee shall maintain records of all monitoring data required by 4.2.1 documenting the date and time of each visible emission check, the emission point or equipment identification number, the name or means of identification of the responsible observer, the results of the check, and if necessary, all corrective actions taken. Such records shall be equivalent to the example form supplied as Appendix A, Attachment D. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall be maintained per the requirements of 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (OOS) or equivalent. **[45CSR13, R13-0181, 4.4.6]**

4.4.4. **Records 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 modification to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, R13-0181, 4.4.3; 45CSR13, R13-~~2617~~ 3223, 4.4.3]

4.4.5. **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. **[45CSR13, R13-0181, 4.4.2; 45CSR13, R13-~~2617~~ 3223, 4.4.2]**

4.4.6. **Fugitives.** The permittee shall monitor all fugitive particulate emission sources as required by 4.1.6. to ensure that a system to minimize fugitive emissions has been installed or implemented. Records shall be maintained on site for a period of no less than five (5) years stating the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems. **[45CSR§30-5.1.c.]**

4.4.7. **Fugitives.** The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures as required by 4.1.7 applied at the facility. These records shall be maintained on site for a period of no less than five (5) years. **[45CSR§30-5.1.c.]**

4.4.8. **40 C.F.R. 63, Subpart FFFF.** The permittee shall maintain records in accordance with 40 C.F.R. §§63.2450, 63.2525, 63.2490 and 63.2540; Tables 10 and 12 to 40 C.F.R. 63, Subpart FFFF; any records required by 40 C.F.R. 63, Subpart A, and as applicable in referenced 40 C.F.R. 63, Subparts F, G, H, SS, UU, WW, and GGG, and 40 C.F.R. 65, Subpart F. **[45CSR34; 40 C.F.R. §§63.2450, 63.2525, 63.2490, 63.2540; Tables 10 and 12 to 40 C.F.R. 63, Subpart FFFF; 40 C.F.R. 63, Subparts A, F, G, H, SS, UU, WW, and GGG; 40 C.F.R. 65, Subpart F]**

4.4.9. **40 C.F.R. 63, Subpart FFFF.** The permittee shall maintain records of the monthly TANK4 calculations required under 4.2.3. The permittee shall also maintain records detailing each carbon canister replacement, the reason for the carbon canister replacement, and when it was replaced. **[Letter from Diana Esher, Director, Air Protection Division, US EPA Region III to David F. Altman, Environmental Control Consultant, E. I. Du Pont de Nemours and Company, dated February 16, 2011]**

4.5. Reporting Requirements

4.5.1. **40 C.F.R. 63, Subpart FFFF.** The permittee shall submit all required applicable reports and notifications per the requirements of 40 C.F.R. §§63.2450, 63.2515, 63.2520, 63.2490, 63.2540; Tables 10, 11 and 12 to 40 C.F.R. 63, Subpart FFFF; and 40 C.F.R. 63, Subpart A, and as applicable in referenced 40 C.F.R. 63, Subparts F, G, H, SS, UU, WW, and GGG, and 40 C.F.R. 65, Subpart F. **[45CSR34; 40 C.F.R. §§63.2450, 63.2515, 63.2520, 63.2490, 63.2540; Tables 10, 11 and 12 to 40 C.F.R. 63, Subpart FFFF; 40 C.F.R. 63, Subparts A, F, G, H, SS, UU, WW, and GGG; 40 C.F.R. 65, Subpart F]**

4.5.2. **40 C.F.R. 63, Subpart FFFF.** The permittee shall include the date of the most recent replacement of the carbon canisters in the semi-annual monitoring report required under 40 C.F.R. 63, Subpart FFFF. **[Letter from Diana Esher, Director, Air Protection Division, US EPA Region III to David F. Altman, Environmental Control Consultant, E. I. Du Pont de Nemours and Company, dated February 16, 2011]**

4.6. Compliance Plan

4.6.1. None.

5.0 Source-Specific Requirements [Metal Parts Degreaser (A900S)]

5.1. Limitations and Standards

5.1.1. The owner or operator of a cold cleaning facility shall:

a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

b. Store waste solvent in covered containers.

c. Close the cover whenever parts are not being handled in the cleaner.

d. Drain the cleaned parts until dripping ceases.

e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.

f. Degrease only materials that are neither porous nor absorbent.

[45CSR§§21-30.3.a.4, 30.3.a.5, 30.3.a.6, 30.3.a.7, 30.3.a.8, 30.3.a.9]

5.2. Monitoring Requirements

5.2.1. None.

5.3. Testing Requirements

5.3.1. Test Method ASTM D323-72 shall be used for measuring the solvent true vapor pressure.
[45CSR§21-30.4.e]

5.4. Recordkeeping Requirements

5.4.1. Each owner or operator of a solvent metal cleaning source subject to this 45CSR§21-30 shall maintain the following records in a readily accessible location for at least 5 years and shall make these records available to the Director upon verbal or written request:

a. A record of central equipment maintenance, such as replacement of the carbon in a carbon adsorption unit.

b. The results of all tests conducted in accordance with the requirements in section 45CSR§21-30.4 (5.3.1).

[45CSR§21-30.5 and 45CSR§30-5.1.c]

5.5. Reporting Requirements

5.5.1. Except as provided in section 45CSR§21-9.3, the owner or operator of any facility containing sources subject to 45CSR§21-5 shall, for each occurrence of excess emissions expected to last more than 7 days, within 1 business day of becoming aware of such occurrence, supply the Director by letter with the following information.

a. The name and location of the facility;

b. The subject sources that caused the excess emissions;

c. The time and date of first observation of the excess emissions; and

d. The cause and expected duration of the excess emissions.

e. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and

f. The proposed corrective actions and schedule to correct the conditions causing the excess emissions.

[45CSR§21-5.2]

5.6. Compliance Plan

5.6.1. None.

Appendix A: R13-0181C Attachments

ATTACHMENT A – Monthly Production & Throughput Report
E. I. du Pont de Nemours and Company - Washington Works
Plant ID No. 107-00001; Permit No. R13-0181C

Current Month and Year: _____
Data Entered By: _____
Date Entered: _____
Reviewed By: _____
Date Reviewed: _____

Storage Tanks

Equipment ID	Material Stored	Max Fill Rate (gpm)	Monthly Throughput (gal)	12 Month Total Throughput (gal)	12 Month Total Emissions[2]		
					Breathing	Working	Total
A010.1S	EA						
A010.2S	EA						
A020S	VOC						
A030S	VOC						
A040S	VOC						
A050S	MeOH						
A070S	VOC						
A080.1S	MMA						
A080.2S	MMA						
A110S	MAA						
A120S	EA						
A130.1S	MMA						
A130.2S	VOC						
A130.3S	VOC						
A130.4S	VOC						
A130.5S	VOC						
A180S	MeOH						
A190S	MeOH						

Raw Material Consumption – Solids

Equipment ID	Monthly Total (lb)
A160.1S	
A160.2S	
A160.3S	
A160.4S	
A260S	

Production – Batches

Maximum batches weighed in one hour	
Total batches for this month	

Production – Finishing

Max. Hourly Production – Line 1	(lb)
Max. Hourly Production – Line 2	(lb)
Total Monthly Production – Line 1	(lb)
Total Monthly Production – Line 2	(lb)
#2 Dryer Flow (Choose control device that was used most frequently this month)	

(1) This record shall be maintained per Section 3.4.2
(2) From TANKS 4.0 (or later version) Program.

ATTACHMENT B – Monthly Emissions Report

E. I. du Pont de Nemours and Company - Washington Works
Plant ID No. 107-00001; Permit No. R13-0181C

Storage Tanks

Emission Point ID	Equipment ID	Control Device ID	VOC		EA		MMA		MeOH	
			Max. pph	ppy[2]	Max. pph	ppy[2]	Max. pph	ppy[2]	Max. pph	ppy[2]
A010E	A010.1 & .2S	A010C								
A020E	A020S	NA								
A030E	A030S	NA								
A040E	A040S	NA								
A050E	A050S	NA								
A070E	A070S	NA								
A080E	A080.1 &.2S	NA								
A110E	A110S	NA								
A120E	A120S	NA								
A130E	A130.1-.5S	NA								
A140E	A130.1-.5S	NA								
A180E	A180S	NA								
A190E	A190S	NA								

Process Equipment – VOC & HAP

Emission Point ID	Equipment ID	Control Device ID	VOC		AA		EA		MMA		MeOH	
			Max. pph	ppy[2]	Max. pph	ppy[2]	Max. pph	ppy[2]	Max. pph	ppy[2]	Max. pph	ppy[2]
A290E	A290.1-.3S, A440.1-.3S	NA										
A300E	A440.4 & .5S	NA										
A450E	A440.1-.5S	NA										
A310E	A310.1 &.2S	NA										
A320E	A320S	NA										
A350E	A350.3S	A350.1C										
A390.1E	A390.3S	A390.1C										
A390.2E	A390.3S	A390.2C										

Process Equipment – PM_{10}

Emission Point ID	Equipment ID	Control Device ID	PM_{10}	
			Max. pph	ppy[2]
A160E	A160.1-.4S	NA		
A260E	A260S	A260C		
A350E	A350.2S, A350.3S, A350.4S, A350.6S, A350.7S, A350.8S, A390.5S, A390.7S	A350.1 & .2C		
A390.1E	A390.2S, A390.3S, A390.5S	A390.1C		
A390.2E	A390.2S, A390.3S, A390.5S	A390.2C		
A390.6E	A390.6S	A390.6C		
A390.8E	A390.8S	NA		

(1) This record shall be maintained per Section 3.4.2

(2) Rolling 12 month totals from TANKS 4.0 (or later version) program.

(3) A390.3S will vent either through A390.1E or A390.2E, but not both at the same time.

(4) Sources with optional emission cases will only vent from one at a time.

ATTACHMENT C – Annual Emissions Report

E. I. du Pont de Nemours and Company - Washington Works

Plant ID No. 107-00001; Permit No. R13-0181C

Current Year: _____

Acrylic Acid (AA) Emissions (lb)

Emission Pont ID	Equipment ID													12 Month Total
A290E	A290.1-.3S, A440.1-.3S													
A300E	A440.4 &.5S													
A450E	A440.1-.5S													
A310E	A310.1 & .2S													
A320E	A320S													

Methyl Methacrylate (MMA) Emissions (lb)

Emission Pont ID	Equipment ID													12 Month Total
A080E	A080.1 & .2S													
A130E	A130.1-.5S													
A140E	A130.1 - .5S													
A290E	A290.1-.3S, A440.1-.3S													
A300E	A440.4 & .5S													
A450E	A440.1 - .5S													
A310E	A310.1 & .2S													
A320E	A320S													
A350E	A350.3S													
A390.1E	A390.3S													
A390.2E	A390.3S													

Methanol (MeOH) Emissions (lb)

Emission Pont ID	Equipment ID													12 Month Total
A050E	A050S													
A180E	A180S													
A190E	A190S													
A450E	A440.1-.5S													
A310E	A310.1 & .2S													
A320E	A320S													
A350E	A350.3S													
A390.1E	A390.3S													
A390.2E	A390.3S													

VOC Emissions (lb)

Emission Pont ID	Equipment ID													12 Month Total
A010E	A010.1 & .2S													
A020E	A020S													
A030E	A030S													
A040E	A040S													
A050E	A050S													
A070E	A070S													
A080E	A080.1 &.2S													
A110E	A110S													
A120E	A120S													
A130E	A130.1-.5S													
A140E	A130.1-.5S													
A180E	A180S													
A190E	A190S													
A290E	A290.1-.3S, A440.1-.3S													
A300E	A440.4 & .5S													
A310E	A440.1-.5S													
A320E	A310.1 & .2S													
A350E	A350.3S													
A390.1E	A390.3S													
A390.2E	A390.3S													

PM_{10} Emissions (lb)

Emission Pont ID	Equipment ID													12 Month Total
A160E	A160.1-.4S													
A260E	A260S													
A350E	A350.2S, A350.3S, A350.4S, A350.6S, A350.7S, A350.8S, A390.5S, A390.7S													
A390.1E	A390.2S, A390.3S, A390.5S													
A390.2E	A390.2S, A390.3S, A390.5S													
A390.6E	A390.6S													
A390.8E	A390.8S													

(1) This record shall be maintained per Section 3.4.2.

(2) A390.3S will vent either through A390.1E or A390.2E, but not both at the same time.

(3) Sources with optional emission cases will only vent from one at a time.

ATTACHMENT D – Monthly Opacity Report
E. I. du Pont de Nemours and Company - Washington Works
Plant ID No. 107-00001; Permit No. R13-0181C

Current Month and Year: _____
Data Entered By: _____
Date Entered: _____
Reviewed By: _____
Date Reviewed: _____

Stack/Vent ID	Stack/Vent Description	Date of Observation	Time of Observation	Name of Observer	Visible Plume? Yes/No	Near 20% Opacity? Yes/No	Method 9 Compliance Status?	Comments
A160E	Ingredient Hopper Stack							
A260E	Salt Silo Stack							
A350E	1A/1B Filter Stack							
A390.1E	#2 Dryer Stack							
A390.2E	#2 Dryer Bag Filter Stack							
A390.8E	#2 Product Transfer Cyclone							

Opacity Observers – Method 22 Training Observer Name	Latest Certification Date	Certification Expiration Date	Current Date	Certification Current?

(1) This record shall be maintained per Section 3.4.2.

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._____

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[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.

Appendix B: R13-~~2617E~~ 3223 Attachment

ATTACHMENT A of R13-~~2617E~~ 3223 for Only the Acrylic Resin Production Area

Emission Point Identification	Source Identification	Source Description	Control Device Identification	Service (VOC/HAP/TAP)	Affected R13 Permit	Included in Original R21 RACM Plan	Currently Subject to:		Other Applicable Regulations - Citation (MACT/BACT/NSPS/NESHAP etc.)
							R21	R27	
A Area	A LabHoods	Laboratory Hoods	None	TAP-M	R13-0181~~C~~	No	No	Yes	
A050E	A050S	Storage Tank	None	VOC	R13-0181~~C~~	Yes	Yes	No	MON MACT
A290E	A290.1	Phase Tank	None	VOC	R13-0181~~C~~	Yes	Yes	No	MON MACT

Note #1 - Formaldehyde (TAP-F) does not qualify as a MACT Wastewater under any Standard.
Note #2 - MON MACT has a process vent definition cut-off at 50 ppm. Below this there are no controls since it is not considered to be a process vent.
Note #3 - The WWTP located at Washington Works does not receive any Group 1 Streams as defined by the rule. Hence the applicability of 40 C.F.R. §63.135 and 40 C.F.R. §63.145 are very, very limited.
Note #4 - Sources identified as being "Removed from Service" are considered permanently removed and must undergo 45CSR13 review prior to being returned to service.
Note #5 - Permits are referenced by their number. The revision letter has been left off but the reference is to the most current revision of the numbered permit.