

West Virginia Department of Environmental Protection

Joe Manchin, III
Governor

Division of Air Quality

Stephanie R. Timmermeyer
Cabinet Secretary

Permit to Operate



Pursuant to

Title V

of the Clean Air Act

Union Carbide Corporation
Technology Park, South Charleston
Group 2 of 2

(Market Development Plant, Shared Services/Maintenance/Energy Systems,
Environmental Operations)
R30-03900004-2006

John A. Benedict
Director

Issued: February 8, 2006 • Effective: February 22, 2006
Expiration: February 8, 2011 • Renewal Application Due: August 8, 2010

Permit Number: **R30-03900004-2006**
Permittee: **Union Carbide Corporation**
Facility Name: **Technology Park ~~Technical Center~~, South Charleston**
Mailing Address: **P.O. Box 8361**
Charleston, WV 25303

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:	South Charleston, Kanawha County, West Virginia
Mailing Address:	P.O. Box 8361 South Charleston, WV 25303
Telephone Number:	304-747-7000
Type of Business Entity:	Corporation
Facility Description:	The research and development groups provide technology for the development of new products, process technology for manufacturing, and support for existing products and processes.
SIC Codes:	2869
UTM Coordinates:	438.7 km Easting • 4,245.5 km Northing • Zone 17

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.

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

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Design Capacity	Year Installed	Control Device
Market Development Plant					
B01	A15, A16, A17, A18, or A31	SR1 Kettle	1,000 gallons	1984 (estimate)	B09, B10, B16, D03 or none
B02	AA1, A16, A17, A18, or A31	SR2 Kettle	1,000 gallons	1992	B09, B10, B16, D03 or none
B04	A13, A16, A18, or A31	BH1 Kettle	100 gallons	1955	B09, B16, D03 or none
BXX	A1X	C1 Ventilation Fan	not applicable	not applicable	
C04	A24, A16, A18, A31	C2 Column	not applicable	1981	B09, B16, D03 or none
C06	A26	C2 Decanter	not applicable	not applicable	
CXX	A2X	C2 Ventilation Fan	not applicable	not applicable	
D01	A33, A16, A18, or A31	C3 Column	not applicable	1978	B09, B16, D03 or none
D05	A34	C3 Receiver	not applicable	not applicable	
D06	A34	Heads Receiver	not applicable	not applicable	
D3X	A3X	C3 Ventilation Fan	not applicable	not applicable	
E01	A41	North Sieve Tower	out of Service	1992	
E02	A42	South Sieve Tower	out of Service	1992	
<u>E-325</u>	<u>AF4</u>	<u>Recovery Device</u>	<u>NA</u>	<u>2009</u>	<u>L15</u>
<u>E-400</u>	<u>AF4</u>	<u>Recovery Device</u>	<u>NA</u>	<u>2009</u>	<u>L15 or none</u>
EXX	A4X	C4 Ventilation Fan	not applicable	not applicable	
DX1	A56, A16, A18, or A31	C5 Kettle	60 gallons	1949	B09, B16, D03 or none
DX2	A56	B5 Short Column	not applicable	not applicable	
DXX	A5X	Cell 5 Ventilation Fan	not applicable	not applicable	
LXX	XXX	Cell 7 Ventilation Fan	not applicable	not applicable	
LS2	AF4	Reaction System	not applicable - R&D	1994	
LS3	AF4	Product Separation	not applicable - R&D	1994	
LS4	AF4	Product Finishing	not applicable - R&D	1994	
LS5	AF4	Small Vessel	not applicable - R&D	1994	
F01	A93, A16, A18, or A31	C9 Reactor	1,000 gallons	1974	B09, B16, D03 or none
F05	A95	C9 Receiver	not applicable	not applicable	
F06	A96	C9 Filter	not applicable	not applicable	
F07	A97	C9 Solids Ventilation System	not applicable	not applicable	
FXX	A9X	C9 Ventilation Fan	not applicable	not applicable	
G01	AJ3, A16, A18, A31, or AJ4	C10 Kettle	500 gallons	1981	B09, B16, D03, G07, or none
GXX	AJX	Drum or Local Ventilation	not applicable	not applicable	
H01	A31	H01 Tank	not applicable - R&D	not applicable	
H02	A31	H01 Column	not applicable - R&D	not applicable	

Emission Unit ID	Emission Point ID	Emission Unit Description	Design Capacity	Year Installed	Control Device
H03	A31	H01 Heat Exchanger	not applicable - R&D	not applicable	
H04	A31	H02 Tank	not applicable - R&D	not applicable	
H05	A31	H03 Tank	not applicable - R&D	not applicable	
H06	A31	H02 Column	not applicable - R&D	not applicable	
H07	A31	H02 Heat Exchanger	not applicable - R&D	not applicable	
H08	A31	H04 Tank	not applicable - R&D	not applicable	
H09	A31	H24 Column	not applicable - R&D	not applicable	
H10	A31	H50 Heat Exchanger	not applicable - R&D	not applicable	
H11	A31	H50 Tank	not applicable - R&D	not applicable	
H12	A31	H51 Heat Exchanger	not applicable - R&D	not applicable	
H13	A31	H51 Tank	not applicable - R&D	not applicable	
H14	A31	H20 Column	not applicable - R&D	not applicable	
H15	A31	H23 Tank	not applicable - R&D	not applicable	
H16	A31	H52 Heat Exchanger	not applicable - R&D	not applicable	
H17	A31	H22 Column	not applicable - R&D	not applicable	
H18	A31	H53 Heat Exchanger	not applicable - R&D	not applicable	
H19	A31	H05 Tank	not applicable - R&D	not applicable	
H20	AH1	H11 Filter	not applicable - R&D	not applicable	
HXX	AHX	C11 Fan	not applicable - R&D	not applicable	
I01	AL3, A16, A18, A31, AJ4, or A17	C12 Kettle	2,000 gallons	Replaced 1993	B09, B16, D03, G07, I07 or none
I06	AL6	Drum Ventilation	not applicable	not applicable	
I08	AL3	C12 Receiver	not applicable	not applicable	
IXX	ALX	Drum or Local Ventilation	not applicable	not applicable	
I08	AL8	Combined Vents for Filter/Dryer	not applicable	not applicable	
I09	AL9	C12 Filter	not applicable	not applicable	
I10	ALY	Drum Ventilation	not applicable	not applicable	
J01	AM4, AR9, or AS2	C13 Autoclave	500 gallons	1959	J36, J38, or none
J03	AM4	C13 Receiver	not applicable	not applicable	
J05/K05	AM5 or AT3 or AT1 or AF4	C359 Autoclave/C13W Reactor	1000 gallons	1996	K01 or L15 or none
J07	AM7	C132 Autoclave	100 gallons	1986	

Emission Unit ID	Emission Point ID	Emission Unit Description	Design Capacity	Year Installed	Control Device
J08	AM9, AR9, or AS2	C131 Autoclave	100 gallons	1968	J36, J38, or none
J11	AN3, AR9, or AS2	C134 Autoclave	30 gallons	1960s (estimate)	J36, J38, or none
J15	AN6, AR9, or AS2	C137 Autoclave	30 gallons	1968	J36, J38, or none
J16	AN7	C138 Autoclave	60 gallons	1960s (estimate)	
J20	AP2, AR9, or AS2	C13 Dryer	not applicable	not applicable	J36, J38, or none
J22	AP4	C132 Crusher	not applicable	not applicable	
J24	AS4, AR9, or AS2	C13 Blender	not applicable	not applicable	J36, J38, or none
J25	AP7	C13 Filter	not applicable	not applicable	
J29	AR2	C131 Filter	not applicable	not applicable	
J30	AR3	C132 Filter	not applicable	not applicable	
J31	AR4	C133 Filter	not applicable	not applicable	
J37	AS1	C13 Decanter	not applicable	not applicable	
J39	AS3	C13 Ventilation Fan	not applicable	not applicable	
J40	AS4	C13 Blender Cold Trap	not applicable	not applicable	
JXX	ASX	Drum Ventilation	not applicable	not applicable	
K02	AT7	Bag Dumping Station	not applicable	1991	K07
K04	AF4 or AR9 AT2 or AT1 or AF4	Tank – Solvent 1 C13W S/R Vessel or Tank Solvent 1	1,500 gallons	1991	K01 or L15 or none
K05	AF4 or AT3 or AR9	C13W Reactor System or Reactor @ Low Pressure		1991	L15 or none
K06	AT6 or AT1 or AF4	C13W Product Separator or Product Separation and Solvent Recovery	not applicable	1991	K01 or L15 or none
K08	AT4 or AT1 or AF4 or AR9	C13W Holding Tank	2,000 gallons	1991	K01 or none
K09	AF4	Vessel C13W Product Separation System	not applicable	2005	Header (to K11 or L15)
K10	ATA	C13W Bagging	not applicable	2005	N/A
K12	AF4	Vessel C13WCT	not applicable	2005	L15
K14	ATF	Vessel C13WCP1	not applicable	2005	N/A
K15	ATG	Vessel C13WCP2	not applicable	2005	N/A
K18	AF4	Tank – Solvent 3	approx 250 gallons	2009	AF4
KIPC	AF4	Containers	not applicable	2005	L15
KXX	ATX	Containers C13W Drum Ventilation	not applicable	1991	
SPA	AXA	T6392-28832	6,500 gallons	1980	
WE1	AW1 or A17	Tank Wagon #1	not applicable	not applicable	B10 or none
WE2	AW2 or A17	Tank Wagon #2	not applicable	not applicable	B10 or none
WE3	AW3	Tank Wagon #3	not applicable	not applicable	
WE4	AW4	Tank Wagon #4	not applicable	not applicable	
WE5	AW5	Tank Wagon #5	not applicable	not applicable	
SP1	AX1	T6395-54 or Tank – Solvent 2	2,400 gallons	1966	
SP2	AX2	T6395-53 or Tank – Solvent 2	2,400 gallons	1966	
SP3	AX3	T6395-55	970 gallons	1976	

Emission Unit ID	Emission Point ID	Emission Unit Description	Design Capacity	Year Installed	Control Device
SP4	AX4	T6D92-1129	1,000 gallons	1965	
SP5	AX5	T6D92-289	1,000 gallons	1965	
SP6	AX6, AJ4 or AL7	T6395-25894	5,500 gallons	1983	G07, I07 or none
SP7	AX7	T6473-37	out of Service	not applicable	
WE6	AW6, AJ4, or AL7	Tank Wagon #6	not applicable	not applicable	G07, I07 or none
WE7	AW7, AJ4 or AL7	Tank Wagon #7	not applicable	not applicable	G07, I07 or none
WE8	AW8	Tank Wagon #8	not applicable	not applicable	
WE9	AW9	Tank Wagon #9	not applicable	not applicable	
Market Development Plant Recovery/Control Devices (Condensers/Cold Traps are dual use equipment – process recovery device(s) or control device(s) depending on process function. Recovery devices are integral to the process. Material collected by control devices is considered to be waste.					
B05	A15	SR1 Condenser	not applicable	not applicable	
B06	A15	SR1 Condenser/Cold Trap	not applicable	not applicable	
B09	A16 or AL8 ^a	C1HPVAC (equipped with after-condenser)	not applicable	not applicable	
B10	A17	C1 Scrubber	not applicable	not applicable	
B16	A18	C4 Steam Jets (previously identified as C1 Steam Jets)	not applicable	not applicable	
B17	AA1	SR2 Condenser	not applicable	not applicable	
B18	AA1	SR2 Cold Trap	not applicable	not applicable	
C01	A24	C2 Condenser	not applicable	not applicable	
C05	A24	C2 Cold Trap	not applicable	not applicable	
D03	A31 or AL8 ^a	C3 Steam Jets	not applicable	not applicable	
D04	A33	C3 Cold Trap	not applicable	not applicable	
DX3	A56	B5 Condenser	not applicable	not applicable	
DX4	A56	B5 Packed Column	not applicable	not applicable	
DX5	A56	BL Condenser	not applicable	not applicable	
DX6	A56	C5 Cold Trap	not applicable	not applicable	
DX7	A56	B5G Condenser	not applicable	not applicable	
DX8	A56	B5L Condenser	not applicable	not applicable	
DX9	A59	B52 Packed Column	not applicable	not applicable	
D10	A56	B5U Condenser	not applicable	not applicable	
L15	AF4	Flare	2 million Btus/hr	1994	
		Manufacture: John Zink			
		Model: EEF-U-2			
		Control Efficiency: 98%			
		Control Pollutant: VOC&HAPs			
F02	AL3 or A93 or AL8 ^a	C9 Condenser	not applicable	not applicable	
F03	AL3 or A93 or AL8 ^a	C9 Cold Trap	not applicable	not applicable	
G01	AJ3, A16, A18, A31, or AJ4	C10 Kettle (control device for R13-2401)	500 gallons	1981	B09, B16, D03, G07, or none
G04	AJ3	C10T Condenser	not applicable	not applicable	
G05	AJ3	C10 Cold Trap	not applicable	not applicable	
G07	AJ4	C10 Scrubber	not applicable	not applicable	
G018	AJ3	C10P Condenser	not applicable	not applicable	

Emission Unit ID	Emission Point ID	Emission Unit Description	Design Capacity	Year Installed	Control Device
I02	AL3 or A93 AJ3	C12 Condenser	not applicable	not applicable	
I03	AL3 or A93	C12 Cold Trap	not applicable	not applicable	
I04	AL4	C12 Packed Column	not applicable	1964	
I05	AL3	C12 Column	not applicable	not applicable	
I07	AL7	C12 Scrubber (Packed Bed Scrubber)	not applicable	not applicable	
J02	AM4	C13 Condenser	not applicable	not applicable	
J04	AM4	C13 Cold Trap	not applicable	not applicable	
J06	AM6	C359 Condenser	not applicable	not applicable	
J09	AM9	C131 Condenser	not applicable	not applicable	
J12	AN3, AR9 or AS2	C134 Condenser	not applicable	not applicable	J36, J38, or none
J17	AN8	C138 Condenser	not applicable	not applicable	
J36	AR9	C13HPVAC (equipped with after-condenser) <u>or Header Vacuum Pump</u>	not applicable	not applicable	
J38	AS2	C13 Steam Jets	not applicable	not applicable	
<u>J41</u>	<u>AR1</u>	<u>Header/Vacuum Pump</u>	<u>NA</u>	<u>2009</u>	
K01	AT1	C13W Scrubber	not applicable	1991	
K07	AT7	C13W Dump Station Filter or	not applicable	1991	
		<u>Hardy System</u> Fabric Filter			
		<u>Baghouse</u> <u>Model: BS-3</u> <u>Control Efficiency: 80%</u>			
K11	AF4	C13PD Condenser	not applicable	2005	L15
Shared Services/Maintenance/Energy Systems					
GT1	GTE	725 Gasoline Storage Tank	6,400 gallons	1990	
ST2	TV2	704 Additive Storage Tank	1,500 gallons	not applicable	
ST4	TV4	730 Additive Storage Tank	1,000 gallons or less	not applicable	
ST5	TV5	740 Tank – Out of Service	1,000 gallons or less	not applicable	
ST6	TV6	753 Diesel Tank	1,000 gallons or less	not applicable	
ST7	TV7	704 Additive Storage Tank	1,000 gallons or less	not applicable	
STC	TVC	742 Additive Storage Tank	1,000 gallons or less	not applicable	
STD	TVD	770 Additive Storage Tank	1,000 gallons or less	not applicable	
STF	TVF	791 Additive Storage Tank	1,000 gallons or less	not applicable	
STG	TVG	2000 Additive Storage Tank	1,000 gallons or less	not applicable	
STH	TVH	6000 Additive Storage Tank	1,000 gallons or less	not applicable	
STI	TVI	B6000 Diesel Storage Tank	8,000 gallons	1997	
STJ	TVJ	B6000 Diesel Feed Tank	100 gallons	1997	
STL	TVL	B6000 Diesel Feed Tank	100 gallons	1997	

Emission Unit ID	Emission Point ID	Emission Unit Description	Design Capacity	Year Installed	Control Device
BG1	none	Bulk Gas Ethane Tube Trailer	not applicable	not applicable	
BG2	none	Bulk Gas Hydrogen Cylinder Bank	not applicable	not applicable	
BG3	none	Bulk Gas Carbon Monoxide Cylinder Bank	not applicable – pressurized vessel	not applicable	
BGB	none	Bulk Gas Carbon Dioxide Storage Tank	not applicable	not applicable	
NXX	none	Bulk Gas Nitrogen Storage Tank	not applicable	not applicable	
OXX	none	Bulk Gas Oxygen Storage Tank	not applicable	not applicable	
not applicable	not applicable	Solvent Cleaning Baths (Miscellaneous Locations)	not applicable	not applicable	
EG1	GV1	B2000 Propane Powered Emergency Electrical Generator	11.5kW	not applicable	
EG4	GV4	B740 Propane Powered Emergency Electrical Generator	4.5 kVA	not applicable	
EG7	GV7	B6000 Diesel Powered Emergency Electrical Generator	1,100 kW	1997	
EG8	GV8	B6000 Diesel Powered Emergency Electrical Generator	1,100 kW	1997	
EG9	GV9	B773 Natural Gas Powered Electrical Generator	45 kW	not applicable	
EG10	GV10	B771 Propane Powered Emergency Electrical Generator	11.5 kW	not applicable	
EPP	EPV	731 Gasoline Powered Pump - Water	115 hp	not applicable	
B702 Carpentry Shop	ACS	Carpentry Shop	not applicable	not applicable	
704RV	704RV	B704 Paint Booth	not applicable	not applicable	
B704	B704	Machine Shop	not applicable	not applicable	
B710	B710	Welding Shop	not applicable	not applicable	
Environmental Operations					
Holz Impoundment	None	Holz Impoundment	Not Applicable	1972	
HZ1	1HZ	Tank	14,000 gal	1999	
HZ2	2HZ	Tank	14,000 gal	1999	
HZ3	3HZ	Tank	1,000 gal	1999	
735 Cage	None	RCRA Container Storage Area	Not Applicable	Prior to 1988	
B787	None	RCRA Container Storage Area	Not Applicable	Prior to 1984	
B800	not applicable	B800 Labpacking/ Bulking Facility	Not Applicable	1995	
B800	B8V1	Empty Container Washer	Not Applicable	2000	
B800	B8V2	Bulking Ventilation Hood Vent	Not Applicable	1995	

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. R13-0123). The current applicable version of such permit(s) is listed below.

<u>Permit Number</u>	<u>Date of Issuance</u>
<u>R13-2082A</u>	<u>April 10, 2003</u>
<u>R13-2401A</u>	<u>September 20, 2006</u>
<u>R13-2631A</u>	<u>May 8, 2009</u>

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	PM	Particulate Matter
CBI	Confidential Business Information	PM₁₀	Particulate Matter less than 10µm in diameter
CEM	Continuous Emission Monitor	pph	Pounds per Hour
CES	Certified Emission Statement	ppm	Parts per Million
C.F.R. or CFR	Code of Federal Regulations	PSD	Prevention of Significant Deterioration
CO	Carbon Monoxide	psi	Pounds per Square Inch
C.S.R. or CSR	Codes of State Rules	SIC	Standard Industrial Classification
DAQ	Division of Air Quality	SIP	State Implementation Plan
DEP	Department of Environmental Protection	SO₂	Sulfur Dioxide
FOIA	Freedom of Information Act	TAP	Toxic Air Pollutant
HAP	Hazardous Air Pollutant	TPY	Tons per Year
HON	Hazardous Organic NESHAP	TRS	Total Reduced Sulfur
HP	Horsepower	TSP	Total Suspended Particulate
lbs/hr or lb/hr	Pounds per Hour	USEPA	United States Environmental Protection Agency
LDAR	Leak Detection and Repair	UTM	Universal Transverse Mercator
M	Thousand	VEE	Visual Emissions Evaluation
MACT	Maximum Achievable Control Technology	VOC	Volatile Organic Compounds
MM	Million		
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour		
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour		
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		
NSPS	New Source Performance Standards		

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, ~~firm, corporation, association or public agency~~ is prohibited except as noted in 45CSR§6-3.1.b. Fires set for the purpose of bona fide instruction and training of public and industrial employees and members of volunteer fire departments in the methods of fighting fires, provided that approval to conduct such burning is received from the ~~Director or the Director's duly authorized representative~~ **Secretary**. Burning of structures for fire training is subject to specific requirements of ~~45CSR15, in particular, 45CSR34 and~~ 40 CFR Part 61 Subpart M. **[45CSR§6-3.1.]**
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, ~~suffer,~~ or allow ~~permit~~ any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. **[45CSR§6-3.2.]**
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation and/or for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, 40 C.F.R. § 61.150. The permittee or owner/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). A copy of this notice should be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health. **[40 C.F.R. 61 and 45CSR~~3415~~]**
- 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. The permitted facility shall be operated in accordance with information filed in the Permit Application R13-2082, R13-2082A, R13-2401, **R13-2631**, and **R13-2631A**.

[45CSR13, Permit No. R13-2082A - (Condition C.3.), Permit No. R13-2401 – (Condition C.3.), Permit No. R13-2631 – (Condition 2.5.1.)]

3.2. Monitoring Requirements

None

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]

3.4. 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, Permit NO. R13-2631 – (Condition 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. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken.

[45CSR§30-5.1.c. State-Enforceable only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[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. All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 – 57th Street
Charleston, WV 25304

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. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
[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 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 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:

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.

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.

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

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.]

- c. Every report submitted under this subsection shall be certified by a responsible official.

[45CSR§30-5.1.c.3.D.]

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.]

3.6. Compliance Plan

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.

45CSR27 – To Prevent and Control the Emissions of Toxic Air Pollutants

The emissions of toxic air pollutants at the facility are lower than the threshold values in 45CSR27 Table A, so the facility is not subject to Best Available Technology requirements.

40 C.F.R. Part 64 - The Union Carbide Corporation's Technology Park Market Development Process are not subject to the Compliance Assurance Monitoring (CAM) rule because they are subject to 40 C.F.R. Part 63 Subpart FFFF that was proposed after November 11, 1990.

3.8. Operational Flexibility

- 3.8.1 The permittee is authorized to implement changes that satisfy the provisions of 45CSR13A, Interpretative Rules that do not require a Regulation 13 permit or would otherwise require a change to this Title V permit. The permittee shall maintain records of such changes and provide copies to the Director upon written request.
[45CSR§13A-4.1]

4.0 Source-Specific Requirements [~~Reserved Market Development Plant~~]

4.1. Limitations and Standards

- 4.1.1. ~~Reserved—Emissions to the atmosphere, from the following emission points of the organo phosphite production plant, shall not exceed the emission limits set forth in Table 1.~~

~~Table 1: Emission Limits of Criteria and Hazardous Air Pollutants~~

Emission Point	Source	Pollutant	Emission Limit	
			PPH	TPY
AL7	Packed Bed Scrubber (I07)	HCl	0.005	0.04
AL3 or A93	Condenser/Cold Trap (I02/I03 or F02/F03)	VOC Toluene	2.5 0.4	3.0 1.7
AL8*	Condenser/Cold Trap (F02/F03)	VOC Toluene	2.7 0.1	5.6 0.1
AL6	Drum Loading (I06)	VOC Toluene	3.22 0.51	0.8 0.32
AJ3	Condenser/Cold Trap (G08/G05)	VOC Toluene	0.15 0.15	0.1 0.1
ALY	Filter Wash Drum Loading (I10)	VOC Toluene	1.85 0.51	0.4 0.05

~~*—This is a virtual emission point representing the combined actual emission points AL6 and A31 (dependant upon vacuum source used).~~

~~[45CSR13, Permit No. R13-2401 (Condition A.1.) (AL7, AL3 or A93, AL8, AL6, AJ3, ALY)]~~

- ~~4.1.1. The outlet gas temperature of the Drying System Condenser/Cold Trap (F02/F03), the Kettle Scrubber Condenser/Cold Trap (G08/G05), and the Reaction System Condenser/Cold Trap (I02/I03) shall not exceed 68°F (Fahrenheit) [20°C (Celsius)] (during production of organo phosphite.)~~
~~[45CSR13, Permit No. R13-2401 (Condition A.2.) (AL8, AJ3, AL3 or A93)]~~

- ~~4.1.2. The liquor flow rate to the Packed Bed Scrubber (I07) shall be maintained at a minimum of 1 GPM (gallon per minute) of at least 10% NaOH (sodium hydroxide) solution (during production of organo phosphite when hydrogen chloride is present in the process vent gases.)~~
~~[45CSR13, Permit No. R13-2401 (Condition A.3.) (AL7)]~~

- ~~4.1.3. The initial liquor composition of the Kettle Scrubber (C01) shall be a minimum of 1.5 times the stoichiometric ratio of NaOH (sodium hydroxide) solution required to neutralize all HCl fed to the Kettle Scrubber (C01). The NaOH solution must be replaced prior to each batch (during production of organo phosphite.)~~
~~[45CSR13, Permit No. R13-2401 (Condition A.4.) (C01)]~~

- ~~4.1.4. The production of organo phosphite shall not exceed 24 production units per year.~~
~~[45CSR13, Permit No. R13-2401 (Condition A.5.)]~~

- ~~4.1.5. Hydrochloric acid shall not be released from any type source operation or duplicate source operation or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of 210 milligrams per dry standard cubic meter. [45CSR§7 4.2, 45CSR13, Permit No. R13 2401 (Condition B.6.) (A17)]~~
- ~~4.1.6. Any stack serving any process source operation or air pollution control equipment 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, 45CSR13, Permit No. R13 2401 (Condition B.6.)]~~
- ~~4.1.7. The total VOC emissions from Building 706/707 shall not exceed 34 lbs/hr or 10 tons/yr, excluding VOC emissions permitted by R13 2401, given in Condition 4.1.1. [CO R21 97 36 (Condition III.1.) (A15, A16, A17, A18, A24, AA1, A13, A31, A33, A56, A93, AJ3, AJ4, AL3, A17, AM4, AM9, AN3, AN6, AR6, AR7, AR9, AP2, AS2, AS4, AW1, AW2, AW6, AW7, AX6) State Enforceable Only.]~~
- ~~4.1.8. The permittee shall maintain records to demonstrate that the amount of products or product intermediates produced by each Market Development Plant process reactor is less than 1,100 tons per year. [CO R21 97 36 (Condition III.2.) (Building 706/707) State Enforceable Only.]~~
- ~~4.1.9. The Permittee, at all times, including periods of start up, shutdown, and malfunction, maintain and operate the VOC emitting sources and associated air pollution control devices in a manner consistent with good air pollution control practices for minimizing emissions. For all periods of noncompliance with Condition 4.1.8, the Permittee shall follow the reporting and variance requirements of Conditions 4.1.13 and 4.1.14 resulting from unavoidable malfunctions of equipment. In the event that the control equipment is inoperable, the production unit shall be shut down or the activity shall be discontinued as expeditiously as possible. [CO R21 97 36 (Condition III.3 and Condition IV.7.) (A16, AR9, A18, AS2, AJ4, AL7) State Enforceable Only.]~~
- ~~4.1.10. In the event that DAQ finds 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, the Permittee agrees to submit to the DAQ a plan within one hundred eighty (180) days of notification of such a finding for complete, facility wide implementation of RACT requirements and shall fully implement such a plan within two (2) years of its approval by DAQ. [CO R21 97 36 (Condition III.8.) State Enforceable Only.]~~
- ~~4.1.12. The permittee shall comply with all applicable requirements of 40 C.F.R. 63, Subpart FFFF “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing” no later than May 10, 2008. The permittee shall submit a complete application for a significant Title V permit modification to include the specific requirements of 40 C.F.R. 63, Subpart FFFF in the operating permit on or prior to the submittal date of the Notification of Compliance Status Report (which is due 150 days after May 10, 2008. [45CSR34, 40 C.F.R. §63.2445])~~

~~4.1.13. Reports of excess emissions. Except as provided in Condition 4.1.13.4, the owner or operator of any facility containing sources subject to 45CSR21-5 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.]~~

~~4.1.14. Variance. If the provisions of 45CSR21 cannot be satisfied due to repairs made as the result of routine maintenance or in response to the unavoidable malfunction of equipment, the Director may permit the owner or operator of a source subject to this regulation to continue to operate said source for periods not to exceed 10 days upon specific application to the Director. Such application shall be made prior to the making of repairs and, in the case of equipment malfunction, within 24 hours of the equipment malfunction. Where repairs will take in excess of 10 days to complete, additional time periods may be granted by the Director. 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. During such time periods, the owner or operator shall take all reasonable and practicable steps to minimize VOC emissions.~~

~~[45CSR§21-9.3.]~~

4.2. Monitoring Requirements

4.2.1. Reserved

4.3. Testing Requirements

4.3.1. ~~Reserved~~ ~~Fugitive VOC (volatile organic compound) emissions from the Filter/Dryer (I09) (during the production of organo phosphite) shall be minimized by testing for leaks prior to commencement of each production batch. Pressure tests and/or "snoop" testing shall be performed following dismantling and reassembling of equipment. The permittee shall maintain records of the aforementioned leak checks that shall contain, at a minimum, the date performed, the initials of the operator who performed the check, the results of the check, and any actions taken. Such records shall be retained on site by the permittee for a period of not less than five (5) years. Certified records shall be made available to the Director or his/her duly authorized representative upon request.~~

~~[45CSR13, Permit No. R13-2401 (Condition B.5.) (A19)]~~

~~4.3.2. Compliance with the emissions standards of 45CSR7-4.2 Section. of for mineral acids (Condition 4.1.6.) for the production of organo phosphite shall be determined by testing in accordance with the following unless determines that alternative methods upon the request of the Director, are required due to interferences or other factors:
[45CSR§7A-3.1.j.1 (AL9)]~~

4.4. Recordkeeping Requirements

4.4.1. ~~Reserved The permittee shall maintain records of the number of production units of organo phosphite produced, the date the batches were run, and the duration of the batch runs. The permittee shall maintain records of the monthly total production units and the rolling twelve month total production units of organo phosphite. Such records shall be retained on site by the permittee for a period of not less than five (5) years. Certified records shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR13, Permit No. R13-2401 (Condition B.1.) (AL7, AL3 or A93, AL8, AL6, AJ3, ALY)]~~

~~4.4.2. The outlet gas temperature of the Drying System Condenser/Cold Trap (F02/F03), the Kettle Scrubber Condenser/Cold Trap (G018/G05), and the Reaction System Condenser/Cold Trap (I02/I03) (during production of organo phosphite) shall be recorded at least twice per shift, when VOC are present. These records shall contain, at a minimum, the date and time of measurement, the initials of the operator making the measurement, the temperature reading, and any actions taken. Such records shall be retained on site by the permittee for a period of not less than five (5) years. Certified records shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR13, Permit No. R13-2401 (Condition B.2.) (AL8, AJ3, AL3 or A93)]~~

~~4.4.1. The liquor flow rate to the Packed Bed Scrubber (I07) (during production of organo phosphite) shall be recorded at least twice per shift, when hydrogen chloride is present in the reaction system exhaust gas. These records shall contain, at a minimum, the date and time of measurement, the initials of the operator making the measurement, the liquor flow rate, and any actions taken. Such records shall be retained on site by the permittee for a period of not less than five (5) years. Certified records shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR13, Permit No. R13-2401 (Condition B.3.) (AL7)]~~

~~4.4.2. The permittee shall maintain records of the refreshing and/or refilling of the liquor of the Kettle Scrubber (G01) (during production of organo phosphite.) These records shall contain, at a minimum, the date and time of refilling, the initials of the operator, the amount of fresh liquor used, and the NaOH concentration of the fresh liquor. Such records shall be retained on site by the permittee for a period of not less than five (5) years. Certified records shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR13, Permit No. R13-2401 (Condition B.4.) (G01)]~~

~~4.4.3. Compliance with the emission limits in Condition 4.1.8 shall be shown through engineering calculations and operating times. The permittee shall keep records of the calculations as well as times of operation for not less than five (5) years.
[CO-R21-97-36 (Condition III.1.) (A15, AA1, A13, A24, A33, A56, A93, AJ3, AL3, AM4, AM9, AN3, AN6, AP2, AS4, AW1, AW2, AW6, AW7, AX6, A16, A17, A18, A31, AJ4, AL7, AP9, AS2)]~~

4.5. Reporting Requirements

Reserved ~~N/A~~

4.6. Compliance Plan

Reserved ~~N/A~~

5.0 Source-Specific Requirements [Organo Metallic Compound Production Unit (OMU2) Process - Market Development Plant]

OMU2 Process		
Emission Unit ID	Emission Point ID	Emission Unit Description
<u>E-325</u>	<u>AF4</u>	<u>Recovery Device</u>
<u>E-400</u>	<u>AF4</u>	<u>Recovery Device</u>
<u>J36</u>	<u>AR9</u>	<u>Header/Vacuum Pump</u>
<u>J41</u>	<u>AR1</u>	<u>Header/Vacuum Pump Receiver</u>
<u>K02</u>	<u>AT7</u>	<u>Bag Dumping Station</u>
<u>K04</u>	<u>AF4 or AR1 or AR9</u>	<u>Tank – Solvent 1</u>
<u>K05</u>	<u>AF4 or AT3 or AR1 or AR9</u>	<u>Reactor</u>
<u>K06</u>	<u>AF4</u>	<u>Product Separation and Solvent Recovery</u>
<u>K08</u>	<u>AF4 or AR1 or AR9</u>	<u>Hold Tank</u>
<u>K18</u>	<u>AF4</u>	<u>Tank – Solvent 3</u>
<u>KXX</u>	<u>ATX</u>	<u>Containers</u>
<u>L15</u>	<u>AF4</u>	<u>Flare</u>
<u>SP1</u>	<u>AX1</u>	<u>Tank – Solvent 2</u>
<u>SP2</u>	<u>AX2</u>	<u>Tank – Solvent 2</u>

5.1. Limitations and Standards

~~5.1.15. During operations of the OMU2 Process,~~ The emissions from the flare, designated as L15, venting through emission point AF4 shall not exceed the limits shown in the following table:

4.1.1. EMISSIONS FROM FLARE L15		
Pollutant	Hourly	Annual*
	lb/hr	TPY
PM ₁₀	0.02	0.07
PM	0.02	0.07
SO ₂	0.01	0.01
NO _x	0.14	0.60
CO	0.74	3.24
VOCs	0.08 0.11	0.19 0.105
Hexane	0.105	0.003
Toluene	0.08 0.05	0.19 0.104

*Annual emissions are based on operating 8760 hours per year.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.1.) Compliance with this streamlined PM limit assures compliance with 45CSR§6-4.1 (L15)]

~~5.1.2+6.~~ The flare, designated as L15, shall be operated continuously when the organo-metallic production unit #2 (OMU2) is operating and VOCs and HAPs are present in the process header that is routed to the flare.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.2.) (L15)]

~~54.1.317.~~ ~~During operations of the OMU2 Process, T~~the permittee shall maintain minimum net heating value of 200 Btu/scf (7.45 MJ/scm) or greater for gas stream in the flare gas header routed to the flare, designated as L15.

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.3.) (L15)]~~

~~54.1.418.~~ ~~During operations of the OMU2 Process, T~~the permittee shall operate the flare, designated as L15, with a flare gas exit velocity of less than 60 feet per second (18.3 m/sec).

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.4.) (L15)]~~

~~54.1.519.~~ ~~During operations of the OMU2 Process, T~~the permittee shall install, operate, maintain and calibrate a monitoring device (including but not limited to a thermocouple, ultra-violet beam sensor, or infrared sensor) capable of continuously detecting that at least one pilot flame or the flare flame is present for the flare L15.

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.5.) (L15)]~~

~~54.1.620.~~ ~~During operations of the OMU2 Process, T~~the flare L15 shall not emit visible particular matter from emission point AF4 greater than or equal to 20% opacity except for visible particular matter emission less than 40% for a period or periods aggregating no more than 8 minutes per start-up.

~~[45CSR§6-4.3, 45CSR§6-4.4, 45CSR13, Permit No. R13-2631 - (Condition 4.1.6.) (L15)]~~

~~54.1.721.~~ ~~During operations of the OMU2 Process, T~~the permittee shall operate and maintain the bag dumping station, designated as (K02), in such a way that fugitive particular matter is contained and routed to the fabric filter baghouse, designated as (K07).

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.7.) (K02, K07)]~~

~~54.1.822.~~ ~~During operations of the OMU2 Process, T~~the fabric filter baghouse, designated as K07, shall not emit visible particulate matter from emission point AT7 greater than 20% opacity except for visible particular matter emission less than 40% for a period or periods aggregating no more than 5 minutes in any 60 minute period.

~~[45CSR§7-3.1, 45CSR§7-3.2, 45CSR13, Permit No. R13-2631 - (Condition 4.1.8.) (K07)]~~

~~54.1.923.~~ ~~During operations of the OMU2 Process, T~~the particulate matter and PM₁₀ emission emitted from emission point AT7 shall not exceed 0.17 pounds per hour and 0.74 tons per year.

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.9.) (K07)]~~

5.1.10. The condenser (E-325) shall be operated at all times when hazardous air pollutants emissions are vented to the device except when the TRE index is greater than 5.0 and operation of E-325 is not required to meet the MON requirements (ie during process standby).

[45CSR34, 40 C.F.R. § 63.993 (a) (2), 45CSR13, R13-2631, 4.1.10. (E-325)]

~~4.1.24. During operations of the OMU2 Process, the condenser, designated as (J36), shall be operated continuously when the reactor K05 and product separator and solvent recovery vessel K06 is venting VOCs and/or HAPs into the process header that is routed to the condenser J36.~~

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.10.) (J36, K05)]~~

~~54.1.1125.~~ ~~During operations of the OMU2 Process, T~~he VOCs and toluene emissions being emitted from ~~the condenser J36 at~~ emission point AR9 shall not exceed 0.47 ~~0.11~~ pounds per hour and 34 ~~5~~ pounds per year.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.11.) (~~K04, K05, K08J36~~)]

~~4.1.26. During operations of the OMU2 Process, the toluene (HAP) emissions being emitted from the condenser J36 at emission point AR9 shall not exceed 0.11 pounds per hour and 5 pounds per year.~~

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.12.) (J36)]~~

~~4.1.27. During operations of the OMU2 Process, the Permittee when operating condenser J36 shall at all times maintain the inlet coolant fluid tem- (Condition 4.1.13.) (J36)]~~

~~4.1.28. During operations of the OMU2 Process, the permittee may vent reactor K05 to emission point AT3 when the pressure in reactor K05 is below a safe level that could be vented to the flare.~~

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.14.) (K05)]~~

~~54.1.129.~~ ~~During operations of the OMU2 Process, T~~he VOC and toluene (HAP) emissions ~~emitted~~ from reactor K05 through emission point AT3 shall not exceed 0.44 ~~0.001~~ pounds per hour and 932 ~~11~~ pounds per year.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.12~~5~~.) (K05)]

~~4.1.30. During operations of the OMU2 Process, the total HAP emissions emitted from reactor K05 through emission point AT3 shall not exceed 0.001 pounds per hour and 11 pounds per year.~~

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.16.) (K05)]~~

~~54.1.131.~~ ~~During operations of the OMU2 Process, T~~he VOC emissions (combined) ~~emitted~~ from tank SP1 through emission point AX1 and tank SP2 through emission point AX2 shall not exceed 24 ~~1.88~~ pounds per year.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.13~~17~~.) (SP1, SP2)]

~~4.1.32. During operations of the OMU2 Process, the VOC emissions emitted from tank SP2 through emission point AX2 shall not exceed 1.88 pounds per year.~~

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.18.) (SP2)]~~

~~54.1.1433.~~ ~~During operations of the OMU2 Process, T~~he VOC and total HAP emissions ~~emitted~~ from containers, designated as KXX through emission point ATX shall not exceed 0.29 ~~2.34~~ pounds per hour and 387 ~~393~~ pounds per year.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.14~~49~~.) (KXX)]

~~4.1.34. During operations of the OMU2 Process, the total HAP emissions emitted from containers, designated as KXX through emission point ATX shall not exceed 2.34 pounds per hour and 393 pounds per year.~~

~~[45CSR13, Permit No. R13-2631 - (Condition 4.1.20.) (KXX)]~~

~~54.1.1535.~~ ~~During operations of the OMU2 Process, C~~ompliance with ~~the~~ all annual emission limits stated in this permit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the emissions by pollutant for the previous twelve (12) consecutive calendar months.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.15~~24~~.)]

~~54.1.163. During operations of the OMU2 Process, in effort T~~to minimize fugitive VOC emissions from process equipment leaks, the permittee shall install and maintain a double seal with a barrier fluid greater than the process fluid, or equivalent design (e.g. diaphragm pumps) on all pumps and agitators in light liquid VOC and/or HAP service associated with the organo-metallic production unit #2.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.1622.)]

~~54.1.173. During operations of the OMU2 Process, in effort T~~to minimize fugitive emissions from process equipments leaks, the permittee shall conduct pressure testing of the process equipment in accordance with 40 C.F.R. § 63.2480. ~~prior to each production campaign or when one of the following condition is met:~~

~~i. When the batch product process train is reconfigured to produce a different product; or~~

~~ii. Once during a calendar year.~~

~~This testing is not required for routine seal breaks, such as changing hose or filters, which are not part of the reconfiguration to produce a different product or intermediate. If in the event that a leak is detected, the permittee shall repair such leak and retest the process equipment before start up of the process. If the process equipment fails the retest or the second of two consecutive pressure test, it shall be repaired as soon as practicable, but not less than 30 calendar days after the second pressure test, provided that the following conditions are met:~~

~~i. Equipment supplies have been depleted and supplies had been sufficiently stocked before the supplies were depleted.~~

~~ii. The repair is made no later than 10 calendar days after delivery of the replacement equipment.~~

[45CSR13, Permit No. R13-2631 - (Condition 4.1.1723.)]

~~54.1.183. During operations of the OMU2 Process, T~~the permittee shall calibrate all monitoring or measuring devices required by this permit, except the monitoring device to detect the presence/absence of the flare pilot flame or flare flame, as required in this permit once every 12 months in accordance with the manufacture's specifications. The device used to monitor the presence of the flare pilot light or flare flame shall be checked annually to confirm proper operation. Records of such calibrations, and checking of the flame sensing device shall be maintained in accordance with Section Condition 3.4.2 of this permit.

[45CSR13, Permit No. R13-2631 - (Condition 4.1.1824.)]

~~54.1.193. Operation and Maintenance of Air Pollution Control Equipment. During operations of the OMU2 Process, T~~the permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment (K07 – Filter, L15 - Flare, ~~and J36 – Condenser~~) 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, Permit No. R13-2631 - (Condition 4.1.1925.) (K07, L15, ~~J36~~)]

5.1.20. The permittee shall comply with applicable operating limits and standards of 40 C.F.R. Part 63 Subpart FFFF. Limits and standards are listed in Attachment 4. [45CSR13, R13-2631, Section 4.1.20.]

~~54.1.21~~**40.** Portions of the facility may be subject to various provisions of 40 C.F.R. Part 63, Subpart EEEE – the Organic Liquids Distribution NESHAP (OLD MACT). The OLD MACT includes requirements that potentially limit Hazardous Air Pollutant (HAP) emissions from: (1) Affected storage tanks storing organic liquids; (2) Affected transfer racks at which organic liquids are loaded into or unloaded out of transport vehicles and/or containers; (3) Affected equipment leak components in organic liquids service that are associated with equipment as specified in 40 C.F.R. § 63.2338 (b) (3). The OLD MACT also includes specific notification, testing, monitoring, recordkeeping, and reporting requirements. The permittee must be in compliance with all applicable provisions of the OLD MACT no later than February 5, 2007, unless the permittee is granted an extension pursuant to the provisions of Subpart EEEE, or the compliance date is changed by USEPA.
[40 C.F.R. 63, Subpart EEEE]

5.2. Monitoring Requirements

~~54.2.1.~~ For the purpose of demonstrating compliance with ~~54.1.317 of this permit~~, the permittee shall monitor and record, at least once per day when VOCs are present in the flare header vent gas, the natural gas flow rate to the flare. The natural gas flow rate shall be a minimum of ~~20.5~~ scfm when VOCs are present in the flare header vent gas. Records of such monitoring shall be maintained in accordance with Condition 3.4.2.

[45CSR13, Permit No. R13-2631 - (Condition 4.2.1.) (L15)]

~~54.2.2.~~ For the purpose of demonstrating compliance with Condition ~~54.1.418 of this permit~~, the process control system shall be equipped with an alarm to signal flare gas header volumetric flow rate ~~that would equate to a velocity of at~~ 60 feet per second or higher ~~at the flare tip~~. The flare gas volumetric flow ~~rate~~ alarm shall be checked once per year to assure proper operation.

[45CSR13, Permit No. R13-2631 - (Condition 4.2.2.) (L15)]

~~54.2.3.~~ ~~During operations of the OMU2 Process, F~~for the purposes of demonstrating compliance with Conditions ~~54.1.15~~ and ~~54.1.216 of this permit~~, the permittee shall continuously monitor the presence of either a pilot light or flare flame while VOCs and HAPs are present in the process header that is routed to the flare.

[45CSR13, Permit No. R13-2631 - (Condition 4.2.3.) (L15)]

~~54.2.4.~~ ~~During operations of the OMU2 Process, F~~for purposes of demonstrating compliance with 45CSR§6-4.3 and Condition ~~54.1.620 of this permit~~, the permittee shall conduct visible emission checks of each emission point subject to an opacity limit once per month during periods of normal unit operation using 40 C.F.R. 60 Appendix A, Method 22. If during these checks, or at any other time, visible emissions are observed at any emission point ~~and are not immediately corrected~~, compliance shall be determined by conducting tests in accordance with 40 C.F.R. 60 Appendix A, Method 9 within 48 hours. If the Method 9 test results show the opacity to be greater than the limit, then an evaluation to determine the cause of the exceedance shall be conducted within three (3) days, unless the cause of the exceedance is corrected within 24 hours. If no visible emissions are observed after four consecutive months, visible emission checks shall be conducted each calendar quarter. If any visible emissions are observed during the quarterly emission checks, visible emission checks shall return to being performed each calendar month. Records shall be maintained in accordance with Condition 3.4.2 ~~of this permit~~ and shall include all data required

by 40 C.F.R. 60 Appendix A, Method 22 or Method 9 test, whichever is appropriate. These records shall include, at a minimum, the date and time of each visible emission check, the visible emissions survey results and, if appropriate, all corrective actions taken.

[45CSR13, Permit No. R13-2631 - (Condition 4.2.4.) (L15)]

~~4.2.5. During operations of the OMU2 Process, for the purposes of demonstrating compliance with Condition 4.1.27. of this permit, the permittee shall monitor the temperature of inlet coolant fluid for the condenser J36 once every 8 hours while VOC are being routed to the condenser. [45CSR13, Permit No. R13-2631 - (Condition 4.2.5.) (J36, K05)]~~

~~5.2.56. During operations of the OMU2 Process, F~~ For the purpose of demonstrating compliance with Conditions ~~5.1.1129.~~ and ~~5.1.1230.~~ of this permit, the permittee shall monitor and record of the number of batches of product produced, whether each batch was a standard or non-standard batch and other data necessary to determine the amount of VOCs and HAPs emitted. ~~monitor the venting of reactor K05 to emission point AT3. While venting, the permittee shall record all necessary data and determine the amount of VOCs and HAPs emitted during the venting. These records shall be kept in such manner that demonstrates compliance to the annual emission limits stated in Conditions 4.1.29. and 4.1.30. on a monthly basis.~~

[45CSR13, Permit No. R13-2631 - (Condition 4.2.56.) (K05)]

5.2.6. For the purpose of demonstrating compliance with condition 5.1.13, the permittee shall maintain a record of the quantity of material received and transferred to Tanks SP1 and SP2.

[45CSR13, Permit No. R13-2631, 4.2.6., (SP1, SP2)]

5.2.7. For the purpose of demonstrating compliance with condition 5.1.14, the permittee shall maintain records of Solvent 1 and Solvent 3 transfers that result in container emissions directly to the air.

[45CSR13, Permit No. R13-2631, 4.2.7., (KXX)]

5.2.8. The permittee shall comply with applicable monitoring requirements of 40 C.F.R. Part 63 Subpart FFFF. Monitoring requirements are listed in Attachment 4.

[45CSR13, R13-2631, Section 4.2.8.]

5.3. Testing Requirements

~~5.3.13.~~ For the purpose of demonstrating compliance with Condition ~~5.1.173~~ of this permit, the permittee shall conduct pressure testing per the provisions of 40 C.F.R. § 63.2480. ~~using the one of the two procedures outlined in the following or an alternative procedure may be used for leak testing the equipment, if permittee demonstrates to the Director that the alternative procedure is capable of detecting losses of fluid:~~

~~a=~~

~~i. The batch product process equipment train shall be pressurized with a gas to a pressure less than the set pressure of any safety relief devices or valves or to a pressure slightly above the operating pressure of the equipment, or alternatively, the equipment shall be placed under a vacuum.~~

~~ii. Once the test pressure is obtained, the gas source or vacuum source shall be shut off.~~

~~iii. The test shall continue for not less than 15 minutes unless it can be~~

~~determined in a shorter period of time that the allowable rate of pressure drop or of pressure rise was exceeded. The pressure in the batch product process equipment shall be measured after the gas or vacuum source is shut off and at the end of the test period. The rate of change in pressure in the batch product process equipment shall be calculated using the following equation:~~

$$\frac{P}{t} = \frac{(P_f - P_i)}{(t_f - t_i)}$$

~~Where:~~

~~$\Delta P/t$ = Change in pressure, psig/hr.
 P = Final pressure, psig.
 P_i = Initial pressure, psig.
 $t_f - t_i$ = Elapsed time, hours.~~

~~iv. The pressure shall be measured using a pressure measurement device (gauge, manometer, or equivalent) which has a precision of ± 2.5 millimeter mercury in the range of test pressure and is capable of measuring pressures up to the relief set pressure of the pressure relief device. If such a pressure measurement device is not reasonably available, the owner or operator shall use a pressure measurement device with a precision of at least 10 percent of the test pressure of the equipment and shall extend the duration of the test for the time necessary to detect a pressure loss or rise that equals a rate of one psig per hour.~~

~~OR~~

~~b.~~

- ~~i. The batch product process equipment train, or section of the train, shall be filled with the test liquid (e.g., water, alcohol) until normal operating pressure is obtained. Once the equipment is filled, the liquid source shall be shut off.~~
- ~~ii. The test shall be conducted for a period of at least 60 minutes, unless it can be determined in a shorter period of time that the test is a failure.~~
- ~~iii. Each seal in the equipment being tested shall be inspected for indications of liquid dripping or other indications of fluid loss. If there are any indications of liquids dripping or of fluid loss, a leak is detected.~~

[45CSR13, Permit No. R13-2631 - (Condition 4.3.1.) ~~(4-15)~~]

5.3.2. The permittee shall comply with applicable testing requirements of 40 C.F.R. Part 63 Subpart FFFF. Testing requirements are listed in Attachment 4. [45CSR13, R13-2631, Section 4.3.2.]

54.4. Recordkeeping Requirements

54.4.16. Record of Maintenance of Air Pollution Control Equipment. For all air pollution control equipment identified in Condition ~~54.1.193~~, (~~K07 – Filter, L15 - Flare for OMU2 Process~~) and the control measures applied to the pumps and agitators in VOC and/or HAP service associated with the organo-metallic production unit #2, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR13, Permit R13-2631 – (Condition 4.4.2) (K07, L15, ~~J36~~)]

54.4.27. Record of Malfunctions of Air Pollution Control Equipment. For all air pollution control equipment identified in Condition ~~54.1.193~~, (~~K07 – Filter, L15 - Flare for OMU2 Process~~) and the control measures applied to the pumps and agitators in VOC and/or HAP service associated with the organo-metallic production unit #2, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

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

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, Permit R13-2631 – (Condition 4.4.3) (K07, L15, ~~J36~~)]

54.4.38. ~~During operation of the OMU2 Process, T~~ the permittee shall keep any and all records and reports of testing and monitoring as required in Sections Conditions 54.2.1 through 4.2.6, and Condition 54.3.3 of this permit in accordance with Section Condition 3.4.2 of this permit.
[45CSR13, Permit No. R13-2631 - (Condition 4.4.4.)]

54.4.49. For the purposes of demonstrating compliance with all of the annual emissions limits stated in Section Conditions 54.1.15 through 54.1.39 of this permit, the permittee shall record all necessary data or information ~~and using this data~~ to determine ~~the~~ the annual ~~the~~ emissions from the respective ~~ed~~ emission point on a per pollutant basis. These records shall be kept in such manner that demonstrates compliance with to the annual emission limit that is stated in this permit on a 12 monthly rolling total basis. All records shall be maintained in accordance with Section Condition 3.4.2.
[45CSR13, Permit No. R13-2631 - (Condition 4.4.5.)]

54.4.510. For the purposes of determined compliance with all of the annual emission limits stated within Section Conditions 54.1.15 through 4.1.39 of this permit, the permittee shall calculate or determine the 12 month rolling total as defined in ~~54.1.153~~ for each emission point by pollutant for each calendar month. The permittee shall submit a compliance report conduct and certify

~~these determinations~~ on a semi annual basis. The periods for these determinations shall run from January 1 to June 30 for the first half and July 1 to December 31 for the second half. These determinations shall be made no later than ~~60~~ ~~30~~ days after end the respective semi-annual period or as otherwise provided in the 45CSR30 air permit. All records and calculations shall be maintained in accordance with Section 3.4.1 ~~of this permit.~~
[45CSR13, Permit No. R13-2631 - (Condition 4.4.6.)]

5.4.6. The permittee shall comply with the applicable recordkeeping requirements of 40 C.F.R. 63 Subpart FFFF. Recordkeeping requirements are listed in Attachment 4. [45CSR13, R13-2631.]

5.5. Reporting Requirements

5.5.1. The permittee shall comply with the applicable reporting requirements of 40 C.F.R. 63 Subpart FFFF. Reporting requirements are listed in Attachment 4. [45CSR13, R13-2631, Section 4.5.1.]

5.6. Compliance Plan

5.6.1. Reserved

6.0 Source-Specific Requirements [Auto Flexibilizers and POLYSLIP Process - Market Development Plant]

<u>Auto Flexibilizers</u>		
<u>Emission Unit ID</u>	<u>Emission Point ID</u>	<u>Emission Unit Description</u>
<u>B01</u>	<u>A15</u>	<u>SR1 Kettle</u>
<u>B05</u>	<u>A15</u>	<u>SR1 Condenser</u>

<u>POLYSLIP® Process</u>		
<u>Emission Unit ID</u>	<u>Emission Point ID</u>	<u>Emission Unit Description</u>
<u>J01</u>	<u>AM4</u>	<u>C13 Autoclave</u>
<u>J02</u>	<u>AM4</u>	<u>C13 Condenser</u>
<u>J04</u>	<u>AM4</u>	<u>C13 Cold Trap</u>
<u>J36</u>	<u>AR9</u>	<u>C13HPVAC</u>

6.1. Limitations and Standards

6.1.1. Reserved

6.2. Monitoring Requirements

6.2.1. Reserved

6.3. Testing Requirements

6.3.1. Reserved

6.4. Recordkeeping Requirements

6.4.1. See Attachment 4 for equipment leaks and those who elects to pressure test the batch product process equipment.

6.4.2. Permittee must keep records of each operating scenario as specified below:

- (1) A description of the process and the type of process equipment used.
- (2) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard in 40 C.F.R. § 63.2505; wastewater point of determination (POD); storage tanks; and transfer racks.
- (3) The applicable control requirements of 40 C.F.R. Part 63 Subpart FFFF, including the level of required control, and for vents, the level of control for each vent.
- (4) Calculations and engineering analyses used to prepare the notification of compliance status report and to demonstrate initial compliance.

(5) For reporting purposes, a change to any of these elements not previously reported constitutes a new operating scenario.

[45CSR34, 40 C.F.R. § 63.2525 (b) (1) – (3), (7), (8)]

6.4.3. The permittee shall record each time that a safety device is opened to avoid unsafe conditions in accordance with 40 C.F.R. § 63.2450 (s).

[45CSR34, 40 C.F.R. § 63.2525 (f)]

6.4.4. The permittee must submit semi-annual or “submit, semi-annually” compliance reports containing the following information, as specified in 40 C.F.R. § 63.2520 (e). This report shall be submitted in accordance with Section 3.5.6.

(1) Company name and address.

(2) Statement by a responsible official with the official’s name, title, and signature, certifying the accuracy of the content of the report.

(3) Date of report and beginning and ending dates of the reporting period.

(4) Applicable information listed in 40 C.F.R. § 63.2520 (e) (10) for process changes

[45CSR34, 40 C.F.R. §§ 63.2520 (e) (1), (2), (3), (10), and Table 11]

6.4.5. Notification of process change.

(i) Whenever you make a process change, or change any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, you must document the change in your compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the information in 40 C.F.R. §§ 63.2520 (e) (10) (i) (A) through (C).

(A) A description of the process change.

(B) Revisions to any of the information reported in the original notification of compliance status report under paragraph (d) of this section.

(C) Information required by the notification of compliance status report under 40 C.F.R. § 63.2520 (d) for changes involving the addition of processes or equipment at the affected source.

(ii) You must submit a report 60 days before the scheduled implementation date of any of the changes identified in 40 C.F.R. § 63.2520 (e) (10) (ii) (A), (B), or (C).

(A) Any change to the information contained in the precompliance report.

(B) A change in the status of a control device from small to large.

(C) A change from Group 2 to Group 1 for any emission point except for batch process vents that meet the conditions specified in 40 C.F.R. § 63.2460 (b) (6) (i).

[45CSR34, 40 C.F.R. § 63.2520 (e) (10)]

6.5. Reporting Requirements

6.5.1. Reserved

6.6. Compliance Plan

6.6.1. Reserved

75.0. Source-Specific Requirements [Shared Services/Maintenance/Energy Systems]

75.1. Limitations and Standards

- 75.1.1. Diesel fuel will be burned as the primary fuel in the two (2) emergency electricity generators.
 [45CSR13, Permit No. R13-2082A - (Condition A.1.) (GV7, GV8)]
- 75.1.2. The maximum sulfur content for the diesel fuel to be burned in the generator engines shall not exceed 0.5%.
 [45CSR13, Permit No. R13-2082A - (Condition A.2.) (GV7, GV8)]
- 75.1.3. The maximum diesel fuel feed rate to each generator engine shall not exceed 74.1 gallons per hour.
 [45CSR13, Permit No. R13-2082A - (Condition A.3.) (GV7, GV8)]
- 75.1.4. Operation of the two generators is to be limited to 750 hours per year per generator.
 [45CSR13, Permit No. R13-2082A - (Condition A.4.) (GV7, GV8)]
- 75.1.5. The maximum allowable emissions to the atmosphere from the electricity generators are not to exceed the following limitations:

Regulated Pollutant	Maximum Emission Rate			
	Generator No. 1 (Emission Point ID No. GV7)		Generator No. 2 (Emission Point ID No. GV8)	
	(lb/hr)	(ton/yr) ¹	(lb/hr)	(ton/yr) ¹
CO	6.11	2.29	6.11	2.29
Hydrocarbons	1.14	0.43	1.14	0.43
NO _x	38.07	14.28	38.07	14.28
PM	0.78	0.29	0.78	0.29
PM ₁₀	0.58	0.22	0.58	0.22
SO ₂	5.13	1.92	5.13	1.92

(1) Based on 750 hours of operation per year.

[45CSR13, Permit No. R13-2082A - (Condition A.5.) (GV7, GV8)]

- 75.1.6. The gasoline storage tank (GT1) used for dispensing gasoline shall be loaded by submerged fill.
 [45CSR§21-23.2.a.1. (GTE)]
- 75.1.7. Cleaning of metal parts is permitted using cold cleaning machines. Cold cleaning machines must be operated in accordance with the following when in use:
 - a. equipped with 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 (psig).
- f. degrease only materials that are neither porous nor absorbent.

[45CSR§21-30.3.a]

75.2. Monitoring Requirements

N/A

75.3. Testing Requirements

N/A

75.4. Recordkeeping Requirements

- 75.4.1.** For the purpose of determining compliance with the maximum allowable sulfur limit established in Condition **75.1.2**, the permittee shall require the fuel supplier to certify in writing that each shipment of diesel fuel to be combusted in the emergency generator engines contain a sulfur content of 0.5% or less. Such sulfur content certification records shall be maintained on-site for a period of no less than five (5) years.

[45CSR13, Permit No. R13-2082A - (Condition B.1.) (GV7, GV8)]

- 75.4.2.** For the purpose of determining compliance with the maximum emission rate limits established in Condition **75.1.5** and the maximum fuel usage limits established for the generator engines in Condition **75.1.3**, the permittee shall maintain accurate monthly records using the sample record keeping form given in ATTACHMENT 1, or its equivalent. Within fifteen (15) days after the end of the calendar month, the Production Leader or EHS Delivery Leader shall initial and date each monthly record attesting to the accuracy and completeness of the data recorded. These records shall be maintained onsite for a period of no less than five (5) years, and upon request by the Director or his or her duly authorized representative, certified copies of these records, signed by the Responsible Official, shall be provided to the Division of Air Quality (DAQ).

[45CSR13, Permit No. R13-2082A - (Condition B.2.) (GV7, GV8)]

75.4.3. All power interruptions which require the utilization of either one (1) or both of the emergency electricity generators herein permitted shall be documented using the sample record keeping forms given in ATTACHMENTS 1 and 2, or their equivalent. Scheduled testing of the emergency generators shall be documented using the sample record keep forms given in ATTACHMENT 3, or its equivalent. Within fifteen (15) days after the end of the reporting period specified for each attachment, the Production Leader or EHS Delivery Leader shall initial and date the record attesting to the accuracy and completeness of the data recorded. These records shall be maintained on site for a period of no less than five (5) years, and upon request by the Director or his or her duly authorized representative, certified copies of these records, signed by the Responsible Official, shall be provided to the Division of Air Quality (DAQ). The permittee may propose to the Director a different record keeping format than described in the attachments.
[45CSR13, Permit No. R13-2082A - (Condition B.3.) (GV7, GV8)]

75.4.4. The Permittee shall maintain daily records showing the quantity of all gasoline delivered to the site and transferred to Tank GT1. These records shall be retained for at least 3 years in a readily accessible location and shall be made available to the Director upon verbal or written request.
[45CSR§21-23.3 (GTE)]

75.4.5. The permittee shall maintain records showing dimensions and an analysis of the capacity (volume) of storage tank GT1.
[45CSR16, 40CFR§60.116b (b) (GTE)]

75.4.6. For the purpose of determining compliance with Condition **75.1.7**, the permittee shall maintain a record showing that the true vapor pressure of solvent used in cold cleaning machines is less than 15 mmHg (0.3 psi) at 38°C (100°F).
[45CSR§30-5.1.c]

75.5. Reporting Requirements

N/A

75.6. Compliance Plan

N/A

86.0. Source-Specific Requirements [Environmental Operations]

86.1. Limitations and Standards

86.1.1. No person shall 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.

[45CSR§7-5.1 (Holz Impoundment)]

86.1.2. The owner or operator of a plant 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.

[45CSR§7-5.2 (Holz Impoundment)]

86.1.3. Compliance with Condition **86.1.2** shall be demonstrated by maintaining paved or graveled roads to the impoundment area. Trucks hauling bottom ash to the impoundment area shall be covered.

[45CSR§30-5.1.c (Holz Impoundment)]

86.2. Monitoring Requirements

N/A

86.3. Testing Requirements

N/A

86.4. Recordkeeping Requirements

N/A

86.5. Reporting Requirements

N/A

86.6. Compliance Plan

N/A

ATTACHMENT 1
UNION CARBIDE CORPORATION;
R13-2082A; Plant ID No.: 0390004
MONTHLY EMERGENCY GENERATOR
NO. 2 FUEL OIL USAGE LOGSHEET ⁽¹⁾⁽²⁾⁽³⁾

Month/Year: _____ Engine No.: 1 (GV7) / 2(GV8) (circle one)

Day	No. 2 Fuel Oil Usage			Reason Generator Was Placed Into Service
	(gal/day)	(hrs/day) Operation	(avg gal/hr) ⁽⁴⁾	
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
Total				

- (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side of this form must be completed upon written request of the Director or his duly-authorized representative.
- (2) This record shall be maintained onsite for a period of no less than five (5) years from the last date for which data was recorded. It shall be made available, upon request, to the Director or his (her) authorized representative.
- (3) The Production Leader or EHS Delivery Leader is required to initialize the reporting form within fifteen (15) days from the end of the calendar month.
- (4) Calculated by dividing the gal. of No. 2 fuel oil consumed in a day (gal/day) by the number of hours per day the emergency generator engine burned No. 2 fuel oil (hrs/day). See **SPECIFIC REQUIREMENT A.3.** of the permit for maximum hourly consumption rate of No. 2 fuel oil.

ATTACHMENT 2

**UNION CARBIDE CORPORATION
 R13-2082A; Plant ID No.: 0390004
 ANNUAL EMERGENCY GENERATOR
 Hours of Operation⁽¹⁾⁽²⁾⁽³⁾**

YEAR: _____ Engine No.: 1 (GV7) / 2 (GV8) (circle one)

Month	Hours of Emergency Generator Operation		Initials ⁽³⁾
	Current Month	YTD	Current Month
January			
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			
Total			

- (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side of this form must be completed upon written request of the Director or his duly-authorized representative.
- (2) This record shall be maintained onsite for a period of no less than five (5) years from the last date for which data was recorded. It shall be made available, upon request, to the Director or his (her) authorized representative.
- (3) The Production Leader or EHS Delivery Leader is required to initial the reporting form within fifteen (15) days from the end of the calendar month.

ATTACHMENT 3

**UNION CARBIDE CORPORATION
 R13-2082A; Plant ID No.: 0390004
 EMERGENCY GENERATOR ENGINE
 Hours of Operation For Testing Purposes⁽¹⁾⁽²⁾**

YEAR: _____ Engine No.: 1 (GV7) / 2 (GV8) (circle one)

Month	No. Operation Hours for Scheduled Testing		Initials ⁽³⁾
	Current Month	YTD	Current Month
January			
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			
Total			

- (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side of this form must be completed upon written request of the Director or his duly-authorized representative.
- (2) This record shall be maintained onsite for a period of no less than five (5) years from the last date for which data was recorded. It shall be made available, upon request, to the Director or his (her) authorized representative.
- (3) The Production Leader or EHS Delivery Leader is required to initialize the reporting form within fifteen (15) days from the end of the calendar month.

ATTACHMENT 4

**UNION CARBIDE CORPORATION – TECHNOLOGY PARK
MARKET DEVELOPMENT PLANT - OMU2 PROCESS**

**Monitoring, Testing, Recordkeeping, and Reporting Requirements per
40 C.F.R. Part 63 Subpart FFFF**

Operating Limits and Standards			
<u>Parameter and/or Affected Equipment</u>	<u>Subparts SS, FFFF Citations</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<p><u>Continuous Process Vents</u></p> <p><u>(K06/E-325 - Product Separation and Solvent Recovery Process)</u></p> <p><u>Group Status Determination</u></p>	<p><u>40 C.F.R. § 63.2455 (b)</u></p>	<p><u>Designate as Group 1 or determine total resource effectiveness (TRE) index.</u></p>	<p><u>Based on engineering calculations TRE Index is 4.82.</u></p> <p><u>K06/E-325 is a Group 2 Continuous Process Vent.</u></p>
<p><u>Continuous Process Vent - Group 2</u></p> <p><u>(K06/E-325-Product Separation and Solvent Recovery – Recovery Device)</u></p>	<p><u>40 C.F.R. § 63.2455 (c)</u> <u>40 C.F.R. § 63.982 (e)</u> <u>40 C.F.R. § 63.993 (a) (2)</u></p>	<p><u>Except as provided below, recovery device E-325 shall be operated at all times when hazardous air pollutant emissions are vented to the device.</u></p> <p><u>Exceptions:</u></p> <ul style="list-style-type: none"> - <u>during system breakdowns, repairs, maintenance periods, instrument adjustments or calibration checks.</u> - <u>when operating scenario MDP-OMU2-05 for standby operations is utilized.</u> <p><u>Comment: During Process Standby Operating Scenario # MDP-OMU2-05, the TRE Index is greater than 5.0 and operation of E-325 is not required to meet MON requirements.</u></p>	<p><u>Continuously monitor and record condenser vent gas exit (product side) temperature except during Process Standby Operating Scenario # MDP-OMU2-05.</u></p> <p><u>Group 2 continuous vent TRE Index greater than 1.9 but less than 5.0.</u></p>
<p><u>Batch Process Vents</u></p> <p><u>Group Status – Operating Scenario #MDP-OMU2-01 (Production Steps)</u></p>	<p><u>40 C.F.R. §§ 63.2460 (a) and (b)</u></p>	<p><u>Determine uncontrolled HAP emissions from each batch vent using procedures in 40 C.F.R. §§ 63.1257 (d) (2) (i) and (ii)</u></p>	<p><u>Uncontrolled emissions were documented per requirements. See Attachment N of the R13-2631A and Title V SM02 application.</u></p> <p><u>Group 2 - Uncontrolled emissions are greater than 200 lbs/yr but less than 10,000 lbs/yr when combined with other batch process vents in common header</u></p>

<u>Operating Limits and Standards</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subparts H, FFFF Citations</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<u>Batch Process Vents Group Status – Operating Scenario #MDP-OMU2-02 (Equipment Washes)</u>	<u>40 C.F.R. §§ 63.2460 (a) and (b)</u>	<u>Determine uncontrolled HAP emissions from each batch vent using procedures in 40 C.F.R. §§ 63.1257 (d) (2) (i) and (ii)</u>	<u>Uncontrolled emissions were documented per requirements. See Attachment D of the R13-2631A application.</u> <u>Group 2 - Uncontrolled emissions are greater than 200 lbs/yr but less than 10,000 lbs/yr when combined with other batch process vents in common header</u>
<u>Batch Process Vent – Group 2 – Equipment Washes (K05/E400 Reactor/Condenser)</u>	<u>40 C.F.R. §§ 63.2460 (c) (1), (c) (2) (v); 63.1257 (d) (2) (i) (C) (4) (ii), 63.1257 (d) (3) (iii) (B)</u>	<u>Conduct one-time demonstration that Condenser E400 is working properly (during boiling operations) – i.e. exhaust gas temperature is less than boiling or bubbling point.</u>	<u>To be completed within 180 days of commencement of operation.</u>
<u>Batch Process Vents - Operating scenarios</u>	<u>40 C.F.R. §§ 63.2525 (b) and (c)</u>	<u>Maintain a schedule or log of operating scenarios, updated each time a new operating scenario is put into operation</u>	<u>See recordkeeping section.</u>
<u>Equipment Leaks, General</u>	<u>40 C.F.R. § 63.2480 (a) – Table 6 of Subpart FFFF</u> <u>40 C.F.R. §§ 63.2480 (b) (1) and (2)</u> <u>40 C.F.R. §§ 63.178 (a) and (b)</u>	<u>Conduct a pressure test of each process train at least annually.</u> <u>• Pressure testing for leaks is not required after reconfiguration of an equipment train if flexible hose connections are the only disturbed equipment.</u>	<u>The facility will comply with the requirements for equipment leaks by following Subpart H, Pressure Testing Alternative.</u>
<u>Equipment Leaks, Pressure Relief Devices in Gas/Vapor Service</u>	<u>40 C.F.R. §§ 63.178 (b) (1) and (2)</u> <u>40 C.F.R. § 63.165</u>	<u>Pressure relief devices shall be operated with an instrument reading of 500 ppm or less above background.</u>	<u>UCC interprets this requirement as being applicable to pressure relief devices that are not part of process equipment train that is checked for leaks using pressure testing.</u> <u>If a pressure relief device opens to prevent an un-safe operating condition, the process equipment train will be pressure tested within 5 days of the release or return to operation.</u>
<u>Equipment Leaks, Sampling Connection Systems</u>	<u>40 C.F.R. §§ 63.178 (b) (1) and (2)</u> <u>40 C.F.R. § 63.166</u>	<u>Each sampling system shall be equipped with a closed-purge, closed-loop, and system.</u>	<u>Sample purges will be collected for disposal by an approve facility.</u>

<u>Operating Limits and Standards</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subparts F, SS, FFFF Citations</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<u>Equipment Leaks, Open-ended Lines or Valves</u>	<u>40 C.F.R. §§ 63.178 (b) (1) and (2)</u> <u>40 C.F.R. § 63.167</u>	<u>Each open-ended line or valve shall be equipped with a cap, blind, flange, purge, or a second valve unless otherwise allowed by 40 C.F.R. §§ 63.167 (c) through (e)</u>	<u>Implement work practice standard.</u>
<u>Maintenance Wastewater</u>	<u>40 C.F.R. § 63.105; 40 C.F.R. § 63.2525 (a)</u>	<u>Develop and maintain a plan for minimizing HAP emissions during maintenance activities including startup, shutdown and malfunctions.</u>	<u>See recordkeeping section.</u>
<u>Continuous Parameter Monitoring System (CPMS) for Continuous Process Vent - Group 2</u> <u>(K06/E-325-Product Separation and Solvent Recovery – Recovery Device)</u>	<u>40 C.F.R. §§ 63.996 (c) (1), (c) (4) and (5)</u>	<u>Except as provided below, the CPMS for Condenser (E-325) vent gas exit (product side) temperature shall be in continuous operation when hazardous air pollutant emissions are being routed to the recovery device. Measurements must be representative of the monitoring activity.</u> <u>Exceptions:</u> - <u>during system breakdowns, repairs, maintenance periods, instrument adjustments or calibration checks.</u> - <u>when operating scenario MDP-OMU2-05 for standby operations is utilized.</u>	<u>Maintain continuous monitoring records.</u> <u>Good engineering practices will be used for installation of the condenser vent gas temperature monitoring device.</u>
<u>Continuous Parameter Monitoring System (CPMS) for Continuous Process Vent - Group 2</u> <u>(K06/E-325-Product Separation and Solvent Recovery – Recovery Device)</u>	<u>40 C.F.R. § 63.6 (e) (3)</u> <u>40 C.F.R. § 63.2525 (j)</u>	<u>Maintain a plan for minimizing emissions of hazardous air pollutants during Product Separation and Solvent Recovery System (K06/E-325) startup, shutdown and malfunction events.</u>	<u>Startup, shutdown, and malfunction plan (SSMP) to be maintained in Plant files.</u>

<u>Monitoring</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subparts SS, FFFF Citations</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<p><u>Continuous Process Vent - Group 2</u></p> <p><u>(K06/E-325-Product Separation and Solvent Recovery – Recovery Device)</u></p>	<p><u>40 C.F.R. § 63.2455 (c)</u></p> <p><u>40 C.F.R. § 63.993 (c) (2)</u></p> <p><u>40 C.F.R. §§ 63.996 (c) (1) – (6)</u></p>	<p><u>Continuously monitor Condenser E-325 vent gas exit (product side) temperature.</u></p> <p><u>Condenser (E-325) vent gas temperature CPMS must be installed, calibrated, operated and maintained per manufacturer’s specification.</u></p> <p><u>Establish a range for proper operation and submit information (range, justification and operating cycles) with Notification of Compliance status.</u></p>	<p><u>Condenser vent gas exit temperature will be monitored using a thermocouple.</u></p> <p><u>Information regarding CPMS installation, calibration, operation and maintenance will be maintained in the Plant files.</u></p> <p><u>See NOCS for range of proper operation.</u></p> <p><u>A data acquisition and handling system will be used to record product side temperature in accordance with 40 C.F.R. § 63.998 (b).</u></p>

<u>Recordkeeping</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subparts A, G, SS, FFFF Citations</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
	<u>General Provisions</u> <u>40 C.F.R. § 63.10 (b) (1)</u>	<u>Maintain required records for five years except as otherwise provided by this permit.</u>	<u>Documentation to be maintained in Plant files.</u>
	<u>40 C.F.R. § 63.2520 (d)</u>	<u>Maintain a copy of all compliance reports and any subsequent addendums or revisions.</u>	<u>Documentation to be maintained in Plant files.</u>
<u>Initial Applicability Determination</u>	<u>40 C.F.R. § 63.2435 (a)-(b)</u> <u>40 C.F.R. § 63.2455 (b),</u> <u>40 C.F.R. § 63.115 (d)</u> <u>40 C.F.R. § 63.2515 (b)</u>	<u>Maintain records and supporting documentation to determine MON applicability to process equipment and operations.</u>	<u>Documentation to be maintained in Plant files.</u>
<u>Batch Process Vents - Operating scenarios</u>	<u>40 C.F.R. §§ 63.2525 (b) and (c)</u>	<u>Keep record of each operating scenario and a schedule or log of operating scenarios, updated each time a new operating scenario is put into operation</u>	<u>Documentation to be maintained in Plant files.</u>
<u>Group 2 Batch Process Vents (K04 Solvent Tank) (K05 Reactor) (K08 Hold Tank) (Group 2 Batch Process Vents are uncontrolled emissions greater than 200 lbs/yr but less than 10,000 lbs/yr)</u>	<u>40 C.F.R. § 63.2525 (e)</u>	<u>Record the following information for Group 2 batch process vents:</u> <ul style="list-style-type: none"> • <u>Day batch was completed</u> • <u>If batch was standard or non-standard</u> • <u>The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch.</u> • <u>Records of the daily 365-day rolling summations of emissions, or alternative records that correlate to the emissions (e.g., number of batches), calculated no less frequently than monthly.</u> 	<u>Documentation to be maintained in Plant files.</u>
<u>Safety Relief Device</u>	<u>40 C.F.R. § 63.2525 (f),</u> <u>40 C.F.R. § 63.2450 (p)</u>	<u>Record each time a safety relief device opens to the air to avoid unsafe condition</u>	<u>Documentation to be maintained in Plant files.</u>

<u>Recordkeeping</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subpart SS, FFFF Citation</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<p><u>Continuous Monitoring Parameter System (CPMS)</u></p> <p><u>Vent Gas (Product Side) Exit Temperature Measurement for Recovery Device</u></p> <p><u>(E-325)</u></p>	<p><u>40 C.F.R. § 63.2450 (k)</u> <u>40 C.F.R. §§63.998 (b) (1) - (3)</u></p>	<ul style="list-style-type: none"> • <u>Except as otherwise provided by this permit, record Condenser E-325 vent gas exit operating temperature at least once every 15 minutes or as otherwise specified below</u> <ul style="list-style-type: none"> <u>i) A record of values measured at least once every 15 minutes or each measured value for systems which measure more frequently than once every 15 minutes; or</u> <u>(ii) A record of block average values for 15-minute or shorter periods calculated from all measured data values during each period or from at least one measured data value per minute if measured more frequently than once per minute.</u> <u>(iii) Where data is collected from an automated continuous parameter monitoring system, the owner or operator may calculate and retain block hourly average values from each 15-minute block average period or from at least one measured value per minute if measured more frequently than once per minute, and discard all but the most recent three valid hours of continuous (15-minute or shorter) records, if the hourly averages do not exclude periods of CPMS breakdown or malfunction. An automated CPMS records the measured data and calculates the hourly averages through the use of a computerized data acquisition system.</u> • <u>Record the daily average product side operating temperature.</u> 	<p><u>A data acquisition and handling system will be used to record condenser vent exit gas temperature in accordance with 40 C.F.R. § 63.998 (b)</u></p>

<u>Recordkeeping</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subparts SS, FFFF Citation</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<p><u>Continuous Monitoring Parameter System (CPMS) Product Side Exit Temperature Measurement for Recovery Device (E-325)</u></p>	<p><u>40 C.F.R. § 63.2525 (g)</u> <u>40 C.F.R. § 63.2450 (k) (1)</u> <u>40 C.F.R. § 63.998 (a) (3)</u> <u>40 C.F.R. § 63.998 (b) (1), (2), and (3)</u> <u>40 C.F.R. § 63.998 (c) (1)</u> <u>40 C.F.R. § 63.998 (c) (3) (i)</u> <u>40 C.F.R. § 63.998 (c) (3) (ii)</u></p>	<p><u>Record the following information for Condenser E-325 exit vent gas temperature monitoring device</u></p> <ul style="list-style-type: none"> • <u>The procedure used for calibrating.</u> • <u>The date and time of completion of calibration and preventive maintenance.</u> • <u>The “as found” and “as left” CPMS readings, whenever an adjustment is made that affects the CPMS reading and a “no adjustment” statement otherwise</u> • <u>The start time and duration (or start and stop times) of any periods when the CPMS is inoperative</u> • <u>The occurrence and duration of each startup, shutdown, and malfunction of the CPMS during which excess emissions occur.</u> • <u>Documentation of whether procedures specified in the startup, shutdown, and malfunction plan were followed for each startup, shutdown, and malfunction during which excess emissions occurred.</u> • <u>Documentation of each startup, shutdown, and malfunction event.</u> • <u>Documentation that there were no excess emissions during each startup, shutdown, or malfunction event, as applicable.</u> • <u>The total duration of operating time during the reporting period.</u> • <u>Record the daily average for periods when the condenser exist vent gas temperature limit is exceeded.</u> 	<p><u>Documentation to be maintained in Plant files.</u></p>

<u>Recordkeeping</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subparts H, FFFF Citation</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<u>Equipment Leaks, General</u>	<u>40 C.F.R. § 63.2525 (a)</u> <u>40 C.F.R. §§ 63.181 (e) (1)-(e) (6);</u>	<u>Maintain records of the following information:</u> <ul style="list-style-type: none"> • <u>The identification of each product or product code produced.</u> • <u>Process equipment subject to the MON identified on a plant site plan, in log entries, or by other appropriate methods.</u> • <u>The dates of each pressure test, the test pressure, and the pressure drop observed during the test.</u> • <u>Records of any visible, audible, or olfactory evidence of fluid loss for equipment in hazardous air pollutant service.</u> • <u>When a process equipment train does not pass two consecutive pressure tests, the following information shall be recorded in a log and kept for 2 years:</u> <ul style="list-style-type: none"> - <u>The date of each pressure test and the date of each leak repair attempt.</u> - <u>Repair methods applied in each attempt to repair the leak.</u> - <u>The reason for the delay of repair.</u> - <u>The expected date for delivery of the replacement equipment and the actual date of delivery of the replacement equipment.</u> - <u>The date of successful repair.</u> 	<u>Documentation to be maintained in Plant files.</u>

<u>Reporting</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subpart FFFF Citation</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<u>Notification of Compliance Status (NOCS)</u>	<u>40 C.F.R. § 63.2520 (d)</u> <u>40 C.F.R. § 63.2520 (e)</u>	<u>Maintain a copy of the initial NOCS report and supporting documentation and any subsequent revisions.</u>	<u>Revised NOCS provided in Section T of permit application.</u>
<u>Schedule of Reports</u>	<u>40 C.F.R. § 63.2520 (b) and Table 8 of Subpart FFFF</u>	<u>Semi-annual compliance reporting periods . First reporting period begins on the compliance date and extends to June 30 or December 31; whichever is later (thus the first reporting period is longer than 6 months).</u>	<u>Submit reports within 60 days of each calendar half or as otherwise allowed by Regulation 30 operating permit.</u>
<u>Semi-annual Compliance Report Required Information</u> <u>General</u>	<u>40 C.F.R. § 63.2520 (e)</u>	<u>The report shall include company name, compliance certification and reporting period covered.</u>	<u>To be provided in semi-annual compliance report.</u>
<u>Semi-annual Compliance Report Required Information Continued.</u> <u>SSM Events</u>	<u>40 C.F.R. § 63.2520 (e) (4)</u>	<u>For each SSM event that caused excess emissions of hazardous air pollutants, report whether the actions were consistent with the SSMP procedures and a brief discussion of each malfunction.</u>	<u>To be provided in semi-annual compliance report.</u>

<u>Reporting</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subpart FFFF Citation</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<p><u>Semi-annual Compliance Report Required Information Continued, Deviations</u></p>	<p><u>40 C.F.R. § 63.2520 (e) (5)</u></p>	<ul style="list-style-type: none"> • <u>Report any deviation from emission limits, operating limit, or work place standard of applicable Subpart FFF provisions.</u> • <u>For the CPMS used to monitor and record Condenser E-325 vent gas exit temperature, report the following information if a deviation of an emission limit or operating limit occurs:</u> <ul style="list-style-type: none"> - <u>date and time that CPMS inoperative.</u> - <u>date and time that each deviation started and stopped and whether each deviation occurred during a period of SSM.</u> - <u>a summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total operating time of the process.</u> - <u>a breakdown of the total duration of the deviations of the process that are due to startup, shutdown, process problems, other known causes, and other unknown causes.</u> - <u>a summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the operating time.</u> - <u>identify the HAPs in the emission stream.</u> - <u>the operating day average value of the condenser vent exit gas temperature for each day when the deviation occurred.</u> 	<p><u>To be provided in semi-annual compliance report.</u></p>

<u>Reporting</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subpart FFFF Citation</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<u>Semi-annual Compliance Report Continued,</u> <u>Operating scenarios</u>	<u>40 C.F.R. § 63.2520 (e) (7)</u>	<u>Submit each new operating scenario implemented during the reporting period</u>	<u>To be provided in semi-annual compliance report.</u>
<u>Semi-annual Compliance Report Continued,</u> <u>Process Unit groups</u>	<u>40 C.F.R. § 63.2520 (e) (8)</u>	<u>Submit records of any new or re-determination of process unit group</u>	<u>To be provided in semi-annual compliance report.</u>
<u>Semi-annual Compliance Report</u> <u>Equipment Leaks</u>	<u>40 C.F.R. § 63.2520 (e) (9)</u>	<u>Report the following :</u> <u>(1) Batch product process equipment train identification;</u> <u>(2) The number of pressure tests conducted;</u> <u>(3) The number of pressure tests where the equipment train failed the pressure test;</u> <u>(4) The facts that explain any delay of repairs.</u>	<u>To be provided in semi-annual compliance report.</u>

<u>Reporting</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subpart FFFF Citation</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<p><u>Semi-annual Compliance Report</u></p> <p><u>Process Changes</u></p>	<p><u>40 C.F.R. § 63.2520 (e) (10)</u></p>	<p><u>Report the following information:</u></p> <ul style="list-style-type: none"> • <u>A process change, or change any of the information submitted in the NOCS report or a previous compliance report, that is not within the scope of an existing operating scenario. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch</u> • <u>Other process change or changes (except for Group 2 vent becoming a Group 1 vent) in any of the information submitted in the NOCS report or a previous report changes, that is not within the scope of an existing operating scenario.</u> <p><u>The report must include the following information :</u></p> <ul style="list-style-type: none"> - <u>A description of the process change.</u> - <u>Revisions to any of the information reported in the original notification of compliance status report.</u> - <u>Information required by the notification of compliance status report for changes involving the addition of processes or equipment at the affected source.</u> 	<p><u>To be provided in semi-annual compliance report.</u></p>

<u>Reporting</u>			
Parameter and/or Affected Equipment	Subpart FFFF Citation	Requirements	Compliance Demonstration and/or Comments
Semi-annual Compliance Report Other Process Changes	40 C.F.R. § 63.2520 (e) (10), continued	Submit a report 60 days before the scheduled implementation date any change from Group 2 to Group 1. The report must include the following information : <ul style="list-style-type: none"> - A description of the process change. - Revisions to any of the information reported in the original notification of compliance status report. - Information required by the notification of compliance status report for changes involving the addition of processes or equipment at the affected source. 	Management of Change Procedure. Submit report within time frame of regulatory provision.
Semi-annual Compliance Report CPMS Exit (Product Side Temperature for Recovery Device (E-325)	40 C.F.R. § 63.999 (c) (1) Periodic reports	CPMS report for shall include dates, total source operating time and information identified in specified subpart when parameter outside range.	To be provided in semi-annual compliance report.
Semi-annual Compliance Report CPMS Vent Gas Exit (Product Side) Temperature for Recovery Device (E-325)	40 C.F.R. § 63.2520 (d) (2)	Submit the result of Condenser E-325 TRE Index evaluation as an addendum to Notification of Compliance Status Report with the semi-annual compliance report or within 60 days following completion of vent measurements, whichever is later.	
Batch Process Vent – Group 2 – Equipment Washes (K05/E400 Reactor/Condenser)	40 C.F.R. §§ 63.2460 (c) (1), (c) (2) (v); 40 C.F.R. § 63.1257 (d) (2) (i) (C) (4) (ii), 40 C.F.R. § 63.1257 (d) (3) (iii) (B)	Include the one-time initial demonstration that Condenser E-400 is properly operated in the Notification of Compliance Status Report	To be submitted in semi-annual compliance report.

<u>Testing</u>			
<u>Parameter and/or Affected Equipment</u>	<u>Subpart FFFF Citation</u>	<u>Requirements</u>	<u>Compliance Demonstration and/or Comments</u>
<u>Continuous Process Vent - Group 2</u> <u>(K06/E-325-Product Separation and Solvent Recovery – Recovery Device</u>	<u>40 C.F.R. § 63.2455 (b)</u> <u>40 C.F.R. § 63.115 (d) (ii)</u>	<u>Perform the following measurements for the representative operating condition expected to yield the lowest TRE index value for Condenser E-325 exit vent gas:</u> <ul style="list-style-type: none"> ● <u>vent stream flow rate</u> ● <u>net vent stream heating value</u> ● <u>total organic carbon emission rate</u> ● <u>total organic HAP emission rate</u> 	<u>Conduct TRE Index evaluation with 180 days of commencement of operation.</u>