



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

07/31/01

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

02-43-12-0034
Tomen Agro, Inc.
Stephen V. Lihwa
3647 Shepard Road
Perry, OH 44081

Dear Stephen V. Lihwa:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 05/08/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 07/31/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 02-43-12-0034 to:
Tomen Agro, Inc.
 3647 Shepard Road
 Perry, OH 44081

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P001 (PMM Process - Chlorinators and Reactors) This emissions unit includes R-101 A to F - six chlorinator reactors, the R-2 (R-213) and R-3 (R-211) Reactor Systems.	BL-416A/B/C - Vacuum Pumps. P010 (Captan Process - North Dryer) DR-402 - North Dryer.	Station. P020 (PMM Process - Carbon Disulfide Unloading and Storage) This emissions unit includes RR-3 - Carbon Disulfide Unloading Station and T-1045 A/B and Carbon Disulfide Storage Tanks.
P002 (PMM Process - Distillation Column) C-202 - Distillation Column.	P012 (Captan Process - South Vacuum Filter and Slurry Tank) This emission unit includes F-421 - South Vacuum Filter and T-414 - Captan Slurry Tank.	P021 (Air Stripper) C-561 - Wastewater Air Stripper
P003 (THPI Process - Reactors) R-331A/B - THPI Reactors.	P013 (THPI Process - THPI Feeder and Dissolving Tank) This emission unit includes WB-406A/B - THPI Weigh Belt and T-409 Dissolving Tank.	
P004 (THPI Process - Flaker) FL-342 - THPI Flaker.		
P006 (Captan Process - South Dryer) DR-401 - South Dryer.	P018 (PMM Process - By Product Storage and Loading) This emissions unit includes T-1050 - By-Product Storage Tank, RR-1S By-product Railcar Loading Station and RR-4 By-product Iso-Container Loading	
P009 (Captan Process - North Vacuum Filter, Pump & Receivers) F-441 - North Vacuum Filter Face Sweep and		

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
 2110 East Aurora Road
 Twinsburg, OH 44087
 (330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

 Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by

January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the 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 federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen 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 paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

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 (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. For purposes of 40 CFR, Part 63, the four manufacturing process units (MPUs) at this facility are listed below.

The perchloromethylmercaptan (PMM) chemical manufacturing process unit (CMPU), including the following emissions units:

PMM process-Chlorinators and Reactors (P001);
PMM process-Distillation Column (P002);
PMM process-By-Product Storage and Loading (P018); and
PMM process-Carbon Disulfide Unloading and Storage (P020).

The Captan MPU, including the following emissions units:

Captan Process-South Dryer (P006);
Captan Process-North Vacuum Filter, Pump & Receivers (P009);
Captan Process-North Dryer (P010); and
Captan Process-South Vacuum Filter and Slurry Tank (P012).

The tetrahydrophthalic anhydride/tetrahydrophthalimide (THPA/I) CMPU, including the following emissions unit:

THPI Process Reactors (P003).

The tetrahydrophthalimide (THPI) MPU, including the following emissions units:

THPI Process Flakers (P004); and
THPI Process - THPI Feeder and Dissolving Tank (P013).

Note: in order to assist both the permittee and Ohio EPA in locating record keeping and reporting requirements to demonstrate or determine compliance, (RK) will be inserted at the beginning of every section containing record keeping requirements and (RP) will be inserted at the beginning of every section containing reporting requirements.

A. State and Federally Enforcable Section (continued)

2. Requirements A.2. through A.34. apply to the PMM CMPU.

The permittee shall control emissions of organic hazardous air pollutants (HAPs) from the PMM CMPU to the level represented by the following equation:

$$E = (0.02 * \text{summation of EPV1}) + (\text{summation of EPV2}) + (0.05 * \text{summation of ES1}) + (\text{summation of ES2}) + (0.02 * \text{summation of ETR1}) + (\text{summation of ETR2}) + (\text{summation of EWW1}) + (\text{summation of EWW2})$$

where:

E = emission rate, in tons per year, allowed for the PMM CMPU;

summation of EPV1 = summation of the uncontrolled emissions, in tons per year, from all Group 1 process vents, as defined in 40 CFR 63.111;

summation of EPV2 = summation of the actual emissions, in tons per year, from all Group 2 process vents, as defined in 40 CFR 63.111;

summation of ES1 = summation of the uncontrolled emissions, in tons per year, from all Group 1 storage vessels, as defined in 40 CFR 63.111;

summation of ES2 = summation of the actual emissions, in tons per year, from all Group 2 storage vessels, as defined in 40 CFR 63.111;

summation of ETR1 = summation of the uncontrolled emissions, in tons per year, from all Group 1 transfer racks, as defined in 40 CFR 63.111;

summation of ETR2 = summation of the actual emissions, in tons per year, from all Group 2 transfer racks, as defined in 40 CFR 63.111;

summation of EWW1 = summation of the actual emissions, in tons per year, from all Group 1 wastewater streams, as defined in 40 CFR 63.111; and

summation of EWW2 = summation of the actual emissions, in tons per year, from all Group 2 wastewater streams, as defined in 40 CFR 63.111.

The emissions level represented by this equation is dependent on the emission points in the PMM CMPU. The level is not fixed and can change as the emissions from each emission point change or as the number of emission points in the PMM CMPU changes.

The permittee shall comply with the above emission limitation by complying with the requirements specified in 40 CFR 63.113 through 63.123 and 40 CFR 63.126 through 63.152. If compliance with these requirements is maintained, the permittee is not required to calculate the annual emission rate specified above.

A. State and Federally Enforcable Section (continued)

3. a. (RK) The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the CMPU during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. (Startup, shutdown, and malfunction are defined in 40 CFR 63.2.) The purpose of the SSMP is to:
- i. ensure that, at all times, the permittee operates and maintains the CMPU, including the associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards;
 - ii. ensure that the permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAPs; and
 - iii. reduce the reporting burden associated with periods of startup, shutdown, and malfunction.

(In order to satisfy the aforementioned SSMP requirements, the permittee may use the PMM CMPU's Standard Operating Procedures manual or other plan, provided the alternative plan meets all the requirements of the SSMP and are made available for inspection when requested by the Administrator.)

- b. During periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the CMPU (including the associated air pollution control equipment) in accordance with the procedures specified in the SSMP.
- c. Determination of whether acceptable operation and maintenance procedures are being employed will be based upon information available to the Administrator and the Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSMP required by this permit), review of operation and maintenance records, and inspection of the CMPU.
- d. Based upon the results of the above-referenced determination, the Administrator and/or the Director may require that the permittee make changes to the SSMP for the CMPU. The Administrator and/or the Director may require reasonable revisions to a SSMP if the Administrator/or and the Director finds the plan:
 - i. does not address a startup, shutdown, or malfunction event that has occurred;
 - ii. fails to provide for the operation of the CMPU (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to levels required by all relevant standards; or
 - iii. does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.
- e. (RK) If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSMP at the time the permittee developed the plan, the permittee shall revise the SSMP within 45 days after the event to include detailed procedures for operating and maintaining the CMPU during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.
- f. (RK) When actions taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the CMPU's SSMP, the permittee shall maintain records for that event that demonstrate that the procedures specified in the SSMP were followed. In addition, the permittee shall maintain records of these events as specified in 40 CFR 63.10(b), including records of the occurrence and duration of each startup, shutdown, or malfunction of operation and each malfunction of the air pollution control equipment.
- g. (RK) The permittee shall maintain the written SSMP on record after it is developed to be made available for inspection, upon request, by the Administrator and/or the Director for the life of the CMPU or until the CMPU is no longer subject to the provisions of this section. In addition, if the SSMP is revised, the permittee shall keep previous (i.e., superseded) versions of the SSMP on record, to be made available for inspection, upon request, by the Administrator and/or the Director, for a period of five years after each revision to the plan.
- h. (RP) The permittee shall submit a semi-annual report confirming that actions taken during periods of startup, shutdown, and malfunction were consistent with the CMPU's SSMP as required under 40 CFR 63.10(d)(5). This report shall be delivered or postmarked by the thirtieth day following the end of each calendar half.

A. State and Federally Enforcable Section (continued)

i. (RP) If an action taken by the permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the CPMU's SSMP, the permittee shall record the actions taken for that event and shall report such actions to the Administrator and the Director within two working days after commencing actions inconsistent with the plan, followed by a letter, delivered or postmarked within seven working days after the end of the event, in accordance with 40 CFR 63.10(d)(5) [unless the permittee makes alternative reporting arrangements, in advance with the Administrator and/or the Director, pursuant to 40 CFR 63.10(d)(5)(ii)].

j. (RP) Excess emissions and continuous monitoring system (CMS) performance report and summary report. Excess emissions and parameter monitoring exceedances are defined in the relevant standards. The permittee of an affected source required to install a CMS by a relevant standard shall submit an excess emissions and continuous monitoring system performance report and/or summary report to the Administrator and the Director semiannually, except when:

i. more frequent reporting is specifically required by the relevant standard;

ii. the Administrator and/or the Director determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or

iii. the CMS data are to be used directly for compliance determination and the source experienced excess emissions, in which case quarterly reports shall be submitted. Once a source reports excess emissions, the source shall follow a quarterly reporting format until a request to reduce reporting frequency under 40 CFR 63.10(e)(3)(ii) is approved.

k. General record keeping requirements.

i. (RK) The permittee of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by 40 CFR, Part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

ii. (RK) The permittee of an affected source subject to the provisions of 40 CFR, Part 63 shall maintain relevant records for such source of the following information.

(a) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment).

(b) The occurrence and duration of each malfunction of the air pollution control equipment.

(c) All maintenance performed on the air pollution control equipment.

(d) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan [see 40 CFR 63.6(e)(3)].

(e) All information necessary to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan [see 40 CFR 63.6(e)(3)] when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of record keeping, in order to minimize the record keeping burden for conforming events.)

(f) Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods).

(g) All results of performance tests, CMS performance evaluations, and opacity and visible emission observations.

(h) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations.

(i) All CMS calibration checks.

(j) All adjustments and maintenance performed on CMS.

(k) Any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements under 40 CFR, Part 63, if the source has been granted a waiver under 40 CFR 63.10(f).

(l) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.

A. State and Federally Enforcable Section (continued)

iii. (RK) Record keeping requirement for applicability determinations. If a permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to a relevant standard or other requirement established under 40 CFR, Part 63, the permittee shall maintain a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the permittee believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow the Administrator and/or the Director to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis shall be performed in accordance with requirements established in the subparts of 40 CFR, Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under section 112, if any.

4. 40 CFR 63.104 - Heat Exchange System Requirements

The permittee's CMPU (as of the application date) meets the following condition specified in 40 CFR 61.104(a)(1); therefore, it is exempt from the requirements of 40 CFR 63.104: the heat exchange system, as defined in 40 CFR 63.101, is operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. If the permittee makes changes to the CMPU heat exchange system so that the system no longer meets the aforementioned exemption criteria, the permittee shall, as expeditiously as possible, comply with the applicable portions of 40 CFR 63.104.

5. 40 CFR 63.105 - Maintenance Wastewater Requirements

a. The permittee shall comply with the requirements of sections A.5.b. through A.5.e. for maintenance wastewaters containing those organic HAPs listed in Table 9 of 40 CFR, Part 63, Subpart G. (Maintenance wastewater is defined in 40 CFR 63.101.)

b. The permittee shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance). The descriptions shall:

i. specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities;

ii. specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and

iii. specify the procedures to be followed when clearing materials from process equipment.

c. The permittee shall modify and update the information required by section A.5.b. as needed following each maintenance procedure based upon the actions taken and the wastewaters generated in the preceding maintenance procedure.

d. The permittee shall implement the procedures described in sections A.5.b. and A.5.c. as part of the SSMP required under 40 CFR 63.6(e)(3).

e. (RK) The permittee shall maintain a record of the information required by sections A.5.b. and A.5.c. as part of the SSMP required under 40 CFR 63.6(e)(3).

A. State and Federally Enforcable Section (continued)

6. 40 CFR 63.113 through 63.118 - Process Vent Provisions

a. The permittee's CMPU presently (as of the application date) contains one Group 1 process vent, which is associated with emissions unit P002. The other process vents within the permittee's CMPU are currently classified as Group 2 vents. (Process vent is defined in 40 CFR 63.101 and Group 1 and 2 process vents are defined in 40 CFR 63.111.)

b. In accordance with 40 CFR 63.100(m), if a change causes a Group 2 emission point to become a Group 1 emission point, then the permittee shall comply with the requirements of 40 CFR, Part 63, Subpart G for the Group 1 emission point as expeditiously as practicable, but in no event later than 3 years after the emission point becomes Group 1.

c. (RK) For the process vents with the TRE index value greater than 4.0 under 40 CFR 63.113(e) or greater than 1.0 under 40 CFR 63.113(a)(3) or 63.113(d), the permittee shall maintain up-to-date, readily accessible records of the following:

i. any process changes as defined in 40 CFR 63.115(e); and

ii. any recalculation of the TRE index value pursuant to 40 CFR 63.115(e).

d. (RK) Whenever a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, the permittee shall record the following information:

i. a description of the process change; and

ii. the results of the recalculation of the TRE index value required under 40 CFR 63.115(e).

e. Whenever a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent to become a Group 1 process vent, the permittee shall submit a report to the Administrator and the Director within 180 calendar days after the process change as specified in 40 CFR 63.151(j). The report shall include the following:

i. a description of the process change;

ii. the results of the recalculation of the flow rate, organic HAP concentration, and TRE index value required under 40 CFR 63.115(e); and

iii. a statement that the permittee will comply with the provisions of 40 CFR 63.113 for Group 1 process vents by the dates specified in 40 CFR, Part 63, Subpart F.

f. Whenever a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, the permittee shall submit a report to the Administrator and the Director within 180 calendar days after the process change. The report may be submitted as part of the next periodic report. The report shall include the following:

i. a description of the process change;

ii. the results of the recalculation of the TRE index value required under 40 CFR 63.115(e); and

iii. a statement that the permittee will comply with the requirements specified in 40 CFR 63.113(d).

A. State and Federally Enforcable Section (continued)

g. The permittee of a Group 1 process vent, as defined in 40 CFR 63.101, shall comply with one of three requirements listed under 40 CFR 63.113. The permittee shall comply with the following from the list:

i. Reduce emissions of total organic HAPs by 98 weight-percent or to a concentration of 20 parts per million by volume, whichever is less stringent. For combustion devices, the emission reduction or concentration shall be calculated on a dry basis, corrected to 3 percent oxygen, and compliance can be determined by measuring either organic HAPs or total organic carbon using the procedures in 40 CFR 63.116.

(a) Compliance with the above requirement may be achieved by using any combination of combustion, recovery, and/or recapture devices, except that a recovery device shall not be used to comply by reducing emissions of total HAPs by 98 weight-percent, except as provided below.

(b) The permittee may use a recovery device, alone or in combination with one or more combustion or recapture devices, to reduce emissions of total HAPs by 98 weight-percent if all the following conditions are met:

(i) the recovery device (and any combustion device or recapture device which operates in combination with the recovery device to reduce emissions of total HAPs by 98 weight-percent) was installed before the date of proposal of the Subpart of 40 CFR, Part 63 that makes 40 CFR, Part 63, Subpart G applicable to process vents in the CMPU;

(ii) the recovery device that will be used to reduce emissions of total organic HAPs by 98 weight-percent is the last recovery device before emission to the atmosphere;

(iii) the recovery device, alone or in combination with one or more combustion or recapture devices, is capable of reducing emissions of total organic HAPs by 98 weight-percent, but is not capable of reliably reducing emissions of total organic HAPs to a concentration of 20 parts per million by volume; and

(iv) if the permittee disposed of the recovered material, the recovery device would comply with the above requirements for recapture devices.

h. If a boiler or process heater is used to comply with the percent reduction requirement or concentration limit specified in A.6.g.ii., then the vent stream shall be introduced into the flame zone of such a device.

i. Halogenated vent streams from Group 1 process vents that are combusted shall be controlled according to section A.6.i.i. or A.6.i.ii.

i. If a combustion device is used to comply with section A.6.g.ii. for a halogenated vent stream, then the gas stream exiting the combustion device shall be conveyed to a halogen reduction device, such as a scrubber, before it is discharged to the atmosphere.

(a) Except as provided in section A.6.i.i.(b), the halogen reduction device shall reduce overall emissions of hydrogen halides and halogens, as defined in 40 CFR 63.111, by 99 percent or shall reduce the outlet mass of total hydrogen halides and halogens to less than 0.45 kilogram per hour, whichever is less stringent.

(b) If a scrubber or other halogen reduction device was installed prior to December 31, 1992, the device shall reduce overall emissions of hydrogen halides and halogens, as defined in 40 CFR 63.111, by 95 percent or shall reduce the outlet mass of total hydrogen halides and halogens to less than 0.45 kilograms per hour, whichever is less stringent.

ii. A halogen reduction device, such as a scrubber or other technique, may be used to reduce the vent stream halogen atom mass emission rate to less than 0.45 kilogram per hour prior to any combustion control device, and thus make the vent stream nonhalogenated; the vent stream must comply with the requirements of section A.6.g.i. or A.6.g.ii.

A. State and Federally Enforcable Section (continued)

j. (RK/RP) The permittee of a Group 2 process vent having a flow rate greater than or equal to 0.005 standard cubic meter per minute, a HAP concentration greater than or equal to 50 parts per million by volume, and a TRE index value greater than 1.0 but less than or equal to 4.0 shall maintain a TRE index value greater than 1.0 and shall comply with the monitoring of recovery device parameters in 40 CFR 63.114(b) or (c), the TRE index calculations of 40 CFR 63.115, and the applicable reporting and record keeping provisions of 40 CFR 63.117 and 63.118. Such permittee is not subject to any other provisions of 40 CFR 63.114 through 63.118.

k. (RK/RP) The permittee of a Group 2 process vent with a TRE index value greater than 4.0 shall maintain a TRE index value greater than 4.0, comply with the provisions for calculation of a TRE index value in 40 CFR 63.115 and the reporting and record keeping provisions in 40 CFR 63.117(b) and 63.118(c) and (h), and is not subject to monitoring or any other provisions of 40 CFR 63.114 through 63.118.

l. (RK/RP) The permittee of a Group 2 process vent with a flow rate less than 0.005 standard cubic meter per minute shall maintain a flow rate less than 0.005 standard cubic meter per minute; comply with the Group determination procedures in 40 CFR 63.115(a), (b), and (e); and the reporting and record keeping requirements in 40 CFR 63.117(c), 40 CFR 63.118(d), and 40 CFR 63.118(i); and is not subject to monitoring or any other provisions of 40 CFR 63.114 through 63.118.

m. (RK/RP) The permittee of a Group 2 process vent with a total organic HAP concentration less than 50 parts per million by volume shall maintain a total organic HAP concentration less than 50 parts per million by volume; comply with the Group determination procedures in 40 CFR 63.115(a), (c), and (e); the reporting and record keeping requirements in 40 CFR 63.117(d) and 63.118(e) and (j); and is not subject to monitoring or any other provisions of 40 CFR 63.114 through 63.118.

n. The permittee of a process vent complying with section A.6.g.i. or A.6.g.ii. is not required to perform the group determination described in 40 CFR 63.115.

o. Off-site control or on-site control not owned or operated by the permittee. This section applies to gas streams that have the characteristics specified in 40 CFR 63.107(b) through (h) or meet the criteria specified in 40 CFR 63.107(i); that are transferred for disposal to an on-site control device (or other compliance equipment) not owned or operated by the permittee of the source generating the gas stream, or to an off-site control device or other compliance equipment; and that have the characteristics (e.g., flow rate, total organic HAP concentration, or TRE index value) of a Group 1 process vent, determined at the point of transfer.

i. The permittee transferring the gas stream shall:

(a) Comply with the provisions specified in 40 CFR 63.114(d) for each gas stream prior to transfer.

(b) Notify the transferee that the gas stream contains organic HAPs that are to be treated in accordance with the provisions of this section. The notice shall be submitted to the transferee initially and whenever there is a change in the required control.

ii. The permittee may not transfer the gas stream unless the transferee has submitted to the Administrator and the Director a written certification that the transferee will manage and treat any gas stream transferred under this section and received from a source subject to the requirements of this section in accordance with the requirements of either 40 CFR 63.113 through 63.118, or 40 CFR 63.102(b), or 40 CFR, Part 63, Subpart D if alternative emission limitations have been granted to the transferor in accordance with those provisions. The certifying entity may revoke the written certification by sending a written statement to the Administrator and the Director and the permittee giving at least 90 days notice that the certifying entity is rescinding acceptance of responsibility for compliance with the regulatory provisions listed in this section. Upon expiration of the notice period, the permittee may not transfer the gas stream to the transferee. Records retained by the transferee shall be retained in accordance with 40 CFR 63.103(c).

iii. By providing this written certification to the Administrator and the Director, the certifying entity accepts responsibility for compliance with the regulatory provisions listed in section A.6.o.ii. with respect to any transfer covered by the written certification. Failure to abide by any of those provisions with respect to such transfers may result in enforcement action by the Administrator and/or the Director against the certifying entity in accordance with the enforcement provisions applicable to violations of these provisions by permittees of sources.

iv. Written certifications and revocation statements to the Administrator and the Director from the transferees of such gas streams shall be signed by a responsible official of the certifying entity, provide the name and address of the certifying entity, and be sent to the Administrator and the Director. Such written certifications are not transferable by the transferee.

A. State and Federally Enforcable Section (continued)

7. 40 CFR 63.114 Process vent provisions - monitoring requirements

a. Each permittee of a process vent that uses a combustion device to comply with the requirements in 40 CFR 63.113(a)(1) or (a)(2), or that uses a recovery device or recapture device to comply with the requirements in 40 CFR 63.113(a)(2), shall install monitoring equipment specified in sections A.7.a.i. and A.7.a.ii. All monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.

i. Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.

(a) Where an incinerator other than a catalytic incinerator is used, a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.

ii. Where a scrubber is used with an incinerator, boiler, or process heater in the case of halogenated vent streams, the following monitoring equipment is required for the scrubber.

(a) A pH monitoring device equipped with a continuous recorder shall be installed to monitor the pH of the scrubber effluent.

(b) A flow meter equipped with a continuous recorder shall be located at the scrubber influent for liquid flow. Gas flow rate shall be determined using one of the procedures specified in the following sections.

(i) The permittee may determine gas flow rate using the design blower capacity, with appropriate adjustments for pressure drop.

(ii) The permittee may prepare and implement a gas flow rate determination plan that documents an appropriate method which will be used to determine the gas flow rate. The plan shall require determination of gas flow rate by a method which will at least provide a value for either a representative or the highest gas flow rate anticipated in the scrubber during representative operating conditions other than startups, shutdowns, or malfunctions. The plan shall include a description of the methodology to be followed and an explanation of how the selected methodology will reliably determine the gas flow rate, and a description of the records that will be maintained to document the determination of gas flow rate. The permittee shall maintain the plan as specified in 40 CFR 63.103(c).

b. Each permittee of a process vent with a TRE index value greater than 1.0 as specified under 40 CFR 63.113(a)(3) or 63.113(d) that uses one or more recovery devices shall install either an organic monitoring device equipped with a continuous recorder or the monitoring equipment specified in section A.7.a.ii. All monitoring equipment shall be installed, calibrated, and maintained according to the manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately. Monitoring is not required for process vents with TRE index values greater than 4.0 as specified in 40 CFR 63.113(e).

i. Where a condenser is the final recovery device in the recovery system, a condenser exit (product side) temperature monitoring device equipped with a continuous recorder shall be used.

c. A permittee of a process vent may request approval to monitor parameters other than those listed in section A.7.a. or A.7.b. The request shall be submitted according to the procedures specified in 40 CFR 63.151(f) or 40 CFR 63.152(e). Approval shall be requested if the permittee:

i. uses a combustion device other than an incinerator, boiler, process heater, or flare; or

ii. maintains a TRE greater than 1.0 but less than or equal to 4.0 without a recovery device or with a recovery device other than the recovery devices listed in sections A.7.a. and A.7.b.; or

iii. uses one of the combustion or recovery or recapture devices listed in sections A.7.a. and A.7.b., but seeks to monitor a parameter other than those specified in sections A.7.a. and A.7.b.

d. (RK) The permittee of a process vent shall comply with section A.7.d.i. or A.7.d.ii. for any bypass line between the origin of the gas stream [i.e., at an air oxidation reactor, distillation unit, or reactor as identified in 40 CFR 63.107(b)] and the point where the gas stream reaches the process vent, as described in 40 CFR 63.107, that could divert the gas stream directly to the atmosphere. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to this section.

i. Properly install, maintain, and operate a flow indicator that takes a reading at least once every fifteen minutes. Records shall be generated as specified in 40 CFR 63.118(a)(3). The flow indicator shall be installed at the entrance to any bypass line that could divert the gas stream to the atmosphere; or

A. State and Federally Enforcable Section (continued)

ii. Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the non-diverting position and the gas stream is not diverted through the bypass line. In a letter dated October 16, 1998, the Administrator approved the following: the permittee shall maintain a continuous record of valve (by-pass valve) position as a means to determine a by-pass condition. The valves are either fully opened or fully closed and are not designed to regulate or adjust flow. The positions of the valves shall be confirmed on a continuous basis by limit switches via a Distribution Control System. The limit switches shall be maintained and tested in accordance with the manufacturer's recommendations.

e. The permittee shall establish a range that indicates proper operation of the control or recovery device for each parameter monitored under sections A.7.a., A.7.b., and A.7.c. In order to establish the range, the information required in 40 CFR 63.152(b) shall be submitted in the Notification of Compliance Status or the operating permit application or amendment. The range may be based upon a prior performance test conducted for determining compliance with a regulation promulgated by USEPA, and the permittee is not required to conduct a performance test under 40 CFR 63.116, if the prior performance test was conducted using the same methods specified in 40 CFR 63.116 and either no process changes have been made since the test, or the permittee can demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process changes.

8. 40 CFR 63.116 Process vent provisions - performance test methods and procedures to determine compliance

Except as provided in 40 CFR 63.116(a) and (b), a permittee using a control device to comply with the organic HAP concentration limit or percent reduction efficiency requirements in 40 CFR 63.113(a)(2) shall conduct a performance test using the procedures in 40 CFR 63.116(c)(1) through (c)(4). The organic HAP concentration and percent reduction may be measured as either total organic HAP or as TOC minus methane and ethane according to the procedures specified.

The test shall be conducted in accordance with the testing requirements for emissions unit P002 specified in Part III of this Title V operating permit.

9. 40 CFR 63.117 Process vent provisions - reporting and record keeping requirements for group and TRE determinations and performance tests

a. (RK/RP) Each permittee subject to the control provisions for Group 1 process vents in 40 CFR 63.113(a) or the provisions for Group 2 process vents with a TRE index value greater than 1.0 but less than or equal to 4.0 in 40 CFR 63.113(d) shall:

i. keep an up-to-date, readily accessible record of the data specified in sections A.9.a.iii. through A.9.a.vi., as applicable, and

ii. if any subsequent TRE determinations or performance tests are conducted after the Notification of Compliance Status has been submitted, report the data in sections A.9.a.iii. through A.9.a.vi. in the next Periodic Report as specified in 40 CFR 63.152(c); and

iii. record and report the following when using a combustion device to achieve a 98 weight percent reduction in organic HAP or an organic HAP concentration of 20 parts per million by volume, as specified in 40 CFR 63.113(a)(2):

(a) The parameter monitoring results for incinerators, catalytic incinerators, boilers or process heaters specified in table 3 of 40 CFR, Part 63, Subpart G, and averaged over the same time period of the performance testing.

(b) For an incinerator, the percent reduction of organic HAP or TOC achieved by the incinerator determined as specified in 40 CFR 63.116(c), or the concentration of organic HAP or TOC (parts per million by volume, by compound) determined as specified in 40 CFR 63.116(c) at the outlet of the incinerator on a dry basis corrected to 3 percent oxygen.

iv. Record and report the following when using a scrubber following a combustion device to control a halogenated vent stream:

A. State and Federally Enforcable Section (continued)

(a) the percent reduction or scrubber outlet mass emission rate of total hydrogen halides and halogens as specified in 40 CFR 63.116(d);

(b) the pH of the scrubber effluent; and

(c) the scrubber liquid to gas ratio.

v. Record and report the following when achieving and maintaining a TRE index value greater than 1.0 but less than 4.0 as specified in 40 CFR 63.113(a)(3) or 63.113(d):

(a) the parameter monitoring results for absorbers, condensers, or carbon adsorbers, as specified in table 4 of 40 CFR, Part 63, Subpart G, and averaged over the same time period of the measurements of vent stream flow rate and concentration used in the TRE determination (both measured while the vent stream is normally routed and constituted); and

(b) the measurements and calculations performed to determine the TRE index value of the vent stream.

vi. Record and report the halogen concentration in the vent stream determined according to the procedures specified in 40 CFR 63.115(d)(2)(v).

b. (RK/RP) The permittee of a Group 2 process vent with a TRE index greater than 4.0 as specified in 40 CFR 63.113(e), shall maintain records of the measurements, engineering assessments, and calculations performed to determine the TRE index value of the vent stream. Documentation of engineering assessments shall include all data, assumptions, and procedures used for the engineering assessments, as specified in 40 CFR 63.115(d)(1).

10. 40 CFR 63.118 Process vent provisions - periodic reporting and record keeping requirements

a. (RK) Each permittee using a control device to comply with 40 CFR 63.113(a)(1) or (a)(2) shall maintain the following records up-to-date and readily accessible:

i. continuous records of the equipment operating parameters specified to be monitored under 40 CFR 63.114(a) and listed in table 3 of 40 CFR, Part 63, Subpart G or specified by the Administrator and/or the Director in accordance with 40 CFR 63.114(c) and 63.117(e);

ii. records of the daily average value of each continuously monitored parameter for each operating day determined according to the procedures specified in 40 CFR 63.152(f); and

iii. hourly records of whether the flow indicator specified under 40 CFR 63.114(d)(1) was operating and whether a diversion was detected at any time during the hour, as well as records of the times and durations of all periods when the gas stream is diverted to the atmosphere or the monitor is not operating.

b. (RK) Each permittee using a recovery device or other means to achieve and maintain a TRE index value greater than 1.0 but less than 4.0 as specified in 40 CFR 63.113(a)(3) or 63.113(d) shall maintain the following records up-to-date and readily accessible:

A. State and Federally Enforcable Section (continued)

- i. continuous records of the equipment operating parameters specified to be monitored under 40 CFR 63.114(b) and listed in table 4 of 40 CFR, Part 63, Subpart G or specified by the Administrator and/or the Director in accordance with 40 CFR 63.114(c) and 63.114(e); and
 - ii. records of the daily average value of each continuously monitored parameter for each operating day determined according to the procedures specified in 40 CFR 63.152(f).
- c. (RK) Each permittee subject to the provisions of 40 CFR, Part 63, Subpart G and who elects to demonstrate compliance with the TRE index value greater than 4.0 under 40 CFR 63.113(e) or greater than 1.0 under 40 CFR 63.113(a)(3) or 63.113(d) shall maintain up-to-date, readily accessible records of:
- i. any process changes as defined in 40 CFR 63.115(e); and
 - ii. any recalculation of the TRE index value pursuant to 40 CFR 63.115(e).
- d. (RK) Each permittee who elects to comply by maintaining a flow rate less than 0.005 standard cubic meter per minute under 40 CFR 63.113(f), shall maintain up-to-date, readily accessible records of the following:
- i. any process changes as defined in 40 CFR 63.115(e) that increase the vent stream flow rate;
 - ii. any recalculation or measurement of the flow rate pursuant to 40 CFR 63.115(e); and
 - iii. if the flow rate increases to 0.005 standard cubic meter per minute or greater as a result of the process change, the TRE determination performed according to the procedures of 40 CFR 63.115(d).
- e. (RK) Each permittee who elects to comply by maintaining an organic HAP concentration less than 50 parts per million by volume organic HAP concentration under 40 CFR 63.113(g) shall maintain up-to-date, readily accessible records of:
- i. any process changes as defined in 40 CFR 63.115(e) that increase the organic HAP concentration of the vent stream;
 - ii. any recalculation or measurement of the concentration pursuant to 40 CFR 63.115(e); and
 - iii. if the organic HAP concentration increases to 50 parts per million by volume or greater as a result of the process change, the TRE determination performed according to the procedures of 40 CFR 63.115(d).
- f. (RP) Each permittee who elects to comply with the requirements of 40 CFR 63.113 shall submit to the Administrator and the Director, periodic reports of the following recorded information according to the schedule in 40 CFR 63.152.
- i. reports of daily average values of monitored parameters for all operating days when the daily average values recorded under sections A.10.a. and A.10.b. were outside the ranges established in the Notification of Compliance Status or this operating permit;
 - ii. for Group 1 points, reports of the duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data as defined in 40 CFR 63.152(c)(2)(ii)(A); and
 - iii. reports of the times and durations of all periods recorded under section A.10.a.iii. when the gas stream is diverted to the atmosphere through a bypass line.

11. 40 CFR 63.119 through 63.123 - Storage Vessel Provisions.

This permittee's CMPU presently (as of the application date) contains no Group 1 storage vessels (as defined in Table 5 in Subpart G). All storage vessels within the permittee's CMPU are currently classified as Group 2.

In accordance with 40 CFR 63.100(m), if a change causes a Group 2 emission point to become a Group 1 emission point, then the permittee shall comply with the requirements of 40 CFR, Part 63, Subpart G for the Group 1 emission point as expeditiously as practicable, but in no event later than 3 years after the emission point becomes Group 1.

(RK) In accordance with 40 CFR 63.123(a), records showing the dimensions of each "storage vessel" and an analysis showing the capacity shall be maintained as long as the storage vessel retains its Group 1 or Group 2 status and is in operation.

A. State and Federally Enforcable Section (continued)

12. 40 CFR 63.126 through 63.130 - Transfer Operations Provisions

The permittee's CMPU presently (as of the application date) contains no Group I transfer operations (as defined in 40 CFR 63.111). All transfer operations within the permittee's CMPU are currently classified as Group 2.

In accordance with 40 CFR 63.100(m), if a change causes a Group 2 emission point to become a Group 1 emission point, then the permittee shall comply with the requirements of 40 CFR, Part 63, Subpart G for the Group 1 emission point as expeditiously as practicable, but in no event later than 3 years after the emission point becomes Group 1.

(RK) The permittee shall record and update annually the information as required under 40 CFR 63.130(f). The updated records shall include:

- a. an analysis demonstrating the design and actual annual throughput of the transfer rack;
 - b. an analysis documenting the weight-percent organic HAPs in the liquid loaded; and
 - c. an analysis documenting the annual rack weighted average HAP partial pressure of the transfer rack.
- i. For Group 2 transfer racks that are limited to transfer of organic HAPs with partial pressures less than 10.3 kilopascals, documentation of the organic HAPs (by compound) that are transferred shall be maintained. (Note: in this case the rack weighted average partial pressure does not need to be calculated.)
 - ii. For racks transferring one or more organic HAPs with partial pressures greater than 10.3 kilopascals, as well as one or more organic HAPs with partial pressures less than 10.3 kilopascals, a rack weighted partial pressure shall be documented. The rack weighted average HAP partial pressure shall be weighted by the annual throughput of each chemical transferred.

13. 40 CFR 63.132 through 63.147 - Process Wastewater Provisions

This permittee's CMPU presently (as of the application date) contains no Group I process wastewater streams (as defined in 40 CFR 63.111). All process wastewater streams within the permittee's CMPU are currently classified as Group 2.

In accordance with 40 CFR 63.100(m), if a change causes a Group 2 emission point to become a Group 1 emission point, then the permittee shall comply with the requirements of 40 CFR, Part 63, Subpart G for the Group 1 emission point as expeditiously as practicable, but in no event later than 3 years after the emission point becomes Group 1.

14. 40 CFR 63.148 - Leak Inspection Provisions

This closed-vent system is subject to 40 CFR 63.172. Therefore, the permittee shall comply with the provisions of 40 CFR 63.172 and is exempt from the requirements of this section.

15. 40 CFR 63.152 - General Reporting and Continuous Records

- a. (RP) The permittee of a source subject to 40 CFR, Part 63, Subpart G shall submit Periodic Reports.
 - i. Except as specified under sections A.15.a.v. and A.15.a.vi., a report containing the information in sections A.15.a.ii., A.15.a.iii., and A.15.a.iv. shall be submitted semiannually no later than 60 calendar days after the end of each six-month period. The first report shall be submitted no later than eight months after the date the Notification of Compliance Status is due and shall cover the six-month period beginning on the date the Notification of Compliance Status is due.
 - ii. Except as provided in section A.15.a.ii.(d), for a permittee of a source complying with the provisions of 40 CFR 63.113 through 63.147 for any emission points, Periodic Reports shall include all information specified in 40 CFR 63.117 and 63.118 for process vents, 40 CFR 63.122 for storage vessels, 40 CFR 63.129 and 63.130 for transfer operations, and 40 CFR 63.146 for process wastewater, including reports of periods when monitored parameters are outside their established ranges.
 - (a) For each parameter or parameters required to be monitored for a control device, the permittee shall establish a range of parameter values to ensure that the device is being applied, operated and maintained properly. These parameter values and the definition of an operating day shall be approved as part of and incorporated into the source's Notification of Compliance Status or operating permit, as appropriate (the permittee's operating day is 7 am to 7 am and all parameter values have been included in Part III of this permit).

A. State and Federally Enforcable Section (continued)

(b) The parameter monitoring data for Group 1 emission points and emission points included in emissions averages that are required to perform continuous monitoring shall be used to determine compliance with the required operating conditions for the monitored control devices or recovery devices. For each excursion, except for excused excursions, the permittee shall be deemed to have failed to have applied the control in a manner that achieves the required operating conditions.

(i) An excursion means any of the three cases listed in section A.15.a.ii.(b)(i)(1), A.15.a.ii.(b)(i)(2), or A.15.a.ii.(b)(i)(3). For a control device or recovery device where multiple parameters are monitored, if one or more of the parameters meets the excursion criteria in section A.15.a.ii.(b)(i)(1), A.15.a.ii.(b)(i)(2), or A.15.a.ii.(b)(i)(3), this is considered a single excursion for the control device or recovery device.

(1) When the daily average value of one or more monitored parameters is outside the permitted range.

(2) When the period of control device or recovery device operation is 4 hours or greater in an operating day and monitoring data are insufficient to constitute a valid hour of data for at least 75 percent of the operating hours.

(3) When the period of control device or recovery device operation is less than 4 hours in an operating day and more than one of the hours during the period of operation does not constitute a valid hour of data due to insufficient monitoring data.

(4) Monitoring data are insufficient to constitute a valid hour of data, as used in sections A.15.a.ii.(b)(i)(2) and A.15.a.ii.(b)(i)(3), if measured values are unavailable for any of the fifteen-minute periods within the hour. For data compression systems approved under 40 CFR 63.151(g)(4), monitoring data are insufficient to calculate a valid hour of data if there are less than four data values recorded during the hour.

(ii) The number of excused excursions for each control device or recovery device for each semiannual period is restricted to one excused excursion for each semiannual period. The semi-annual periods shall be defined as those that begin on April 22 and April 22 plus six months for each year.

(iii) A monitored parameter that is outside its established range or monitoring data that are not collected are excursions. However, if the conditions in section A.15.a.ii.(b)(iii)(1) or A.15.a.ii.(b)(iii)(2) are met, these excursions are not violations and do not count toward the number of excused excursions for determining compliance.

(1) Periods of start-up, shutdown, or malfunction. During periods of start-up, shutdown, or malfunction when the CMPU is operated during such periods in accordance with the CMPU's start-up, shutdown, and malfunction plan as required by 40 CFR 63.6(e)(3).

(2) Periods of nonoperation. During periods of nonoperation of the CMPU, or portion thereof, that results in cessation of the emissions to which the monitoring applies.

(iv) Nothing in section A.15.a.ii.(b) shall be construed to allow or excuse a monitoring parameter excursion caused by any activity that violates other applicable provisions of 40 CFR, Part 63, Subpart A, F, or G.

(v) Section A.15.a.ii.(b), except A.15.a.ii.(b)(iii), shall apply only to emission points and control devices or recovery devices for which continuous monitoring is required by 40 CFR 63.113 through 63.150.

(c) Periodic Reports shall include the daily average values of monitored parameters for both excused and unexcused excursions, as defined in section A.15.a.ii.(b)(i). For excursions caused by lack of monitoring data, the duration of periods when monitoring data were not collected shall be specified.

(d) The provisions of sections A.15.a.ii., A.15.a.ii.(a), A.15.a.ii.(b), and A.15.a.ii.(c) do not apply to any storage vessel for which the permittee is not required, by the applicable monitoring plan established under 40 CFR 63.120(d)(2), to maintain continuous records. If continuous records are required, the permittee shall specify, in the monitoring plan, whether the provisions of sections A.15.a.ii., A.15.a.ii.(a), A.15.a.ii.(b), and A.15.a.ii.(c) apply.

A. State and Federally Enforcable Section (continued)

- iii. If any performance tests are reported in a Periodic Report, the following information shall be included:
- (a) One complete test report shall be submitted for each test method used for a particular kind of emission point tested. A complete test report shall contain the information specified in section 40 CFR 63.152(b)(1)(ii).
 - (b) For additional tests performed for the same kind of emission point using the same method, results and any other information required in 40 CFR 63.117 for process vents, 40 CFR 63.129 for transfer operations, and 40 CFR 63.146 for process wastewater shall be submitted, but a complete test report is not required.
- iv. Periodic Reports shall include the information in sections A.15.a.iv.(a) through A.15.a.iv.(d), as applicable:
- (a) for process vents, reports of process changes as required under 40 CFR 63.118(g), (h), (i), and (j);
 - (b) any supplements required under 40 CFR 63.151(i) and (j);
 - (c) notification if any Group 2 emission point becomes a Group 1 emission point, including a compliance schedule as required in 40 CFR 63.100; and
 - (d) for gas streams sent for disposal pursuant to 40 CFR 63.113(i) or for process wastewater streams sent for treatment pursuant to 40 CFR 63.132(g), reports of changes in the identity of the transferee.
- v. The permittee of a CMPU shall submit quarterly reports for all emission points included in an emissions average.
- (a) The quarterly reports shall be submitted no later than sixty calendar days after the end of each quarter. The first report shall be submitted with the Notification of Compliance Status no later than five months after the compliance date specified in 40 CFR 63.100.
 - (b) The quarterly reports shall include the information specified in this section for all emission points included in an emissions average.
 - (i) the credits and debits calculated each month during the quarter;
 - (ii) a demonstration that debits calculated for the quarter are not more than 1.30 times the credits calculated for the quarter, as required under 40 CFR 63.150(e)(4);
 - (iii) the values of any inputs to the credit and debit equations in 40 CFR 63.150(g) and (h) that change from month to month during the quarter or that have changed since the previous quarter;
 - (iv) results of any performance tests conducted during the reporting period including one complete report for each test method used for a particular kind of emission point as described in section A.15.a.iii.; and
 - (v) reports of daily average values of monitored parameters for both excused and unexcused excursions as defined in section A.15.a.ii.(b)(1). (For excursions caused by lack of monitoring data, the duration of periods when monitoring data were not collected shall be specified.)
 - (c) Sections A.15.a.ii.(a) through A.15.a.ii.(c) shall govern the use of monitoring data to determine compliance for Group 1 and Group 2 points included in emissions averages. For storage vessels to which the provisions of sections A.15.a.ii.(a) through A.15.a.ii.(c) do not apply [as specified in section A.15.a.ii.(d)], the permittee is required to comply with the provisions of the applicable monitoring plan, and monitoring records may be used to determine compliance.
 - (d) Every fourth quarterly report shall include the following:
 - (i) a demonstration that annual credits are greater than or equal to annual debits as required by 40 CFR 63.150(e)(3); and
 - (ii) a certification of compliance with all the emissions averaging provisions in 40 CFR 63.150.
- vi. The permittee of a CMPU shall submit reports quarterly for particular emission points not included in an emissions average under the circumstances described in sections A.15.a.vi.(a) through A.15.a.vi.(e).
- (a) The permittee of a CMPU subject to 40 CFR, Part 63, Subpart G shall submit quarterly reports for a period of one year for an emission point that is not included in an emissions average if:
 - (i) The emission point has more excursions, as defined in section A.15.a.ii.(b), than the number of excused excursions allowed under section A.15.a.ii.(b)(ii) for a semiannual reporting period; and

A. State and Federally Enforcable Section (continued)

- (ii) The Administrator and the Director requests the permittee to submit quarterly reports for the emission point.
- (b) The quarterly reports shall include all information in sections A.15.a.ii., A.15.a.iii., and A.15.a.iv. applicable to the emission point(s) for which quarterly reporting is required under section A.15.a.vi.(a). Information applicable to other emission points within the CMPU shall be submitted in the semiannual reports required under section A.15.a.i.
- (c) Quarterly reports shall be submitted no later than 60 calendar days after the end of each quarter.
- (d) After quarterly reports have been submitted for an emission point for one year, the permittee may return to semiannual reporting for the emission point unless the Administrator and/or the Director requests the permittee to continue to submit quarterly reports.
- (e) Sections A.15.a.ii.(a) through A.15.a.ii.(c) shall govern the use of monitoring data to determine compliance for Group 1 emission points. For storage vessels to which the provisions of sections A.15.a.ii.(a) through A.15.a.ii.(c) do not apply [as specified in section A.15.a.ii.(d)], the permittee is required to comply with the provisions of the applicable monitoring plan, and monitoring records may be used to determine compliance.
- b. (RP) Other reports shall be submitted as specified in 40 CFR, Part 63, Subpart A or in 40 CFR 63.113 through 63.151. These reports are:
 - i. Reports of start-up, shutdown, and malfunction required by 40 CFR 63.10(d)(5). The start-up, shutdown and malfunction reports may be submitted on the same schedule as the Periodic Reports required under section A.15.a. instead of the schedule specified in 40 CFR 63.10(d)(5).
 - ii. For storage vessels, the notifications of inspections required by 40 CFR 63.122(h)(1) and (h)(2).
 - iii. For permittees of CMPUs required to request approval for a nominal control efficiency for use in calculating credits for an emissions average, the information specified in 40 CFR 63.150(i).
 - iv. If a permittee transfers for disposal a gas stream that has the characteristics specified in 40 CFR 63.107(b) through (h) or meets the criteria specified in 40 CFR 63.107(i) to an off-site location or an on-site location not owned or operated by the permittee of the CMPU and the vent stream was not included in the information submitted with the Notification of Compliance Status or a previous periodic report, the permittee shall submit a supplemental report. The supplemental report shall be submitted no later than July 23, 2001 or with the next periodic report, whichever is later. The report shall provide the information listed in sections A.15.b.iv.(a) through A.15.b.iv.(d).
 - (a) The CMPU that is the origin of all or part of the vent stream that exits the process vent.
 - (b) The type(s) of unit operations (i.e., an air oxidation reactor, distillation unit, or reactor) that creates the vent stream that exits the process vent.
 - (c) For a Group 2 process vent, the last recovery device, if any.
 - (d) For a Group 1 process vent, the identity of the transferee.
- c. (RP) A permittee subject to this 40 CFR, Part 63, Subpart G shall submit the information specified in sections A.15.c.i. through A.15.c.iv. with the operating permit application or as otherwise specified by the permitting authority. The permittee shall submit written updates as amendments to the operating permit application on the schedule and under the circumstances described in 40 CFR 63.151(j). Notwithstanding, if the permittee has an operating permit under 40 CFR, Part 70 or 71, the permittee shall follow the schedule and format required by the permitting authority.
 - i. The information specified in 40 CFR 63.151(f) or (g) for any emission points for which the permittee requests approval to monitor a unique parameter or use an alternative monitoring and recording system.
 - ii. The information specified in 40 CFR 63.151(d) for points included in an emissions average.
 - iii. The information specified in 40 CFR 63.151(e) for points not included in an emissions average.
 - iv. The information specified in 40 CFR 63.151(h) as applicable.

A. State and Federally Enforcable Section (continued)

- 16.** 40 CFR 63.162(c) Standards: general requirements for leak detection and repair program.
- a. Each piece of equipment in this process unit that is subject to the leak detection monitoring requirements of this permit shall be identified such that it can be distinguished readily from equipment that is not subject to the leak detection monitoring requirements. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, or by designation of process unit boundaries by some form of weatherproof identification.
 - b. Equipment that is in vacuum service is excluded from leak detection monitoring requirements.
 - c. When each leak is detected as specified in this permit, the following requirements apply:
 - i. a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment;
 - ii. the identification on a valve may be removed after it has been monitored and no leak has been detected during the follow-up monitoring;
 - iii. the identification on a connector may be removed after it has been monitored within the first three months after being returned to organic HAPs service and no leak has been detected; and
 - iv. the identification which has been placed on equipment determined to have a leak, except for a valve or connector that is subject to the requirements of section A.16.d.iii., may be removed after it is repaired.
- 17.** 40 CFR 63.163 Standards: pumps in light liquid service.
- a. The permittee shall monitor each pump monthly to detect leaks by the method specified in section A.24.
 - b. The instrument reading that defines a leak is 5,000 parts per million or greater for pumps handling polymerizing monomers.
 - c. Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected.
 - d. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in section A.21.
 - e. A first attempt at repair shall be made no later than five calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:
 - i. tightening of packing gland nuts; and
 - ii. ensuring that the seal flush is operating at design pressure and temperature.
 - f. Percent leaking pumps shall be determined by the following equation:
$$\%PI = [(PL - PS)/(PT - PS)] \times 100$$

where:

$\%PL$ = percent leaking pumps;

PL = number of pumps found leaking as determined through the monthly monitoring required in section A.17.a. and A.17.b.;

PT = total pumps in organic HAP service, including those that are exempt; and

PS = number of pumps leaking within one month of start-up during the current monitoring period.
 - g. Any pump that is designated as unsafe-to-monitor is exempt from the requirements of sections A.17.c. through A.17.e., if:
 - i. the permittee determines that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with sections A.17.c. through A.17.e.; and
 - ii. the permittee has a written plan that requires monitoring of the pump as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable.

A. State and Federally Enforcable Section (continued)

- 18.** 40 CFR 63.165 Standards: pressure relief devices in gas/vapor service.
- a. Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500 parts per million above background except as provided in section A.18.b., as measured by the method specified in section A.24.
 - b. After each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million above background, as soon as practicable, but no later than five calendar days after each pressure release, except as specified in section A.21.
 - c. No later than five calendar days after the pressure release and being returned to organic HAP service, the pressure relief device shall be monitored to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured in accordance with section A.24.
 - d. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device, as described in 40 CFR 63.172, is exempt from the requirements of sections A.18.a. through A.18.c.
 - e. Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of sections A.18.a. and A.18.b.
 - f. After each pressure release, a rupture disk shall be installed upstream of the pressure relief device as soon as practicable but no later than five calendar days after each pressure release, except:
 - i. if the equipment is isolated from the process until a repair is made; or
 - ii. if the repair must be delayed because it is technically infeasible before the next shutdown.
- 19.** 40 CFR 63.166 Standards: sampling connection systems.
- a. Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system.
 - b. Each closed-purge, closed-loop, or closed-vent system required by section A.19.a. shall:
 - i. return the purged process fluid directly to the process line; or
 - ii. collect and recycle the purged process fluid to a process; or
 - iii. be designed and operated to capture and transport the purged process fluid to a control device that complies with the requirements of 40 CFR 63.172; or
 - iv. collect, store, and transport the purged process fluid to a system or facility identified in 40 CFR 63.166(b)(4)(i), (ii) or (iii).
 - c. In-situ sampling systems and sampling systems without purges are exempt from the requirements of sections A.19.a. and A.19.b.
- 20.** 40 CFR 63.167 Standards: open-ended valves or lines.
- a. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and sections A.20.d. and A.20.e. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair.
 - b. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
 - c. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with section A.20.a. at all other times.
 - d. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of sections A.20.a. through A.20.c.
 - e. Open-ended valves or lines containing materials which would autocatalytically polymerize or, would present an explosion hazard, serious overpressure hazard, or other safety hazard if capped or equipped with a double block and bleed system as specified in sections A.20.a. through A.20.c. are exempt from the requirements of sections A.20.a. through A.20.c.

A. State and Federally Enforcable Section (continued)

- 21.** 40 CFR 63.168 Standards: valves in gas/vapor service and in light liquid service.
- a. The permittee shall monitor each valve in organic HAP service for leaks as outlined in sections A.21.d. through A.21.g.
 - b. The permittee shall monitor all valves subject to the leak detection and repair program to detect leaks by the method specified in section A.24.
 - c. The instrument reading that defines a leak is an instrument reading of 500 parts per million or greater.
 - d. At process units with 2 percent or greater leaking valves, calculated according to section A.21.h., the permittee shall monitor each valve once per month.
 - e. At process units with less than 2 percent leaking valves, calculated according to section A.21.h., the permittee shall monitor each valve once each quarter, except as provided in sections A.21.f. and A.21.g.
 - f. At process units with less than 1 percent leaking valves, calculated according to section A.21.h., the permittee shall monitor each valve once every 2 quarters, except as provided in section A.21.g.
 - g. At process units with less than 0.5 percent leaking valves, calculated according to section A.21.h., the permittee shall monitor each valve once every four quarters.
 - h. The percent of leaking valves at a process unit shall be determined by the following equation:

$$\%VL = [VL/(VT + VC)] \times 100$$

where:

%VL = percent leaking valves;

VL = number of valves found leaking excluding nonrepairables as provided in section A.21.j.;

VT = total valves monitored, in a monitoring period excluding valves monitored as required by section A.21.n.; and

VC = optional credit for removed valves = $0.67 \times$ net number (i.e., total removed - total added) of valves in organic HAP service removed from process unit after July 24, 1995, and after the date of initial start-up for new emissions units. If credits are not taken, then VC = 0.

- i. For use in determining monitoring frequency, as specified in sections A.21.d. through A.21.g., the percent leaking valves shall be calculated as a rolling average of two consecutive monitoring periods for monthly, quarterly, or semiannual monitoring programs; and as an average of any three out of four consecutive monitoring periods for annual monitoring programs.
- j. Nonrepairable valves shall be included in the calculation of percent leaking valves the first time the valve is identified as leaking and nonrepairable and as required to comply with section A.21.k. Otherwise, a number of nonrepairable valves (identified and included in the percent leaking calculation in a previous period) up to a maximum of 1 percent of the total number of valves in organic HAP service at a process unit may be excluded from calculation of percent leaking valves for subsequent monitoring periods.
- k. If the number of nonrepairable valves exceeds 1 percent of the total number of valves in organic HAP service at a process unit, the number of nonrepairable valves exceeding 1 percent of the total number of valves in organic HAP service shall be included in the calculation of percent leaking valves.
- l. When a leak in any valve is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in section A.22.
- m. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:
 - i. tightening of bonnet bolts;
 - ii. replacement of bonnet bolts;
 - iii. tightening of packing gland nuts; and
 - iv. injection of lubricant into lubricated packing.
- n. When a leak is repaired, the valve shall be monitored at least once within the first three months after its repair.

A. State and Federally Enforcable Section (continued)

- o. Any valve that meets the following criteria may be designated as unsafe-to-monitor and is exempt from the requirements of sections A.21.b. through A.21.n. above:
 - i. the permittee determines that the valve is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with sections A.21.b. through A.21.g. above; and
 - ii. the permittee has a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable.
- p. Any valve that meets the following criteria may be designated difficult-to-monitor and is exempt from the requirements of sections A.21.b. through A.21.g.:
 - i. the valve cannot be monitored without elevating the monitoring personnel more than two meters above a support surface or it is not accessible at any time in a safe manner;
 - ii. the process unit within which the valve is located is an existing emissions unit or the permittee designates less than 3 percent of the total number of valves in a new emissions unit as difficult-to-monitor; and
 - iii. the permittee follows a written plan that requires monitoring of the valve at least once per calendar year.

22. 40 CFR 63.171 Standards: delay of repair.

- a. Delay of repair of equipment for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur by the end of the next process unit shutdown.
- b. Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in organic HAP service.
- c. Delay of repair for valves, connectors and agitators is also allowed if:
 - i. the permittee determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair; and
 - ii. when repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40 CFR 63.172.
- d. Delay of repair for pumps is also allowed if:
 - i. repair requires replacing the existing seal design with a new system that the permittee has determined, in accordance with 40 CFR 63.176(d), will provide better performance or meets the requirements of 40 CFR 63.163(e), 40 CFR 63.163(f) or 40 CFR 63.163(g); and
 - ii. repair is completed as soon as practicable, but not later than six months after the leak was detected.
- e. Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit shutdown will not be allowed unless the third process unit shutdown occurs sooner than six months after the first process unit shutdown.

A. State and Federally Enforceable Section (continued)

- 23.** 40 CFR 63.174 Standards: connectors in gas/vapor service and in light liquid service.
- a. The permittee shall monitor all connectors in gas/vapor and light liquid service, except as provided in sections A.23.h. through A.23.k.
 - b. The connectors shall be monitored to detect leaks by the method specified in section A.24.
 - c. If an instrument reading greater than or equal to 500 parts per million is measured, a leak is detected.
 - d. The permittee shall monitor all connectors at the frequencies specified below, except as provided in sections A.23.j. through A.23.l.
 - i. If the percent leaking connectors in the process unit was 0.5 percent or greater during the last required annual or biennial monitoring period, the permittee shall monitor the connectors once per twelve-month period.
 - ii. If the percent leaking connectors was less than 0.5 percent during the last required monitoring period, the permittee shall monitor the connectors once every two years. The permittee may comply with this requirement by monitoring at least 40 percent of the connectors in the first year and the remainder of the connectors in the second year. The percent leaking connectors will be calculated for the total of all monitoring performed during the two-year period.
 - iii. If the permittee of a process unit in a biennial leak detection and repair program calculates less than 0.5 percent leaking connectors from the two-year monitoring period, the permittee may monitor the connectors one time every four years. The permittee may comply with the requirements of this section by monitoring at least 20 percent of the connectors each year until all connectors have been monitored within four years.
 - iv. If a process unit complying with requirements of section A.23.d.iii. using a four-year monitoring interval program has 1 percent or greater leaking connectors, the permittee shall increase the monitoring frequency to one time per year. The permittee may again elect to use the provisions of section A.23.d.iii. when the percent leaking connectors decreases to less than 0.5 percent.
 - e. Except as provided in section A.23.f., each connector that has been opened or has otherwise had the seal broken shall be monitored for leaks within the first three months after being returned to organic HAP service. If the follow-up monitoring detects a leak, it shall be repaired according to the provisions of section A.23.h., unless it is determined to be nonrepairable, in which case it is counted as a nonrepairable for the purposes of section A.23.q.
 - f. As an alternative to the requirements in section A.23.e., the permittee may choose to calculate percent leaking connectors for the monitoring periods described in section A.23.d., by setting the nonrepairable component, CAN, in the equation in section A.23.q., to zero for all monitoring periods.
 - g. The permittee may switch alternatives described in sections A.23.e. and A.23.f. at the end of any monitoring period, provided that it is reported in the periodic report required in section A.33 of this permit. After reporting a switch to the new alternative, initial monitoring shall be conducted within twelve months.
 - h. When a leak is detected, it shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected, except as provided in sections A.23.k. and A.22. A first attempt at repair shall be made no later than five calendar days after the leak is detected.
 - i. If a leak is detected, the connector shall be monitored for leaks within the first three months after its repair.

A. State and Federally Enforcable Section (continued)

j. Any connector that meets the following criteria may be designated as an unsafe-to-monitor connector, exempt from the requirements of section A.23.a.:

i. the permittee determines that the connector is unsafe-to-monitor because personnel would be exposed to an immediate danger as a result of complying with sections A.23.a. through A.23.i.; and

ii. the permittee has a written plan that requires monitoring of the connector as frequently as practicable during safe-to-monitor periods, but not more frequently than the periodic schedule otherwise applicable.

k. Any connector that meets the following criteria may be designated as an unsafe-to-repair connector, exempt from the requirements of sections A.23.a. and A.23.h.:

i. the permittee determines that repair personnel would be exposed to an immediate danger as a consequence of complying with section A.23.h.; and

ii. the connector will be repaired before the end of the next scheduled process unit shutdown.

l. Any connector that is inaccessible or is ceramic or ceramic-lined (e.g., porcelain, glass, or glass-lined), is exempt from the requirements of sections A.23.a. and A.23.h. and from the record keeping and reporting requirements of all of Part II of this permit. An inaccessible connector is one that is:

i. buried;

ii. insulated in a manner that prevents access to the connector by a monitor probe;

iii. obstructed by equipment or piping that prevents access to the connector by a monitor probe;

iv. unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold which would allow access to connectors up to 7.6 meters (25 feet) above the ground;

v. inaccessible because it would require elevating the monitoring personnel more than 2 meters above a permanent support surface or would require the erection of scaffold; or

vi. not able to be accessed at any time in a safe manner to perform monitoring. (Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines, or would risk damage to equipment.)

m. If any inaccessible or ceramic or ceramic-lined connector is observed to be leaking by visual, audible, olfactory, or other means, the leak shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected, except as provided in section A.23.l.

n. A first attempt at repair shall be made no later than five calendar days after the leak is detected.

o. For use in determining the monitoring frequency, as specified in section A.23.d., the percent leaking connectors shall be calculated as specified in sections A.23.p. and A.23.q.

p. For the first monitoring period, use the following equation:

$$\%CL = CL / (Ct + CC) \times 100$$

where:

%CL = percent leaking connectors;

CL = number of connectors measured at 500 parts per million or greater, by the method specified in section A.24.;

Ct = total number of monitored connectors in the process unit; and

CC = optional credit for removed connectors = 0.67 x net number (i.e., total removed - total added) of connectors in organic HAP service removed from the process unit after July 24, 1995, and after the date of initial start-up for new process units. If credits are not taken, then CC = 0.

A. State and Federally Enforcable Section (continued)

q. For subsequent monitoring periods, the permittee shall use the following equation:

$$\%CL = [(CL - CAN)/(Ct + CC)] \times 100$$

where:

%CL = percent leaking connectors;

CL = number of connectors, including nonrepairables, measured at 500 parts per million or greater, by the method specified in section A.24.;

CAN = number of allowable nonrepairable connectors, as determined by monitoring required in sections A.23.d. through A.23.g., not to exceed 2 percent of the total connector population, Ct;

Ct = total number of monitored connectors, including nonrepairables, in the process unit; and

CC = optional credit for removed connectors = 0.67 x net number (i.e., total removed - total added) of connectors in organic HAP service removed from the process unit after July 24, 1995, and after the date of initial start-up for new process units. If credits are not taken, then CC = 0.

r. If the permittee eliminates a connector subject to monitoring under section A.23.a., the permittee may receive credit for elimination of the connector, as described in section A.23.p., provided the requirements below are met:

i. the connector was welded after April 24, 1994;

ii. the integrity of the weld is demonstrated by testing in accordance with the procedures in section A.24. or by testing using X-ray, acoustic monitoring, hydrotesting, or other applicable method;

iii. welds created after October 24, 1994 are monitored or tested within three months of being welded; and

iv. if an inadequate weld is found or the connector is not welded completely around the circumference, the connector is not considered a welded connector and is therefore not exempt from the provisions of this permit.

24. 40 CFR 63.180(b)(1)
Monitoring shall comply with Method 21 of 40 CFR, Part 60, Appendix A.

a. Except as provided for in section A.24.b., the detection instrument shall meet the performance criteria of Method 21 of 40 CFR, Part 60, Appendix A, except the instrument response factor criteria in section 3.1.2(a) of Method 21 shall be for the average composition of the process fluid not each individual VOC in the stream. For process streams that contain nitrogen, water, air, or other components that are not organic HAP's or VOC's, the average stream response factor may be calculated on an inert-free basis. The response factor may be determined at any concentration for which monitoring for leaks will be conducted.

b. If no instrument is available at the plant site that will meet the performance criteria specified in section A.24.a., the instrument readings may be adjusted by multiplying by the average response factor of the process fluid, calculated on an inert-free basis as described above.

c. The detection instrument shall be calibrated before use, on each day of its use, by the procedures specified in Method 21 of 40 CFR, Part 60, Appendix A.

A. State and Federally Enforcable Section (continued)

- d. Calibration gases shall be:
 - i. Zero air (less than 10 parts per million of hydrocarbon in air).
 - ii. A mixture of methane and air at a concentration of approximately, but less than, 10,000 parts per million methane for agitators; 5,000 parts per million for pumps in polymerizing monomer service; 1,000 parts per million for all other pumps; and 500 parts per million for all other equipment, except as provided in section A.24.d.iii.
 - iii. The instrument may be calibrated at a higher methane concentration than the concentration specified for that piece of equipment. The concentration of the calibration gas may exceed the concentration specified as a leak by no more than 2,000 parts per million. If the monitoring instrument's design allows for multiple calibration scales, the lower scale shall be calibrated with a calibration gas that is no higher than 2,000 parts per million above the concentration specified as a leak and the highest scale shall be calibrated with a calibration gas that is approximately equal to 10,000 parts per million. If only one scale on an instrument will be used during monitoring, the permittee need not calibrate the scales that will not be used during that day's monitoring.
- e. Monitoring shall be performed when the equipment is in organic HAP service, in use with an acceptable surrogate VOC which is not an organic HAP, or is in use with any other detectable gas or vapor.

25. 40 CFR 63.180(c)

When a pressure relief device, a compressor designated to operate less than 500 parts per million above background, or a closed-vent system is monitored for compliance, or when equipment subject to a leak definition of 500 ppm is monitored for leaks, the monitoring shall comply with the following requirements:

- a. the requirements of section A.24. shall apply;
- b. the background level shall be determined, as set forth in Method 21 of 40 CFR, Part 60, Appendix A;
- c. the instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21 of 40 CFR, Part 60, Appendix A; and
- d. the arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 parts per million for determining compliance.

26. 40 CFR 63.180(d)

- a. Each piece of equipment within a process unit that can reasonably be expected to contain equipment in organic HAP service is presumed to be in organic HAP service unless the permittee demonstrates that the piece of equipment is not in organic HAP service. For a piece of equipment to be considered not in organic HAP service, it must be determined that the percent organic HAP content can be reasonably expected not to exceed 5 percent, by weight, on an annual average basis. For purposes of determining the percent organic HAP content of the process fluid that is contained in or contacts equipment, Method 18 of 40 CFR, Part 60, Appendix A shall be used.
- b. The permittee may use good engineering judgment rather than the procedures in section A.26.a. to determine that the percent organic HAP content does not exceed 5 percent, by weight. However, when the permittee and the Administrator and/or the Director do not agree on whether a piece of equipment is not in organic HAP service, the procedures in section A.26.a. shall be used to resolve the disagreement.

Conversely, the permittee may determine that the organic HAP content of the process fluid does not exceed 5 percent, by weight (e.g., accounting for 98 percent of the content and showing that organic HAP is less than 3 percent.)

- c. If the permittee determines the piece of equipment is in organic HAP service, the determination can be revised after following the procedures in section A.26.a., or by documenting that a change in the process or raw materials no longer causes the equipment to be in organic HAP service.
- d. Samples used in determining the percent organic HAP content shall be representative of the process fluid that is contained in or contacts the equipment.

27. 40 CFR 63.181(a)

(RK) The permittee may comply with the record keeping requirements for all process units subject to the leak detection and monitoring requirements of this permit in one record keeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records and information required by this section shall be maintained in a manner that can be readily accessed at the plant site. This could include physically locating the records at the plant site or accessing the records from a central location by computer at the plant site.

A. State and Federally Enforcable Section (continued)

28. 40 CFR 63.181(b)

(RK) The following information pertaining to all equipment in each process unit subject to the leak detection monitoring requirements of this permit shall be recorded.

- a. A list of identification numbers for equipment (except connectors that are inaccessible, designated as unsafe-to-monitor, or designated as unsafe-to-repair, and instrumentation systems) subject to the leak detection and monitoring requirements of this permit. Connectors need not be individually identified if all connectors in a designated area or length of pipe are identified as a group, and the number of connectors is indicated.
- b. A schedule by process unit for monitoring valves and connectors in gas/vapor service subject to the leak detection and monitoring requirements of this permit.
- c. Physical tagging of the equipment to indicate that it is in organic HAP service is not required. Equipment subject to the leak detection and monitoring requirements of this permit may be identified on a plant site plan, in log entries, or by other appropriate methods.
- d. A list of identification numbers for pressure relief devices in gas/vapor service that are subject to the leak detection and monitoring requirements of this permit.
- e. A list of identification numbers for pressure relief devices equipped with rupture disks subject to the leak detection and monitoring requirements of this permit.
- f. Identification of instrumentation systems subject to the leak detection and monitoring requirements of this permit. Individual components in an instrumentation system need not be identified.
- g. Identification of screwed connectors subject to the leak detection and monitoring requirements of this permit. Identification can be by area or grouping if the total number within each group or area is recorded.
- h. The following information pertaining to all valves designated as unsafe-to-monitor according to section A.21.o. or difficult-to-monitor according to section A.21.p., and connectors designated as unsafe-to-monitor according to section A.23.j. or unsafe-to-repair according to section A.23.k. or inaccessible according to section A.23.l. shall be recorded:
 - i. identification of equipment designated as unsafe-to-monitor, difficult-to-monitor, or unsafe-to-inspect and the plan for monitoring or inspecting this equipment;
 - ii. a list of identification numbers for the equipment that is designated difficult-to-monitor, an explanation of why the equipment is designated difficult-to-monitor, and the planned schedule for monitoring this equipment;
 - iii. a list of identification numbers for connectors that are designated unsafe-to-repair and an explanation why the connector is designated unsafe-to-repair;
 - iv. a list of valves removed from and added to the process unit, according to the percent leaking valves calculation performed according to section A.21.h., if the net credits for removed valves is expected to be used; and
 - v. copies of the periodic reports required by this permit, if records are not maintained on a computerized database capable of generating summary reports from the records.

A. State and Federally Enforcable Section (continued)

29. 40 CFR 63.181(d)

(RK) When each leak is detected in equipment subject to the leak detection and monitoring requirements of this permit, the following information shall be recorded and maintained for two years:

- a. the instrument and the equipment identification number and the operator name, initials, or identification number;
- b. the date the leak was detected and the date of first attempt to repair the leak;
- c. the date of successful repair of the leak;
- d. maximum instrument reading measured in accordance with section A.24. after it is successfully repaired or determined to be nonrepairable;
- e. "Repair delayed" and the reason for the delay if a leak is not repaired within fifteen calendar days after discovery of the leak; (The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup/shutdown/malfunction plan for the emissions unit or may be part of a separate document that is maintained at the plant site. In such case, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.)
- f. dates of process unit shutdowns that occur while the equipment is unrepaired;
- g. identification, either by list, location (area or grouping), or tagging of connectors that have been opened or have otherwise had the seal broken since the last monitoring period; and
- h. the date and results of follow-up monitoring as required by this permit. (If identification of disturbed connectors is made by location, then all connectors within the designated location shall be monitored.)

30. (RK) The permittee shall maintain a VOC log book which lists the identification of each piece of equipment subject to the leak detection program. The log book shall be maintained in a readily accessible location and shall list the following information:

- a. the date of each process unit startup and leak test; and
- b. either of the following for the above dates:
 - i. "All tests negative, no leaks detected," or
 - ii. if leaking equipment identified, the following:
 - (a) an identification of the leaking equipment;
 - (b) a summary of the repairs made or attempted along with the dates; and
 - (c) the results and dates of the follow-up leak tests.

31. (RP) If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective actions taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

32. 40 CFR 63.182(d)(1)

(RP) The permittee shall submit reports to the Administrator and the Director containing the information in section A.33. every six months.

A. State and Federally Enforcable Section (continued)

33. 40 CFR 63.182(d)(2)

(RP) For each process unit subject to the leak detection and monitoring requirements of this permit, the following report summary shall be prepared for each monitoring period during the six-month period:

- a. the number of valves for which leaks were detected, the percent leaking valves, and the total number of valves monitored;
- b. the number of valves for which leaks were not repaired, identifying the number of those that are determined nonreparable;
- c. the number of connectors for which leaks were detected, the percent of connectors leaking, and the total number of connectors monitored;
- d. the number of connectors for which leaks were not repaired, identifying the number of those that were determined to be nonreparable;
- e. the number of pumps for which leaks were detected, the percent leakers, and the total number of pumps monitored;
- f. the number of pumps for which leaks were not repaired;
- g. the facts that explain any delay of repairs and, where appropriate, why a process unit shut-down was technically infeasible;
- h. the results of all monitoring of each pressure relief device in gas/vapor service conducted within the semiannual reporting period;
- i. if applicable, notification of a change in connector monitoring alternatives; and
- j. any revisions to items reported in the previous Notification of Compliance Status report, required by 40 CFR 63.182(a)(2).

34. (RP) The permittee shall submit semiannual reports to the Administrator and the Director that summarize the following information for this program during the preceding six-month period:

- a. the number of process unit start-ups and the number of leak tests;
- b. an identification of each leak test that indicated a leak and an identification of the number of flanges, valves, and pressure relief devices that were leaking; and
- c. any changes to the quantity or equipment identification for the equipment listed in the Notification of Compliance Status report, that are any pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, valve, flange, connector, closed-vent system, and any other device or system in VOC service within this process unit.

The reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months.

35. Requirements A.35. through A.42. apply to the PMM and THPA/I CMPUs. (These terms apply to process units that produce as an intermediate of final product one or more of the organic chemicals listed in Appendix A of OAC rule 3745-21-09. The PMM and THPA/I CMPUs produce organic chemicals that are listed in Appendix A as an intermediate of final product.)

A leak detection and repair program for equipment in the process unit shall be developed and implemented in accordance with the requirements specified in OAC rules 3745-21-09(DD)(2)(b) through (DD)(2)(m).

A. State and Federally Enforcable Section (continued)

- 36.** (RK) The permittee shall maintain the following information in a log that is maintained in a readily accessible location:
- a. a list of identification numbers for equipment subject to the requirements of OAC rule 3745-21-09(DD)(2) to (DD)(10);
 - b. a list of identification numbers for equipment designated for no detectable emissions as provided in OAC rule 3745-21-09(DD)(7), and a signature of the permittee authorizing such designation;
 - c. a list of identification numbers for pressure relief devices subject to OAC rule 3745-21-09(DD)(4);
 - d. a list of identification numbers for closed vent systems subject to OAC rule 3745-21-09(DD)(9); and
 - e. for compliance tests required under OAC rules 3745-21-09(DD)(4)(c), (DD)(7)(c), and (DD)(9)(c):
 - i. the date of each compliance test;
 - ii. the background level measured during each compliance test; and
 - iii. the maximum instrument reading measured at the equipment during each compliance test.
- 37.** (RK) The following information pertaining to valves subject to an alternative monitoring schedule, as provided in OAC rule 3745-21-09(DD)(2)(c), shall be recorded in a log that is maintained in a readily accessible location:
- a. a list of identification numbers for valves designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve;
 - b. a list of identification numbers for valves designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the schedule for monitoring each valve; and
 - c. a list of identification numbers for valves subject to the alternative monitoring schedule based on a skip period, a schedule for monitoring, and the percentage of valves leaking during each monitoring period.
- 38.** (RK) The following information pertaining to closed vent systems and control equipment described in OAC rules 3745-21-09(DD)(9) and (DD)(10) shall be recorded and maintained in a readily accessible location:
- a. detailed schematics, design specifications, and piping and instrumentation diagrams;
 - b. the dates and descriptions of any changes in the design specifications;
 - c. description of the parameter or parameters monitored, as required in OAC rule 3745-21-09(DD)(10)(d), to ensure that the control equipment is operated and maintained in conformance with its design, and an explanation of the reason for selecting such parameter or parameters;
 - d. periods when the closed vent systems and control equipment are not operated as designed, including periods when a flare pilot light does not have a flame; and
 - e. dates of startups and shutdowns of the closed vent systems and control equipment.
- 39.** (RK) The following information pertaining to barrier fluid systems and sensors described in OAC rule 3745-21-09(DD)(8) shall be recorded in a log that is maintained in a readily accessible location:
- a. a list of identification numbers of pumps and compressors equipped with such barrier fluid systems and sensors;
 - b. the criteria that indicate failure of the seal system, the barrier fluid system, or both, as required in OAC rule 3745-21-09(DD)(8)(d) and an explanation of the criteria; and
 - c. any changes to such criteria and the reasons for the changes.
- 40.** (RK) The following information for use in determining an exemption for the process unit as provided in OAC rule 3745-21-09(DD)(17)(a) shall be recorded in a log that is maintained in a readily accessible location:
- a. an analysis demonstrating the design capacity of the process unit;
 - b. a statement listing the feed and raw materials and products from the process unit and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohols; or
 - c. an analysis demonstrating that no equipment is in VOC service.

A. State and Federally Enforcable Section (continued)

- 41.** (RK) The following information pertaining to specific equipment that are exempt as provided in OAC rule 3745-21-09(DD)(17)(b) shall be recorded in a log that is maintained in a readily accessible location:
- a. a list of identification numbers of equipment in vacuum service;
 - b. a list of identification numbers of equipment not in VOC service and the information or data used to demonstrate that the equipment is not in VOC service; and
 - c. a list of equipment subject to an equivalent emission requirement that is approved by the Director pursuant to OAC rule 3745-21-09(DD)(16).
- 42.** (RP) Semiannual reports shall be submitted to NEDO by the first day of February and August and shall include the following information for the preceding semiannual periods:
- a. the process unit identification;
 - b. the number of pumps in light liquid service excluding those pumps designated for no detectable emissions under the provision of OAC rule 3745-21-09(DD)(2)(d)(i) and those pumps complying with OAC rule 3745-21-09(DD)(2)(d)(iii);
 - c. the number of valves in gas/vapor service or in light liquid service excluding those valves designated for no detectable emission under the provision of OAC rule 3745-21-09(DD)(2)(d)(iv) and those valves subject to the alternative standard for monitoring under the provision of OAC rule 3745-21-09(DD)(2)(d)(v);
 - d. the number of compressors excluding those compressors designated for no detectable emissions under the provision of OAC rule 3745-21-09(DD)(3)(c) and those compressors complying with OAC rule 3745-21-09(DD)(3)(d) or (DD)(3)(e); and
 - e. for each month during the semiannual period:
 - i. the number of pumps in light liquid service for which leaks were detected as described in OAC rule 3745-21-09(DD)(2)(g);
 - ii. the number of pumps in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;
 - iii. the number of valves in gas/vapor service or in light liquid service for which leaks were detected as described in OAC rule 3745-21-09(DD)(2)(g);
 - iv. the number of valves in gas/vapor service or in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;
 - v. the number of compressors for which leaks were detected as described in OAC rule 3745-21-09(DD);
 - vi. the number of compressors for which leaks were not repaired within fifteen calendar days after the date of leak detection;
 - vii. the facts that explain each delay of repair allowed pursuant to OAC rule 3745-21-09(DD)(11); and
 - f. the dates of process unit shutdowns that occurred within the semiannual period.

- 43.** Requirement A.43. applies to the Captan MPU.

40 CFR 63.190 - 193 - Equipment Leaks

The permittee shall maintain information, data, and analysis used to determine that the MPU does not have equipment in organic HAP service as defined in 40 CFR 63.161.

A. State and Federally Enforcable Section (continued)

44. Requirement A.44. applies to the Captan MPU and the THPA/I CMPU.

40 CFR, Part 63, Subpart MMM:

a. Precompliance plan. The Precompliance plan shall be submitted by the permittee at least six months prior to the compliance date of the standard. For new sources, the Precompliance plan shall be submitted to the Administrator and the Director with the application for approval of construction or reconstruction. The Administrator shall have 90 days to approve or disapprove the Precompliance plan. The Precompliance plan shall be considered approved if the Administrator either approves it in writing, or fails to disapprove it in writing within the 90-day time period. The 90-day period shall begin when the Administrator receives the Precompliance plan. If the Precompliance plan is disapproved, the permittee must still be in compliance with the standard by the compliance date. To change any of the information submitted in the Precompliance plan, the permittee shall notify the Administrator and the Director at least 90 days before the planned change is to be implemented; the change shall be considered approved if the Administrator either approves the change in writing, or fails to disapprove the change in writing within 90 days of receipt of the change. The Precompliance plan shall include the following information:

- i. requests for approval to use alternative monitoring parameters or requests to set monitoring parameters according to 40 CFR 63.1366(b)(4);
- ii. descriptions of the daily or per batch demonstrations to verify that control devices subject to 40 CFR 63.1366(b)(1)(i) are operating as designed;
- iii. data and rationale used to support the parametric monitoring level(s) that are set according to 40 CFR 63.1366(b)(3)(ii)(B);
- iv. for permittees complying with the requirements of 40 CFR 63.1362(i), the pollution prevention demonstration summary required in 40 CFR 63.1365(g)(3);
- v. data and rationale used to support an engineering assessment to calculate uncontrolled emissions from process vents as required in 40 CFR 63.1365(c)(2)(ii); and
- vi. for fabric filters that are monitored with bag leak detectors, an operation and maintenance plan that describes proper operation and maintenance procedures, and a corrective action plan that describes corrective actions to be taken, and the timing of those actions, when the particulate matter concentration exceeds the set point and activates the alarm.

(An owner or operator of an existing affected source may request an extension of up to one additional year to comply with Subpart MMM if the additional time is needed for the installation of controls.)

b. Notification of compliance status report. The Notification of Compliance Status report required under 40 CFR 63.9(h) shall be submitted no later than 150 calendar days after the compliance date and shall include the following information:

- i. the results of any applicability determinations, emission calculations, or analyses used to identify and quantify HAP emissions from the affected source;
- ii. the results of emissions profiles, performance tests, engineering analyses, design evaluations, or calculations used to demonstrate compliance (for performance tests, results should include descriptions of sampling and analysis procedures and quality assurance procedures);
- iii. descriptions of monitoring devices, monitoring frequencies, and the values of monitored parameters established during the initial compliance determinations, including data and calculations to support the levels established;
- iv. operating scenarios;
- v. descriptions of absolute or hypothetical peak-case operating and/or testing conditions for control devices;
- vi. identification of emission points subject to overlapping requirements described in 40 CFR 63.1360(h) and the authority under which the permittee will comply, and identification of emission sources discharging to devices described by 40 CFR 63.1362(l);
- vii. anticipated periods of planned routine maintenance during which the permittee would not be in compliance with the provisions in 40 CFR 63.1362(c)(1) through (4); and
- viii. percentage of total production from a PAI process unit that is anticipated to be produced for use as a PAI in the three years after either June 23, 1999 or startup, whichever is later.

A. State and Federally Enforcable Section (continued)

- 45.** Requirement A.45. applies to the THPA/I CMPU.

Pursuant to a letter dated March 13, 1995 to the permittee from USEPA, stating that USEPA made a determination that THPA is not a product, but rather an isolated intermediate, the THPA/I CMPU is exempt from the requirements of 40 CFR, Part 63, Subparts F, G, H, and I.

- 46.** Requirements A.46. and A.47. relate to the facility as a whole:

This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from Ohio EPA.

All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR, Part 61 and OAC Chapter 3745-20.

- 47.** This facility is subject to the requirements of 40 CFR, Part 68, Section 112(r).

- 48.** Negative Declarations:

40 CFR, Part 82 - Stratospheric Ozone Protection (Inadvertent production of carbon tetrachloride)

USEPA has determined that the permittee's production of carbon tetrachloride at this plant is inadvertent and therefore not controlled under the Stratospheric Ozone Protection Program. 40 CFR 82.3(m) clarifies that the inadvertent or coincidental creation of insignificant quantities of a listed chemical during a chemical manufacturing process is not deemed a controlled substance. USEPA concluded that emissions of carbon tetrachloride from the PMM process are not controlled by this program. This determination is verified in a letter from David Lee, USEPA, Branch Chief, Program Implementation Branch, Washington, DC, dated January 26, 1994 to Mr. Augustine D. Stungys, Plant Manager, Zeneca Ag Products, Perry, Ohio.

40 CFR, Part 82, Subpart F - Recycling and Emissions Reduction

The permittee does not have any regulated appliances (containing Class I or Class II substances in quantities greater than 50 pounds per appliance).

40 CFR, Part 61, Subpart FF - National Emission Standard for Benzene Waste Operations

The applicability section of this standard in 40 CFR 61.340 states that the provisions of this subpart apply to owners and operators of chemical manufacturing plants, coke by-product plants, and petroleum refineries. However, the permittee's facility does not have activities associated with benzene or benzene waste.

40 CFR, Part 60, Subparts K, Ka, Kb - New Source Performance Standards for Storage Tanks

The permittee does not have any organic liquid storage tanks that meet the applicability criteria of these standards (due to construction dates alone, along with other applicability criteria).

A. State and Federally Enforceable Section (continued)

49. 40 CFR, Part 60, Subparts VV, III, NNN, RRR - New Source Performance Standards for Certain SOCM Processes

The permittee has not constructed or reconstructed any affected facilities that meet the applicability criteria of these New Source Performance Standards that cover, respectively: equipment leaks (Subpart VV); air oxidation unit processes (Subpart III); distillation operations (Subpart NNN); and reaction processes (Subpart RRR).

40 CFR, Part 60, Subpart E - New Source Performance Standards for Incinerators

The permittee does not have any incinerator(s) used for solid waste.

40 CFR, Part 63, Subparts F & G - Hazardous Organic NESHAP (THPA/I CMPU only)

USEPA has made a facility-specific applicability determination for the permittee's facility. Specifically, the CMPU that manufactures THPA is exempt from the requirements of 40 CFR, Part 63, Subparts F & G, because THPA exists only as an isolated intermediate. This determination is verified in a letter dated March 13, 1995 from Carol Browner, Administrator of USEPA, Washington DC, to Augustine D. Stungys, Plant Manager, Zeneca Ag Products, Perry, Ohio.

OAC rule 3745-21-07 "Control of Organic Materials from Stationary Sources (Photochemically Reactive Materials)"

The requirements of this rule do not apply because of one or more of the following reasons (please note that the third item in this list is sufficient for this determination):

Lake County is not classified as a Priority I county for VOC regulations.

All the emissions units at the facility are existing sources.

The materials stored, loaded, or employed at this facility are not considered to be photochemically reactive materials.

All emissions of VOC are otherwise regulated under OAC rule 3745-21-09.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001-Boiler Number 1
B002-Boiler Number 2
B003-Boiler Number 3
B004-Boiler Number 4
P005-Captan process reactors
P007-Captan process bagger
P008-Lab hoods
P011-Pneumatic Conveyor-Captan Process
P014-Captan process-house vacuum
P015-Iodine/Alox hood
P016-Maleic Anhydride Storage and Unloading
P017-HCl storage tank
P019-Distillation column feed tank-PMM process
P022-Flaker feed tank-THPI process
Z101-PMM storage tank
Z102-PMM storage tank
Z103-PMM storage tank
Z104-Chlorine unloading
Z201-Butadiene unloading
Z202-Ammonia unloading
Z203-Butadiene Storage
Z401-Diesel Generator
Z402-Fire water pump
Z403-Waste water tanks
Z404-Recycle water tank
Z405-Roadways and parking areas

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PMM Process - Chlorinators and Reactors (P001)

Activity Description: This emissions unit includes R-101 A to F - six chlorinator reactors, the R-2 (R-213) and R-3 (R-211) Reactor Systems.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R-101 A through F (six chlorinator reactors) and the R-2 (R-213) and R-3 (R-211) reactor systems, controlled by wet scrubber C-221	OAC rule 3745-21-09(DD)	See section A.1.2.a.
	40 CFR, Part 63, Subparts A, F, G, and H	See section A.1.2.a.

2. Additional Terms and Conditions

- 2.a Refer to Part II of the General Terms and Conditions for requirements from 40 CFR, Part 63 "National Emission Standards For Hazardous Air Pollutants For Source Catagories" and OAC rule 3745-21-09(DD) "Leaks from process units that produce organic chemicals."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PMM Process - Distillation Column (P002)
Activity Description: C-202 - Distillation Column.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
distillation column (C-202), with thermal oxidizer, and wet scrubbers C-222 and C-232	OAC rule 3745-31-05(A)(3) (PTI 02-1285)	4.34 TPY of hydrogen halides and halogens 5.7 lbs of sulfur dioxide (SO ₂)/hr 1.0 lb/hr of total organic compounds (OC) or hazardous air pollutants (HAPs) (10 lbs/hr of total OC or HAPs during startup) and 4.4 TPY of total OC or HAPs (including startup emissions) 0.42 lb of particulate emissions (PE)/hr and 2.0 TPY of PE The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subparts A, F, G, and H and OAC rule 3745-21-09(DD).
	OAC rule 3745-18-06	See sections A.1.2.b through A.1.2.f. The emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(DD)	See section A.1.2.a.
	40 CFR, Part 63, Subparts A, F, G, and H	See section A.1.2.a.

2. Additional Terms and Conditions

- 2.a Refer to Part II of the General Terms and Conditions for requirements from 40 CFR, Part 63 "National Emission Standards For Hazardous Air Pollutants For Source Catagories" and OAC rule 3745-21-09(DD) "Leaks from process units that produce organic chemicals."
- 2.b Emissions from this emissions unit shall be vented to an existing wet scrubber (C-222), then to a thermal oxidizer, and then to a final wet scrubber (C-232) before being released to the atmosphere.

2. Additional Terms and Conditions (continued)

- 2.c** The thermal oxidizer shall reduce total organic HAP emissions from this emission unit by 98% by weight or to 20 parts per million (ppm) by volume on a dry basis corrected to 3% oxygen whichever is less stringent.
- 2.d** The new (final) scrubber (C-232) shall control hydrogen halides and halogens. Overall emissions shall be reduced by 99% by weight or an outlet mass emission rate of less than 0.45 kilogram per hour, whichever is less stringent.
- 2.e** The maximum emission rate of OC, including carbon disulfide, carbon tetrachloride and chloroform is 1 pound per hour.
- 2.f** Based on engineering estimates, the maximum emission rate of OC including carbon disulfide, carbon tetrachloride and chloroform is 10 pounds per hour during startup.

II. Operational Restrictions

- 1.** The daily average concentration of caustic in the scrubber liquor for scrubber C-222 shall be maintained above 3 percent, except for specific events as specified in 40 CFR, Part 63 that include "excused excursions" and events addressed in the affected source's SSMP.
- 2.** The daily average pH of the scrubber liquor for scrubber C-232 shall be maintained at 7 or greater and at a pH no lower than the minimum established during the most recent performance test which demonstrated the emissions unit was in compliance, except for specific events as specified in 40 CFR, Part 63 that include "excused excursions" and events addressed in the affected source's SSMP.
- 3.** The daily average liquid to gas ratio shall be maintained at a value not less than the ratio maintained during the most recent stack test which demonstrated the emissions unit was in compliance, except for specific events as specified in 40 CFR, Part 63 that include "excused excursions" and events addressed in the affected source's SSMP.
- 4.** The daily average temperature of the incineration in the thermal oxidizer shall be maintained at or above the minimum temperature maintained during the most recent emission test that demonstrated the emissions unit was in compliance, except for specific events as specified in 40 CFR, Part 63 that include "excused excursions" and events addressed in the affected source's SSMP.

III. Monitoring and/or Record Keeping Requirements

- 1.a** The process vent system contains bypass valves that could divert a vent stream away from the control device. One of the following shall be installed on each bypass line:
 - i. a flow indicator in each bypass line that takes a reading at least once every 15 minutes shall be properly installed, maintained, and operated;
 - ii. each bypass line shall be secured in the non-diverting position with either a carseal or a lock-and-key type configuration, and monthly visual monitoring shall be performed; or
 - iii. an alternative form of monitoring approved by USEPA. In a letter dated October 16, 1998, the Administrator approved the following: the permittee shall maintain a continuous record of valve (by-pass valve) position as a means to determine a by-pass condition. The valves are either fully opened or fully closed and are not designed to regulate or adjust flow. The positions of the valves shall be confirmed on a continuous basis by limit switches via a Distribution Control System. The limit switches shall be maintained and tested in accordance with the manufacturer's recommendations.
- 1.b** The permittee shall maintain records of the times of all startup periods during which the bypass line is used.
- 2.a** A pH monitoring device equipped with a continuous recorder shall be operated and maintained to monitor the pH of the scrubber effluent for scrubber C-232. For this recirculating system, the recirculation pH shall be monitored as equivalent to the effluent pH.
- 2.b** A flow meter equipped with a continuous recorder shall be operated and maintained at the scrubber influent for liquid flow for scrubber C-232. For this recirculating system the scrubber recirculating flow rate shall be monitored as equivalent to the influent flow.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.c** The following daily records for scrubber C-232 shall be maintained:
- i. continuous records of the scrubber effluent pH and scrubber influent flow, to the extent required by 40 CFR, Part 63;
 - ii. gas stream flow rate;
 - iii. the daily average value of scrubber effluent pH and daily average liquid-to-gas ratio for each operating day; and
 - iv. operating time for the control device, monitoring equipment, and the associated emissions unit.
- 2.d** The monitoring devices and recorders required by this permit shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.
- 3.a** The permittee shall properly operate and maintain equipment to monitor and record the recirculation liquor flow rate for scrubber C-222.
- 3.b** The permittee shall properly operate and maintain equipment to continuously monitor and record the concentration of NaOH in the scrubber liquor for scrubber C-222 while the emissions unit is in operation.
- 3.c** The permittee shall collect and record the following information each day for scrubber C-222:
- i. the recirculation liquor flow rate, in gallons per minute;
 - ii. the concentration of caustic (NaOH percent) in the scrubber liquor; and,
 - iii. a record of operating time for the control device, monitoring equipment, and the associated emissions unit.
- 4.a** The permittee shall calibrate, maintain, and operate a temperature monitoring device equipped with a continuous recorder in the firebox of the thermal oxidizer, or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs. The device shall be capable of accurately measuring temperature. Units shall be in degrees Fahrenheit.
- 4.b** The following records for the thermal oxidizer shall be maintained:
- i. continuous records of the incinerator temperature to the extent required by 40 CFR, Part 63; and
 - ii. the daily average temperature for each operating day.
- 4.c** The permittee shall collect and record the following information for the thermal incinerator each day:
- i. all periods of actual operation during which the daily average temperature of the incineration in the thermal oxidizer is not maintained within the operating range established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - ii. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The daily average shall be calculated as the average of all values for a monitored parameter recorded during the operating day, except as provided in the next paragraph. The average shall cover a 24-hour period if operation is continuous, or the number of hours of operation per operating day if operation is not continuous.

Monitoring data recorded during periods of monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments, start-ups, shutdowns, malfunctions, and periods of non-operation for the distillation column resulting in cessation of the emissions to which the monitoring applies as described in 40 CFR 63.152(a)(5)(c)(2)(ii)(c), shall not be included in computing the hourly or daily averages. Records shall be maintained of the times and durations of all such periods and any other periods of process or control device operation when monitors are not operating.

The operating day for this process shall be from 7 A.M. to 7 A.M.

If all recorded values for a monitored parameter during an operating day are within the range established in this permit or the most recent performance test that illustrated compliance, the permittee may record that all values were within the range rather than calculating and recording a daily average for that operating day; and

if the daily average value for a monitored parameter during an operating day is within the range established in this permit or the most recent emission test that demonstrated compliance, the permittee may retain one-hour block averages for that operating day and discard, at or after the end of that operating day, the fifteen minute or more frequent readings, as provided in 40 CFR 63.152(f).

IV. Reporting Requirements

1. Periodic reports shall be submitted semiannually no later than 60 calendar days after the end of each six-month period. The first report shall be submitted no later than June 19 and shall cover the six-month period beginning on October 19 of the previous year. These periodic reports shall include:
- a. All daily average values of the following monitored parameters for all operating days when the daily average values recorded are outside the ranges established in the compliance tests:
 - i. the scrubber effluent pH for scrubber C-232;
 - ii. the scrubber liquid to gas ratio for scrubber C-232;
 - iii. the thermal oxidizer incineration temperature; and
 - iv. the NaOH concentration for scrubber C-232.
 - b. The duration of periods when monitoring data was not collected for each potential excursion caused by insufficient monitoring data. Insufficient monitoring data is defined as for a period of control device operation of four hours or greater in an operating day if monitoring data is insufficient to constitute a valid hour of data for at least 75% of the operating hours. When the period of control device operation is less than four hours, monitoring data is insufficient when more than one of the hours does not constitute a valid hour due to insufficient data.
 - c. The times and durations of all periods when the vent stream is diverted from the control device through a bypass line.
 - d. All periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out.
2. Semiannual reports of start-up, shutdown and malfunction shall be submitted on the same schedule as above.
3. Except during the first thirty minutes of each startup of the distillation column process, any opening of the bypass valve, which causes the emission of an air contaminant in violation of any applicable law, shall be reported to the Northeast District Office of Ohio EPA (NEDO) in accordance with OAC rule 3745-15-06 according to the schedule described above.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation for Scrubber C-232:
99 percent overall control of hydrogen halides and halogens or 0.45 kilogram per hour, whichever is less stringent; 5.7 pounds per hour controlled mass emission rate of SO₂

Applicable Compliance Method:
Results of stack testing performed on September 17, 1998 indicated actual emission rates of 0.046 kg/hr of hydrogen halides and halogens and 0.17 lb/hr of SO₂ and an overall control efficiency of 99.1 %. No additional testing is required at this time.
 - 1.b Emission Limitation for Thermal Incinerator:
98% by weight reduction of total OC or 20 ppm by volume on a dry basis corrected to 3% oxygen whichever is less stringent

Applicable Compliance Method:
 - i. to determine compliance with the percent removal efficiency requirement:
 - (a) sampling sites shall be located at the inlet and at the outlet of the incinerator or outlet of scrubber C-232 based upon Ohio EPA approval;
 - (b) the mass emissions of total OC or total organic HAPs shall be summed at the inlet and those at the outlet of the incinerator shall be summed; and
 - (c) the percent reduction shall be determined by comparison of the summed inlet and summed outlet measurements using the equation in 40 CFR 63.116(c)(4)(iii).
 - ii. In order to determine compliance with the 20 parts per million by volume emission limit, the sampling site shall be located at the outlet of the incinerator or outlet of scrubber C-232 based upon USEPA approval.
 - iii. The minimum sampling time for each run shall be one hour in which an integrated sample is taken or at least four grab samples are taken at equal intervals.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2.5 years after issuance of this permit.
 - b. Emission testing shall be conducted to determine compliance with the following allowable control efficiencies and mass emission rates; the test methods which must be employed to determine compliance with these allowables are specified below:
 - i. the following methods shall be used to determine compliance with the requirement of 98% reduction or 20 ppmv on a dry basis corrected to 3% oxygen of total OC or HAPS whichever is less stringent: 40 CFR, Part 60, Appendix A, Methods 1-4 and 18 (or alternative methods approved by Ohio EPA).

V. Testing Requirements (continued)

c. Capture efficiency at the hot well by the existing scrubber shall be demonstrated to the satisfaction of Ohio EPA. Additional capture hooding or enclosures shall be installed if required by Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by NEDO.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods specified above. The test methods and procedures selected shall be based upon a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to NEDO and the Lake County General Health District (LCGHD). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in NEDO's refusal to accept the results of the emission test(s).

Personnel from NEDO and LCGHD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to NEDO within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

1. Note:

Sections A.I.2.b, A.I.2.c, A.I.2.d and the associated operational restrictions, monitoring and record keeping requirements, reporting requirements, and testing requirements were established in PTI 02-1285 to address the control requirements for a Group 1 process vent as specified in 40 CFR, Part 63, Subpart G.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: THPI Process - Reactors (P003)
Activity Description: R-331A/B - THPI Reactors.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R-331A/B - THPI Reactors controlled by wet scrubber C-332 and a flare	OAC rule 3745-17-11(B)(1)	3.70 lbs of particulate emissions/hr
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-21-09(TT)(1)	For the THPI production process, the stage 1 and stage 2 reactor vent streams shall be vented to a flare that meets the requirements of OAC rule 3745-21-09(DD)(10)(d).

2. Additional Terms and Conditions

- 2.a The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any one hundred twenty consecutive minutes.

II. Operational Restrictions

1. A continuous monitoring and recording device that records the presence of a pilot flame shall be operated by the permittee when the emissions unit is in operation and employing organic compounds.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record the following information for each day the emissions unit is in operation:
 - i. all periods during which the emissions unit was in operation and employing organic compounds and there was no pilot flame; and
 - ii. all periods during which the emissions unit was in operation and employing organic compounds and the monitoring device was out of service.
2. The permittee shall maintain a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall record all periods during which the pilot flame is not functioning properly.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods during which the emissions unit was in operation and employing organic compounds and the pilot flame was not functioning properly as required under OAC rule 3745-21-09(B)(4).
2. The permittee shall submit quarterly summaries of the log or record of the operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the previous calendar quarters.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
3.70 lbs of particulate emissions/hr

Applicable Compliance Method:

Compliance with the above hourly particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). No testing is specifically required but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing may be requested at opacity levels less than the visible emission limitation specified in this permit.

- 1.b Emission Limitation:
Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the above visible particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

- 1.c Emission Limitation:
The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any one hundred twenty consecutive minutes.

Applicable Compliance Method:

If required, compliance with the above visible particulate emission limitation shall be determined by Method 22 of 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: THPI Process - Flaker (P004)
Activity Description: FL-342 - THPI Flaker.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
FL-342 - THPI Flaker, screw conveyor, elevators and hoppers, controlled by wet scrubber C-342	OAC rule 3745-17-11(B)(1)	3.36 lbs of particulate emissions/hr
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The scrubber water flow rate shall be continuously maintained at a value of not less than 15 gallons per minute at all times while the emissions unit is in operation.

Note: Deviations are not necessarily indicative of an emission violation, but rather serve as a trigger for additional testing and/or further investigation to determine compliance with the emission limitation(s).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information for each day the emissions unit is in operation:

- a. the scrubber water flow rate, in gallons per minute; and
- b. a log of the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber water flow rate was not maintained at or above the required level.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the log or record of the operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the previous calendar quarters.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
3.36 lbs of particulate emissions/hr

Applicable Compliance Method:

Compliance with the above hourly particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). No testing is specifically required but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing may be requested at opacity levels less than the visible emission limitation specified in this permit.

- 1.b Emission Limitation:
Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the above visible particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Captan Process - South Dryer (P006)
Activity Description: DR-401 - South Dryer.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
DR-401 - South Dryer	OAC rule 3745-17-11(B)(1)	5.18 lbs of particulate emissions/hr
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
	40 CFR, Part 63, Subpart I	See section A.I.2.a.

2. Additional Terms and Conditions

- 2.a Refer to Part II of the General Terms and Conditions for requirements from 40 CFR, Part 63 "National Emission Standards For Hazardous Air Pollutants For Source Categories."
- 2.b The particulate emission limitation specified above is much greater than the potential to emit for this emissions unit. Therefore, no hourly records are required to demonstrate compliance with this limit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:
5.18 lbs of particulate emissions/hr

Applicable Compliance Method:

Compliance with the above hourly particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). No testing is specifically required but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing may be requested at opacity levels less than the visible emission limitation specified in this permit.

1.b Emission Limitation:
Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the above visible particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Captan Process - North Vacuum Filter, Pump & Receivers (P009)

Activity Description: F-441 - North Vacuum Filter Face Sweep and BL-416A/B/C - Vacuum Pumps.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F-441 - north vacuum filter face sweep and BL-416A/B/C - vacuum pumps, controlled by wet scrubber C-450	OAC rule 3745-31-05(A)(3) (PTI issued June 6, 1974, no number assigned)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A)(1).
	OAC rule 3745-17-11(B)(1)	5.18 lbs of particulate emissions/hr
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
	40 CFR, Part 63, Subpart I	See section A.1.2.a.

2. Additional Terms and Conditions

- 2.a Refer to Part II of the General Terms and Conditions for requirements from 40 CFR, Part 63 "National Emission Standards For Hazardous Air Pollutants For Source Categories."

II. Operational Restrictions

1. The scrubber water flow rate shall be continuously maintained at a value of not less than 20 gallons per minute at all times while the emissions unit is in operation.

Note: Deviations are not necessarily indicative of an emission violation, but rather serve as a trigger for additional testing and/or further investigation to determine compliance with the emission limitation(s).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information for each day the emissions unit is in operation:

- a. the scrubber water flow rate, in gallons per minute; and
- b. a log of the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber water flow rate was not maintained at or above the required level.
2. The permittee shall submit quarterly summaries of the log or record of the operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the previous calendar quarters.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
5.18 lbs of particulate emissions/hr

Applicable Compliance Method:

Compliance with the above hourly particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). No testing is specifically required but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing may be requested at opacity levels less than the visible emission limitation specified in this permit.

- 1.b Emission Limitation:
Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the above visible particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Captan Process - North Dryer (P010)
Activity Description: DR-402 - North Dryer.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
DR-402 - North Dryer	OAC rule 3745-17-11(B)(1)	5.18 lbs or particulate emissions/hr
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
	40 CFR, Part 63, Subpart I	See section A.I.2.a.

2. Additional Terms and Conditions

- 2.a Refer to Part II of the General Terms and Conditions for requirements from 40 CFR, Part 63 "National Emission Standards For Hazardous Air Pollutants For Source Categories."
- 2.b The particulate emission limitation specified above is much greater than the potential to emit for this emissions unit. Therefore, no hourly records are required to demonstrate compliance with this limit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:
5.18 lbs of particulate emissions/hr

Applicable Compliance Method:

Compliance with the above hourly particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). No testing is specifically required but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing may be requested at opacity levels less than the visible emission limitation specified in this permit.

1.b Emission Limitation:
Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the above visible particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Captan Process - South Vacuum Filter and Slurry Tank (P012)

Activity Description: This emission unit includes F-421 - South Vacuum Filter and T-414 - Captan Slurry Tank.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
south vacuum filter (F-421) and captan slurry tank (T-414)	OAC rule 3745-17-11(B)(1)	5.18 lbs of particulate emissions/hr
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
	40 CFR, Part 63, Subpart I	See section A.I.2.a.

2. Additional Terms and Conditions

- 2.a Refer to Part II of the General Terms and Conditions for requirements from 40 CFR, Part 63 "National Emission Standards For Hazardous Air Pollutants For Source Categories."
- 2.b The particulate emission limitation specified above is much greater than the potential to emit for this emissions unit. Therefore, no hourly records are required to demonstrate compliance with this limit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
5.18 lbs of particulate emissions/hr

Applicable Compliance Method:

Compliance with the above hourly particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). No testing is specifically required but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing may be requested at opacity levels less than the visible emission limitation specified in this permit.

- 1.b** Emission Limitation:
Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the above visible particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: THPI Process - THPI Feeder and Dissolving Tank (P013)

Activity Description: This emission unit includes WB-406A/B - THPI Weigh Belt and T-409 Dissolving Tank.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
THPI weigh belt (WB-406A/B) and dissolving tank (T-409), controlled by wet scrubber C-406	OAC rule 3745-17-11(B)(1)	3.36 lbs of particulate emissions/hr
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The scrubber water flow rate shall be continuously maintained at a value of not less than 16 gallons per minute at all times while the emissions unit is in operation.

Note: Deviations are not necessarily indicative of an emission violation, but rather serve as a trigger for additional testing and/or further investigation to determine compliance with the emission limitation(s).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information for each day the emissions unit is in operation:

- a. the scrubber water flow rate, in gallons per minute; and
- b. a log of the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber water flow rate was not maintained at or above the required level.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the log or record of the operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the previous calendar quarters.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
3.36 lbs of particulate emissions/hr

Applicable Compliance Method:

Compliance with the above hourly particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). No testing is specifically required but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing may be requested at opacity levels less than the visible emission limitation specified in this permit.

- 1.b Emission Limitation:
Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the above visible particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PMM Process - By Product Storage and Loading (P018)

Activity Description: This emissions unit includes T-1050 - By-Product Storage Tank, RR-1S By-product Railcar Loading Station and RR-4 By-product Iso-Container Loading Station.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
This emissions unit includes a by-product storage tank (T-1050), by-product railcar loading station (RR-1S), and by-product iso-container loading station (RR-4), controlled by wet scrubbers C-1070 and C-1075.	OAC rule 3745-21-09(DD)	See section A.1.2.a.
	40 CFR, Part 63, Subparts A, F, G, and H	See section A.1.2.a.

2. Additional Terms and Conditions

- 2.a Refer to Part II of the General Terms and Conditions for requirements from 40 CFR, Part 63 "National Emission Standards For Hazardous Air Pollutants For Source Catagories" and OAC rule 3745-21-09(DD) "Leaks from process units that produce organic chemicals."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PMM Process - Carbon Disulfide Unloading and Storage (P020)

Activity Description: This emissions unit includes RR-3 - Carbon Disulfide Unloading Station and T-1045 A/B and Carbon Disulfide Storage Tanks.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
carbon disulfide unloading station (RR-3) and carbon disulfide storage tanks (T-1045 A/B)	OAC rule 3745-31-05(A)(3) (PTI 02-830)	none
	OAC rule 3745-21-09(TT)(2)	Volatile organic compound ("VOC") emissions from the diked area of the carbon disulfide tanks shall be reduced by employing styrofoam sheets which completely cover the diked area.
	OAC rule 3745-21-09(DD)	See section A.1.2.a.
	40 CFR, Part 63, Subparts A, F, G, and H	See section A.2.1.a.

2. Additional Terms and Conditions

- 2.a Refer to Part II of the General Terms and Conditions for requirements from 40 CFR, Part 63 "National Emission Standards For Hazardous Air Pollutants For Source Categories" and OAC rule 3745-21-09(DD) "Leaks from process units that produce organic chemicals."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Air Stripper (P021)
Activity Description: C-561 - Wastewater Air Stripper

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
wastewater air stripper	OAC rule 3745-31-05(A)(3) (PTI 02-3471)	0.94 lb of carbon disulfide (CS ₂) per hour 0.19 lb of carbon tetrachloride (CCl ₄) per hour 0.04 lb of chloroform (CHCl ₃) per hour
	OAC rule 3745-21-07(G)(2)	This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material ("PRM"), or any substance containing such PRM. Therefore there are no applicable emission limitations from this rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall take samples of the wastewater stream flowing to the air stripper at least twice each month and not less than ten days apart. The samples shall be analyzed for concentrations of CS₂, CCl₄, and CHCl₃ and the permittee shall record the following information for each sample taken:
 - a. the date the sampling occurred;
 - b. the concentration of each compound, in weight percent of the total wastewater stream;
 - c. the flow rate of wastewater at the time of sampling, in lbs/hr; and
 - d. the concentration of each compound, in lbs/hr.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain monthly records of the total amount of wastewater that flowed through the air stripper, in gallons.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the information required to be maintained in section A.III.1. of these terms and conditions. These summaries shall also include the monthly wastewater flow specified in section A.III.2. and shall be submitted by January 31, April 30, July 31, and October 31 of each year for the previous calendar quarters.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
0.94 lb of CS₂ per hour

0.19 lb of CCl₄ per hour

0.04 lb of CHCl₃ per hour

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by the record keeping specified in section A.III. of these terms and conditions.

VI. Miscellaneous Requirements

1. If the emission limitations specified above are exceeded or this emissions unit causes or contributes to a public nuisance, Ohio EPA may require the permittee to install air pollution control equipment on this emissions unit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: **Tomen Agro, Inc.**
Facility ID: **02-43-12-0034**

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