# West Virginia Department of Environmental Protection Division of Air Quality

Harold D. Ward Cabinet Secretary

# Permit to Operate



Pursuant to **Title V**of the Clean Air Act

Issued to:

The Chemours Company FC, LLC
Washington Works
Fluoropolymers
R30-10700182-2021 (Part 2 of 14)

Laura M. Crowder Director, Division of Air Quality

Issued: October 1, 2021 • Effective: October 15, 2021 Expiration: October 1, 2026 • Renewal Application Due: April 1, 2026 Permit Number: R30-10700182-2021 (Part 2 of 14)
Permittee: The Chemours Company FC, LLC
Facility Name: Washington Works

Business Unit: Fluoropolymers
Permittee Mailing Address: P. O. Box 1217, Washington, WV 26181-1217

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

Facility Location: Washington, Wood County, West Virginia Facility Mailing Address: Building 1, Chemours Washington Works

Washington, WV 26181-1217

Telephone Number: (304) 863-4200 Type of Business Entity: Corporation

Facility Description: Chemical and Plastic Resins Manufacturing

SIC Codes: 2821, 2869, 2819

UTM Coordinates: 442.310 km Easting • 4,346.800 km Northing • Zone 17

Permit Writer: Jonathan Carney

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

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

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

# 1.1. Emission Units

| Emission<br>Unit ID | Emission Unit Description        | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device  |
|---------------------|----------------------------------|--------------------------------|----------------------|---|
|                     | (                                | C1 Area                        |                      |   |
| C1FA                | Cool Down_Bin                    | 1986                           | C1FEE                | C1MI (Cyclone), C1MJ<br>(Cyclone) & C1MIC<br>(Bagfilter)                          |
| C1FB                | Cool Down Bin                    | 1986                           | C1FEE                | C1MI (Cyclone), C1MJ<br>(Cyclone) & C1MIC<br>(Bagfilter)                          |
| C1FC                | Cube Bin                         | 2006                           | C1FCE                | None  |
| C1FD                | Fluorine Trailor Unloading       | 1986                           | C1FEE                | C1FEC - Scrubber  |
| C1FE                | South Fluorination_Reactor       | 1986                           | C1FEE                | C1FEC – Scrubber  |
| C1FF                | Heat Up Bin                      | 1986                           | C1FFE                | None  |
| C1FG                | Heat Up Bin                      | 1986                           | C1FGE                | None  |
| C1FH                | North Fluorination Reactor       | 2021                           | C1FEE                | C1FEC - Scrubber  |
| C1FK                | Fluff Conveying-Isolation System | 1996                           | C1FKE                | C1FKC – Bag Filter  |
| CIEO                | D                                | 1006                           | C1FQE                | None  |
| C1FQ                | Reactor                          | 1996                           | T7IME                | T7IMC – Thermal Converter   |
| C1FR                | Ingredient System                | 1996                           | C1FRE                | None  |
| C1FS                | Dryer                            | 1996                           | C1FSE                | C1FSC1 – Baghouse<br>C1FSC2 – Scrubber<br>C1FSC3 – Scrubber<br>C1FSC4 –Carbon Bed |
| C1FU                | Bin                              | 1996                           | C1FUE                | None  |
| CIEV                | Extruder                         | 1982                           | C1FVE1               | None  |
| C1FV –              | Gear Pump                        | 2021                           | C1FVE2               | None  |
| C1FW                | Ingredient System                | 1996                           | Area                 | None  |
| CIFW                | ingredient System                | 1990                           | C1FWE                | None  |
| C1GA                | Cube Bin                         | 2006                           | C1GAE                | None  |
| C1GB                | Cube Bin                         | 2006                           | C1GBE                | None  |
| C1GC                | Cube Bin                         | 2006                           | C1GCE                | None  |
| C1GD                | Tank                             | 1996                           | C1GDE                | None  |

| Emission<br>Unit ID | Emission Unit Description           | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device  |
|---------------------|-------------------------------------|--------------------------------|----------------------|---|
| C1GF                | Isolation Filter                    | 2005                           | C1GFE                | C1GFC1 (Vacuum pumps) and<br>C1GFC2 (Spray tower)       |
| C1GG                | Ammonium Hydroxide System           | 2005                           | C1GGE                | None  |
| CICII               | In and Contain                      | 1006                           | C1FQE                | None  |
| C1GH                | Ingredient System                   | 1996                           | T7IME                | T7IMC – Thermal Converter                               |
| C1GJ                | Flake Conveying System              | 1996                           | C1GJE                | C1GJC – Bag Filter                                      |
| C1GK                | Sump                                | 1996                           | Area                 | None  |
| C1GL                | Pellet Conveyor- both fluorinators  | 2021                           | C1FEE                | C1MI (Cyclone), C1MJ<br>(Cyclone) & C1MIC<br>(Baghouse) |
| C1GN                | Conveying System                    | 1996                           | C1FEE                | C1GNC1 – Baghouse<br>C1GNC2 – Filter                    |
| C1GP                | Conveying System                    | 1996                           | C1GPE                | C1GPC – Baghouse  |
| C1GQ                | Conveying System                    | 1982                           | C1GQE                | C1GQC1 – Bag Filter<br>C1GQC2-Filter                    |
| C1GR                | Cleaning Station                    | 1982                           | C1GRE                | None  |
| C1GS                | Blender                             | 1988                           | C1GPE                | C1GPC – Baghouse  |
| C1GT                | Blender                             | 1988                           | C1GPE                | C1GPC – Baghouse  |
| C1GV                | Hopper                              | 1982                           | C1GVE                | None  |
| C1GW                | Isolation Filtrate Collection Tank  | 2005                           | C1GWE                | None  |
| C1GX                | VE Ingredient System                | 1996                           | C1GXE                | None  |
| C1GZ                | Oven                                | 2007                           | C1GZE                | C1GZC – Vacuum Pump                                     |
| C1MB                | Tank                                | 1996                           | C1MBE                | None  |
| C1ME                | Vent Recovery System                | 2005                           | T7IME                | T7IMC – Thermal Converter                               |
| C1MF                | Central Vacuum System               | 1982                           | C1MFE                | None  |
| C1MG                | Pellet Separation Cyclone           | 2021                           | C1MGE                | C1MGC - Baghouse  |
| C1MK                | South Fluorination Room Ventilation | 1986                           | C1FEE                | None  |
| C1ML                | Metals Lab                          | 2021                           | C1MLE                | None  |
| C1MM                | Clean Room Vent                     | 2021                           | C1MME                | None  |
| C1MN                | F2 Trailer Unloading Ventilation    | 2014                           | C1MNE                | None  |
| C1MO                | North Fluorination Room Ventilation | 2021                           | C1MOE                | None  |
| C1NM                | ACS Feed Tank                       | 2005                           | C1NPE                | C1NPC – Scrubber  |

| Emission<br>Unit ID             | Emission Unit Description | Year<br>Installed/<br>Modified | Emission<br>Point ID                              | Control Device                                       |
|---------------------------------|---------------------------|--------------------------------|---|--|
| CINP                            | Recovery System           | 2005                           | C1NPE   | CINPC – Scrubber                                     |
| C1NR                            | ACS Product Tank          | 2005                           | C1NPE   | C1NPC – Scrubber                                     |
| C1NPC                           | Scrubber                  | 2005                           | CINPC   | None   |
| C1MG                            | Cyclone                   | 2021                           | C1MGE   | C1MGC(Baghouse)                                      |
| C1NB                            | Tank                      | 2023                           | C1NBE   | None   |
| C1NC                            | Tank                      | 2023                           | C1NCE   | None   |
| C1ND                            | Ingredient System         | 2023                           | C1NDE   | None   |
| C1NE                            | Ingredient System         | 2023                           | C1NEE   | None   |
| C1NG,<br>C1NH                   | Product System            | 2023                           | C1NGE   | C1NGC Condenser                                      |
| C1PA                            | Tank                      | 2023                           | C1NGE   | C1NGC Condenser                                      |
| C1NF                            | Tank                      | 2023                           | C1NFE   | C1NFC Scrubber                                       |
| C1PC,<br>C1PD,<br>C1PE,<br>C1PF | Vacuum Pump               | 2023                           | C1PCE   | C1PCC Vacuum Pump                                    |
| C1PG,<br>C1PB                   | Tank                      | 2023                           | C1PGE   | C1PGC1, C1PGC2, C1PGC3<br>Filter/Scrubber/Carbon Bed |
| C1PH                            | Receiver                  | 2023                           | С1РНЕ   | C1PHC Filter Receiver                                |
| C1PI                            | Hopper                    | 2023                           | C1PIE   | None   |
| C1PK                            | Feeder                    | 2023                           | C1PKE   | None   |
| C1PJ                            | Feeder                    | 2023                           | С1РЈЕ   | None   |
| C1PM                            | Hopper                    | 2023                           | C1PME   | None   |
| C1PL                            | Process System            | 2023                           | C1PLE   | C1PLC Filter   |
| C1PN                            | Process System            | 2023                           | C1PNE   | C1PNC Vacuum Pump                                    |
| C1PU                            | Cleaning Station          | 2023                           | C1GRE   | None   |
| C1PO                            | Product System            | 2023                           | C1POE   | None   |
| C1PP,<br>C1PQ,<br>C1PR,<br>C1PS | Bins                      | 2023                           | C1PPE,<br>C1PQE,<br>C1PRE,<br>C1PSE<br>(combined) | None   |
| C1PT                            | Tank                      | 2023                           | C1PTE   | None   |
| C1QE                            | Container Loading         | 2023                           | C1QEE   | None   |

| Emission<br>Unit ID | Emission Unit Description       | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device  |
|---------------------|---------------------------------|--------------------------------|----------------------|---|
| <u>'</u>            |                                 | C2 Area                        |                      |   |
| C2DA                | Tank                            | 1982                           | C2DAE                | None  |
| C2DE                | Tank                            | 1982                           | C2DAE                | None  |
| C2DG                | Reactor                         | 2008                           | C2EJE                | None  |
| C2DH                | Sparge Bin for extruded pellets | 1996                           | C2DHE                | None  |
| C2DK                | Process Tank                    | 1996                           | C2DKE                | C2DKC – Bag Filter  |
| C2DO                | Common Bag Filter               | 1998                           | C2EUE                | C2EUC   |
| C2DS                | Conveying System                | 1989                           | C2DSE                | C2DSC – Bag Filter  |
| C2DW                | Dryer                           | 1982                           | C2DTE                | C2DWC1 – Bag Filter<br>C2DWC2 – Scrubber<br>C2DTC3 – Scrubber |
| C2EC                | Tank                            | 1982                           | C2DAE                | None  |
| C2EF                | Reactor                         | 1998                           | C2EFE                | None  |
| C2EG                | Process Equipment               | 1998                           | C2EGE                | C2EGC – Bag Filter  |
| С2ЕН                | Dryer                           | 1998                           | C2DTE                | C2EHC1 – Bag Filter<br>C2EHC2 – Scrubber<br>C2DTC3 – Scrubber |
| C2EJ                | Supply System                   | 1988                           | C2EFE                | None  |
|                     |                                 |                                | C2EJE                | None  |
| C2EN                | Conveying System                | 1998                           | C2ENE                | C2ENC – Bag Filter  |
| C2ER                | Extruder                        | 1998                           | C2ERE                | None  |
| C2ES                | Extruder                        | 1998                           | T7IME                | T7IMC – Thermal Converter                                     |
| C2ET                | Bin                             | 1998                           | C2ETE                | None  |
| C2EU                | Elutriator                      | 1998                           | C2EUE                | C2EUC – Bag Filter  |
| C2EV                | Packout                         | 1998                           | C2EVE                | None  |
| C2EZ                | Loading Station                 | 2006                           | C2EZE                | None  |
| C2KD                | Dryer                           | 1998                           | C2KDE                | None  |
| C2KO                | Process Equipment               | 1997                           | C2KOE1               | C2KOC1 – Bag Filter   |
| C2KP                | Process Equipment               | 1998                           | C2KPE                | C2KPC – Bag Filter  |
| C2KU                | Ingredient System               | 2005                           | C2KUE                | None  |
| C2KW                | Feed Tank                       | 2006                           | C2DAE                | None  |
| C2KX                | Storage Tank                    | 2006                           | C2DAE                | None  |
| C2KL                | Additive Bag Dump Station       | 2018                           | C2KLE                | C2KLC   |

| Emission<br>Unit ID | Emission Unit Description | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device            |
|---------------------|---------------------------|--------------------------------|----------------------|---------------------------|
| C2EB1               | Extruder                  | 2018                           | C2EBE                | C2EB1C / C2EB2C           |
| C2EB2               | Area Vent                 | 2018                           | C2EBE                | None                      |
| C2EA1               | Primary Feed Hopper       | 2018                           | C2EBE                | C2EA1C                    |
| C2EA2               | Secondary Feed Hopper     | 2018                           | C2EBE                | C2EA2C                    |
| C2KJ                | Gala Dryer                | 2018                           | C2EBE                | None                      |
| C2KN                | Powder Feeder Blower      | 2018                           | C2KNE                | C2KNC1 / C2KNC2           |
|                     |                           | C3 Area                        |                      |                           |
| СЗНА                | Tank                      | 1992                           | СЗНРЕ                | None                      |
| СЗНВ                | Tank                      | 1992                           | СЗНРЕ                | None                      |
| C3HD                | Tank                      | 1993                           | СЗНРЕ                | None                      |
|                     |                           |                                | T7IME                | T7IMC – Thermal Converter |
| C3HG                | Tank                      | 1992                           | C3HG2E               | None                      |
|                     |                           |                                | C3HGE                | C3HGC – Scrubber          |
| СЗНН                | Tank                      | 1992                           | C3HGE                | C3HGC – Scrubber          |
| СЗНІ                | Reactor                   | 1992                           | C3HIE                | None                      |
|                     |                           |                                | T7IME                | T7IMC – Thermal Converter |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device            |
|---------------------|-----------------------------------|--------------------------------|----------------------|---------------------------|
| СЗНЈ                | Still Pot                         | 1992                           | СЗНІЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
|                     |                                   |                                | СЗНРЕ                | C3HPC - Scrubber          |
| СЗНК                | Tank                              | 1992                           | СЗНРЕ                | C3HPC – Scrubber          |
| C3HL                | Cylinder                          | 1992                           | СЗНРЕ                | C3HPC – Scrubber          |
| СЗНМ                | Tank                              | 1992                           | СЗНРЕ                | C3HPC – Scrubber          |
| C3HN                | Tank                              | 1992                           | СЗНРЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| СЗНО                | Reactor                           | 1992                           | СЗНРЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| СЗНР                | Cylinder                          | 1992                           | СЗНРЕ                | C3HPC – Scrubber          |
| C3HQ                | Still Pot                         | 1992                           | СЗНРЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| C3HS                | Tank                              | 1990                           | СЗНРЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| СЗНТ                | Tank                              | 1992                           | СЗНІЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| СЗНХ                | Tank                              | 1992                           | СЗНРЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| C3ID                | Tank                              | 1992                           | СЗНРЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC - Thermal Converter |
| C3IE                | Tank                              | 1992                           | СЗНРЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| C3IF                | Tank                              | 1992                           | СЗНРЕ                | C3HPC – Scrubber          |
| C3IG                | Bulk Loading                      | 1992                           | СЗНРЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| СЗІН                | Tank                              | 1995                           | СЗНІЕ                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
|                     |                                   |                                |                      | None                      |
| C3IJ                | Tank                              | 1992                           | СЗНІЕ                |                           |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device                      |
|---------------------|-----------------------------------|--------------------------------|----------------------|-------------------------------------|
| C3IK                | Tank                              | 1992                           | C3HIE                | None                                |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter           |
| C3IL                | Tank                              | 1992                           | СЗНІЕ                | None                                |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter           |
| C3IM                | Tank                              | 1992                           | C3IME                | None                                |
| C3IN                | Tank                              | 1992                           | C3INE                | None                                |
| C3IO                | Tank                              | 1992                           | C3IOE                | None                                |
| C3IT                | Tank                              | 2001                           | СЗНРЕ                | None                                |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter           |
| C3IV                | Charge Pot                        | 1992                           | СЗНРЕ                | C3HPC – Scrubber                    |
| C3IW                | Pit                               | 1992                           | Area                 | None                                |
| C3IX                | Tank                              | 1992                           | СЗНРЕ                | None                                |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter           |
| C3IY                | Tank                              | 1992                           | СЗНРЕ                | None                                |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter           |
| C3IZ                | Tank                              | 2004                           | СЗНРЕ                | None                                |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter           |
| СЗЈА                | Filter                            | 2007                           | C3IPE                | None                                |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter           |
|                     |                                   | C4 Area                        |                      |                                     |
| <u>C4AA</u>         | <u>Hopper</u>                     | 2024                           | <u>C4AAE</u>         | C4AAC1 – Baghouse                   |
| C4AB                | <u>Hopper</u>                     | <u>2024</u>                    | <u>C4AAE</u>         | C4AAC1 – Baghouse                   |
| <u>C4AC</u>         | <u>Extruder</u>                   | 2024                           | <u>C4ACE</u>         | <u>None</u>                         |
| C4AD                | <u>Treater</u>                    | 2024                           | <u>C4ACE</u>         | <u>None</u>                         |
| <u>C4AE</u>         | <u>Cleaner</u>                    | 2024                           | <u>C4AEE</u>         | C4AEC1 – Liquid Ring<br>Vacuum Pump |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified   | Emission<br>Point ID | Control Device            |
|---------------------|-----------------------------------|----------------------------------|----------------------|---------------------------|
|                     | T1, T2, T3                        | 3, <b>T4</b> , and <b>T7</b> Are | as                   |                           |
| T1BB                | Compressor & Intercooler          | 1997                             | T7XIE                | T7XIC – Scrubber          |
| T1BC                | Compressor & Intercooler          | 1987                             | T7XIE                | T7XIC – Scrubber          |
| T1BD                | Compressor & Intercooler          | 1987                             | T7XIE                | T7XIC – Scrubber          |
| T1BE-BJ             | Coolers                           | 2000                             | T7XIE                | T7XIC – Scrubber          |
| T1BP-BT             | Storage Tanks                     | 1978                             | T7XIE                | T7XIC – Scrubber          |
| T1BW                | Absorber                          | 2001                             | T7IME                | T7IMC – Thermal Converter |
| T1BX                | Absorber                          | 2001                             | T7IME                | T7IMC – Thermal Converter |
| T1CA                | Furnace                           | 1994                             | T1CAE                | None                      |
|                     |                                   |                                  | T7XIE                | None                      |
| TICB                | Furnace                           | 1994                             | T1CBE                | None                      |
|                     |                                   |                                  | T7XIE                | None                      |

| Emission<br>Unit ID    | <b>Emissions Unit Description</b>      | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device            |
|------------------------|--|--------------------------------|----------------------|---------------------------|
| T1CC                   | Furnace                                | 1994                           | T1CCE                | None                      |
|                        |  |                                | T7XIE                | None                      |
| T1CD                   | Furnace                                | 2000                           | T1CDE                | None                      |
|                        |  |                                | T7XIE                | None                      |
| T1CK,<br>T1LA,<br>T1CL | Aftercoolers                           | 1999-2006                      | T7XIE                | T7XIC - Scrubber          |
| T1CU                   | Tank                                   | 1982                           | T7XIE                | None                      |
| T1CV                   | Dryer                                  | 1997                           | T7IME                | T7IMC – Thermal Converter |
| T1CW                   | Tank                                   | 1989                           | T7XIE                | T7XIC – Scrubber          |
| T1DB-DC                | Dryers                                 | 1985                           | T7XIE                | None                      |
|                        |  |                                | T1DBE                | None                      |
| T1DD-DF                | Coolers                                | 2000                           | T7XIE                | T7XIC – Scrubber          |
|                        |  |                                | T7IME                | T7IMC – Thermal Converter |
| T1DG-DH                | Bag Filters                            | 2000                           | T7XIE                | T7XIC – Scrubber          |
|                        |  |                                | T7IME                | T7IMC – Thermal Converter |
| TIDI                   | Vaporizer                              | 1997                           | T7XIE                | None                      |
|                        |  |                                | T7IME                | T7IMC – Thermal Converter |
| T1DS                   | Snubber Tank & Compressor Inlet Piping | 1997                           | T7XIE                | T7XIC – Scrubber          |
| T1DT                   | Spare Intercooler                      | 1999                           | T7XIE                | T7XIC – Scrubber          |
| T1DU                   | Compress Area Common Hi-Press Piping   | 1997                           | T7XIE                | T7XIC - Scrubber          |
|                        |  |                                | T7IME                | T7IMC – Thermal Converter |
| T1EE                   | Analyzer Vents                         | 1997-2006                      | T7XIE                | None                      |
| T1EV                   | Shipping Trailers                      | 1997                           | T7XIE                | T7XIC – Scrubber          |
| T1GN                   | Mixed Gas Holder                       | 1985                           | T1GNE                | None                      |
| T1JB                   | Raw Material Unloading                 | 2007                           | T1JBE                | None                      |
| T1LB-LE                | Raw Material Storage                   | 1955-1997                      | T7XIE                | None                      |
| T1LF                   | Storage Tank & Vaporizer               | 1989                           | T2ERE                | T2ERC – Scrubber          |
| T1LH                   | Feed Pump                              | 1997                           | T1LHE                | None                      |
| T1LI                   | Feed Pump                              | 1997                           | T1LIE                | None                      |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device            |
|---------------------|-----------------------------------|--------------------------------|----------------------|---------------------------|
| T1XA                | Compressor                        | 2000                           | T1XAE                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
|                     |                                   |                                | T7XIE                | T7XIC - Scrubber          |
| T1XC-C              | Absorber                          | 2001                           | T7IME                | T7IMC – Thermal Converter |
| T1XD                | Column                            | 1997                           | T7XIE                | T7XIC - Scrubber          |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| T1XG                | Column                            | 1997                           | T7XIE                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| T1XO                | Column – Feed Condenser           | 1997                           | T7XIE                | T7XIC – Scrubber          |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| T2EN                | Tank Car Loading                  | 2005                           | T2ERE                | T2ERC – Scrubber          |
| T2EO-EP             | Tanks                             | 2005                           | T2ERE                | T2ERC – Scrubber          |
| T2ER                | Storage Tanks                     | 2005                           | T2ERE                | T2ERC – Scrubber          |
| T2ES                | Air Stripper                      | 1997                           | T2ERE                | T2ERC – Scrubber          |
| T2ET                | HCl Aqueous Acid Tank #1          | 2015                           | T2ERE                | T2ERC - Scrubber          |
| T2EU                | HCl Aqueous Acid Tank #2          | 2015                           | T2ERE                | T2ERC - Scrubber          |
| T2EX                | Trailer Loading                   | 2000                           | T2EXE                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| T2EY                | Analyzer                          | 2000                           | T2EYE                | None                      |
| т2ХН,               | Cooler/Absorber                   | 1997                           | T2ERE                | T2ERC – Scrubber          |
| T2XL                |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| T2XJ                | Column                            | 1997                           | T7XIE                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| T2XM                | Column                            | 1997                           | T7XIE                | T7XIC – Scrubber          |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| T2XN                | Column 1997                       | 1997                           | T7XIE                | None                      |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter |
| T2XQ                | Vaporizer                         | 1997                           | T7XIE                | T7XIC – Scrubber          |
| T2XS                | Column Feed Cooler                | 1997                           | T7XIE                | None                      |
| T2XT-XU             | Adsorption Beds                   | 1997                           | T2ERE                | T2ERC – Scrubber          |
| T2XV                | Cooler Loop                       | 1997                           | T7XIE                | None                      |
| T3FB                | Furnace                           | 1997                           | T7XIE                | None                      |

| Emission<br>Unit ID | <b>Emissions Unit Description</b>            | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device            |
|---------------------|--|--------------------------------|----------------------|---------------------------|
| T4GB                | Storage Tank                                 | 1987                           | T4GBE                | None                      |
| T4GK                | Shipping Containers                          | 1983                           | T7XIE                | None                      |
| T4GM                | Column                                       | 1997                           | T7XIE                | T7XIC - Scrubber          |
|                     |  |                                | T7IME                | T7IMC – Thermal Converter |
| T4GO                | Recycle Tank                                 | 1979                           | T7XIE                | T7XIC – Scrubber          |
|                     |  |                                | T7IME                | T7IMC – Thermal Converter |
| T4GP                | Feed Tank                                    | 1983                           | T7XIE                | T7XIC – Scrubber          |
|                     |  |                                | T7IME                | T7IMC – Thermal Converter |
| T4GQ                | Recycle Tank                                 | 1983                           | T7XIE                | T7XIC – Scrubber          |
|                     |  |                                | T7IME                | T7IMC – Thermal Converter |
| T4GS                | Column                                       | 1997                           | T7XIE                | None                      |
| T4GT                | Column                                       | 1997                           | T7XIE                | None                      |
| T4GU                | Storage Tanks                                | 1997                           | T7XIE                | None                      |
| T4GV                | Storage Tank                                 | 1997                           | T7XIE                | None                      |
| T4GW                | Tank   | 1993                           | T7XIE                | None                      |
| T4GX                | Tank   | 1999                           | T7XIE                | None                      |
| T4KA                | Cylinder Loading                             | 1982                           | T7XIE                | None                      |
| T4KB                | Feed Tank                                    | 1993                           | T7XIE                | None                      |
| T4KC                | Truck Loading                                | 1982                           | T7XIE                | None                      |
| T4KD                | Tank Car Loading                             | 1982                           | T7XIE                | None                      |
| T4XK                | Column                                       | 1998                           | T7XIE                | None                      |
|                     |  |                                | T7IME                | T7IMC – Thermal Converter |
| T7AA                | Tank   | 1985                           | T7XIE                | None                      |
| T7AB                | Methylene Chloride System Losses             | 1985                           | T7ABE                | None                      |
| T7AK                | Cooling Tower                                | 2000                           | T7AKE                | None                      |
| T7EI,<br>T7XI       | N & S Stillhouse Vacuum System (Misc. Vents) | 1997                           | T7XIE                | T7XIC – Scrubber          |
| T7EM                | Portable Container Facility                  | 1996                           | T7EME                | None                      |
|                     |  |                                | T7IME                | T7IMC – Thermal Converter |
| T7IO                | Silo   | 1997                           | T7IOE                | T7IOC – Baghouse          |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device   |
|---------------------|-----------------------------------|--------------------------------|----------------------|------------------|
| T7JD                | Neutralization Tank               | 1986                           | T7JDE                | T7JDC – Scrubber |
| Т7ЈЈ                | Emergency Generator               | 2000                           | Т7ЈЈЕ                | None             |
|                     |                                   | T5 Area                        |                      |                  |
| T5HA                | Heater                            | 1998                           | T5HAE                | None             |
| Т5НВ                | Heater                            | 1998                           | Т5НВЕ                | None             |
| Т5НС                | Reactor                           | 1992                           | Area                 | None             |
|                     |                                   |                                | Т5НСЕ                | None             |
|                     |                                   |                                | T5HCE2               | None             |
| T5HD                | Reactor                           | 1997                           | Area                 | None             |
|                     |                                   |                                | T5HDE                | None             |
|                     |                                   |                                | T5HDE2               | None             |
| T5HF                | Mix Station Fume Hood             | NA                             | T5HFE                | None             |
| T5HG                | Dryer                             | 2001                           | T5HGE                | T5HGC – Cyclone  |
| T5HI                | Dryer                             | 2001                           | T5HIE                | T5HIC – Cyclone  |
| T5HN                | Raw Material System               | 2001                           | Area                 | None             |
|                     |                                   |                                | Т5НСЕ                | None             |
| Т5НО                | Tank                              | 1989                           | Area                 | None             |
| Т5НР                | Tank                              | 1997                           | T5HCE<br>T5HDE       | None             |
| Т5НТ                | #1 Tank                           | 1990                           | T5HTE<br>T5HDE       | None             |
| T5HU                | #2 Tank                           | 1990                           | T5HUE<br>T5HDE       | None             |
| T5HV                | #3 Tank                           | 1990                           | T5HVE<br>T5HDE       | None             |
| T5HW                | #4 Tank                           | 1989                           | Т5НСЕ                | None             |
|                     |                                   |                                | T5HWE                | None             |
| T5HX                | #5 Tank                           | 1997                           | T5HDE                | None             |
|                     |                                   |                                | T5HXE                | None             |
| T5HY                | Tank                              | 1995                           | Т5НҮЕ                | None             |
| T5HZ                | Tank                              | 1998                           | T5HZE                | None             |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device   |
|---------------------|-----------------------------------|--------------------------------|----------------------|--|
| l .                 |                                   | T6 Area                        |                      |  |
| T5HM                | Raw Material System               | 1990                           | T6IUE                | None   |
| T6IB                | Reactor 6                         | 1985                           | T6IBE                | None   |
| T6IC                | Reactor 7                         | 1985                           | T6ICE                | None   |
| T6ID                | Reactor 8                         | 1985                           | T6IDE                | None   |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter                              |
| T6IE                | Dryer 2                           | 1993                           | T6IEE                | None   |
|                     |                                   |                                | T6IZCE               | T6IFC – Packed Bed Scrubber<br>T6IZC – Deep Bed Filter |
| T6IF                | Dryer 3                           | 1989                           | T6IFE                | None   |
|                     |                                   |                                | T6IZCE               | T6IFC – Packed Bed Scrubber<br>T6IZC – Deep Bed Filter |
| T6IG                | #2 Float Tank                     | 2001                           | T6IGE                | None   |
| T6IH                | #3 Float Tank                     | 1988                           | T6IGE                | None   |
| T6II                | #1 Weigh Tank                     | 1985                           | T6IBE                | None   |
|                     |                                   |                                | T6IIE                | None   |
| T6IJ                | #2 Weigh Tank                     | 1985                           | T6ICE                | None   |
|                     |                                   |                                | T6IJE                | None   |
| T6IK                | #3 Weigh Tank                     | 1985                           | T6IDE                | None   |
|                     |                                   |                                | T6IKE                | None   |
| T6IL                | #4 Weigh Tank                     | 1985                           | T6ILE                | None   |
|                     |                                   |                                | T6IUE                | None   |
| T6IU                | Reactor 9                         | 2000                           | T6IUE                | None   |
|                     |                                   |                                | T7IME                | T7IMC – Thermal Converter                              |
| T6IV                | Dryer 1                           | 2001                           | T6IZCE               | T6IFC – Packed Bed Scrubber<br>T6IZC – Deep Bed Filter |
| T6IW                | #1 Float Tank                     | 2000                           | Т6РМЕ                | None   |
| T6IX                | #1 Chiller Cooler Vent            | 2001                           | T6IXE                | None   |
| T6IY                | #3 Chiller Cooler Vent            | 1989                           | T6IYE                | None   |
| T6IZ                | Accumulator Vent                  | NA                             | T6IZE                | None   |
| Т6ЈЕ                | Ingredient Tank                   | 1988                           | T6JEE                | None   |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device       |
|---------------------|-----------------------------------|--------------------------------|----------------------|----------------------|
| T6JF                | Ingredient Tank                   | NA                             | T6JFE                | None                 |
| T6PA                | Head Tank                         | 1988                           | T6PAE                | None                 |
| Т6РВ                | Feed System                       | 1985                           | T6IBE T6ICE T6IDE    | None<br>None<br>None |
|                     |                                   |                                | T6IUE                | None                 |
| T6PC                | Decanter 6                        | 1988                           | T6PCE                | None                 |
| T6PD                | Decanter 7                        | 1986                           | T6PDE                | None                 |
| T6PE                | Decanter 8                        | 2000                           | T6PEE                | None                 |
| T6PF                | Decanter 9                        | 2000                           | T6PFE                | None                 |
| T6PG                | Stabilization Tank #3             | 1985                           | T6PGE                | None                 |
| Т6РН                | Stabilization Tank #4             | 1985                           | T6PGE                | None                 |
| Т6РІ                | Feed System                       | 2001                           | Area                 | None                 |
|                     |                                   |                                | T6IBE                | None                 |
|                     |                                   |                                | T6ICE                | None                 |
|                     |                                   |                                | T6IDE                | None                 |
|                     |                                   |                                | T6IUE                | None                 |
|                     |                                   | 2022                           | T6PIE                | None                 |
| T6PJ                | Raw Material Feed System          | 2001                           | Area                 | None                 |
|                     |                                   |                                | T6IBE                | None                 |
|                     |                                   |                                | T6ICE                | None                 |
|                     |                                   |                                | T6IDE                | None                 |
|                     |                                   |                                | T6IUE                | None                 |
| T6PK                | Stabilization Tank                | NA                             | T6PGE                | None                 |
| T6PL                | Process Tank                      | 1998                           | T6PGE                | None                 |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device |
|---------------------|-----------------------------------|--------------------------------|----------------------|----------------|
| T6PM                | Process Tank                      | 2001                           | T6PME                | None           |
| T6PN                | Process Tank                      | 2001                           | T6PNE                | None           |
| Т6РО                | Storage Tank                      | 2001                           | Т6РОЕ                | None           |
| T6PP                | Storage Tank                      | 2001                           | Т6РРЕ                | None           |
| T6PQ                | Formulation Tank                  | 2001                           | T6PQE                | None           |
| T6PR                | Fresh Tank                        | 1994                           | T6PRE                | None           |
| T6PS                | Melt Tank                         | 2001                           | T6PSE                | None           |
| T6PT                | Decanter                          | 1997                           | Area                 | None           |
| T6PU                | Process Tank                      | 2000                           | T6PUE                | None           |
| T6PV                | Process Tank                      | NA                             | T6PVE                | None           |
| T6PW                | Process Tank                      | 1993                           | T6PWE                | None           |
| T6PX                | Process Tank                      | 1988                           | T6PXE                | None           |
| T6PY                | Supernate Tank                    | NA                             | Т6РҮЕ                | None           |
| T6PZ                | Process Tank                      | 1998                           | T6PZE                | None           |
| T6QA                | Ion Exchange Columns              | 2006                           | T6QAE                | None           |
| T6QB                | Ion Exchange Columns              | 2006                           | T6QBE                | None           |
| T6QE                | Ion Exchange Columns              | 2006                           | T6QEE                | None           |
| T6QF                | Ion Exchange Columns              | 2006                           | T6QFE                | None           |
| T6QG                | Feed Tank                         | 2006                           | T6PGE                | None           |
| T6QH                | Feed Tank                         | 2006                           | T6PGE                | None           |
| T6QI                | Knockout Pot                      | 1985                           | Area                 | None           |
| T6QJ                | #6 Tank                           | 1985                           | T6IBE                | None           |
| T6QK                | #7 Tank                           | 1985                           | T6ICE                | None           |
| T6QL                | #8 Tank                           | 1985                           | T6IDE                | None           |
| T6QM                | #9 Tank                           | 1992                           | T6IUE                | None           |
| T6QN                | Blend Tank #1                     | 1985                           | T6QNE                | None           |
| T6QO                | Blend Tank #2                     | 1985                           | T6QOE                | None           |
| T6QP                | Blend Tank #3                     | 1986                           | T6QPE                | None           |
| T6QQ                | Blend Tank #4                     | 1986                           | T6QQE                | None           |
| T6QR                | Blend Tank #5                     | 2000                           | T6QRE                | None           |
| T6QS                | Blend Tank #6                     | 2000                           | T6QSE                | None           |
| T6QT                | Blend Tank #7                     | 2000                           | T6QTE                | None           |

| Emission<br>Unit ID | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device |
|---------------------|-----------------------------------|--------------------------------|----------------------|----------------|
| T6QU                | Ingredient Tote #1                | NA                             | T6QUE                | None           |
| T6QV                | Ingredient Tote #2                | NA                             | T6QVE                | None           |
| T6QW                | Recovered Ingredient Feed Tank #1 | 2002                           | T6QWE                | None           |
| T6QY                | Recovered Ingredient Feed Tank #2 | 2002                           | T6QYE                | None           |
| T6QZ                | Recovered Ingredient Storage Tank | 2002                           | T6QZE                | None           |
| T6RA                | Filters                           | 2000                           | T6RAE                | None           |
| T6RB                | Reactor Waste Solids Drum         | NA                             | T6RBE                | None           |
| T6RC                | Coagulator #1                     | 1999                           | T6RCE                | None           |
| T6RD                | Coagulator #2                     | 1988                           | T6RDE                | None           |
| T6RE                | Coagulator #3                     | 1988                           | T6REE                | None           |
| T6RF                | Conveyor #1                       | 2001                           | T6RFE                | None           |
| T6RG                | Conveyor #2                       | 1993                           | T6RGE                | None           |
| T6RH                | Conveyor #3                       | 1989                           | T6RHE                | None           |
| T6RI                | FP Packout                        | 1993                           | T6RIE                | None           |
| T6RJ                | Packout Tank #1                   | 2001                           | T6RJE                | None           |
| T6RK                | Packout Tank #2                   | 2001                           | T6RKE                | None           |
| T6RL                | Ingredient Tank #1                | 1986                           | T6RLE                | None           |
| T6RM                | Ingredient Tank #2                | 1986                           | T6RME                | None           |
| T6RN                | Ingredient Tank #3                | 1986                           | T6RNE                | None           |
| T6RO                | Ingredient Tank #4                | 1986                           | T6ROE                | None           |
| T6RP                | Ingredient Tank #5                | 1986                           | T6RPE                | None           |
| T6RQ                | Ingredient Tank #6                | 1986                           | T6RQE                | None           |
| T6RR                | Ingredient Tank #7                | 2000                           | T6RRE                | None           |
| T6RS                | Ingredient Tank #8                | 2000                           | T6RSE                | None           |
| T6RT                | Ingredient Tank #9                | 2000                           | T6RTE                | None           |
| T6RU                | Ingredient Tank #10               | 2000                           | T6RUE                | None           |
| T6RV                | Ingredient Tank #11               | 1986                           | T6RVE                | None           |
| T6RW                | Ingredient Tank #12               | 1986                           | T6RWE                | None           |
| T6RX                | Ingredient Tank #13               | 1986                           | T6RXE                | None           |
| T6RY                | Ingredient Tank #14               | 1986                           | T6RYE                | None           |
| T6RZ                | Ingredient Tank #15               | 1986                           | T6RZE                | None           |
| T6SA                | Ingredient Tank #16               | 1986                           | T6SAE                | None           |

| Emission<br>Unit ID           | <b>Emissions Unit Description</b> | Year<br>Installed/<br>Modified | Emission<br>Point ID | Control Device |  |
|-------------------------------|-----------------------------------|--------------------------------|----------------------|----------------|--|
| T6SB                          | WIT Tank                          | NA                             | T6SBE                | None           |  |
| T6SC                          | Cylinder<br>Feed System           | NA<br>2022                     | T6SCE                | None           |  |
| T6SD                          | Reactor Knockout                  | 1985-2000                      | T6SDE                | None           |  |
| T6SE                          | Ingredient Truck Uploading Area   | NA                             | T6SEE                | None           |  |
| T6SJ                          | Solids-Liquids Separation Tank    | 2015                           | T6SJE                | None           |  |
| T6SK                          | Cooling Tower                     | 2021                           | T6SKE                | None           |  |
| T6SL                          | Container Loading                 | 2022                           | T6SLE                | None           |  |
| Mineral Spirits Parts Washers |                                   |                                |                      |                |  |
| C1LD                          | Parts Washer                      | 2010                           | C1LDE                | None           |  |
| T1JG                          | Parts Washer                      | NA                             | T1JGE                | None           |  |

# 1.2. Active R13, R14, and R19 Permits

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

| Area                      | Permit or<br>Consent Order<br>Number | Date of<br>Issuance | Permit Determinations or<br>Amendments That Affect<br>the Permit (if any) |
|---------------------------|--------------------------------------|---------------------|---|
| All                       | R13-3223                             | December 8, 2014    | NA  |
| C1                        | R13-2365T                            | November 16, 2023   | NA  |
| C2                        | R13-1953M                            | October-26, 2023    | NA  |
| C3                        | R13-2391I                            | August 7, 2015      | NA  |
| <u>C4</u>                 | <u>R13-3645</u>                      | March 12, 2024      | <u>NA</u>   |
| T1, T2, T3, T4,<br>and T7 | R13-1823Q                            | February 6, 2024    | NA  |
| T5                        | R13-1353I                            | March 13, 2019      | NA  |
| Т6                        | R13-0815N                            | March 17, 2023      | NA  |

#### 2.0 General Conditions

#### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.39.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

# 2.2. Acronyms

| CAAA                   | Clean Air Act Amendments          | NSPS      | New Source Performance          |
|------------------------|-----------------------------------|-----------|---------------------------------|
| CBI                    | Confidential Business Information |           | Standards                       |
| CEM                    | Continuous Emission Monitor       | PM        | Particulate Matter              |
| CES                    | Certified Emission Statement      | $PM_{10}$ | Particulate Matter less than    |
| C.F.R. or CFR          | Code of Federal Regulations       |           | 10μm in diameter                |
| CO                     | Carbon Monoxide                   | pph       | Pounds per Hour                 |
| C.S.R. or CSR          | Codes of State Rules              | ppm       | Parts per Million               |
| DAQ                    | Division of Air Quality           | PSD       | Prevention of Significant       |
| DEP                    | Department of Environmental       |           | Deterioration                   |
|                        | Protection                        | psi       | Pounds per Square Inch          |
| FOIA                   | Freedom of Information Act        | SIC       | Standard Industrial             |
| HAP                    | Hazardous Air Pollutant           |           | Classification                  |
| HON                    | Hazardous Organic NESHAP          | SIP       | State Implementation Plan       |
| HP                     | Horsepower                        | $SO_2$    | Sulfur Dioxide                  |
| lbs/hr <i>or</i> lb/hr | Pounds per Hour                   | TAP       | Toxic Air Pollutant             |
| LDAR                   | Leak Detection and Repair         | TPY       | Tons per Year                   |
| m                      | Thousand                          | TRS       | Total Reduced Sulfur            |
| MACT                   | Maximum Achievable Control        | TSP       | Total Suspended Particulate     |
|                        | Technology                        | USEPA     | United States                   |
| mm                     | Million                           |           | <b>Environmental Protection</b> |
| mmBtu/hr               | Million British Thermal Units per |           | Agency                          |
|                        | Hour                              | UTM       | Universal Transverse            |
| mmft³/hr <i>or</i>     | Million Cubic Feet Burned per     |           | Mercator                        |
| mmcf/hr                | Hour                              | VEE       | Visual Emissions                |
| NA or N/A              | Not Applicable                    |           | Evaluation                      |
| NAAQS                  | National Ambient Air Quality      | VOC       | Volatile Organic                |
|                        | Standards                         |           | Compounds                       |
| NESHAPS                | National Emissions Standards for  |           |                                 |
|                        | Hazardous Air Pollutants          |           |                                 |
| $NO_x$                 | Nitrogen Oxides                   |           |                                 |

# 2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c. [45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.

[45CSR§30-4.1.a.3.]

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

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

  [45CSR§30-6.3.c.]

#### 2.4. Permit Actions

2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[45CSR§30-5.1.f.3.]

# 2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
  - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
  - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

#### 2.6. Administrative Permit Amendments

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

[45CSR§30-6.4.]

#### 2.7. Minor Permit Modifications

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

[45CSR§30-6.5.a.]

# 2.8. Significant Permit Modification

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

## 2.9. Emissions Trading

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

[45CSR§30-5.1.h.]

### 2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
  - a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
  - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
  - c. The change shall not qualify for the permit shield.
  - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
  - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

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

[45CSR§30-5.9.]

## 2.11. Operational Flexibility

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

[45CSR§30-5.8]

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

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:
  - a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
  - b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

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

[45CSR§30-2.40]

## 2.12. Reasonably Anticipated Operating Scenarios

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
  - a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
  - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
  - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

## 2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

#### 2.14. Inspection and Entry

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
  - a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

## 2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
  - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

#### 2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations. [45CSR§30-5.1.f.2.]

#### 2.17. Reserved

## 2.18. Federally-Enforceable Requirements

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

# 2.19. Duty to Provide Information

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

[45CSR§30-5.1.f.5.]

# 2.20. Duty to Supplement and Correct Information

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

[45CSR§30-4.2.]

## 2.21. Permit Shield

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

  [45CSR§30-5.6.a.]
- 2.21.2. Nothing in this permit shall alter or affect the following:
  - a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
  - b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
  - c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

#### 2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding. [45CSR§30-5.3.e.3.B.]

## 2.23. Severability

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

#### 2.24. Property Rights

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

# 2.25. Acid Deposition Control

- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.
  - a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
  - b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
  - c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

## [45CSR§30-5.1.d.]

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

# 3.0 Facility-Wide Requirements

#### 3.1. Limitations and Standards

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

[45CSR§6-3.2.]

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

[40 C.F.R. §61.145(b) and 45CSR34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.

[45CSR§4-3.1 State-Enforceable only.]

3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.

[45CSR§11-5.2]

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.

[W.Va. Code § 22-5-4(a)(14)]

- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

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

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

- 3.1.8. **Risk Management Plan.** This stationary source, as defined in 40 C.F.R. § 68.3, is subject to Part 68. This stationary source shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. Part 68.10. This stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71. **140 C.F.R. 681**
- 3.1.9. **Fugitives.** No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. [45CSR§7-5.1.; 45CSR13, R13-2365, 5.1.1.; 45CSR13, R13-1953, 4.1.18; 45CSR13, R13-2391, B.8; 45CSR13, R13-1353, B.2; 45CSR13, R13-0815, 5.1.6; 45CSR13, R13-3645, 5.1.1]
- 3.1.10. **Fugitives.** The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. [45CSR§7-5.2; 45CSR13, R13-2365, 5.1.1.; 45CSR13, R13-1953, 4.1.19; 45CSR13, R13-2391, B.8; 45CSR13, R13-1353, B.2; 45CSR13, R13-0815, 5.1.1; 45CSR13, R13-3645, 5.1.1]
- 3.1.11. MACT Applicability Determination Records. An owner or operator of a stationary source that emits (or has the potential to emit, without considering control(s) one or more hazardous air pollutants who determines that the source is not subject to a relevant standard or other requirement established under this part, shall keep a record of the applicability determination as specified in §63.10(b)(3) of 40 C.F.R. 63 Subpart A. [45CSR34 and 40 C.F.R. §63.10(b)(3)]
- 3.1.12. Reserved.
- 3.1.13. Reserved
- 3.1.14. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. [45CSR§7-4.12; 45CSR13, R13-2365, 5.1.1.; 45CSR13, R13-1953, 4.1.17; 45CSR13, R13-2391, B.8; 45CSR13, R13-1823, 4.3.4.; 45CSR13, R13-1353, B.2; 45CSR13, R13-0815, 5.1.5; 45CSR13, R13-3645, 5.1.1]
- 3.1.15. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. [45CSR§7-9.1; 45CSR13, R13-2365, 5.1.1; 45CSR13, R13-1953, 4.1.20; 45CSR13, R13-2391, B.8; 45CSR13, R13-1353, B.2; 45CSR13, R13-0815, 5.1.1; 45CSR13, R13-3645, 5.1.1]

3.1.16. **45CSR21.** The permittee shall comply with all hourly and annual emission limits set forth by the affected 45CSR13 permits, for each of the sources and associated emission points identified in Attachment A of Permit R13-3223 (Appendix E of this Permit).

Note: For the Fluoropolymer Production Area, the affected permits are R13-2365, R13-1953, R13-2391, R13-1823, R13-1353, and R13-0815, and R13-3645, and the Attachment A listing only for those sources in the Fluoropolymer Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.1.1; 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]

- 3.1.17. **45CSR21**. The permitted sources identified in Appendix E and recognized as being subject to 45CSR21 shall comply with all applicable requirements of 45CSR21 "Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds" provided, however, that compliance with any more stringent requirements under the affected 45CSR13 permit identified in Appendix E, are also demonstrated. The applicable requirements set forth by 45CSR21 shall include, but not be limited to, the following: [45CSR13, R13-3223, 4.1.2; 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2; 45CSR13, R13-3645, 6.1.1]
  - 3.1.17.1. The permittee shall maintain the aggregated hourly and annual VOC control efficiency of 90% or greater, on a site-wide basis, for all existing sources listed or required to be listed as part of the original facility-wide Reasonably Available Control Measures (RACM) plan, as identified in Appendix E. [45CSR13, R13-3223, 4.1.2.1; 45CSR§21-40.3.a.1 (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2; 45CSR13, R13-3645, 6.1.1]
  - 3.1.17.2. On or after May 1, 1996, construction or modification of any emission source resulting in a maximum theoretical emissions (MTE) of VOCs equaling or exceeding six (6) pounds per hour and not listed or required to be listed in the facility-wide RACM plan shall require the prior approval by the Director of an emission control plan that meets the definition of reasonable available control technology (RACT) on a case-by-case basis for both fugitive and non-fugitive VOC emissions from such source. All sources constructed or modified on or after May 1, 1996 shall be subject to the following: [45CSR13, R13-3223, 4.1.2.2; 45CSR§21-40.3.c (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]
    - a. The RACT control plan(s) shall be embodied in a permit in accordance to 45CSR13. [45CSR13, R13-3223, 4.1.2.2.a; 45CSR\$21-40.4.e (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]
    - b. The MTE and associated emission reductions of the constructed or modified source will not be calculated into the site-wide aggregate hourly and annual emissions reduction requirements set forth in Section 3.1.17.1. [45CSR13, R13-3223, 4.1.2.2.b; 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]
  - 3.1.17.3. If a modification to an existing source with current MTE below the threshold of six (6) pounds per hour of VOCs causes an increase in the MTE that results in the source exceeding the six (6) pounds per hour threshold for the first time, the source shall be subject to RACT in accordance to

- Section 3.1.17.2. [45CSR13, R13-3223, 4.1.2.3; 45CSR§21-40.3.c (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2; 45CSR13, R13-3645, 6.1.1.a]
- 3.1.17.4. Physical changes to or changes in the method of operation of an existing emission source listed or required to be listed as part of the facility-wide RACM plan, that results in an increase in VOC emissions of any amount, shall require the prior approval by the Director of an emission control plan that meets the definition of RACT on a case-by-case basis for both fugitive and non-fugitive VOC emissions from the source. All sources modified on or after May 1, 1996 shall be subject to the following; [45CSR13, R13-3223, 4.1.2.4; 45CSR§21-40.3.c (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]
  - a. The RACT control plan (s) shall be embodied in a permit in accordance to 45CSR13. [45CSR13, R13-3223, 4.1.2.4.a; 45CSR\$21-40.4.e (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]
  - b. The facility-wide RACM plan shall be modified to include the RACT analysis conducted on the modified source(s). [45CSR13, R13-3223, 4.1.2.4.b; 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]
  - c. The MTE and associated emission reductions of the modified source shall be recalculated as part of the site-wide aggregate hourly and annual emissions reduction requirements to demonstrate compliance with the minimum 90% reduction rate as set forth in 3.1.17.1 of this permit. [45CSR13, R13-3223, 4.1.2.4.c; 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]
- 3.1.17.5. In the event the facility-wide RACM plan is modified to delete an existing emission source, and any associated pollution control equipment, due to the source being permanently removed from service or reassigned to service not subject to the requirements of 45CSR§21-40, the MTE shall be recalculated to demonstrate that the 90% facility-wide VOC reduction requirement set forth in Section 3.1.17.1 is still being met. In the event such a modification results in the site-wide aggregate hourly and annual emissions reduction being recalculated to a rate less than 90%, the RACM plan shall be revised to include all new and/or modified sources and their associated control technologies constructed on or after May 1, 1996, in order to meet the requirements set forth in 3.1.17.1. [45CSR13, R13-3223, 4.1.2.5; 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]
- 3.1.17.6. In the event a source and associated emission point identified in Appendix E is subject to the New Source Performance Standards (NSPS) of 40 C.F.R. 60, the National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40 C.F.R. 61, or the Maximum Achievable Control Technology (MACT) standards of 40 C.F.R. 63, then compliance with such requirements as defined in the affected 45CSR13 permit shall demonstrate compliance with the RACT requirements set forth in R13-3223. [45CSR13, R13-3223, 4.1.2.6; 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]

Note: For the Fluoropolymer Production Area, the affected permits are R13-2365, R13-1953, R13-2391, R13-1823, R13-1353, and R13-0815, and R13-3645, and the Attachment A listing only for those

sources in the Fluoropolymer Production Area is provided in Appendix E.

- 3.1.18. **45CSR27**. The permitted sources identified in Appendix E and recognized as being subject to 45CSR27 shall comply with all applicable requirements of 45CSR27 "To Prevent and Control the Emissions of Toxic Air Pollutants" provided, however, that compliance with any more stringent requirements under the affected 45CSR13 permit identified in Appendix E are also demonstrated. The applicable requirements set forth by 45CSR27 shall include, but not be limited to, the following: **[45CSR13, R13-3223, 4.1.3; 45CSR13, R13-1823, 4.1.25]** 
  - 3.1.18.1. The permittee shall employ the best available technology (BAT) for the purpose of reducing toxic air pollutants (TAP) associated with the applicable sources and emission points identified in Appendix E. [45CSR13, R13-3223, 4.1.3.1; 45CSR§27-3.1 (State-Enforceable only); 45CSR13, R13-1823, 4.1.25]
  - 3.1.18.2. The permittee shall employ BAT for the purpose of preventing and controlling fugitive emissions of TAP to the atmosphere as a result of routing leakage from those sources and their associated equipment identified in Appendix E as operating in TAP service. [45CSR13, R13-3223, 4.1.3.2; 45CSR\$27-4.1 (State-Enforceable only); 45CSR13, R13-1823, 4.1.25]

Note: For the Fluoropolymer Production Area, the affected permits are R13-2365, R13-1953, R13-2391, R13-1823, R13-1353, and R13-0815, and the Attachment A listing only for those sources in the Fluoropolymer Production Area is provided in Appendix E.

3.1.19. **45CSR27.** In the event a source and associated emission point identified in Appendix E are subject to the MACT standards of 40 C.F.R. 63, then compliance with the applicable MACT requirements identified in the affected 45CSR13 permit shall demonstrate compliance with the BAT requirements set forth in 3.1.18.

Note: For the Fluoropolymer Production Area, the affected permits are R13-2365, R13-1953, R13-2391, R13-1823, R13-1353, and R13-0815, and the Attachment A listing only for those sources in the Fluoropolymer Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.1.4; 45CSR§27-3.1 (State-Enforceable only); 45CSR13, R13-1823, 4.1.25]

- 3.1.20. Reserved.
- 3.1.21. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Appendix E and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. [45CSR13, R13-3223, 4.1.5; 45CSR13, R13-1953, 4.1.23; 45CSR13, R13-1823, 4.1.26; 45CSR13, R13-0815, 4.1.9; 45CSR13, R13-3645, 4.1.7]
- 3.1.22. The Permittee shall not purchase, manufacture, store, or use Ammonium Perfluorooctanoate (APFO) for commercial or non-analytical purposes within the Chemours' Washington Works Facility. The facility may purchase, store, or use APFO for compliance or analytical investigative purposes at the Washington Works facility.

[45CSR13, R13-2365, 4.1.4; 45CSR13, R13-1953, Condition 4.1.5; 45CSR13, R13-1823, Condition 4.1.3; 45CSR13, R13-1353, Condition A.7; 45CSR13, R13-0815, Condition 4.1.6; 45CSR13, R13-3645, 4.1.5]

3.1.23. In accordance with the provisions of the Consent Decree in U.S. v. E.I. DuPont De Nemours And Company, Civil Action No. 6:13-cv-27030 (S.D. W.Va.), including the definition in Paragraph 7 of the Consent Decree where applicable, Chemours shall do the following.

- a. Maintain the LDAR Manual as required by Paragraph C of Attachment A of the above referenced Consent Decree.
- b. Review the LDAR Manual annually and update as needed as stated in Paragraph G of Attachment A of the above referenced Consent Decree.
- c. Adhere to the Enhanced LDAR Program (ELP), specifically referenced in Section I of Attachment B of the above referenced Consent Decree.

[45CSR§13-5.10.; 45CSR13, R13-1823, 4.1.27]

## 3.2. Monitoring Requirements

- 3.2.1. Reserved.
- 3.2.2. **45CSR21.** The permittee shall implement and maintain leak detection and repair (LDAR) programs for the reduction of fugitive VOC emissions in all manufacturing process units subject to 45CSR§21-40 producing a product or products intermediate or final, in excess of 1,000 megagrams (1,100 tons) per year in accordance with the applicable methods and criteria of 45CSR§21-37 or alternate procedures approved by the Director. Procedures approved by the Director, 40 C.F.R. 60, Subpart VV, 40 C.F.R. 61, Subpart V, 40 C.F.R. 63, Subpart H, 40 C.F.R. 63, Subpart TT, 40 C.F.R. 63, Subpart UU, 40 C.F.R. 65, Subpart F, and 40 C.F.R. 265, Subpart CC. This requirement shall apply to all units identified in Appendix E irrespective of whether or not such units produce as intermediates or final products, substances on the lists contained with 40 C.F.R. 60, 40 C.F.R. 61, or 40 C.F.R. 63.

Note: The Attachment A listing only for those sources in the Fluoropolymers Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.2.1; 45CSR§21-40.3.a.2 (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2; 45CSR13, R13-3645, 6.1.1.b]

3.2.3. **45CSR27.** The permittee shall implement and maintain a LDAR program for the applicable sources and emission points identified in Appendix E in order to reduce the emissions of TAP in accordance with the requirements of 40 C.F.R. 63, Subpart H – "National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks." Compliance with 40 C.F.R. 63, Subpart H shall be considered demonstration of compliance with the provisions of 45CSR§27-4 – "Fugitive Emissions of Toxic Air Pollutants."

Note: The Attachment A listing only for those sources in the Fluoropolymers Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.2.2; 45CSR§27-4.1 (State-Enforceable only); 45CSR13, R13-1823, 4.1.25]

3.2.4. **45CSR21.** In the event a source and associated emission point identified in Appendix E are subject to the MACT standards of 40 C.F.R. 63, then compliance with any applicable LDAR program set forth by the MACT and identified in the affected 45CSR13 permit shall demonstrate compliance with the monitoring requirements set forth in this permit.

Note:

For the Fluoropolymer Production Area, the affected permits are R13-2365, R13-1953, R13-2391, R13-1823, R13-1353, and R13-0815, and R13-3645, and the Attachment A listing only for those sources in the Fluoropolymer Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.2.3; 45CSR§21-37.1.c (State-Enforceable only); 45CSR§27-4.1 (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]

#### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
  - a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
  - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
  - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  - 1. The permit or rule evaluated, with the citation number and language.
  - 2. The result of the test for each permit or rule condition.
  - 3. A statement of compliance or non-compliance with each permit or rule condition.

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

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

[45CSR13, R13-3223, 4.3.1; 45CSR§21-40.3.a.2 (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2; 45CSR13, R13-3645, 6.1.1.c]

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

Note: For the Fluoropolymer Production Area, the affected permits are R13-2365, R13-1953, R13-2391, R13-1823, R13-1353, and R13-0815, and R13-3645, and the Attachment A listing only for those sources in the Fluoropolymer Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.3.2; 45CSR§21-37.1.c (State-Enforceable only); 45CSR§27-4.1 (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]

#### 3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
  - a. The date, place as defined in this permit and time of sampling or measurements;

- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-3223, 4.4.1; 45CSR13, R13-1953, 4.4.1; 45CSR13, R13-1823, 4.4.1; 45CSR13, R13-2365, 4.4.2; 45CSR13, R13-0815, 4.4.1; 45CSR13, R13-3645, 4.4.2]

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

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken. [45CSR§30-5.1.c. State-Enforceable only.]
- 3.4.4. **Fugitives.** The permittee shall monitor all fugitive particulate emission sources as required by 3.1.9 to ensure that a system to minimize fugitive emissions has been installed or implemented. Records shall be maintained on site stating the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems.

  [45CSR§30-5.1.c.; 45CSR13, R13-1953, 4.4.7]
- 3.4.5. **Fugitives.** The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures as required by 3.1.10 applied at the facility [45CSR§30-5.1.c.; 45CSR13, R13-1953, 4.4.8]
- 3.4.6. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
  - a. The equipment involved.
  - b. Steps taken to minimize emissions during the event.
  - c. The duration of the event.
  - d. The estimated increase in emissions during the event.

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

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

[45CSR13, R13-3223, 4.4.3; 45CSR13, R13-1823, 4.4.3; 45CSR13, R13-1953, 4.4.3; 45CSR13, R13-2365, 4.4.4; 45CSR13, R13-0815, 4.4.3; 45CSR13, R13-3645, 4.4.4]

3.4.7. **45CSR21.** Unless granted a variance pursuant to 45CSR§21-9.3, or as approved by the Director as part of a required Start-up, Shutdown, and Malfunction (SSM) Plan mandated under 40 C.F.R. §63.6(e) or another applicable Section of 40 C.F.R. 63, the owner or operator of the facility shall operate all emission control equipment listed Appendix E as part of the facility-wide control efficiency plan at all times the facilities are in operation or VOC emissions are occurring from these sources or activities. In the event of a malfunction, and a variance has not been granted, the production unit shall be shutdown or the activity discontinued as expeditiously as possible. The permittee shall comply with 45CSR§21-9.3 with respect to all periods of non-compliance with the emission limitations set forth in the affected 45CSR13 permits and the emissions reduction requests set forth in the facility-wide control efficiency plan resulting from unavoidable malfunctions of equipment.

Note: For the Fluoropolymer Production Area, the affected permits are R13-2365, R13-1953, R13-2391, R13-1823, R13-1353, and R13-0815, and R13-3645, and the Attachment A listing only for those sources in the Fluoropolymer Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.4.4; 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2; 45CSR13, R13-3645, 6.1.1.d]

3.4.8. **45CSR27.** The permittee shall maintain records of the results of all monitoring and inspections, emission control measures applied, and the nature, timing, and results of repair efforts conducted in accordance to 45CSR§27-10 and set forth in the affected 45CSR13 permits as identified in Appendix E.

Note: For the Fluoropolymer Production Area, the affected permits are R13-2365, R13-1953, R13-2391, R13-1823, R13-1353, and R13-0815, and the Attachment A listing only for those sources in the Fluoropolymer Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.4.5; 45CSR13, R13-1823, 4.1.25]

- 3.4.9. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures. [45CSR13, R13-1953, 4.4.2; 45CSR13, R13-1823, 4.4.2; 45CSR13, R13-3223, 4.4.2; 45CSR13, R13-2365, 4.4.3; 45CSR13, R13-0815, 4.4.2; 45CSR13, R13-3645, 4.4.3]
- 3.4.10. **40** C.F.R. **63**, **Subpart GGGGG**. The permittee's site remediation activities are not subject to the requirements of 40 C.F.R. **63** Subpart GGGGG, except for the recordkeeping requirements in 3.4.10.2, provided that the permittee meets the requirements specified in paragraphs 3.4.10.1. through 3.4.10.2, and 40 C.F.R. §63.7881(c)(3).

- 3.4.10.1. The permittee determines that the total quantity of the HAP listed in Table 1 to 40 C.F.R. 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped, or otherwise removed during all of the site remediations conducted at your facility is less than 1 megagram (Mg) annually. This exemption applies the 1 Mg limit on a facility-wide, annual basis, and there is no restriction to the number of site remediations that can be conducted during this period.
- 3.4.10.2. The permittee must prepare and maintain at the facility written documentation to support the determination that the total HAP quantity in the remediation materials for the year is less than 1 Mg. The documentation must include a description of the methodology and data used for determining the total HAP content of the remediation material.

[45CSR34; 40 C.F.R. §63.7881(c)]

3.4.11. **40** C.F.R. **63**, Subpart DDDDD. The permittee shall keep the records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Each record will be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. Each record will be kept on site, or accessible from on site, for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records may be kept off site for the remaining 3 years [40 C.F.R. §§ 63.7560(a),(b),(c); 45 CSR 34 (T1CA, T1CB, T1CC, T1CD, T5HA, and T5HB)]

### 3.5. Reporting Requirements

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

[45CSR§§30-4.4. and 5.1.c.3.D.]

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

3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

DAQ: US EPA:

Director Section Chief
WVDEP U. S. Environmental Protection Agency, Region III

Division of Air Quality Enforcement and Compliance Assurance Division 601 57<sup>th</sup> Street SE Air, RCRA and Toxics Branch (3ED21)

Charleston, WV 25304 Four Penn Center

1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2852

#### **DAQ** Compliance and Enforcement<sup>1</sup>:

DEPAirQualityReports@wv.gov

<sup>1</sup>For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

- 3.5.4. **Fees.** The permittee shall pay fees on an annual basis in accordance with 45CSR§30-8. **[45CSR§30-8.]**
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

DAQ: US EPA:

DEPAirQualityReports@wv.gov R3 APD Permits@epa.gov

[45CSR§30-5.3.e.]

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31.

All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

#### DAQ:

DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

- 3.5.7. Reserved.
- 3.5.8. **Deviations.** 
  - a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
    - 1. Reserved.
    - 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or email. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
    - 3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
    - 4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

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

  [45CSR§30-5.1.c.3.B.]
- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

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

Note: The Attachment A listing only for those sources in the Fluoropolymers Production Area is provided in Appendix E.

[45CSR13, R13-3223, 4.5.1; 45CSR§40.4.c.1 (State-Enforceable only); 45CSR13, R13-2365, 6.1.1; 45CSR13, R13-1953, 4.1.21; 45CSR13, R13-2391, B.6; 45CSR13, R13-1823, 4.1.24; 45CSR13, R13-1353, B.7; 45CSR13, R13-0815, 5.1.6.1 and 5.1.6.2]

# 3.6. Compliance Plan

3.6.1. None

#### 3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
  - a. 40 C.F.R. 60 Subpart K "Standards of Performance For Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978." Tanks in the Fluoropolymer Production Unit containing petroleum liquids constructed, relocated, or modified during these dates have a storage capacity less than the applicability threshold.
  - b. 40 C.F.R. 60 Subpart Ka "Standards of Performance for Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984." Tanks in the Fluoropolymer Production Unit containing petroleum liquids constructed, relocated, or modified during these dates have a storage capacity less than the applicability threshold.
  - c. 40 C.F.R. 60 Subpart Kb "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." Tanks in the Fluoropolymer Production Unit containing volatile organic liquids constructed, relocated, or modified after July 23, 1984 have a storage capacity less than the applicability threshold.
  - d. 40 C.F.R. 60 Subpart VV "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry." Fluoroproducts facilities do not produce as intermediates or final products any of the materials listed in §60.489.
  - e. 40 C.F.R. 60 Subpart DDD "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry." The Fluoroproducts production facilities do not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
  - f. 40 C.F.R. 60 Subpart NNN "Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations." The Fluoroproducts facilities do not have a process unit that produces any of the chemicals listed in §60.667 as a product, co-product, by-product, or intermediate.

- g. 40 C.F.R. 60 Subpart RRR "Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes." The Fluoroproducts facilities do not have a process unit that produces any of the chemicals listed in \$60.707 as a product, co-product, by-product, or intermediate.
- h. 40 C.F.R. 61 Subpart V "National Emission Standards for Equipment Leaks (Fugitive Emissions Sources)." Applies to sources in VHAP service as defined in §61.241. VHAP service involves chemicals that are not used in Fluoroproducts manufacture.
- i. 40 C.F.R. 63 Subpart H "National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks." 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in §§63.100(b)(1), (b)(2), and (b)(3).
- j. 40 C.F.R. 63 Subpart JJJ "National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins. Fluoroproducts manufacturing does not produce the materials listed in §63.1310.
- k. 40 C.F.R. 82 Subpart B "Protection of Stratospheric Ozone." Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. The Fluoroproducts production facility does not conduct motor vehicle maintenance involving CFCs on site.
- 1. 40 C.F.R. 63, Subpart EEEE - "National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)." Storage tank T5HY has a design capacity of less than 18.9 cubic meters (5,000 gallons) and is not required to be controlled under 40 C.F.R. 63, Subpart EEEE. It is only subject to the recordkeeping requirements of 40 C.F.R. §63.2343(a). Storage tank T7AA is an existing tank with a design capacity greater than or equal to 18.9 cubic meters (5,000 gallons) and less than 189.3 cubic meters (50,000 gallons) storing an organic liquid with an annual average true vapor pressure of the total Table 1 organic HAP in the stored organic liquid less than 27.6 kilopascals (4.0 psia). Since the annual average true vapor pressure of the total Table 1 organic HAP is less than 4.0 psia, this tank is not required to be controlled under 40 C.F.R. 63, Subpart EEEE and is only subject to the notification, recordkeeping, and reporting requirements of 40 C.F.R. §§63.2343(b)(1) through (3). The unloading systems MCE and MCS are used for unloading when maintenance or inspection is required and are not an affected source under 40 C.F.R. 63, Subpart EEEE as specified in 40 C.F.R. §63.2338(c)(3). Since the tanks do not require control and the unloading systems are not affected sources, 40 C.F.R. §63.2350(c) does not require Chemours to develop a written startup, shutdown, and malfunction (SSM) plan for the tanks or unloading systems. Also, since the equipment leak detection requirements of 40 C.F.R. §63.2346(c) only apply if the affected source has at least one storage tank or transfer rack that meets the applicability criteria for control in Table 2 of 40 C.F.R. 63, Subpart EEEE, and none of the tanks or transfer racks are required to be controlled, Chemours is not subject to the leak detection and repair requirements of 40 C.F.R. 63, Subpart EEEE.

# 4.0 Source-Specific Requirements [C1 Area]

# 4.1. Limitations and Standards

4.1.1. Emissions to the atmosphere shall not exceed the hourly and annual emission limits as set forth in Table 4.1.1.

**Table 4.1.1 - Emission Limits** 

| Emission | Source Description                           | Control Device  | Pollutant                            | Emission Limit        |                       |
|----------|--|---|--------------------------------------|-----------------------|-----------------------|
| Point    | Source Description                           | Control Device  | 1 Onutant                            | pph                   | tpy                   |
| C1FCE    | C1FC (bin)                                   | N/A   |                                      |                       |                       |
| C1GAE    | C1GA (bin)                                   | N/A   | $PM_{10}^{2}$                        | 0.08                  | 0.07                  |
| C1GBE    | C1GB (bin)                                   | N/A   | VOC <sup>2</sup>                     | 0.23                  | 0.50                  |
| C1GCE    | C1GC (bin)                                   | N/A   |                                      |                       |                       |
|          | C1FA (bin)<br>C1FB (bin)                     | C1MI/C1MJ/<br>C1MIC<br>(cyclone/bagfilter)                                      |                                      |                       |                       |
| CIEEE    | C1FD (supply cylinder)                       |   | $PM_{10}^{1}$                        | 0.27                  | 0.83                  |
| C1FEE    | C1FE (reactor)                               | C1FEC (scrubber)  | HF                                   | 0.01                  | 0.02                  |
|          | C1FH (reactor)                               |   |                                      |                       |                       |
|          | C1GN (cube conveyor: C1GN to C1FA & C1FB)    | C1GNC1 (baghouse)<br>C1GNC2 (baghouse)  |                                      |                       |                       |
| C1FFE    | C1FF (bin)                                   | N/A   | PM <sub>10</sub><br>VOC              | 0.54<br>0.12          | 0.83                  |
| C1FGE    | C1FG (bin)                                   | N/A   | PM <sub>10</sub><br>VOC              | 0.54<br>0.12          | 0.18                  |
| C1FQE    | C1FQ (reactor) C1GH (ingredient feed system) | N/A   | VOC<br>ODC<br>Acetonitrile           | 38.54<br>0.93<br>0.01 | 25.88<br>0.06<br>0.01 |
| C1FSE    | C1FS (dryer)                                 | C1FSC1 (baghouse)<br>C1FSC2 (scrubber)<br>C1FSC3 (scrubber)<br>C1FSC4(scrubber) | PM <sub>10</sub><br>VOC              | 0.01<br>1.08          | 0.02<br>4.10          |
|          | C1FK (conveying system)                      | C1FKC (baghouse)  |                                      |                       |                       |
| C1FUE    | C1FU (bin)                                   | N/A   | $PM_{10}$                            | 0.20                  | 0.32                  |
| C1FVE1   | C1FV (extruder)                              | N/A   | VOC<br>PM <sub>10</sub> <sup>1</sup> | 0.14<br>0.08          | 0.04<br>0.35          |
| C1FVE2   | C1FV (melt Gear pump with die plate)         | N/A   | VOC<br>HF                            | 0.43<br>1.00          | 0.11<br>0.11          |
| C1FWE    | C1FW (ingredient feed system)                | N/A   | VOC<br>Acetonitrile                  | 32.2<br>< 0.01        | 0.35                  |

| Emission  | Source Description  | Control Device                      | Pollutant                     | Emission Limit |        |
|-----------|---|-------------------------------------|-------------------------------|----------------|--------|
| Point     | Source Description  | Control Device                      | ronutant                      | pph            | tpy    |
|           |   |                                     | VOC                           | 1.89           | 2.97   |
| C1GDE     | C1GD (tank)   | N/A                                 | ODC                           | 0.08           | 0.01   |
| CIGDL     | CIGD (talik)  | IV/A                                | Acetonitrile                  | 0.01           | 0.01   |
|           |   |                                     | PM <sub>10</sub>              | 0.50           | 0.79   |
| C1GJE     | C1GJ (conveying system)                                     | C1GJC (baghouse)                    | PM <sub>10</sub>              | 0.87           | 0.11   |
| area      | C1GK (sump)   |                                     | VOC                           | 1.94           | 0.21   |
| emissions | CIFW (ingredient feed system)                               | N/A                                 | ODC                           | 0.08           | 0.01   |
| C1GPE     | C1GP (conveying system) C1GS (blender #1) C1GT (blender #2) | C1GPC (baghouse)                    | Acetonitrile PM <sub>10</sub> | 0.01           | 0.01   |
| C1GQE     | C1GQ (conveying system)                                     | C1GQC1 (baghouse)<br>C1GQC2(filter) | PM <sub>10</sub>              | 0.10           | 0.13   |
| C1GVE     | C1GV (hopper)   | N/A                                 | $PM_{10}$                     | 0.20           | 0.32   |
| C1GXE     | C1GX (ingredient system charge pot)                         | N/A                                 | VOC                           | 1.89           | 0.31   |
|           |   |                                     | VOC                           | 0.51           | 0.18   |
|           | C1GZ (oven)   | C1GZC (vacuum pump)                 | Hydrofluoric                  |                | < 0.01 |
| C1GZE     |   |                                     |                               | < 0.01         |        |
|           |   |                                     | PM <sub>10</sub>              | < 0.01         | < 0.01 |
|           |   |                                     | СО                            | 0.01           | 0.01   |
| C1MBE     | C1MB Tank   | None                                | VOC                           | 0.01           | 0.01   |
| C1MGE     | C1MG (Cyclone)  | C1MGC(Baghouse)                     | PM <sub>10</sub>              | 0.01           | 0.01   |
| C1MLE     | Amalyssia I ala   | N/A                                 | $NO_x$                        | 0.02           | 0.01   |
| CIVILE    | Analysis Lab  | IN/A                                | HF                            | 0.11           | 0.03   |
| C1NBE     | Tank  | N/A                                 | VOC                           | 0.34           | 1.51   |
| C1NCE     | Tank  | N/A                                 | VOC                           | 0.34           | 1.51   |
| C1NFE     | Nitric Acid Tank  | Scrubber                            | Nitric Acid                   | 1.02           | 0.01   |
| C1NGE     | Product System  | Condenser                           | НС                            | 0.7            | 0.74   |
|           |   |                                     | VOC                           | 0.56           | 2.46   |
| CIDOR     | T1-   | Filter/Scrubber/Carbon              | HC                            | 0.17           | 0.74   |
| C1PGE     | Tank  | Bed                                 | Nitric Acid                   | 0.03           | 0.11   |
|           |   |                                     | PM <sub>10</sub>              | 0.01           | 0.02   |
| C1PHE     | Receiver  | Filter Receiver                     | PM <sub>10</sub>              | 0.05           | 0.19   |
| C1PIE     | Hopper  | None                                | PM <sub>10</sub>              | 0.08           | 0.32   |
| C1PME     | Hopper  | None                                | PM <sub>10</sub>              | 0.02           | 0.06   |
|           |   |                                     | HF                            | 0.99           | 0.11   |
| C1PNE     | Process System  | Vacuum Pump                         | VOC                           | 0.57           | 0.15   |
|           |   |                                     | PM <sub>10</sub>              | 0.05           | 0.13   |

| Emission         | Source Description         | Control Device    | Dallastanst           | Emission Limit |        |
|------------------|----------------------------|-------------------|-----------------------|----------------|--------|
| Point            | Source Description         | Control Device    | Pollutant             | pph            | tpy    |
| C1GRE            | Classing Station           | None              | HF                    | 1.32           | 1.71   |
| CIGKE            | 1GRE Cleaning Station None |                   | VOC                   | 0.02           | 0.02   |
|                  |                            |                   | VOC                   | 0.04           | 0.17   |
| C1POE            | Product System             | None              | $PM_{10}$             | 0.10           | 0.38   |
|                  |                            |                   | PM <sub>2.5</sub>     | 0.17           | 0.77   |
| C1PPE,<br>C1PQE, |                            |                   | VOC                   | 0.19           | 0.36   |
| C1PRE,<br>C1PSE  | Bins                       | None              | PM <sub>10</sub>      | 0.14           | 0.28   |
| (combined)       |                            |                   | PM <sub>2.5</sub>     | 0.40           | 0.77   |
| C1QEE            | C1QE/Container Loading     | None              | VOC                   | 0.41           | 0.72   |
|                  | Tank                       | None              | VOC                   | 4.6E-5         | 4.7E-5 |
| CIPTE            |                            |                   | НС                    | 4.8E-3         | 4.9E-3 |
| C1PTE            |                            |                   | Nitric Acid           | 8.0E-3         | 8.2E-3 |
|                  |                            |                   | Ammonium<br>Hydroxide | 7.0E-6         | 7.2E-6 |
| C1PLE            | Process System             | Filter            | PM                    | 1.0E-3         | 7.6E-4 |
|                  |                            |                   | VOC                   | 3.8E-3         | 1.7E-2 |
| C1PCE            | Vacuum Pump                | C1PCC Vacuum Pump | НС                    | 7.7E-3         | 3.4E-2 |
|                  |                            |                   | Nitric Acid           | 5.5E-5         | 2.4E-4 |
| C1NFE            | Tank                       | Scrubber          | Nitric Acid           | 0.26           | 7.8E-4 |
| C1NPE            | ACS Feed Tank              | C1NPC Scrubber    | VOC                   | 0.57           | 3.71   |

Note: Emission limits for hydrogen fluoride (HF) include emissions of hydrogen fluoride and several non-HAP fluorinated compounds which react to form hydrogen fluoride.

Compliance with the above emission limits shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate emission limits for emission points C1FCE, C1GAE, C1GBE, C1GCE, C1FEE, C1FFE, C1FGE, C1FSE, C1FUE, C1FVE1, C1GDE, C1GJE, C1GPE, C1GQE, C1GVE, G1GZE, and C1MGE, C1PGE, C1PHE, C1PHE, C1PME, C1PNE, C1POE, C1PPE, C1PQE, C1PRE, C1PSE and C1PLE and the less stringent 45CSR§7-4.2 nitric acid emission limits for emission points C1NFE, C1PCE, C1PGE, and C1PTE.

[45CSR13, R13-2365, 4.1.1 and 5.1.1; 45CSR§§7-4.1. and 4.2.]

4.1.2. The total of acetonitrile emitted hourly and annually from emission points C1FWE, C1GXE, C1FW, C1FQE, C1GDE, and C1GK shall not exceed 0.01 pounds per hour and 15 pounds per year. [45CSR13, R13-2365, 4.1.2]

<sup>&</sup>lt;sup>1</sup> Particulate emissions from these emission points will only occur given an anticipated process chemistry change. The permittee shall notify the DAQ within 30 calendar days of a process change that results in particulate emissions from these emission points.

<sup>&</sup>lt;sup>2</sup> Limits shown are totals for all four cube bins

- 4.1.3. Process equipment C1GH and C1FQ shall be vented to the thermal converter (Equipment ID T7IMC) or the mixed gas holder (Equipment ID T1GN) until the internal pressure of these vessels reach 5 psig. The thermal converter (Equipment ID T7IMC) and mixed gas holder (Equipment ID T1GN) are permitted under permit R13-1823B or an amended permit thereof. [45CSR13, R13-2365, 4.1.3]
- 4.1.4. The following equipment does not emit any regulated air pollutant.

| Identification | n Number | Description      |
|----------------|----------|------------------|
| C1F            | R        | Coagulant System |

[45CSR13, R13-2365, 4.1.7]

- 4.1.5. Compliance with all annual emission and/or operating limits shall be determined using a twelve (12) month rolling total. A twelve month rolling total shall mean a sum of any given month of the previous twelve (12) consecutive calendar months. [45CSR13, R13-2365, 4.2.2]
- 4.1.6. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. (C1FCE, C1GAE, C1GBE, C1GCE, C1FEE, C1FFE, C1FGE, C1FSE, C1FUE, C1FVE1, C1GDE, C1GJE, C1GPE, C1GQE, C1GVE, C1GZE, C1MGE, C1PGE, C1PHE, C1PIE, C1PME, C1PNE, C1POE, C1PPE, C1PQE, C1PRE, C1PSE, C1PLE) [45CSR13, R13-2365, 5.1.1; 45CSR§7-3.1.]
- 4.1.7. The provisions of 4.1.6. shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (C1FCE, C1GAE, C1GBE, C1GCE, C1FEE, C1FFE, C1FGE, C1FSE, C1FUE, C1FVE1, C1GDE, C1GJE, C1GPE, C1GQE, C1GVE, C1GZE, C1MGE C1PGE, C1PHE, C1PIE, C1PME, C1PNE, C1POE, C1PPE, C1PQE, C1PRE, C1PSE, C1PLE) [45CSR13, R13-2365, 5.1.1; 45CSR\$7-3.2.]
- 4.1.8. Operation and Maintenance of Air Pollution Control Equipment. The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulations, or alternative control plan approved by the Secretary. [45CSR§13-5.10; 45CSR13, R13-2365, 4.1.11]

#### 4.2. Monitoring Requirements

4.2.1. For the purpose of determining compliance with the opacity limits of Conditions 4.1.6 and 4.1.7, the permittee shall conduct opacity monitoring and record keeping for all emission points and equipment subject to an opacity limit under 45CSR7, including, but not limited to, the emission points addressed in 4.1.1. The opacity monitoring and record keeping shall include visual emission checks for all emission points subject to a particulate matter emission limit contained in this permit.

Monitoring shall be conducted at least once per month. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60 Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for 1 minute to determine if there is a visible emission. For observations for visible emissions from emission point C1FSE (which follows a water scrubber), when condensed water vapor is present within the plume as it emerges from the emission outlet,

opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible; the observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.

If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within three (3) days of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions.

#### [45CSR13, R13-2365, 4.2.1]

4.2.2. Compliance monitoring shall be accomplished by a combination of interlocking the feedstream to either parameters on these devices or other devices in the same flow path as these devices and parametric monitoring as specified in the tables below.

Table 4.2.2.a - Process Monitoring and Interlock Settings

| Control<br>Device ID | Description                 | Compliance Monitoring & Interlock Settings   |
|----------------------|-----------------------------|--|
| C1FEC                | FP Cube Reactor<br>Scrubber | This control equipment sets its interlocked parameter as the recirculating liquid flow rate. The flow in this stream shall not fall below 40 gallons per minute. Should this interlock be tripped, the ingredient supply to the main reactor "C1FE" and "C1FH" shall shut down. Due to the fact that the liquid recirculating flow does not totally define the level of efficiency being maintained by the control equipment, other parameters such as liquid temperature, KOH concentration, and pressure drop are also required to be measured as specified in the parametric monitoring section of this permit. |
| C1FKC                | Conveying System            | The bagfilter shall have a low delta P interlock set at 1" w.c. to detect bag failure, which shuts the system down. A high delta P alarm be set at 12" w.c. to monitor for restricted or overloaded bags.  |
| C1FSC2               | Dryer Scrubber              | This scrubber shall be interlocked to shut down the feed to the dryer if the pressure drop across the 1 micron filter in the recirculating liquid line exceeds 40 psig. The feed to the dryer shall also be interlocked to shut off, if the exiting gas temperature exceeds 80°C under normal operation, or above 85°C during the first two hours of start-up from the introduction of fresh polymer into the dryer.   |
| C1FSC3               | Dryer Scrubber              | The water flow rate to the scrubber spray nozzles shall be interlocked at 0.3 gpm, and the feed will not start if the water flow is below this level. The facility may use the injection of steam to add moisture and prevent icing in cold weather.   |
| C1FSC4               | Carbon Adsorption<br>Beds   | The relative humidity of the stream entering the carbon adsorption beds shall be <60% when online. If 60% is exceeded for 5 minutes, the dryer feed will be interlocked off to maintain adequate capture. Relative humidity is tracked either via a humidity sensor or psychometric tables for inlet and outlet temperatures of the heater prior to the carbon beds.   |

| Control<br>Device ID | Description                       | Compliance Monitoring & Interlock Settings  |
|----------------------|-----------------------------------|---|
| CIGJC                | Conveying System<br>#1 Bag Filter | The #1 bag filter incorporates a 10 micron inline filter in between the blower and bag house. The interlocked parameter is the suction pressure measured after the 10 micron filter. If the pressure measured at this location falls below -10.5 inches Hg then the relevant blower and conveying system shall shut down. |
| C1GQC1/C<br>1GQC2    | Conveying System<br>#2 Bag Filter | The #2 bag filter also incorporates a 10 micron inline filter in between the blower and bag house. The interlocked parameter is the suction pressure to the blower. If the pressure measured at this location falls below -9.5 inches Hg then the relevant blower and conveying system shall shut down.                   |
| C1GZC                | Spray Tower with<br>Vacuum Pump   | If water flow to the vacuum pump is $\leq 2$ gallons per minute, the heaters will automatically shut down.  |
| C1MGC                | Bag Filter                        | Air/fines stream is filtered with the fines collected in a waste drum, and the air vented continuously.   |
| C1NFC                | Scrubber                          | Feed to C1NF shall be interlocked off if C1NFC level is low while filling C1NF.   |
| C1NGC                | Condenser<br>System               | The condenser vent valve shall not open under normal operation if the cooling supply temperature is greater than -30 degrees Celsius.   |
| C1PGC1/C<br>1PGC2    | Filter/Scrubber                   | Scrubber shall be interlocked to shut down the feed to the dryer if the pressure drop across the filter in the recirculating liquid line exceeds 40 psig. The feed to the dryer shall also be interlocked to shut off if there is no water flow to the scrubber.  |

Note: These parameters are continuously measured by the DCS, which shall produce an hourly average in order to justify compliance with proper operation of the equipment.

**Table 4.2.2.b - Parametric Monitoring of Control Equipment** 

| Control<br>Device ID | Description                        | Monitoring Parameter   |
|----------------------|------------------------------------|--|
| C1FEC                |                                    | The concentration of KOH in the scrubber liquor shall not fall below 4.0 wt%. The solution will be sampled after every 5 <sup>th</sup> batch until the KOH concentration falls below 6.0 wt%. Once 6.0 wt% is reached the solution will be sampled every other batch. KOH solution shall be sampled at least once per day when fluorinating and KOH concentration of the sample measured in an on-site analytical laboratory. The solution can only be recharged twice before having to be replaced. The number of batches through the combination of the C1FE reactor and C1FH reactor that are vented to C1FEC shall be documented to coincide with the KOH measurement frequency. |
| C1FEC                | Reactor<br>Scrubber                | Min. Recirculating KOH flow (gpm)  |
| C1FSC2               | Dryer Scrubber                     | Maximum Circulating Filter Delta P (psig)  |
| C1FSC2               | Dryer Scrubber                     | Min. Exit Gas Temperature (°C)   |
| C1FSC3               | Dryer Scrubber                     | Min. Water Flow (gpm)  |
| C1FSC4               | Carbon<br>Adsorption Beds          | Carbon Bed Online Time   |
| C1FKC                | Conveying<br>System Bag<br>Filter  | Min. Bagfilter Delta P (in. H <sub>2</sub> 0)  |
| C1GJC                | Conveying<br>System Bag<br>Filter  | Min. Blower Suction Press – C1GJC (in. Hg)   |
| C1GQC1               | Conveying<br>System Bag<br>Filter  | Min. Blower Suction Press – C1GQC1 (in. Hg)  |
| C1GQC2               | Conveying<br>System Bag<br>Filter  | Visible Emissions Observation (like Method 22)   |
| C1GZC                | Spray Tower<br>with Vacuum<br>Pump | Gallons per minute   |
| C1NGC                | Condenser<br>System                | Maximum cooling supply temperature when vent valve is open   |
| C1PGC1/C<br>1PGC2    | Scrubber                           | Maximum circulating filter delta P(psig); Minimum total water flow to Scrubber(gallons per minute)   |
| C1PGC3               | Adsorption<br>Carbon Beds          | Maximum and Minimum delta P across beds  |
| С1РНС                | Baghouse                           | Visible Emissions Observation (like Method 22) while the stack is running  |
| C1PLC                | Baghouse                           | Visible Emissions Observation (like Method 22) while the stack is running  |
| C1NFC                | Scrubber                           | Minimum scrubber level while filling C1NF  |

Note: If any exceedance of the parameters listed above are observed during process operations, corrective action shall be taken immediately. For each exceedance, a corrective action report shall be generated. This report shall include the duration of the malfunction, the corrective actions taken, and an estimate of the emissions generated.

[45CSR13, R13-2365, 4.2.3, 40 C.F.R.§63.994(c)(1)(ii), 40 C.F.R. §63.2450(k)(3)]

#### 4.3. Testing Requirements

4.3.1. For the purpose of determining compliance with the emission limits set forth on Dryer (C1FS) in 4.1.1, the permittee shall conduct a compliance test of the Dryer (C1FS) within ninety (90) days of the date the 60-minute average production rate exceeds 120% of the rate demonstrated during the most recent test.

This test shall be performed at the maximum permitted production rate, or if less, at the maximum sustainable production rate. In the event that the production rate achieved during the testing is less than 80% of the maximum permitted rate, the permittee shall conduct additional testing within ninety (90) days of the date the 60-minute average production rate exceeds 120% of the rate demonstrated during the most recent test.

A test protocol shall be submitted to DAQ for approval within thirty (30) days of the test date. The Director shall be notified at least fifteen (15) days in advance of the actual dates and times at which the tests will be conducted. The results of emission testing shall be submitted to the DAQ within sixty (60) days of the actual test date.

[45CSR13, R13-2365, 4.3.1]

- 4.3.2. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices. [45CSR13, R13-2365, 5.1.1; 45CSR§7-8.1]
- 4.3.3. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions. [45CSR13, R13-2365, 5.1.1; 45CSR\$7-8.2]

## 4.4. Recordkeeping Requirements

- 4.4.1. Records of the visible emission observations required in 4.2.1 shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and if necessary, all corrective actions taken. [45CSR13, R13-2365, 4.2.1]
- 4.4.2. The permittee shall maintain and operate all baghouses, scrubbers, and any other air emissions control devices installed at the C1 Area in accordance with proper operational guidelines to minimize emissions. For all baghouses, scrubbers, and any other air emissions control devices installed in the C1 Area, the permittee shall keep accurate records of filter changes and maintenance activities, and of malfunctions and other operational shutdowns which result in excess emissions.

The referenced baghouses, scrubbers, and other control devices include, but are not limited to those identified as: baghouses C1FSC1, C1FKC, C1GJC, C1GQC1, C1GQC2, C1GPC, C1MGC, C1PHC, C1PLC, and C1PGC1; scrubbers C1FSC2, C1FSC3, C1FSC4, C1FEC, C1NPC, C1PGC2, C1NFC, and C1PNC; condenser system C1NGC; other collectors C1PCC; adsorption system carbon beds C1PGC3.

For each malfunction or operational shutdown of a control device that results in excess emissions, the following additional information must be recorded, at a minimum:

- a. The equipment involved and associated cause of the malfunction.
- b. Steps taken to correct the malfunction.
- c. Steps taken to minimize emissions during the malfunction.
- d. The duration of the malfunction.
- e. The estimated increase in emissions during the malfunction.
- Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

#### [45CSR13, R13-2365, 4.1.6]

- 4.4.3. For the purpose of determining compliance with the maximum emission limits set forth in 4.1.1 and 4.1.2, the permittee shall maintain records equivalent to the example record keeping form supplied as Attachment A of Appendix A, and emission reports equivalent to the monthly and annual reports supplied as Attachments B and C of Appendix A. [45CSR13, R13-2365, 4.4.1]
- 4.4.4. The permittee shall maintain a log that documents when an interlock condition listed in 4.2.2 is activated that documents when these interlocks are tripped and the operation continues for greater than thirty (30) minutes in duration. At a minimum, the following information must be documented for each logged malfunction:
  - a. The equipment involved and associated cause of malfunction.
  - b. Steps taken to correct the malfunction.
  - c. Steps taken to minimize emissions during the malfunction.
  - d. The duration of the malfunction.
  - e. The estimated increase in emissions during the malfunction.
  - f. Any changes or modifications to equipment or procedures that would help prevent future recurrence of the malfunction.

In the event that a malfunction occurs that triggers the recordkeeping requirements above and those contained in 4.4.2, the permittee is required to only make one record of the malfunction occurrence to comply with both requirements.

#### [45CSR13, R13-2365, 4.1.9 and 4.2.4]

4.4.5. All records required by 4.2.2 shall be condensed to monthly summaries as described below. Monthly summaries shall include for each of the recorded process parameters, whichever is appropriate, the observed maximum or minimum values recorded during actual operations as well as any corrective action reports and reports generated as a result of 4.4.4. [45CSR13, R13-2365, 4.1.10]

# 4.5. Reporting Requirements

4.5.1. The following equipment is used on an as-needed basis and may not be operated for extended periods of time. Written notification shall be provided to the DAQ in the event of permanent shutdown of this equipment.

| Identification Number | Description          |
|-----------------------|----------------------|
| C1GJ                  | Conveying to packout |

[45CSR13, R13-2365, 4.1.8]

# 4.6. Compliance Plan

4.6.1. None

### 5.0 Source-Specific Requirements [C2 Area]

#### 5.1. Limitations and Standards

5.1.1. Emissions to the atmosphere of  $PM_{10}$  shall not exceed the hourly and annual emission limits as set forth in Table 5.1.1.

Table 5.1.1 - PM<sub>10</sub> Emission Limits

| <b>Emission Point ID</b> | Source ID                           | Emission Limit |       |
|--------------------------|-------------------------------------|----------------|-------|
| Emission Fount ID        | Source 1D                           | (pph)          | (tpy) |
| C2DSE                    | C2DS                                | 0.08           | 0.01  |
| C2DTE                    | C2DW, C2EH                          | 0.48           | 1.03  |
| C2ENE                    | C2EN                                | 0.56           | 1.69  |
| C2ERE                    | C2ER                                | 1.00           | 3.42  |
| C2KPE                    | C2KP                                | 0.10           | 0.17  |
| C2DKE                    | C2DK                                | 0.01           | 0.01  |
| C2EGE                    | C2EG                                | 0.01           | 0.01  |
| C2EUE                    | C2DO, C2EU                          | 0.02           | 0.02  |
| C2KLE                    | C2KL                                | 0.01           | 0.01  |
| C2KNE                    | C2KN                                | 0.01           | 0.01  |
| C2EBE                    | C2EA1, C2EA2, C2KJ,<br>C2EB1, C2EB2 | 0.02           | 0.09  |
| C2DHE                    | C2DH                                | 0.01           | 0.04  |

Note: For cases where multiple sources vent to a single emission point, the emissions limit of the single emission point shall apply to the combined sum of emissions from each of the associated sources.

Compliance with the above emission limits shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate emission limits for emission points C2DSE, C2DTE, C2ENE, C2ERE, C2KPE, C2DKE, C2EGE, C2EUE, C2KLE, C2EBE, and C2DHE.

#### [45CSR13, R13-1953, 4.1.1 and 4.1.14; 45CSR§7-4.1]

5.1.2. Emissions to the atmosphere of VOC shall not exceed the hourly and annual emission limits as set forth in Table 5.1.2.

**Table 5.1.2. - VOC Emission Limits** 

| Emission Point ID | Source ID                    | Emission Limit     |       |  |
|-------------------|------------------------------|--------------------|-------|--|
| Emission I omt ID | Source ID                    | (pph)              | (tpy) |  |
| C2DAE             | C2DA, C2DE, C2EC, C2KW, C2KX | 11.90              | 2.10  |  |
| C2DKE             | C2DK                         | 6.30               | 5.51  |  |
| C2DTE             | C2DW, C2EH                   | 1.10               | 3.31  |  |
| C2EFE             | C2EF, C2EJ                   | 75.10              | 7.51  |  |
| C2EGE             | C2EG                         | 9.40               | 11.60 |  |
| C2EJE             | C2EJ, C2DG                   | 107.19             | 3.60  |  |
| C2ERE             | C2ER                         | 4.00               | 10.50 |  |
| C2ETE             | C2ET                         | 3.25               | 11.16 |  |
| C2EVE             | C2EV                         | 67.69 <sup>1</sup> | 0.33  |  |

| Emission Point ID | Source ID | <b>Emission Limit</b> |       |  |
|-------------------|-----------|-----------------------|-------|--|
| Emission Foint 1D | Source 1D | (pph)                 | (tpy) |  |
| C2KDE             | C2KD      | 0.18                  | 0.56  |  |
| C2KOE1            | C2KO      | 0.05                  | 0.04  |  |
| C2DHE             | C2DH      | 0.11                  | 0.49  |  |
| C2EBE             | C2EB2     | 0.06                  | 0.03  |  |

Note: For cases where multiple sources vent to a single emission point, the emissions limit of the single emission point shall apply to the combined sum of emissions from each of the associated sources.

### [45CSR13, R13-1953, 4.1.2]

5.1.3. Emissions to the atmosphere of Hydrogen Fluoride shall not exceed the hourly and annual emission limits as set forth in Table 5.1.3.

Table 5.1.3. - HF Emission Limits

| Emission Point ID | Source ID    | <b>Emission Limit</b> |       |  |
|-------------------|--------------|-----------------------|-------|--|
|                   |              | (pph)                 | (tpy) |  |
| C2DHE             | C2DH         | 0.03                  | 0.01  |  |
| C2ERE             | C2ER         | 0.04                  | 0.13  |  |
| C2ETE             | C2ET         | 0.02                  | 0.06  |  |
| C2KDE             | C2KD         | 0.06                  | 0.18  |  |
| C2KOE1            | C2KO         | 0.02                  | 0.02  |  |
| C2KUE             | C2KU         | 0.16                  | 0.01  |  |
| C2EBE             | C2EA1, C2EA2 | 0.03                  | 0.10  |  |

- Note 1: For cases where multiple sources vent to a single emission point, the emission limit of the single emission point shall apply to the combined sum of emissions from each of the associated sources.
- Note 2: In-process emissions of fluorine and fluorinated compounds that react to form hydrogen fluoride have been reported as hydrogen fluoride.

### [45CSR13, R13-1953, 4.1.3]

5.1.4. Emissions to the atmosphere of Hazardous Air Pollutants (HAP) other than Hydrogen Fluoride shall not exceed the annual emission limits as set forth in Table 5.1.4.

**Table 5.1.4. - HAP Emission Limits** 

| Emission Point ID | Source ID    | Pollutant               | Emission Limit (tpy) |
|-------------------|--------------|-------------------------|----------------------|
| C2EFE             | C2EF, C2EJ   | Total HAPs <sup>1</sup> | 0.01                 |
| C2EJE             | C2DG, C2EJ   | Total HAPs <sup>1</sup> | 0.01                 |
| C2EVE             | C2EV         | Total HAPs <sup>1</sup> | 0.01                 |
| C2DHE             | C2DH         | Total HAPs <sup>1</sup> | 0.06                 |
| C2EBE             | C2EA1, C2EA2 | Total HAPs <sup>1</sup> | 0.10                 |

Note: For cases where multiple sources vent to a single emission point, the emission limit of the single emission point shall apply to the combined sum of emissions from each of the associated sources.

<sup>&</sup>lt;sup>1</sup> Emission limit in pounds per month.

<sup>1</sup> The emissions of total HAPs identified in Table 5.1.4 of this permit for emission point ID C2EVE, may consist of any one, or a combination of the following pollutants: Di-Sec-Octyl Phthalate (CAS No. 117-81-7), Methanol (CAS No. 67561), and Chromium III Compounds (16065-83-1). The emissions of total HAPs identified in Table 5.1.4 of this permit for emission point ID C2EFE or C2EJE may consist of any one, or a combination of the following pollutants: Toluene, Acetonitrile, HCl.

[45CSR13, R13-1953, 4.1.4]

- 5.1.5. Reserved
- 5.1.6. Compliance with all annual emission and/or operating limits shall be determined using a twelve month rolling total. A twelve month rolling total shall mean a sum in any given month of the previous twelve (12) consecutive calendar months. [45CSR13, R13-1953, 4.1.9]
- 5.1.7. Process equipment C2ES shall be vented to the thermal converter (Equipment ID No. T7IMC). The thermal converter (Equipment ID No. T7IMC) is permitted under the current revision of permit R13-1823. [45CSR13, R13-1953, 4.1.10]
- 5.1.8. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity except as noted in 5.1.9. (C2DTE, C2ERE, C2KPE, C2DKE, C2EGE, C2EUE, C2KLE, C2KNE, C2EBE, C2DHE, C2EJE, C2EFE) [45CSR13, R13-1953, 4.1.11; 45CSR§7-3.1.]
- 5.1.9. The provisions of 5.1.8. shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (C2DTE, C2ERE, C2KPE, C2DKE, C2EGE, C2EUE, C2KLE, C2KNE, C2EBE, C2DHE, C2EJE, C2EFE) [45CSR13, R13-1953, 4.1.12; 45CSR87-3.2.]
- 5.1.10. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to 3.1.9 is required to have a full enclosure and be equipped with a particulate matter control device. (C2DSE, C2ENE) [45CSR13, R13-1953, 4.1.13; 45CSR87-3.7]
- 5.1.11. Reserved
- 5.1.12. Mineral acids shall not be released from any type source operation or duplicate source operation or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity given in Table 45-7B or 45CSR7.

Hydrochloric acid mist and/or vapor for source operations installed after July 1, 1970: 210 mg/m<sup>3</sup>

(C2EJE, C2EFE) [45CSR13, R13-1953, 4.1.15; 45CSR§7-4.2 and Table 45-7B]

5.1.13. No person shall circumvent the provisions of 45CSR7 by adding additional gas to any exhaust or group of exhausts for the purpose of reducing the stack gas concentration. [45CSR13, R13-1953, 4.1.16; 45CSR§7-4.3]

### **5.2.** Monitoring Requirements

5.2.1. For the purpose of determining compliance with 5.1.8, the permittee shall perform routine monitoring of bagfilter systems in accordance to the requirements set forth in Table 5.2.1.

**Table 5.2.1. - Demonstration of Opacity Standards** 

| Control      |              | Claimed PM             |                      | Compliance Monitor                           | ing                     |
|--------------|--------------|------------------------|----------------------|--|-------------------------|
| Device<br>ID | Source<br>ID | Control Efficiency (%) | Activity             | Operating<br>Parameter or<br>Permitted Limit | Inspection<br>Frequency |
| C2DKC        | C2DK         | 99.9                   | Opacity              | 20%  | Monthly                 |
| C2DSC        | C2DS         | 99.99                  | Opacity              | 20%  | Daily (when running)    |
| C2DWC1       | C2DW         | 99.91                  | Process<br>Interlock | $\Delta P > 20 \text{ psig}$                 | None Required           |
| C2EGC        | C2EG         | 99.9                   | Opacity              | 20%  | Monthly                 |
| C2EHC1       | С2ЕН         | 99.91                  | Process<br>Interlock | $\Delta P > 20 \text{ psig}$                 | None Required           |
| C2ENC        | C2EN         | 99.99                  | Opacity              | 20%  | Daily (when running)    |
| C2KPC        | C2KP         | 99.99                  | Opacity              | 20%  | Daily (when running)    |
| C2EUC        | C2EU         | 99.99                  | Opacity              | 20%  | Monthly                 |
| C2EB1C       | C2EB1        | 50.0                   | Opacity              | 20%  | Monthly                 |
| C2EA1C       | C2EA1        | 99.9                   | Opacity              | 20%  | Monthly                 |
| C2EA2C       | C2EA2        | 99.9                   | Opacity              | 20%  | Monthly                 |
| C2KNC1       | C2KN         | 99.9                   | Opacity              | No VE  | Monthly                 |
| C2KNC2       |              | 99.9                   | Opacity              | No VE  | Monthly                 |
| C2KLC        | C2KL         | 99.9                   | Opacity              | No VE  | Monthly                 |

Control efficiency of particulate matter in the form of polymer only.

- Bagfilter systems C2DKC, C2DSC, C2EGC, C2ENC, C2KPC, and C2EUC shall be subject to periodic opacity monitoring as required per 5.2.2.
- b. For control systems C2DWC1 and C2EHC1, the process interlock and monitoring requirements are specified in 5.2.4. Compliance with the conditions of 5.2.4 shall demonstrate compliance with this requirement.
- c. If any of the listed control equipment is operated outside its respective limits and/or parameter(s), excluding start-ups and shutdowns, corrective actions shall be taken immediately. At a minimum, the information specified in condition 3.4.6. must be documented in a corrective action report for each occurrence and/or deviation from the normal parametric operating range that results in excess emissions.

A log of all routine inspection and maintenance activities for which an inspection frequency is specified in Table 5.2.1., shall be maintained per condition 3.4.9.

[45CSR13, R13-1953, 4.2.1]

5.2.2. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1, 3.2, and 3.7 set forth in conditions 5.1.8, 5.1.9, and 5.1.10, the permittee shall conduct opacity monitoring for all emission points and equipment subject to an opacity limit under 45CSR7, including, but not limited to, the emission points addressed in 5.1.1. The opacity monitoring and record keeping shall include a visual emission evaluation for all emission points subject to a particulate matter emission limit contained in this permit. For emission points C2DKE, C2EGE, C2EUE, and C2EBE monitoring shall be conducted at least once per month. For emission points C2DSE, C2ENE, and C2KPE monitoring shall be conducted on a daily basis when these emission units are operating.

Visible emission checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for 1 minute to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within three (3) days of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions.

[45CSR13, R13-1953, 4.2.2; 45CSR§30-5.1.c.]

#### 5.2.3. Reserved.

5.2.4. Compliance monitoring shall be accomplished by interlocking the upstream to either parameters on these devices or other devices in the same flow path as these devices as specified in the table below.

**Table 5.2.4. - Process Interlock Settings** 

| Control   | Description | Compliance Monitoring & Interlock Settings                                     |
|-----------|-------------|--|
| Device ID |             |  |
| C2DWC2    | Dryer       | These scrubbers shall be interlocked to shut down the feed to the dryer if     |
| C2EHC2    | Scrubbers   | the pressure drop across the 10 micron filter in the recirculating liquid line |
|           |             | exceeds 20 psig. The feed to the sources will stop if the water flow to these  |
|           |             | scrubbers drops below 2,000 pounds per hour.                                   |
| C2DTC3    | Scrubber    | The scrubber shall be interlocked to shut down if the water feed to the        |
|           |             | scrubber drops below 1.5 gpm. This will shut down the feeds to all sources     |
|           |             | feeding the scrubber.  |

Note: These parameters are continuously measured by the DCS, which shall produce an hourly average in order to justify compliance with proper operation of the equipment.

The permittee shall maintain a log using the sample record-keeping format appended as Attachment D of Appendix B that documents when these interlocks are tripped and the operation continues for greater than thirty (30) minutes in duration. At a minimum, the information specified in condition 3.4.6. must be documented for each logged malfunction:

In the event that a malfunction occurs that triggers the record keeping requirements above and those contained in 5.2.1, the permittee is required to only make one record of the malfunction occurrence to comply with both requirements.

[45CSR13, R13-1953, 4.2.4]

# 5.3. Testing Requirements

- 5.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices. [45CSR13, R13-1953, 4.3.1; 45CSR87-8.1]
- 5.3.2. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions. [45CSR13, R13-1953, 4.3.2; 45CSR§7-8.2]
- 5.3.3. For the purpose of determining compliance with the emission limits of the dryer units C2DW, and C2EH, in 5.1.1, the permittee shall conduct a compliance test of the permitted facility within ninety (90) days of the date the 60-minute average production rate exceeds 120% of the rate demonstrated during the most recent test conducted on November 29, 2004.

A test protocol shall be submitted to DAQ for approval within thirty (30) days of the test date. The Director shall be notified at least fifteen (15) days in advance of the actual dates and times at which the tests will be conducted. The results of emission testing shall be submitted to the DAQ within sixty (60) days of the actual test date.

[45CSR13, R13-1953, 4.3.3]

# 5.4. Recordkeeping Requirements

- 5.4.1. For the purpose of determining compliance with the permit limits based on the maximum permitted emission rates as described in 5.1.1, 5.1.2, 5.1.3, and 5.1.4, the permittee shall perform monthly calculations of the maximum hourly and total annual emissions associated with the operation of all affected sources. In addition, the permittee shall record and document all operating parameters and production records used to calculate the monthly emissions estimates using a format similar to the sample recordkeeping forms appended to R13-1953 as Attachments A, B, and C and located in Appendix B of this permit. [45CSR13, R13-1953, 4.4.5]
- 5.4.2. The permittee shall maintain records of all monitoring data required by 5.2.2., documenting the date and time of each visible emission check, the emission point or equipment identification number, the name or means of identification of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall be maintained per the requirements of 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (OOS) or equivalent. [45CSR13, R13-1953, 4.4.4]

5.4.3. Certified copies of all records required to be maintained under Condition 3.4.2 shall be made available to the Director of the Division of Air Quality or his duly authorized representative upon request. At a time prior to submittal to the Director, all records shall be certified and signed by a "Responsible Official" utilizing the attached Certification of Data Accuracy statement. If these records are considered to contain confidential business information as identified in the permit application, then the records may be submitted according to the procedures set forth in 45CSR31 – "Confidential Information." [45CSR13, R13-1953, 4.4.6]

# 5.5. Reporting Requirements

5.5.1. Reserved.

## 5.6. Compliance Plan

5.6.1. None.

### 6.0 Source-Specific Requirements [C3 Area]

#### 6.1. Limitations and Standards

- 6.1.1. Emissions within the Telomers (C3) Area, as listed in 6.1.3, will be monitored by tracking the total number of batches per year, limited to 3,040, the number of batches per line per year, limited to 1,520, and by keeping track of significant maintenance events as listed in APPENDIX C, Attachment A of this permit. [45CSR13, R13-2391, A.1]
- 6.1.2. During routine operations and during periods of preparation for cleaning and/or maintenance, emissions from the equipment identified in Table 6.1.2 shall be routed through the associated air pollution equipment prior to being released into the atmosphere.

**Table 6.1.2** 

| Equipment ID No. | Air Pollution Control<br>Device ID No. | Air Pollution Control Device Type | Emission Point ID No. |
|------------------|--|-----------------------------------|-----------------------|
| C3HG             | C3HGC                                  | Scrubber                          | C3HGE                 |
| СЗНН             | C3HGC                                  | Scrubber                          | C3HGE                 |
| СЗНК             | СЗНРС                                  | Scrubber                          | СЗНРЕ                 |
| C3HL             | СЗНРС                                  | Scrubber                          | СЗНРЕ                 |
| C3IF             | СЗНРС                                  | Scrubber                          | СЗНРЕ                 |
| СЗНМ             | СЗНРС                                  | Scrubber                          | СЗНРЕ                 |
| СЗНР             | СЗНРС                                  | Scrubber                          | СЗНРЕ                 |
| C3IV             | СЗНРС                                  | Scrubber                          | С3НРЕ                 |

[45CSR13, R13-2391, A.2]

6.1.3. The maximum allowable emissions released to the atmosphere during normal operations shall be limited to the pollutants and associated emission rates shown in Table 6.1.3.

**Table 6.1.3** 

| Emission | V              | OC              | HF                |                 | Fluo              | rides           | PM10              |                 |
|----------|----------------|-----------------|-------------------|-----------------|-------------------|-----------------|-------------------|-----------------|
| Point ID | Hourly (lb/hr) | Annual (ton/yr) | Hourly<br>(lb/hr) | Annual (ton/yr) | Hourly<br>(lb/hr) | Annual (ton/yr) | Hourly<br>(lb/hr) | Annual (ton/yr) |
| СЗНРЕ    | 779.2          | 3.40            |                   |                 | 0.04              | 0.01            | 0.19              | 0.08            |
| C3HGE    |                |                 |                   |                 |                   |                 | 0.87              | 0.11            |
| C3HG2E   |                |                 |                   |                 |                   |                 | 0.02              | 0.002           |
| C3HIE    | 255.7          | 0.814           |                   |                 |                   |                 |                   |                 |
| C3IPE    | 0.40           | 0.28            |                   |                 |                   |                 |                   |                 |
| Area     |                |                 | 0.50              | 0.001           |                   |                 | 2.00              | 0.07            |

Compliance with the above emission limits shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate emission limits for emission units C3HG, C3HH, and C3HK venting through emission points C3HGE, C3HG2E, and C3HPE.

[45CSR13, R13-2391, A.3 and B.8; 45CSR§7-4.1.]

6.1.4. Except for those emissions limited by Table 6.1.3 of this permit, all process vents from the C3 process equipment shown in Table 6.1.4 shall direct process related emissions to the thermal converter T7IMC covered in permit R13-1823B and subsequent revisions.

**Table 6.1.4** 

| Equipment ID No. | Description | Equipment ID No. | Description  |
|------------------|-------------|------------------|--------------|
| СЗНІ             | Reactor     | C3HD             | Tank         |
| СЗНО             | Reactor     | C3IE             | Tank         |
| СЗНЈ             | Still Pot   | C3ID             | Tank         |
| C3HQ             | Still Pot   | СЗНХ             | Tank         |
| СЗНТ             | Tank        | C3IT             | Tank         |
| C3IL             | Tank        | C3IX             | Tank         |
| C3HN             | Tank        | C3IY             | Tank         |
| C3IK             | Tank        | C3IG             | Bulk Loading |
| C3HS             | Tank        | C3IH             | Tank         |
| C3IJ             | Tank        | СЗЈА             | Filter       |

[45CSR13, R13-2391, A.4]

- 6.1.5. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. (C3HGE, C3HG2E, and C3HPE) [45CSR13, R13-2391, B.8; 45CSR§7-3.1.]
- 6.1.6. The provisions of 6.1.5. shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (C3HGE, C3HG2E, and C3HPE) [45CSR13, R13-2391, B.8; 45CSR§7-3.2.]

## **6.2.** Monitoring Requirements

6.2.1. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2 (6.1.5 and 6.1.6 of this permit), the permittee shall conduct opacity monitoring and record keeping for all emission points and equipment subject to an opacity limit under 45CSR7. Monitoring shall be conducted at least once per month. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for 1 minute to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within twenty-four (24) hours of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within twenty-four (24) hours after the visible emission and the sources are operating at normal conditions. (C3HGE, C3HG2E, and C3HPE) [45CSR§30-5.1.c.]

#### **6.3.** Testing Requirements

6.3.1. None.

### 6.4. Recordkeeping Requirements

- 6.4.1. Records of the visible emission observations required in 6.2.1 shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. (C3HGE, C3HG2E, and C3HPE) [45CSR§30-5.1.c.]
- 6.4.2. For the purpose of determining compliance with the maximum emission limits set forth in 6.1.3, the permittee shall maintain records equivalent to the example record keeping form supplied as Appendix C, Attachment A to this permit, and emission reports equivalent to the monthly and annual reports supplied as Appendix C, Attachments B and C to this permit. All records shall be documented and maintained in accordance to the requirements set forth by 6.4.7 of this permit. [45CSR13, R13-2391, B.2]
- 6.4.3. The permittee shall maintain certified records that the L2 Scrubber (C3HGC) solution was changed before falling below a concentration of 0.2 percent Na<sub>2</sub>SO<sub>3</sub>. The solution status is determined by periodic analytical measurements of scrubber composition (a minimum of once every seven days). To show compliance, the concentration of Na<sub>2</sub>SO<sub>3</sub> in the scrubbing media shall be recorded for each analysis and each date and time the solution is changed. The periodic analysis results and measured concentration at changeout and the number of times the concentration is less than 0.2 percent shall be recorded monthly. All records shall be documented and maintained in accordance to the requirements set forth by 6.4.7 of the permit.

  [45CSR13, R13-2391, B.3]
- 6.4.4. The permittee shall maintain certified records that the L3 Scrubber (C3HPC) solution was changed before falling below a concentration of 0.2 percent Na<sub>2</sub>SO<sub>3</sub> and KOH/NaOH. The solution status is determined by periodic analytical measurements of scrubber composition (a minimum of once every seven days). To show compliance, the concentration of Na<sub>2</sub>SO<sub>3</sub> and KOH/NaOH in the scrubbing media shall be recorded for each analysis and each date and time the solution is changed. The periodic analysis results and measured concentration at changeout and the number of times the concentration is less than 0.2 percent shall be recorded monthly. All records shall be documented and maintained in accordance to the requirements set forth by 6.4.7 of this permit. [45CSR13, R13-2391, B.4]
- 6.4.5. The permittee is subject to 40 C.F.R. 63, Subpart A, Section 1(b)(3), and therefore, must maintain record of the applicability determination performed per 40 C.F.R. 63, Section 10(b)(3). [45CSR13, R13-2391, B.5]
- 6.4.6. Reserved.
- 6.4.7. The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on-site. The remaining three (3) years of data may be maintained off-site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, or DVDs, or magnetic tape disks), on microfilm, or on microfiche.

Certified copies of these records shall be made available to the Director of the Division of Air Quality or his duly authorized representative upon request. At a time prior to submittal to the Director, all records shall be certified and signed by a "Responsible Official" utilizing the attached Certification of Data Accuracy statement.

If these records are considered to contain confidential business information as identified in the permit application, then the records may be submitted according to the procedures set forth in 45CSR31 - "Confidential Information."

[45CSR13, R13-2391, B.1]

# 6.5. Reporting Requirements

6.5.1. None.

# 6.6. Compliance Plan

6.6.1. None.

### 7.0 Source-Specific Requirements [T1, T2, T3, T4, and T7 Areas]

#### 7.1. Limitations and Standards

7.1.1. Process criteria pollutant emissions shall not exceed the following maximum hourly and annual emission limits:

| Emission                          | Emission |       |       | Proc | ess Crite      | ria Pollu | tant Emis | sion Lin | nits |      |                 |
|-----------------------------------|----------|-------|-------|------|----------------|-----------|-----------|----------|------|------|-----------------|
| Point Name                        | Point ID | V     | OC    | S    | O <sub>2</sub> | N         | Ox        | C        | o    | P    | M <sub>10</sub> |
|                                   |          | PPH   | TPY   | PPH  | TPY            | PPH       | TPY       | PPH      | TPY  | PPH  | TPY             |
| Furnace                           | T1CAE    | 0.05  | 0.21  | 0.01 | 0.03           | 0.83      | 3.65      | 0.70     | 3.07 | 0.06 | 0.28            |
| Furnace                           | T1CBE    | 0.07  | 0.30  | 0.01 | 0.04           | 1.24      | 5.45      | 1.04     | 4.58 | 0.09 | 0.42            |
| Furnace                           | T1CCE    | 0.07  | 0.30  | 0.01 | 0.04           | 1.24      | 5.45      | 1.04     | 4.58 | 0.09 | 0.42            |
| Furnace                           | T1CDE    | 0.07  | 0.29  | 0.01 | 0.04           | 1.19      | 5.25      | 1.00     | 4.41 | 0.09 | 0.40            |
| Dryers                            | T1DBE    | 1.17  | 0.19  | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |
| Mixed Gas<br>Holder               | T1GNE    | 1,380 | 7.95  | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |
| Raw Material<br>Unloading         | T1JBE    | 0.01  | 0.01  | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |
| North Tank<br>Farm<br>Scrubber    | T2ERE    | 1.74  | 0.64  | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |
| Trailer<br>Loading                | T2EXE    | 0.76  | 0.45  | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |
| Analyzer                          | T2EYE    | 0.26  | 1.13  | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |
| Storage Tank                      | T4GBE    | 1.64  | 0.02  | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |
| Cooling<br>Tower                  | T7AKE    | N/A   | N/A   | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | 1.3  | 4.23            |
| Portable<br>Container<br>Facility | Т7ЕМЕ    | 1.0   | 0.01  | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |
| Thermal<br>Converter<br>Stack     | T7IME    | 1.45  | 6.47  | 0.64 | 1.77           | 3.30      | 5.29      | 0.57     | 2.46 | 0.42 | 1.96            |
| Silo                              | T7IOE    | N/A   | N/A   | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | 0.4  | 0.09            |
| Emergency<br>Generator            | Т7ЈЈЕ    | 0.36  | 0.09  | 2.2  | 0.55           | 40.4      | 10.09     | 6.5      | 1.61 | 0.4  | 0.09            |
| South Central<br>Vent Stack       | T7XIE    | 2,440 | 33.83 | N/A  | N/A            | N/A       | N/A       | N/A      | N/A  | N/A  | N/A             |

Compliance with the above emission limits shall demonstrate compliance with the less stringent 45CSR§2-4.1.b hourly particulate and 45CSR§10-3.1.e hourly sulfur dioxide emission limits for Furnace T1CD venting through emission point T1CDE; the less stringent 45CSR§7-4.1 hourly particulate emission limits for emission units T7AK and T7IO venting through emission points T7AKE, and T7IOE; the less stringent 45CSR§6-4.1 hourly particulate emission limit for the Thermal Converter T7IMC venting through emission point T7IME.

[45CSR13, R13-1823, 4.1.1.; 45CSR§2-4.1.b; 45CSR§6-4.1; 45CSR§7-4.1; and 45CSR§10-3.1.e]

7.1.2. Process hazardous air pollutant (HAP) emissions shall not exceed the following maximum hourly and annual emission limits:

|                                      |                      | Process Hazardous Air Pollutant Emission Limits |      |      |      |      |                          |      |         |      |      |
|--------------------------------------|----------------------|---|------|------|------|------|--------------------------|------|---------|------|------|
| Emission<br>Point Name               | Emission<br>Point ID | Chro  | mium | Н    | Cl   | Н    | HF Methylene<br>Chloride |      | Toluene |      |      |
|                                      |                      | PPH   | TPY  | PPH  | TPY  | PPH  | TPY                      | PPH  | TPY     | PPH  | TPY  |
| North Tank<br>Farm Scrubber          | T2ERE                | N/A   | N/A  | 0.6  | 1.78 | N/A  | N/A                      | N/A  | N/A     | N/A  | N/A  |
| Storage Tank                         | T4GBE                | N/A   | N/A  | N/A  | N/A  | N/A  | N/A                      | N/A  | N/A     | 1.64 | 0.02 |
| Brine System<br>Losses               | T7XIE                | N/A   | N/A  | N/A  | N/A  | N/A  | N/A                      | N/A  | 33.95 a | N/A  | N/A  |
| Portable<br>Container<br>Facility    | Т7ЕМЕ                | N/A   | N/A  | N/A  | N/A  | 0.01 | 0.01                     | N/A  | N/A     | N/A  | N/A  |
| Thermal<br>Converter<br>Stack        | T7IME                | 0.03  | 0.04 | 0.06 | 0.26 | 0.54 | 2.51                     | 0.01 | 0.01    | 0.01 | 0.01 |
| Neutralization<br>System<br>Scrubber | T7JDE                | N/A   | N/A  | 0.12 | 0.01 | N/A  | N/A                      | N/A  | N/A     | N/A  | N/A  |
| South Central<br>Vent Stack          | T7XIE                | N/A   | N/A  | 14.7 | 1.54 | N/A  | N/A                      | N/A  | N/A     | N/A  | N/A  |

<sup>&</sup>lt;sup>a</sup> This is total methylene chloride losses and includes fugitives.

Compliance with the above hydrochloric acid emission limits shall demonstrate compliance with the less stringent 45CSR§7-4.2 hydrochloric acid concentration limits for emission points T2ERE, T7JDE, and T7XIE.

[45CSR13, R13-1823, 4.1.2.; 45CSR§7-4.2]

- 7.1.3. Reserved.
- 7.1.4. Total maintenance emissions from all sources shall not exceed the following maximum annual emission limits:

| Pollutant Name | Maintenance Emission Limits (TPY) |
|----------------|-----------------------------------|
| VOC            | 19.5                              |
| HCl            | 0.56                              |
| HF             | 0.01                              |
| Toluene        | 0.03                              |
| Acetonitrile   | 0.01                              |

[45CSR13, R13-1823, 4.1.4.]

7.1.5. All control devices shall be maintained and operated in accordance with the information submitted in Permit Application R13-1823A through R13-1823Q. The operating conditions which shall be adhered to include the following:

| Thermal Converter - Combustion (T7IMC)                        | Value                                      | Units  |  |
|---|--|--|--|
| Minimum Combustion Chamber Temperature                        | 1,800                                      | °F   |  |
| Maximum Waste Gas Feed Rate                                   | 1,910                                      | pph  |  |
| Maximum Charge Rate   | As required und                            | ler CISWI monitoring                               |  |
| (HFC-23 from tank car unloading for CISWI)                    | requirements in Co                         | ndition 7.2.2.                                     |  |
| Thermal Converter - Scrubber (T7IMC)                          | Value                                      | Units  |  |
| Maximum Gas Stream Flow                                       |  | the 40 C.F.R. 63, Subpart equirements in Condition |  |
| Pressure Drop Across the Wet Acid Gas Scrubber                | As required us requirements in Co          | nder the monitoring ndition 7.2.2.                 |  |
| Minimum Re-circulated Liquor Flow (1st Stage)                 | 40   | gpm  |  |
| Minimum Re-circulation Pump Current (1st Stage)               | 1.0  | Amps   |  |
| Note: If minimum re-circulation liquor flow indication        |  |  |  |
| above is less than 40 gpm (i.e. flow meter malfunction), then |  |  |  |
| the recirculation pump amp load must be maintained above      |  |  |  |
| 1.0 amp load as a back-up indication to flow.                 |  |  |  |
| 4th (Final Scrubbing) Stage Requirements:                     |  |  |  |
| Minimum Scrubber Liquor Flow                                  | The most stringent of the CISWI monitoring |  |  |
| (4 <sup>th</sup> Stage)                                       | •  | Condition 7.2.2, the 40                            |  |
| (Dilute Na <sub>2</sub> SO <sub>3</sub> , pH adjusted)        | 1  | part FFFF monitoring                               |  |
|   |  | ondition 7.2.7, or the 40                          |  |
|   |  | rt NNNNN monitoring                                |  |
| Liquor Oxidation/Reduction Potential (4 <sup>th</sup> Stage)  | requirements in Co                         | millivolts vs.                                     |  |
| Elquoi Oxidation/Reduction Potential (4 Stage)                | <u>≥</u> +400                              | Ag/AgCl ref. electrode                             |  |
| Minimum Scrubber Liquor pH (4 <sup>th</sup> Stage)            | The most stringent                         | of the CISWI monitoring                            |  |
| William Scrubber Elquor pri (4 Stage)                         |  | Condition 7.2.2, the 40                            |  |
|   |  | part FFFF monitoring                               |  |
|   | 1  | ondition 7.2.7, or the 40                          |  |
|   |  | rt NNNNN monitoring                                |  |
|   | requirements in Condition 7.2.4.           |  |  |
| Maximum Scrubber Effluent pH (4th Stage)                      | _  | the 40 C.F.R. 63, Subpart                          |  |
| 1 ( 5 /   | NNNN monitoring requirements in            |  |  |
|   | Condition 7.2.4.                           | - •  |  |
| Neutralization System Scrubber (T7JDC)                        | Value                                      | Units  |  |
| Scrubber Liquor Flow Range                                    | 0.5 to 2                                   | gpm  |  |
| Daily Confirmation of Blower Operation                        |  |  |  |

# [45CSR13, R13-1823, 4.1.5.]

7.1.6. Column T4XK (column process vent and pot vent) shall not vent to atmosphere when the Thermal Converter (T7IMC) is down. [45CSR13, R13-1823, 4.1.6.]

7.1.7. Process emissions from the following equipment shall be directed to the indicated control device:

| Equipment                | Equipment<br>ID No. | Control Device            | Control Device<br>ID No. |
|--------------------------|---------------------|---------------------------|--------------------------|
| Air Stripper             | T2ES                | North Tank Farm Scrubber  | T2ERC                    |
| Column                   | T4GM                | Thermal Converter         | T7IMC                    |
| Column - Pot Vent        | T4XK                | Thermal Converter         | T7IMC                    |
| Column - Process Vent    | T4XK                | Thermal Converter         | T7IMC                    |
| Storage Tanks            | T1BP - T            | South Stillhouse Scrubber | T7XIC                    |
| Column - Operating Vents | T1XD                | South Stillhouse Scrubber | T7XIC                    |
| Column                   | T2XM                | South Stillhouse Scrubber | T7XIC                    |
| TFE/CO2 System Vents     | T2EX                | Thermal Converter         | T7IMC                    |

[45CSR13, R13-1823, 4.1.7.]

7.1.8. Maintenance emissions from the following equipment shall be directed to the indicated control device:

| Equipment                | Equipment<br>ID No. | Control Device            | Control Device<br>ID No. |
|--------------------------|---------------------|---------------------------|--------------------------|
| Storage Tank & Vaporizer | T1LF                | North Tank Farm Scrubber  | T2ERC                    |
|                          |                     | South Stillhouse Scrubber | T7XIC                    |
| Coolers                  | T1DD - F            | Thermal Converter         | T7IMC                    |
| Bag Filters              | T1DG &H             | Thermal Converter         | T7IMC                    |
| Column                   | T1XD                | Thermal Converter         | T7IMC                    |
| Column                   | T4GM                | Thermal Converter         | T7IMC                    |
| Storage Tank             | T4GO                | Thermal Converter         | T7IMC                    |
| Storage Tanks            | T1BP - T            | South Stillhouse Scrubber | T7XIC                    |

[45CSR13, R13-1823, 4.1.8.]

- 7.1.9. The furnaces T1CA, T1CB, T1CC, and T1CD shall be operated and maintained in accordance with the manufacturer's recommendations and specifications and in a manner consistent with good operating practices and shall only burn natural gas. [45CSR13, R13-1823, 4.1.9.]
- 7.1.10. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. (TICAE, TICBE, TICCE, TICDE) [45CSR§2-3.1; 45CSR13, R13-1823, 4.1.10.]

#### 7.1.11. **RESERVED.**

7.1.12. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. (T7AKE, T2ERE, T7JDE, and T7XIE) [45CSR13, R13-1823, 4.1.12.; 45CSR\$7-3.1.]

- 7.1.13 The provisions of 7.1.12 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (T7AKE, T2ERE, T7JDE, and T7XIE) [45CSR13, R13-1823, 4.1.13.; 45CSR§7-3.2.]
- 7.1.14. No person shall cause, suffer, allow, or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to 45CSR§7-5.1 is required to have a full enclosure and be equipped with a particulate matter control device. (T7IOE) [45CSR13, R13-1823, 4.1.14.; 45CSR§7-3.7.]
- 7.1.15. The permittee shall comply with the following emission limitations of 45CSR18 for the thermal converter and associated scrubber (T7IMC):

Table 45-18J – Emission limits for existing commercial and industrial solid waste incinerators that apply on and after February 7, 2018<sup>a</sup>

| Air pollutant                            | Emission limit <sup>b</sup>                           | Averaging time <sup>c</sup>   | Performance test methods  |
|--|---|---|---|
| Cadmium                                  | 0.0026-milligrams per<br>dry standard cubic<br>meter. | 3-run average (collect a minimum volume of 2 dry standard cubic meters).  | Performance test (Method 29 of 40CFR60, appendix A-8). Use ICPMS for the analytical finish. |
| Carbon monoxide                          | 17 parts per million by dry volume.                   | 3-run average (1 hour minimum sample time per run).   | Performance test<br>(Method 10 at 40CFR<br>60, appendix A-4).                               |
| Dioxins/furans (total mass basis)        | 4.6 nanograms per dry standard cubic meter.           | 3-run average (collect a minimum volume of 2 dry standard cubic meters).  | Performance test<br>(Method 23 at 40CFR60,<br>appendix A-7).                                |
| Dioxins/furans (toxic equivalency basis) | 0.13 nanograms per<br>dry standard cubic<br>meter.    | 3-run average-(collect a minimum volume of 2 dry standard cubic meters).  | Performance test<br>(Method 23 of 40CFR<br>60, appendix A-7).                               |
| Hydrogen chloride                        | 29 parts per million<br>by dry volume.                | 3-run average (For Method 26, collect a minimum volume of-60 liters per run. For Method 26A, collect a minimum volume of 1 dry standard cubic meter per run). | Performance test (Method 26 or 26A of 40CFR 60, appendix A-8).                              |

| Air pollutant                 | Emission limit <sup>b</sup>  | Averaging time <sup>c</sup>   | Performance test methods  |
|-------------------------------|--|---|---|
| Lead                          | 0.015 milligrams per<br>dry standard cubic<br>meter.                             | 3-run average (collect a minimum volume of 2 dry standard cubic meters).  | Performance test (Method 29 of 40CFR 60, appendix A-8) Use ICPMS for the analytical finish.       |
| Mercury                       | 0.0048 milligrams per<br>dry standard cubic<br>meter.                            | 3-run average (For Method 29 and ASTM D6784–02 (Reapproved 2008), collect a minimum volume of 2 dry standard cubic meters per run. For Method 30B, collect a minimum sample as specified in Method 30B at 40CFR60, appendix A). | Performance test (Method 29 or 30B of 40CFR 60, appendix A-8) or ASTM D6784-02 (Reapproved 2008). |
| Nitrogen oxides               | 53 parts per million by dry volume.  | 3-run average (for Method 7E, 1-hour minimum sample time per run).  | Performance test (<br>Method 7 or 7E of<br>40CFR60, appendix<br>A-4).                             |
| Particulate matter filterable | 34 milligrams per dry standard cubic meter.                                      | 3-run average (collect a minimum volume of 1 dry standard cubic meter).   | Performance test (<br>Method 5 or 29 of<br>40CFR 60, appendix A-3<br>or appendix A-8).            |
| Sulfur dioxide                | 11 parts per million<br>by dry volume.   | 3-run average (1 hour minimum sample time per run).   | Performance test (<br>Method 6 or 6C of<br>40CFR 60, appendix A-<br>4).                           |
| Fugitive ash                  | Visible emissions for<br>no more than 5% of<br>the hourly observation<br>period. | Three 1-hour observation periods.   | Visible emission test<br>(Method 22 at 40CFR60,<br>appendix A-7).                                 |

a The date specified in the state plan can be no later than 3 years after the effective date of approval of a revised state plan or February 7, 2018.

[45CSR13, R13-1823, 4.1.15; 45CSR§§18-9.1 and 9.6.a, and Table 45-18J; §§62.12155 through 62.12157; 45CSR§6-4.3]

b All emission limitations are measured at 7 percent oxygen, dry basis at standard conditions. For dioxins/furans, the owner or operator shall meet either the total mass basis limit or the toxic equivalency basis limit.

c In lieu of performance testing, the owner or operator may use a CEMS or, for mercury, an integrated sorbent trap monitoring system, to demonstrate initial and continuing compliance with an emissions limit, as long as the owner or operator complies with the CEMS or integrated sorbent trap monitoring system requirements applicable to the specific pollutant in 9.9.a through 9.9.z and 9.10.a through 9.10.t. As prescribed in 9.9.u, if the owner or operator uses a CEMS or integrated sorbent trap monitoring system to demonstrate compliance with an emissions limit, the averaging time is a 30-day rolling average of 1-hour arithmetic average emission concentrations. Compliance with the above 5 percent opacity limit shall demonstrate compliance with the less stringent twenty percent opacity limit of 45CSR\$6-4.3.

- 7.1.16. The Permittee shall meet the emission limitations specified under 7.1.15 and operating limits specified under 7.2.2. The emission limits apply at all times the unit is operating including and not limited to startup, shutdown, or malfunction. [45CSR13, R13-1823, 4.1.16; 45CSR§§18-9.6.a, c, and d; 40 C.F.R. §§62.12155 through 62.12157]
- 7.1.17. The permittee shall burn only the same types of waste and fuels used to establish the operating limits specified under 7.2.2. [45CSR13, R13-1823, 4.1.17; 45CSR§18-9.9.d; 40 C.F.R. §§62.12155 through 62.12157
- 7.1.18. 40 C.F.R. 63, Subpart NNNN. The permittee shall meet the applicable emission limit and work practice standard in Table 1 to 40 C.F.R. 63, Subpart NNNNN for each emission stream from an HCl process vent; each emission stream from an HCl storage tank; each emission stream from an HCl transfer operation; and each emission stream resulting from leaks from equipment in HCl service.

| For each |   | You must meet the following emission limit and work practice standard   |  |
|----------|---|---|--|
| 1.       | Emission stream from an HCl process vent at an existing source                    | a. Reduce HCl emissions by 99 percent or greater or achieve an outlet concentration of 20 ppm by volume or less; and  |  |
|          |   | b. Reduce Cl <sub>2</sub> emissions by 99 percent or greater of achieve an outlet concentration of 100 ppm by volume or less.   |  |
| 2.       | Emission stream from an HCl storage tank at an existing source                    | Reduce HCl emissions by 99 percent or greater of achieve an outlet concentration of 120 ppm by volume or less.  |  |
| 3.       | Emission stream from an HCl transfer operation at an existing source              | Reduce HCl emissions by 99 percent or greater of achieve an outlet concentration of 120 ppm by volume or less.  |  |
| 4.       | Emission stream from leaking equipment in HCl service at existing and new sources | <ul> <li>a. Prepare and operate at all times according to an<br/>equipment LDAR plan that describes in detail the<br/>measures that will be put in place to detect leaks and<br/>repair them in a timely fashion; and</li> </ul>  |  |
|          |   | b. Submit the plan to the Administrator for commen only with your Notification of Compliance Status and   |  |
|          |   | c. You may incorporate by reference in such planexisting manuals that describe the measures in place to control leaking equipment emissions required as part of other federally enforceable requirements provided that all manuals that are incorporated by reference are submitted to the Administrator. |  |

(T2ERE and T7IMC) [45CSR34; 40 C.F.R. §§63.8990(a) and 63.9000(a); Table 1 to 40 C.F.R. 63, Subpart NNNNN; 45CSR13, R13-1823, 4.1.18.]

7.1.19. 40 C.F.R. 63, Subpart NNNNN. The permittee shall meet all applicable general requirements of 40 C.F.R.§63.9005. [45CSR34; 40 C.F.R.§63.9005; 45CSR13, R13-1823, 4.1.19.]

- 7.1.20. **40 C.F.R. 63, Subpart FFFF.** The Fluoropolymers Business Unit has been determined to be subject to the following requirements of 40 C.F.R. 63, Subpart FFFF "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing."
  - a. General Requirements. The permittee shall comply with all applicable general requirements specified in Table 12 to 40 C.F.R. 63, Subpart FFFF and 40 C.F.R. §§63.2450 and 63.2540. [45CSR34; 40 C.F.R. §§63.2450 and 63.2540; Table 12 to 40 C.F.R. 63, Subpart FFFF; 45CSR13, R13-1823, 4.1.20.a]
  - b. **Hydrogen Halide and Halogen HAP Emissions from Process Vents.** The permittee shall comply with each emission limit in Table 3 to 40 C.F.R. 63, Subpart FFFF and each applicable requirement specified in 40 C.F.R. §63.2465 for process vents that emit hydrogen halide and halogen HAPs.
    - i. Hydrogen Halide and Halogen HAP Process Vents. For a process with uncontrolled hydrogen halide and halogen HAP emissions from process vents ≥ 1,000 lb/yr, the permittee has chosen to reduce collective hydrogen halide and halogen HAP emissions by ≥ 99 percent by weight or to an outlet concentration ≤ 20 ppm<sub>v</sub> by venting through one or more closed-vent systems to any combination of control devices. (Emission Units: C2ES, T1BW, T1BX, T1XC, and T1XD; Control Devices: T7XIC and T7IMC and/or its associated Scrubber)

[45CSR34; 40 C.F.R. §63.2465; Table 3 to 40 C.F.R. 63, Subpart FFFF; 45CSR13, R13-1823, 4.1.20.b]

- c. Equipment Leaks. The permittee shall comply with each applicable requirement of 40 C.F.R. §63.2480 and Table 6 of 40 C.F.R. 63, Subpart FFFF, and either 40 C.F.R. 63, Subpart H, 40 C.F.R. 63, Subpart UU, or 40 C.F.R. 65, Subpart F for the applicable Fluoropolymers equipment components that are in organic HAP service. [45CSR34; 40 C.F.R. §63.2480; Table 6 to 40 C.F.R. 63, Subpart FFFF; 45CSR13, R13-1823, 4.1.20.c]
- d. Wastewater Streams. The permittee shall comply with the applicable requirements of 40 C.F.R. §§63.105, 63.132 through 63.148, 63.2485, and Table 7 to 40 C.F.R. 63, Subpart FFFF for the Fluoropolymers wastewater streams. [45CSR34; 40 C.F.R. §63.2485; Table 7 to 40 C.F.R. 63, Subpart FFFF; 45CSR13, R13-1823, 4.1.20.d]

#### 7.1.21. 40 C.F.R. 63, Subpart DDDDD (Boiler MACT)

C.F.R. §63.7515(d)]

Sources T1CA, T1CB, T1CC and T1CD are existing process heaters that shall comply with the requirements of 40 C.F.R. 63, Subpart DDDDD – "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters".

[45CSR34; 40 C.F.R. §63.7485; 40 C.F.R. §63.7495(b)]

- a. T1CA has a heat input capacity of <10 million BTUs/hr, therefore the permittee shall conduct biennial tune-ups for this source as specified in d. below. Each biennial tune-up specified in d. below must be conducted no more than 25 months after the previous tune-up.</li>
   [45CSR 34; 40 C.F.R. §63.7540(a)(11); 40 C.F.R. §§63.7500(a)(1) and (e); Table 3, Item #2; 40
- T1CB, T1CC, and T1CD have heat input capacities ≥ 10 million BTUs/hr, therefore the permittee shall conduct annual tune-ups for this source as specified in d. below. Each annual tune-up specified in d. below must be conducted no more than 13 months after the previous tune-up. [45CSR34; 40 C.F.R. §63.7500(a)(1) and (e), Table 3, Item #3; 40 C.F.R. §63.7505(a); 40 C.F.R. §63.7515(d); 40 C.F.R. §63.7540(a)(10)]

c. At all times, you must operate and maintain any affected source (as defined in 40 C.F.R. § 63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[45CSR34; 40 C.F.R. §63.7500(a)(3)]

d. You must conduct the tune-up while burning the type of fuel (or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12 months prior to the tune-up. This frequency does not apply to limited-use boilers and process heaters, as defined in 40 C.F.R. §63.7575, or units with continuous oxygen trim systems that maintain an optimum air to fuel ratio.

[45CSR34; 40 C.F.R. §63.7540(a)(10)]

(i) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

[45CSR34; 40 C.F.R. §63.7540(a)(10)(i)]

- (ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available; [45CSR34; 40 C.F.R. §63.7540(a)(10)(ii)]
- (iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

[45CSR34; 40 C.F.R. §63.7540(a)(10)(iii)]

- (iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject; [45CSR34; 40 C.F.R. §63.7540(a)(10)(iv)]
- (v) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

[45CSR34; 40 C.F.R. §63.7540(a)(10)(v)]

- 7.1.22. Operator Training and Qualification.
  - a. No CISWI unit shall be operated unless a fully trained and qualified CISWI unit operator is accessible, either at the facility or within one hour of travel time from the facility. The trained and qualified CISWI unit operator may operate the CISWI unit directly or be the direct supervisor of one or more other plant personnel who operate the unit. If all qualified CISWI unit operators are temporarily not accessible, you shall follow the procedures in Condition 7.1.22.k.
  - b. Operator training and qualification shall be obtained by completing an incinerator operator training course that includes, at a minimum, the three elements described in paragraphs b.1 through b.3.
    - b.1. Training on the eleven subjects listed in subparagraphs b.1.A through b.1.K.
      - b.1.A. Environmental concerns, including types of emissions.
      - b.1.B. Basic combustion principles, including products of combustion.
      - b.1.C. Operation of the specific type of incinerator to be used by the operator, including proper startup, waste charging, and shutdown procedures.
      - b.1.D. Combustion controls and monitoring.
      - b.1.E. Operation of air pollution control equipment and factors affecting performance (if applicable).
      - b.1.F. Inspection and maintenance of the incinerator and air pollution control devices.
      - b.1.G. Actions to prevent and correct malfunctions or to prevent conditions that may lead to malfunctions.
      - b.1.H. Bottom and fly ash characteristics and handling procedures.
      - b.1.I. Applicable Federal, State, and local regulations, including Occupational Safety and Health Administration workplace standards.
      - b.1.J. Pollution prevention.
      - b.1.K. Waste management practices.
    - b.2. An examination designed and administered by the instructor of the incinerator operator training course: and,
    - b.3. Written material covering the training course topics that can serve as reference material following completion of the course.
  - c. The operator training course shall be completed by the later of the following three dates:
    - c.1. The final compliance date set forth in 45CSR§18-9.3.e.
    - c.2. Six months after CISWI unit startup.

- c.3. The date before an employee assumes responsibility for operating the CISWI or assumes responsibility for supervising the operation of the CISWI.
- d. You shall obtain operator qualification by completing a training course that satisfies the criteria under subdivision b.
- e. Qualification is valid from the date on which the training course is completed and the operator successfully passes the examination required under paragraph b.2.
- f. To maintain qualification, you shall complete an annual review or refresher course covering, at a minimum, the five topics described below:
  - f.1. Update of regulations.
  - f.2. Incinerator operation, including startup and shutdown procedures, waste charging, and ash handling.
  - f.3. Inspection and maintenance.
  - f.4. Prevention and correction of malfunctions or conditions that may lead to malfunction.
  - f.5. Discussion of operating problems encountered by attendees.
- g. You shall renew a lapsed operator qualification by one of the two methods specified below:
  - g.1. For a lapse of less than 3 years, you shall complete a standard annual refresher course described in subdivision f.
  - g.2. For a lapse of 3 years or more, you shall repeat the initial qualification requirements set forth in subdivision d.
- h. Documentation shall be available at the facility and readily accessible for all CISWI unit operators that addresses the ten topics described in paragraphs h.1 through h.10. You shall maintain this information and the training records required by subdivision j in a manner that they can be readily accessed and are suitable for inspection upon request.
  - h.1. Summary of the applicable standards under 45CSR§18-9.
  - h.2. Procedures for receiving, handling, and charging waste.
  - h.3. Incinerator startup, shutdown, and malfunction procedures.
  - h.4. Procedures for maintaining proper combustion air supply levels.
  - h.5. Procedures for operating the incinerator and associated air pollution control systems within the standards established under 45CSR§18-9.

- h.6. Monitoring procedures for demonstrating compliance with the incinerator operating limits.
- h.7. Reporting and recordkeeping procedures.
- h.8. The waste management plan required under 45CSR§18-9.4.
- h.9. Procedures for handling ash.
- h.10. A list of the wastes burned during the performance test.
- i. You shall establish a program for reviewing the information listed in subdivision h with each incinerator operator.
  - i.1. The initial review of the information listed in subdivision h shall be conducted by the later of the three dates specified in subparagraphs i.1.A through i.1.C.
    - i.1.A. The final compliance date (increment 2) set forth in 45CSR§18-9.3.e.
    - i.1.B. Six months after CISWI unit startup; or,
    - i.1.C. Six months after being assigned to operate the CISWI unit.
  - i.2. Subsequent annual reviews of the information listed in subdivision h shall be conducted no later than 12 months following the previous review.
- j. You shall also maintain the information specified in paragraphs j.1 through j.3.
  - j.1. Records showing the names of CISWI unit operators who have completed review of the information in subdivision h as required by subdivision i, including the date of the initial review and all subsequent annual reviews.
  - j.2. Records showing the names of the CISWI operators who have completed the operator training requirements under Condition 7.1.22, met the criteria for qualification under subdivision d, and maintained or renewed their qualification under subdivision f or subdivision g. Records shall include documentation of training, the dates of the initial refresher training, and the dates of their qualification and all subsequent renewals of such qualifications.
  - j.3. For each qualified operator, the phone and/or cell phone number at which they can be reached during operating hours.
- k. If all qualified operators are temporarily not accessible (i.e., not at the facility and not able to be at the facility within one hour), you either, depending on the length of time that a qualified operator is not accessible:

- k.1. When all qualified operators are not accessible for more than eight hours, but less than two weeks, the CISWI unit may be operated by other plant personnel familiar with the operation of the CISWI unit who have completed a review of the information specified in subdivision h within the past 12 months. However, you shall record the period when all qualified operators were not accessible and include this deviation in the annual report as specified under Condition 7.5.1.e.
- k.2. When all qualified operators are not accessible for two weeks or more, you shall take both actions that are described below:
  - k.2.A. Notify the Secretary in writing within 10 days of this deviation. In the notice, state what caused this deviation, what you are doing to ensure that a qualified operator is accessible, and when you anticipate that a qualified operator will be accessible; and
  - k.2.B. Submit a status report to the Administrator and Secretary every four weeks outlining what you are doing to ensure that a qualified operator is accessible, stating when you anticipate that a qualified operator will be accessible and requesting approval from the Administrator and Secretary to continue operation of the CISWI unit. You shall submit the first status report four weeks after notification to the Administrator and Secretary of the deviation under subparagraph k.2.A. If the Administrator and Secretary notifies you that your request to continue operation of the CISWI unit is disapproved, the CISWI unit may continue operation for 90 days, then shall cease operation. Operation of the unit may resume if you meet the following requirements:
    - k.2.B.1. A qualified operator is accessible as required under subdivision a.
    - k.2.B.2. You notify the Administrator and Secretary that a qualified operator is accessible and that you are resuming operation.

[45CSR§18-9.5; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

7.1.23. Use of the bypass stack at any time is an emissions standards deviation for particulate matter, HCl, Pb, Cd, Hg, NO<sub>x</sub>, SO<sub>2</sub>, and dioxin/furans.

[45CSR§18-9.9.v; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

## 7.2. Monitoring Requirements

7.2.1. The permittee shall conduct visual emission monitoring during periods of commercial operation for the following emission points and equipment subject to visual emissions or opacity limits under 45CSR6 and 45CSR7. (TTIOE, TTAKE)

If commercial production is nearly continuous, monitoring shall be conducted at least once per month. If commercial production is intermittent, monitoring shall be conducted at least once per calendar month or a record shall be prepared to document that no commercial production was conducted in the month. These checks shall be performed during periods of normal commercial operation of emission sources that vent from the referenced emission points for 1 minute to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct a visible emission evaluation per 45CSR7A (for T7IOE and T7AKE) within three (3) days of the first identification of visible emissions.

A 45CSR7A or 40 C.F.R. 60, Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions.

- a. For source emissions from the storage silo (T7IO) through emission point (T7IOE), monitoring shall be conducted during each material unloading event.
- b. The Emergency Generator (T7JJ) shall be used only for emergencies and for routine readiness checks. Regular visual emissions observations are not required.

[45CSR13, R13-1823, 4.2.1; 45CSR§30-5.1.c]

- 7.2.2. The permittee shall install, calibrate (to manufacturer's specifications), maintain, and operate devices to continuously monitor the following operating parameters for the thermal converter and associated scrubber (T7IMC):
  - a. **Maximum charge rate** (for continuous units, maximum charge rate is 110 percent of the average charge rate measured during the most recent performance test demonstrating compliance with all applicable emission limitations);

[45CSR13, R13-1823, 4.2.2; 45CSR§§18-9.6.c.1.A]

- The pressure drop across the wet acid gas scrubber shall be continuously monitored to ensure proper internal configuration of the scrubber while it is being used to treat acid gases;
   [45CSR13, R13-1823, 4.2.2]
- c. **Minimum scrubber liquor flow rate**, which is calculated as the lowest 1-hour average liquid flow rate at the inlet to the wet acid gas or particulate matter scrubber measured during the most recent performance test demonstrating compliance with all applicable emission limitations; [45CSR13, R13-1823, 4.2.2; 45CSR§§18-9.6.c.3.]
- d. **Minimum scrubber liquor pH,** which is calculated as the lowest 1-hour average liquor pH-at the inlet to the wet acid gas scrubber measured during the most recent performance test demonstrating compliance with the HCl emission limitation.

[45CSR13, R13-1823, 4.2.2; 45CSR§§18-9.6.c.4]

The operating limits established during the most recent performance tests are specified in the following table.

| Operating Parameter          | Average Rate<br>Measured During<br>Compliance Testing | CISWI Operating<br>Limit | Test Date<br>Establishing<br>Limit |
|------------------------------|---|--------------------------|------------------------------------|
| Maximum charge rate          | 773.6 lb/hr   | 850.0 <u>l</u> b/hr      | August 15-16,2023                  |
| Minimum scrubber liquor flow | 40.7-gpm  | 40.7 gpm                 | August 15-16,                      |
| rate                         |   |                          | 2023                               |
| Minimum scrubber liquor pH   | 7.0   | 7.0                      | August 15-16,                      |
|                              |   |                          | 2023                               |

Operation above the established maximum or below the established minimum operating limits constitutes a deviation from the established operating limits. Three-hour rolling average values are used to determine compliance. Operation above the established maximum, below the established minimum, or outside the allowable range of the operating limits specified in 45CSR§18-9.9.a constitutes a deviation from the Permittee's operating limits, except during performance tests conducted to determine the emission and operating limits or to establish new operating limits. Operating limits are confirmed or reestablished during performance tests.

[45CSR13, R13-1823, 4.2.2; 45CSR§§18-9.6.c.1.A, 9.6.c.3, 9.6.c.4, 9.10.a, 9.9.c; 40 C.F.R. §§62.12155 through 62.12157]

- 7.2.3. **40** C.F.R. 63, Subpart NNNN. The permittee shall demonstrate compliance with the HCl and Cl<sub>2</sub> emission limits of 7.1.18 for T2ERE by meeting the combination of the following conditions:
  - a. Scrubber base temperature at or below 82 °C (process instrument measurement), AND
  - b. Fresh water make-up to the top section of the scrubber, measured with a flow meter (process instrument measurement) at or above 1,000 pph. Inherent in the scrubber design, 1,000 pph liquid flow is the minimum required to assure proper wetting of the packing and, therefore, proper scrubbing; <u>OR</u>
  - c. Operation of the recycle acid flow system through a restricting orifice. The restriction orifice is designed to assure that proper pump operation will provide flow well above the minimum required flow to wet the scrubber packing under all operational scenarios. Therefore, verification of proper operation of the recycle acid pump is indicated by the pump power monitor installed upon the pump. For the column to be properly operated (with the packing wetted adequately) the power monitor must read above a 1.4 amp minimum. This amp rating corresponds to the pump manufacturer's minimum recommended sustained flow rate for the pump.

(Emission Point: T2ERE; Control Device: T2ERC) [45CSR34; 40 C.F.R. §§ 63.9000(b) and 63.9025(b); Table 2 to 40 C.F.R. 63, Subpart NNNNN; 45CSR13, R13-1823, 4.2.3; Letter from Bernard E. Turlinski, Associate Director, Office of Enforcement and Permits Review, EPA Region III, to Robert L. Ritchey, Sr. Environmental Control Consultant of DuPont Washington Works, dated April 4, 2006]

- 7.2.4. **40** C.F.R. **63**, Subpart NNNN. The permittee shall establish the following operating limits in order to demonstrate compliance with the HCl and Cl<sub>2</sub> emission limits of 7.1.18 for T7IMC:
  - a. The minimum value as the operating limit for scrubber inlet liquid or recirculating liquid flow rate, as appropriate. The minimum values shall be based on the scrubber inlet liquid or recirculating liquid flow rate, as appropriate; and

b. The minimum and maximum values as the operating limits for scrubber effluent pH.

The operating limits shall be defined and based on the results of the most recent compliance testing which successfully demonstrates compliance with the applicable emission standards specified in 7.1.18. Subsequent testing requirements are specified in 7.3.3.

(Emission Point: T7IME; Control Device T7IMC) [45CSR34; 40 C.F.R. §§ 63.9000(b) and 63.9020(e)(1); Table 2 to 40 C.F.R. 63, Subpart NNNNN; 45CSR13, R13-1823, 4.2.4]

- 7.2.5. **40 C.F.R. 63, Subpart NNNN.** For each operating parameter that is required to be monitored under 7.2.3 and 7.2.4, the permittee shall install, operate, and maintain each CMS according to the requirements in 40 C.F.R. §63.9025(a). [45CSR34; 40 C.F.R. §63.9025(a); 45CSR13, R13-1823, 4.2.5]
- 7.2.6. 40 C.F.R. 63, Subpart FFFF. The permittee shall perform all required monitoring in compliance with the applicable general provisions of 40 C.F.R. 63, Subpart FFFF, per: 40 C.F.R. §§63.2450 and 63.2540; Table 12 to 40 C.F.R. 63, Subpart FFFF; and 40 C.F.R. 63, Subpart A. [45CSR34; 40 C.F.R. §§63.2450 and 63.2540; Table 12 to 40 C.F.R. 63, Subpart FFFF; 40 C.F.R. 63, Subpart A; 45CSR13, R13-1823, 4.2.6]
- 7.2.7. **40** C.F.R. **63**, Subpart FFFF. The permittee shall demonstrate compliance with the hydrogen halide and halogen HAP emission standards listed in 7.1.20.b.i for the Thermal Converter (T7IMC) and associated scrubber, by maintaining the following monitoring parameters as established during the most recent performance tests dated August 15-16, 2023:

| Thermal Converter – Scrubber (T7IMC)  | Monitoring | Limit        |
|---------------------------------------|------------|--------------|
|                                       | Frequency  |              |
| Minimum Scrubber Effluent pH          | Continuous | 7.0          |
| Minimum Scrubber Influent Liquor Flow | Continuous | 40.7 gpm     |
| Maximum Gas Stream Flow               | Continuous | 10,499.1 pph |

(Emission Units: C2ES, T1BW, T1BX, and T1XC; Control Device: T7IMC and associated Scrubber) [45CSR34; 40 C.F.R. §§63.988(c), 63.994(c) and 63.996; 45CSR13, R13-1823, 4.2.7]

7.2.8. **40** C.F.R. **63**, Subpart FFFF. The permittee shall demonstrate compliance with the hydrogen halide and halogen HAP emission standards listed in 7.1.20.b.i for the South Still House Scrubber (T7XIC), by maintaining the following monitoring parameters as established in the Notification of Compliance Status (NOCS) Report dated October 6, 2008 and the supplemental alternative monitoring proposal dated March 11, 2010:

| South Still House Scrubber (T7XIC)       | Monitoring<br>Frequency | Limit          |
|--|-------------------------|----------------|
| Maximum Scrubber Temperature             | Continuous              | 140 °F (60 °C) |
| Minimum Scrubber Liquor Circulation Rate | Continuous              | 200 gpm        |
| Maximum Vent Flow Discharge Rate         | Continuous              | 2,194 lb/hr    |

(Emission Unit: T1XD; Control Device: T7XIC) [40 C.F.R. §§63.994(c), 63.996(d), and 63.999(d); Letter from David F. Altman, Sr. Environmental Control Consultant of DuPont Washington Works to John Benedict, Director of DAQ and carbon copy to Judy Katz, Director of EPA Region III, dated May 8, 2008; Design Evaluation and Petition Document for the South Stillhouse Scrubber T7XIC, dated March 11, 2010; Alternative Monitoring Approval for Water Scrubber ID (T7XIC) from John Benedict, Director of DAQ to Karl J. Boelter, Plant Manager, dated June 16, 2010; 45CSR13, R13-1823, 4.2.8]

- 7.2.9. The Permittee shall conduct an initial and annual inspection of the air pollution control device. The inspection shall include, at a minimum, the following:
  - k.1. Inspect air pollution control device(s) for proper operation.
  - k.2. Develop a site-specific monitoring plan according to the requirements in Condition 7.2.10. This requirement also applies to you if you petition the Administrator for alternative monitoring parameters under 40 CFR §60.13(i).

[45CSR§18-9.9.k; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

- 7.2.10. For each CMS required in this section, you shall develop and submit to the Secretary for approval a site-specific monitoring plan according to the requirements of this subdivision that addresses subparagraphs l.1.A through l.1.F.
  - 1.1. You shall submit this site-specific monitoring plan at least 60 days before your initial performance evaluation of your continuous monitoring system.
    - 1.1.A. Installation of the continuous monitoring system sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device).
    - 1.1.B. Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer and the data collection and reduction systems.
    - 1.1.C. Performance evaluation procedures and acceptance criteria (e.g., calibrations).
    - 1.1.D. Ongoing operation and maintenance procedures in accordance with the general requirements of 40 CFR §60.11(d).
    - 1.1.E. Ongoing data quality assurance procedures in accordance with the general requirements of 40 CFR §60.13.
    - 1.1.F. Ongoing recordkeeping and reporting procedures in accordance with the general requirements of 40 CFR §§60.7(b),(c) introductory test, (c)(1), (c)(4), (d), (e), (f) and (g).
  - 1.2. You shall conduct a performance evaluation of each continuous monitoring system in accordance with your site-specific monitoring plan.

1.3. You shall operate and maintain the continuous monitoring system in continuous operation according to the site-specific monitoring plan.

## [45CSR§18-9.9.1; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

- 7.2.11. The facility shall meet the requirements in Condition 7.2.10 and paragraphs m.1 through m.4 below with regards to the use of a flow monitoring system.
  - m.1. Install the flow sensor and other necessary equipment in a position that provides a representative flow.
  - m.2. Use a flow sensor with a measurement sensitivity at full scale of no greater than 2 percent.
  - m.3. Minimize the effects of swirling flow or abnormal velocity distributions due to upstream and downstream disturbances.
  - m.4. Conduct a flow monitoring system performance evaluation in accordance with your monitoring plan at the time of each performance test but no less frequently than annually.

## [45CSR§18-9.9.m; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

- 7.2.12. The facility shall meet the requirements in Condition 7.2.10 and paragraphs n.1 through n.6 below with regards to the usage of a pressure monitoring system.
  - n.1. Install the pressure sensor(s) in a position that provides a representative measurement of the pressure (e.g., PM scrubber pressure drop).
  - n.2. Minimize or eliminate pulsating pressure, vibration, and internal and external corrosion.
  - n.3. Use a pressure sensor with a minimum tolerance of 1.27 centimeters of water or a minimum tolerance of 1 percent of the pressure monitoring system operating range, whichever is less.
  - n.4. Perform checks at the frequency outlined in your site-specific monitoring plan to ensure pressure measurements are not obstructed (e.g., check for pressure tap pluggage daily).
  - n.5. Conduct a performance evaluation of the pressure monitoring system in accordance with your monitoring plan at the time of each performance test but no less frequently than annually.
  - n.6. If at any time the measured pressure exceeds the manufacturer's specified maximum operating pressure range, conduct a performance evaluation of the pressure monitoring system in accordance with your monitoring plan and confirm that the pressure monitoring system continues to meet the performance requirements in your monitoring plan. Alternatively, install and verify the operation of a new pressure sensor.

## [45CSR§18-9.9.n; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

- 7.2.13. The facility shall meet the requirements of paragraphs o.1 through o.4 regarding the use of a pH monitoring system.
  - o.1. Install the pH sensor in a position that provides a representative measurement of scrubber effluent pH.
  - o.2. Ensure the sample is properly mixed and representative of the fluid to be measured.
  - o.3. Conduct a performance evaluation of the pH monitoring system in accordance with your monitoring plan at least once each process operating day.

o.4. Conduct a performance evaluation (including a two-point calibration with one of the two buffer solutions having a pH within 1 of the pH of the operating limit) of the pH monitoring system in accordance with your monitoring plan at the time of each performance test but no less frequently than quarterly.

[45CSR§18-9.9.0; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

7.2.14. The owner or operator of an affected source with a bypass stack shall install, calibrate (to manufacturers' specifications), maintain and operate a device or method for measuring the use of the bypass stack including date, time and duration.

[45CSR§18-9.10.p; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

- 7.2.15. Monitoring Data. -- For each continuous monitoring system required or optionally allowed under 45CSR§\$18-9.10.a through 10.t, the Permittee shall monitor and collect data according to the following:
  - s.1. The Permittee shall operate the monitoring system and collect data at all required intervals at all times compliance is required except for periods of monitoring system malfunctions or out of control periods, repairs associated with monitoring system malfunctions or out of control periods (as specified in 45CSR§18-9.12.e.15), and required monitoring system quality assurance or quality control activities including, as applicable, calibration checks and required zero and span adjustments. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The Permittee is required to affect monitoring system repairs in response to monitoring system malfunctions or out of control periods and to return the monitoring system to operation as expeditiously as practicable.
  - s.2. The Permittee may not use data recorded during the monitoring system malfunctions, repairs associated with monitoring system malfunctions or out of control periods, or required monitoring system quality assurance or control activities in calculations used to report emissions or operating levels. The Permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system.
  - s.3. Except for periods of monitoring system malfunctions or out-of-control periods, repairs associated with monitoring system malfunctions or out of control periods, and required monitoring system quality assurance or quality control activities including, as applicable, calibration checks and required zero and span adjustments, failure to collect required data is a deviation of the monitoring requirements.

[45CSR§18-9.10.u; 40 C.F.R. §§62.12155 through 62.12157 (T7IMC)]

# 7.3. Testing Requirements

- 7.3.1. Except as specified in l. below, the permittee shall conduct an annual performance test for the pollutants listed in Condition 7.1.15. The annual performance test shall be conducted using the test methods specified in 7.1.15. Subsequent annual performance tests shall be conducted no later than 13 months following the previous performance test.
  - a. All performance tests shall consist of a minimum of three test runs conducted under conditions representative of normal operations.

- b. You shall document that the waste burned during the performance test is representative of the waste burned under normal operating conditions by maintaining a log of the quantity of waste burned (as required in 7.4.8) and the types of waste burned during the performance test.
- c. All performance tests shall be conducted using the minimum run duration specified in Condition 7.1.15.
- d. Method 1 of 40 CFR Part 60, Appendix A shall be used to select the sampling location and number of traverse points.
- e. Method 3A or 3B of 40 CFR Part 60, Appendix A shall be used for gas composition analysis, including measurement of oxygen concentration. Method 3A or 3B of Appendix A shall be used simultaneously with each method.
- f. All pollutant concentrations, except for opacity, shall be adjusted to 7 percent oxygen using Equation 1:

$$C_{adj} = C_{meas} \frac{(20.9 - 7)}{(20.9 - \% O_2)}$$
 Equation 1

Where:

 $C_{adj}$  = pollutant concentration adjusted to 7 percent oxygen;

 $C_{meas}$  = pollutant concentration measured on a dry basis;

(20.9 - 7) = 20.9 percent oxygen - 7 percent oxygen (defined oxygen correction basis);

20.9 = oxygen concentration in air, percent; and

 $\%O_2$  = oxygen concentration measured on a dry basis, percent.

- g. You shall determine dioxins/furans toxic equivalency by following the procedures in paragraphs g.1 through g.4.
  - g.1. Measure the concentration of each dioxin/furan tetra- through octa-isomer emitted using EPA Method 23 at 40 CFR Part 60, Appendix A.
  - g.2. Quantify isomers meeting identification criteria 2, 3, 4, and 5 in Section 5.3.2.5 of Method 23, regardless of whether the isomers meet identification criteria 1 and 7. You shall quantify the isomers per Section 9.0 of Method 23 (Note: You may reanalyze the sample aliquot or split to reduce the number of isomers not meeting identification criteria 1 or 7 of Section 5.3.2.5).
  - g.3. For each dioxin/furan (tetra through octa-chlorinated) isomer measured in accordance with paragraphs g.1 and g.2, multiply the isomer concentration by its corresponding toxic equivalency factor specified in Table 45-18H of 45CSR18.

- g.4. Sum the products calculated in accordance with paragraph g.3 to obtain the total concentration of dioxins/furans emitted in terms of toxic equivalency.
- h. Method 22 at 40 CFR Part 60, Appendix A-7 shall be used to determine compliance with the fugitive ash emission limit in Condition 7.1.15.
- i. If you have an applicable opacity operating limit, you shall determine compliance with the opacity limit using Method 9 at 40 CFR Part 60, Appendix A-4, based on three 1-hour blocks consisting of ten 6-minute average opacity values, unless the owner or operator is required to install a continuous opacity monitoring system, consistent with 45CSR§§18-9.9.a through 9.9.y and 9.10.a through 9.10.t.
- j. You shall determine dioxins/furans total mass basis by following the procedures in paragraphs j.1 through j.3.
  - j.1. Measure the concentration of each dioxin/furan tetra- through octa-chlorinated isomer emitted using EPA Method 23 at 40 CFR Part 60, Appendix A-7.
  - j.2. Quantify isomers meeting identification criteria 2, 3, 4, and 5 in Section 5.3.2.5 of Method 23, regardless of whether the isomers meet identification criteria 1 and 7. You shall quantify the isomers per Section 9.0 of Method 23 (Note: You may reanalyze the sample aliquot or split to reduce the number of isomers not meeting identification criteria 1 or 7 of Section 5.3.2.5).
  - j.3. Sum the quantities measured in accordance with paragraphs j.1 and j.2 to obtain the total concentration of dioxins/furans emitted in terms of total mass basis.
- k. You use results of performance tests to demonstrate compliance with the emission limitations in Condition 7.1.15.
- 1. The Permittee may test less often for the pollutants in 7.1.15 (except for opacity) as described below:
  - 1.1. You shall conduct annual performance tests no later than 13 months of the previous performance test.
  - 1.2. You shall conduct the air pollution control device inspections on an annual basis (but no more than 12 months following the previous annual air pollution control device inspection) and complete the air pollution control device inspection as described in 45CSR§§18-9.8.e and 9.8.f.
  - 1.3. You shall conduct annual performance tests according to the schedule specified in 7.3.1.l, with the following exceptions:
    - 1.3.A. You may conduct a repeat performance test at any time to establish new values for the operating limits, as specified in 7.3.1.m. New operating limits become effective on the date the you submit the performance test report to the EPA's Central Data Exchange or postmarked, per the requirements of 45CSR18-9.12.j.2. The Secretary may request a repeat performance test at any time.

- 1.3.B. You shall repeat the performance test within 60 days of a process change, as defined in Section 2 and;
- 1.3.C. You may conduct performance tests less often if the following conditions are met. For at least two consecutive performance tests the results from the performance tests demonstrate the emission level for the pollutant is no greater than the emission level specified in parts 1.3.C.1 or 1.3.C.2; there is not a change in the operation of the affected source or air pollution control equipment that could increase emissions; and you are not required to conduct a performance test for the pollutant in response to a request by the Secretary in subparagraph 1.3.A or a process change in subparagraph 1.3.B. If these conditions are met, you are not required to conduct a performance test for that pollutant for the next 2 years. You shall conduct a performance test for the pollutant no later than 37 months from the previous performance test for the pollutant. If the emission level for the CISWI unit continues to meet the emission level specified in 1.3.C.1 or 1.3.C.2, the owner or operator may conduct performance tests for the pollutant every third year if there are no changes in the operation of the affected source or air pollution control equipment that could increase emissions.

Each such performance test shall be conducted no later than 37 months from the previous performance test.

- 1.3.C.1. For particulate matter, hydrogen chloride, mercury, carbon monoxide, nitrogen oxides, sulfur dioxide, cadmium, lead, and dioxins/furans, the emission level equal to 75 percent of the applicable emission limit in Condition 7.1.15, as applicable.
- 1.3.C.2. For fugitive emissions, visible emissions (of combustion ash from the ash conveying system) for 2 percent of the time during each of the three 1-hour observation periods.
- 1.3.D. If you are conducting less frequent testing for a pollutant as provided in subparagraph 1.3.C and a subsequent performance test for the pollutant indicates that your CISWI unit does not meet the emission level specified in parts 1.3.C.1 or 1.3.C.2, as applicable, you shall conduct annual performance tests for the pollutant according to the schedule specified in paragraph 1.3 until you qualify for less frequent testing for the pollutant as specified in subparagraph 1.3.C.
- m. Repeat Performance Test to Establish New Operating Limits.
  - m.1. You may conduct a repeat performance test at any time to establish new values for the operating limits. The Secretary may request a repeat performance test at any time.
  - m.2. You shall repeat the performance test if your feed stream is different than the feed streams used during any performance test used to demonstrate compliance.

[45CSR13, R13-1823, 4.3.1; 45CSR§§18-9.7, 9.8.f, 9.9.b, 9.9.z, and 9.9.aa; 40 C.F.R. §§62.12155 through 62.12157]

7.3.2. Reserved

7.3.3. **40** C.F.R. 63, Subpart NNNN. The permittee shall conduct all subsequent applicable performance tests according to the procedures in 40 C.F.R. §63.9020 on the earlier of the title V operating permit renewal or within 5 years of issuance of the title V permit. The results of the subsequent performance tests shall be reported within 60 days after the completion of the test. This report should also verify that the operating limits for the affected source have not changed or provide documentation of revised operating limits established as specified in Table 2 to 40 C.F.R. 63, Subpart NNNNN. The reports for all subsequent performance tests should include all applicable information required in 40 C.F.R. §63.9050.

The permittee shall not be required to conduct a performance test for an emission point for which a performance test was conducted within the previous 5-year period, using the same test methods specified in 40 C.F.R. §63.9020 and for which either no deliberate process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process changes. The operating limits reported under the previous performance test shall be sufficient to meet the monitoring requirements in 40 C.F.R. 63, Subpart NNNNN.

(Emission Points: T2ERE and T7IME; Control Devices: T2ERC and T7IMC) [45CSR34, 40 C.F.R. §§63.9015 and 60.9020(d); 45CSR13, R13-1823, 4.3.3]

7.3.4. **Opacity testing.** Any test to determine compliance with the visible emissions (opacity) limitations set forth in 7.2.1 shall be conducted by personnel appropriately trained for the task. Personnel performing the visual emissions observation shall be trained and familiar with the limitations and restrictions associated with 40 CFR 60 Appendix A – Method 22. Any person performing an opacity observation for compliance assessment in the event of visible emission must be a certified visible emission observer in accordance with 45CSR7A – "Compliance Test Procedures for 45CSR7 – *To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations.*" Nothing in this section, however, shall preclude any permittee or the Secretary from using opacity data from a properly installed, calibrated, maintained and operated continuous opacity monitor as evidence to demonstrate compliance or a violation of visible emission requirements. If continuous opacity monitoring data results are submitted when determining compliance with visible emission limitations for a period of time during which 45CSR7A or Method 22 data indicates noncompliance, the 45CSR7A or Method 22 data shall be used to determine compliance with the visible emission limitations. **[45CSR13, R13-1823, 4.3.5.]** 

# 7.4. Recordkeeping Requirements

- 7.4.1. For the purpose of determining compliance with the process emission limits set forth in 7.1.1 and 7.1.2, and the operating limitations set forth in 7.1.5, 7.1.6, and 7.1.7, the permittee shall maintain records equivalent to the example monthly record keeping form supplied as Attachment A of Appendix D, and the emission reports equivalent to the monthly and annual reports supplied as Attachments D and E of Appendix D. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request. [45CSR13, R13-1823, 4.4.4.]
- 7.4.2. For the purpose of determining compliance with the maintenance emission limits set forth in 7.1.4, the permittee shall maintain records equivalent to the example monthly record keeping form supplied as Attachment B of Appendix D, and the emission reports equivalent to the monthly and annual reports supplied as Attachments D and E of Appendix D. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request.

  [45CSR13, R13-1823, 4.4.5.]

- 7.4.3. For the purpose of determining compliance with the control device parameter monitoring specified in 7.1.5, 7.2.2, 7.2.3, 7.2.4, 7.2.7, and 7.2.8, the permittee shall maintain records equivalent to the example monthly record keeping form supplied as Attachment C of Appendix D. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request.

  [45CSR13, R13-1823, 4.4.6.]
- 7.4.4. Notwithstanding the requirements in Section 3.4.6. of this permit, malfunctions (defined as monitoring parameters outside acceptable values defined in 7.1.5, 7.2.2, 7.2.3, 7.2.4, 7.2.7, and 7.2.8) of the North Tank Farm Scrubber (T2ERC), the Thermal Converter (T7IMC), the Neutralization System Scrubber (T7JDC), and/or the South Stillhouse Scrubber (T7XIC) for periods exceeding (30) minutes in duration shall be documented in writing as appendices to the record keeping form supplied as Attachment C of Appendix D. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request. At a minimum, the following information shall be documented for each malfunction:
  - a. The equipment involved and associated cause of the malfunction.
  - b. Steps taken to correct the malfunction.
  - c. Steps taken to minimize emissions during the malfunction.
  - d. The duration of the malfunction.
  - e. The estimated increase in emissions during the malfunction.
  - f. Any changes or modification to equipment or procedures that would help prevent future recurrence of the malfunction.

In the event a MACT standard requiring a Startup, Shutdown, and Malfunction (SSM) Plan should be found applicable to this permitted process in the future, then that SSM Plan would supercede the provisions of Specific Requirement 7.4.4 above. Until that time, or until notice from the permittee in writing to the Director of plans to adopt an SSM Plan, the provisions of Specific Requirement 7.4.4 will remain applicable.

## [45CSR13, R13-1823, 4.4.7.]

- 7.4.5. The permittee shall maintain records of all occurrences of objectionable odors from any of the incinerators. In addition to the date and time of the occurrence, the record shall also include the suspected cause and any actions taken. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request. [45CSR13, R13-1823, 4.4.8]
- 7.4.6. In addition to the monthly records of the quantity of fuel consumed in Furnace T1CD (required to be maintained in Attachment A of Appendix D), the permittee shall also maintain the date and time of startup and shutdown. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his/her duly authorized representative upon request. [45CSR§2-8.3.c and 45CSR§2A-7.1.a.1; 45CSR13, R13-1823, 4.4.9]
- 7.4.7. Records of the visible emission observations required by 7.2.1 shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and if

necessary, all corrective actions taken. The permittee shall maintain these records according to the conditions specified in 40 CFR 63.10(b)(1). Certified copies of these records shall be made available to the Director of the Division of Air Quality or his or her duly authorized representative upon request. If these records are considered to contain business confidential information as identified in the permit application, then the records may be submitted according to the procedures set forth in 45CSR31 - "Confidential Information." [45CSR13, R13-1823, 4.4.10]

- 7.4.8. You shall maintain the items (as applicable) as specified in subdivisions a, b, and subdivisions e through w for a period of at least 5 years for the thermal converter and associated scrubber (T7IMC):
  - a. Calendar date of each record.
  - b. Records of the data described in paragraphs b.1 through b.6:
    - b.1. The CISWI unit charge dates, times, weights, and hourly charge rates.
    - b.2. Liquor flow rate to the wet scrubber inlet every 15 minutes of operation, as applicable.
    - b.3. Pressure drop across the wet scrubber system every 15 minutes of operation or amperage to the wet scrubber every 15 minutes of operation, as applicable.
    - b.4. Liquor pH as introduced to the wet scrubber every 15 minutes of operation, as applicable.
  - c. Reserved.
  - d. Reserved.
  - e. Identification of calendar dates and times for which data show a deviation from the operating limits in Table 45-18G with a description of the deviations, reasons for such deviations, and a description of corrective actions taken.
  - f. The results of the initial, annual, and any subsequent performance tests conducted to determine compliance with the emission limits and/or to establish operating limits, as applicable. Retain a copy of the complete test report including calculations.
  - g. Records showing the names of CISWI unit operators who have completed review of the information in 45CSR18§9.5.h as required by 45CSR18§9.5.i, including the date of the initial review and all subsequent annual reviews.
  - h. Records showing the names of the CISWI operators who have completed the operator training requirements under 45CSR18§§9.5.a and 9.5.b, met the criteria for qualification under 45CSR18§§9.5.d and 9.5.e, and maintained or renewed their qualification under 45CSR18§§9.5.f or 9.5.g. Records shall include documentation of training, the dates of the initial and refresher training, and the dates of their qualification and all subsequent renewals of such qualifications.
  - i. For each qualified operator, the phone and/or pager number at which they can be reached during operating hours.
  - j. Records of calibration of any monitoring devices as required under 45CSR18§§9.10.a through 9.10.r.

- k. Equipment vendor specifications and related operation and maintenance requirements for the incinerator, emission controls, and monitoring equipment.
- 1. The information listed in 45CSR18§9.5.h.
- m. A daily log of the quantity of waste burned and the types of waste burned (always required).
- n. Records of the annual air pollution control device inspections that are required for each CISWI unit subject to the emissions limits in 7.1.15 and records of any required maintenance and any repairs not completed within 10 days of an inspection or the timeframe established by the Secretary.
- o. For continuously monitored pollutants or parameters, you shall document and keep a record of the following parameters measured using continuous monitoring systems.
  - o.1. All 6-minute average levels of opacity.
  - o.2. All 1-hour average concentrations of sulfur dioxide emissions.
  - o.3. All 1-hour average concentrations of nitrogen oxides emissions.
  - o.4. All 1-hour average concentrations of carbon monoxide emissions.
  - o.5. All 1-hour average concentrations of particulate matter emissions.
  - o.6. All 1-hour average concentrations of mercury emissions.
  - o.7. All 1-hour average concentrations of HCl CEMS outputs.
  - o.8. All 1-hour average percent oxygen concentrations.
  - o.9. All 1-hour average PM CPMS readings or particulate matter CEMS outputs.
- p. Records indicating use of the bypass stack, including dates, times and durations.
- q. If you choose to stack test less frequently than annually, consistent with 45CSR18§§9.9.z.3, you shall keep annual records that document that your emissions in the previous stack test(s) were less than 75 percent of the applicable emission limit and document that there was no change in source operations including fuel composition and operation of air pollution control equipment that would cause emissions of the relevant pollutant to increase within the past year.
- r. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- s. Records of all required maintenance performed on the air pollution control and monitoring equipment.
- t. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §60.11(d), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

- u. For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR §241.3(b)(1), records which document how the secondary material meets each of the legitimacy criteria under 40 CFR §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR §241.3(b)(4), you shall keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR §241.2 and each of the legitimacy criteria in 40 CFR §241.3(d)(1); if the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR §241.3(c), records that document how the fuel satisfies the requirements of the petition process; for operating units that combust nonhazardous secondary materials as fuel per 40 CFR §241.4, records documenting that the material is a listed non-waste under 40 CFR §241.4(a).
- v. Records of the criteria used to establish that the unit qualifies as a small power production facility under §3(17)(C) of the Federal Power Act (16 U.S.C. §796(17)(C)) and that the waste material the unit is proposed to burn is homogeneous.
- w. Records of the criteria used to establish that the unit qualifies as a cogeneration facility under §3(18)(B) of the Federal Power Act (16 U.S.C. §796(18)(B)) and that the waste material the unit is proposed to burn is homogeneous.
- x. The owner or operator shall have all records available onsite in either paper copy or computer-readable format that can be printed upon request, unless an alternative format is approved by the Secretary. [45CSR13, R13-1823, 4.4.11; 45CSR§18-9.11; 40 C.F.R. §§62.12155 through 62.12157]
- 7.4.9. **40** C.F.R. **63**, **Subpart EEEE**. For each storage tank subject to 40 C.F.R. **63**, Subpart EEEE having a capacity of less than 18.9 cubic meters (5,000 gallons) and for each transfer rack subject to this subpart that only unloads organic liquids (i.e., no organic liquids are loaded at any of the transfer racks), you must keep documentation that verifies that each storage tank and transfer rack is not required to be controlled. The documentation must be kept up-to-date (i.e., all such emission sources at a facility are identified in the documentation regardless of when the documentation was last compiled) and must be in a form suitable and readily available for expeditious inspection and review according to 40 C.F.R. §63.10(b)(1), including records stored in electronic form in a separate location. The documentation may consist of identification of the tanks and transfer racks identified in 7.4.9 on a plant site plan or process and instrumentation diagram (P&ID). [45CSR34; 40 C.F.R. §63.2343(a); 45CSR13, R13-1823, 4.4.12]
- 7.4.10. **40** C.F.R. **63**, **Subpart EEEE**. For each storage tank subject to 40 C.F.R. **63**, Subpart EEEE having a capacity of 18.9 cubic meters (5,000 gallons) or more that is not subject to control based on the criteria specified in Table 2 of 40 C.F.R. **63**, Subpart EEEE, items 1 through 6, you must keep documentation, including a record of the annual average true vapor pressure of the total Table 1 organic HAP in the stored organic liquid, that verifies the storage tank is not required to be controlled under 40 C.F.R. **63**, Subpart EEEE. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to 40 C.F.R. §63.10(b)(1), including records stored in electronic form in a separate location. (T7AA) [45CSR34; 40 C.F.R. §863.2343(b) and (b)(3); 45CSR13, R13-1823, 4.4.13]
- 7.4.11. **40** C.F.R. 63, Subpart EEEE. For each transfer rack subject to 40 C.F.R. 63, Subpart EEEE that loads organic liquids but is not subject to control based on the criteria specified in Table 2 of 40 C.F.R. 63, Subpart EEEE, items 7 through 10, you must keep documentation, including the records specified in 40 C.F.R. §63.2390(d), that verifies the transfer rack is not required to be controlled under 40 C.F.R. 63, Subpart EEEE. The documentation must be kept up-to-date and must be in a form suitable and readily available for

- expeditious inspection and review according to 40 C.F.R. §63.10(b)(1), including records stored in electronic form in a separate location. [45CSR34; 40 C.F.R. §§63.2343(c) and (c)(3); 45CSR13, R13-1823, 4.4.14]
- 7.4.12. **40** C.F.R. **63**, **Subpart NNNN**. The permittee shall maintain records in accordance with 40 C.F.R. §§63.9005, 63.9055, 63.9060, 63.9065; Table 7 to 40 C.F.R. 63, Subpart NNNNN; and 40 C.F.R. 63, Subpart A. [45CSR34, 40 C.F.R. §§63.9005, 63.9055, 63.9060, 63.9065; Table 7 to 40 C.F.R. 63, Subpart NNNNN; 40 C.F.R. 63, Subpart A; 45CSR13, R13-1823, 4.1.15]
- 7.4.13. 40 C.F.R. 63, Subpart FFFF. The permittee shall maintain records in accordance with 40 C.F.R. §§63.2450, 63.2525, and 63.2540; Table 12 to 40 C.F.R. 63, Subpart FFFF; any records required by 40 C.F.R. 63, Subpart A, and as applicable in referenced 40 C.F.R. 63, Subparts F, G, H, SS, UU, WW, and GGG, and 40 C.F.R. 65, Subpart F. [45CSR34; 40 C.F.R. §§63.2450, 63.2525, 63.2540; Table 12 to 40 C.F.R. 63, Subpart FFFF; 40 C.F.R. 63, Subparts A, F, G, H, SS, UU, WW, and GGG; 40 C.F.R. 65, Subpart F; 45CSR13, R13-1823, 4.4.16]
- 7.4.14. **40** C.F.R. **63**, **Subpart DDDDD**. The permittee shall keep a copy of each notification and report submitted to comply with 40 C.F.R **63** Subpart DDDDD, including all documentation supporting the Initial Notification or Notification of Compliance Status or periodic compliance reports submitted, according to the requirement in § **63**.10(b)(2)(xiv) and§ **63**.10(b)(2)(viii).

[40 C.F.R. §§ 63.7555 (a)(1),(2); 45CSR34]

- a. For Furnaces T1CB, T1CC and T1CD, the permittee shall comply with recordkeeping requirements of 40 C.F.R. §63.7540(a)(10)(vi) and maintain an annual report containing the tune-up data specified by 40 C.F.R. §63.7540(a)(10)(vi)(A) through (C):
  - (i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
  - (ii) A description of any corrective actions taken as a part of the tune-up; and
  - (iii) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.
- b. For Furnace T1CA, the permittee shall comply with recordkeeping requirements of 40 C.F.R. §63.7540(a)(11) and maintain a biennial report containing the tune-up data specified by 40 C.F.R. §63.7540(a)(10)(vi)(A) through (C):
  - (i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
  - (ii) A description of any corrective actions taken as a part of the tune-up; and
  - (iii) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

[40 C.F.R. §§63.7540(a)(10)(vi) and (a)(11); 40 C.F.R. §63.7555; 45CSR34]

# 7.5. Reporting Requirements

- 7.5.1. The permittee shall comply with the following reporting requirements:
  - a. The owner or operator shall comply with the reporting requirements provided in Table 45-18I.

- b. You shall submit a waste management plan no later than the date specified in Table 45-18E for submittal of the final control plan.
- You shall submit the information specified in paragraphs c.1 through c.3 no later than 60 days following a performance test. All reports shall be signed by the facilities manager.
  - c.1. The complete test report for the initial performance test results obtained under 45CSR§18-9.8.a, as applicable.
  - c.2. The values for the site-specific operating limits established for 7.2.2.
- d. You shall submit an annual report no later than 12 months following the submission of the information in 7.5.1.c. You shall submit subsequent reports no more than 12 months following the previous report. If the unit is subject to Title V permitting requirements under 45CSR30, you may be required by the permit to submit these reports more frequently.
- e. The annual report required under subdivision 7.5.1.d shall include the items listed in paragraphs e.1 through e.16. If you have a deviation from the operating limits or the emission limitations, you shall also submit deviation reports as specified in 7.5.2.
  - e.1. Company name and address.
  - e.2. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - e.3. Date of report and beginning and ending dates of the reporting period.
  - e.4. The values for the operating limits established pursuant to 7.2.2.
  - e.5. If no deviation from any emission limitation or operating limit that applies to you has been reported, a statement that there was no deviation from the emission limitations or operating limits during the reporting period.
  - e.6. The highest recorded 3-hour average and the lowest recorded 3-hour average, as applicable, for each operating parameter recorded for the calendar year being reported.
  - e.7. Information recorded under 7.4.8.c, d, and e for the calendar year being reported.
  - e.8. If a performance test was conducted during the reporting period, the process unit tested, the pollutant tested and the performance test date. The owner or operator shall not submit the performance test report later than the date of submittal of the annual report and shall follow the procedure specified in 45CSR§18-9.12.j.2.A.
  - e.9. A statement that the facility met the requirements of paragraph 7.3.1.1.1 or 7.3.1.1.2, and, therefore, was not required to conduct a performance test during the reporting period, if the facility met the requirements of paragraph 7.3.1.1.1 or 7.3.1.1.2, and, you did not conduct a performance test during the reporting period.

- e.10. Documentation of periods when all qualified CISWI unit operators were unavailable for more than 8 hours, but less than 2 weeks.
- e.11. If you had a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction that occurred during the reporting period and that caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §60.11(d), including actions taken to correct a malfunction.
- e.12. For each deviation from an emission or operating limitation that occurs for a CISWI unit for which you are not using a CMS to comply with the emission or operating limitations in section 9, the annual report shall contain the following information.
  - e.12.A. The total operating time of the CISWI unit at which the deviation occurred during the reporting period.
  - e.12.B. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- e.13. If there were periods during which the continuous monitoring system, including the CEMS, was out of control as specified in paragraph e.15, the annual report shall contain the following information for each deviation from an emission or operating limitation occurring for a CISWI unit for which you are using a continuous monitoring system to comply with the emission and operating limitations in 45CSR§18-9.
  - e.13.A. The date and time that each malfunction started and stopped.
  - e.13.B. The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - e.13.C. The date, time, and duration that each continuous monitoring system was out of control, including start and end dates and hours and descriptions of corrective actions taken.
  - e.13.D. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.
  - e.13.E. A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.
  - e.13.F. The total duration of the deviations during the reporting period categorized according to each of the following attributed causes: control equipment problems, process problems, other known causes, and other unknown causes.
  - e.13.G. A summary of the total duration of continuous monitoring system downtime during the reporting period, and the total duration of continuous monitoring system downtime as a percent of the total operating time of the CISWI unit at which the continuous monitoring system downtime occurred during that reporting period.

- e.13.H. An identification of each parameter and pollutant that was monitored at the CISWI unit.
- e.13.I. A brief description of the CISWI unit.
- e.13.J. A brief description of the continuous monitoring system.
- e.13.K. The date of the latest continuous monitoring system certification or audit.
- e.13.L. A description of any changes in continuous monitoring system, processes, or controls since the last reporting period.
- e.14. If there were periods during which the continuous monitoring system, including the CEMS, was not out of control as specified in paragraph e.15, a statement that there were not periods during which the continuous monitoring system was out of control during the reporting period.
- e.15. A continuous monitoring system is out of control if any of the following occur.
  - e.15.A. The zero (low-level), mid-level (if applicable), or high-level calibration drift exceeds two times the applicable calibration drift specification in the applicable performance specification or in the relevant standard.
  - e.15.B. The continuous monitoring system fails a performance test audit (e.g., cylinder gas audit), relative accuracy audit, relative accuracy test audit, or linearity test audit.
  - e.15.C. The continuous opacity monitoring system calibration drift exceeds two times the limit in the applicable performance specification in the relevant standard.
- e.16. For energy recovery units, include the annual heat input and average annual heat input rate of all fuels being burned in the unit to verify which subcategory of energy recovery unit applies.

## [45CSR13, R13-1823, 4.5.1; 45CSR§§18-9.12.a-e; 40 C.F.R. §§62.12155 through 62.12157]

- 7.5.2. Deviation from the Operating Limits or Emission Limitations.
  - 1. You shall submit a deviation report if any recorded 3-hour average parameter level is above the maximum operating limit or below the minimum operating limit established under 7.2.2, if the bag leak detection system alarm sounds for more than 5 percent of the operating time for the 6-month reporting period, or if a performance test was conducted that deviated from any emission limitation.
  - 2. The deviation report shall be submitted by August 1 of that year for data collected during the first half of the calendar year (January 1 to June 30), and by February 1 of the following year for data you collected during the second half of the calendar year (July 1 to December 31).
  - 3. In each report required under 7.5.2 for any pollutant or parameter that deviated from the emission limitations or operating limits specified in 45CSR§18-9, include the four items described in paragraphs 3.a through 3.d.
    - a. The calendar dates and times your unit deviated from the emission limitations or operating limit requirements.
    - b. The averaged and recorded data for those dates.
    - c. Durations and causes of the following:

- 1. Each deviation from emission limitations or operating limits and your corrective actions.
- 2. Bypass events and your corrective actions.
- d. A copy of the operating limit monitoring data during each deviation and any test report that documents the emission levels, the process unit tested, the pollutant tested and the date that the performance test was conducted. The owner or operator shall not submit the performance test report later than the submittal date of the deviation report according to 45CSR§18-9.12.j.2.A.
- 4. Deviation from the Requirement to have a Qualified Operator Accessible. -- If no qualified operator is accessible for 2 weeks or more, you shall take the two actions in paragraphs 4.a and 4.b.
  - a. Submit a notification of the deviation within 10 days that includes the three items in subparagraphs 4.a.1 through 4.a.3.
    - 1. A statement of what caused the deviation.
    - 2. A description of what you are doing to ensure that a qualified operator is accessible.
    - 3. The date when you anticipate that a qualified operator will be available.
  - b. Submit a status report to the Secretary every 4 weeks that includes the three items in subparagraphs 4.b.1 through 4.b.3.
    - 1. A description of what you are doing to ensure that a qualified operator is accessible.
    - 2. The date when you anticipate that a qualified operator will be accessible.
    - 3. A request for approval from the Administrator to continue operation of the CISWI unit.
- 5. If your unit was shut down by the Administrator under the provisions of paragraph 4.b due to a failure to provide an accessible qualified operator, you shall notify the Administrator that you are resuming operation once a qualified operator is accessible.

### [45CSR13, R13-1823, 4.5.2; 45CSR§§18-9.12.f-h; 40 C.F.R. §§62.12155 through 62.12157]

#### 7.5.3. Reserved

- 7.5.4. **40 C.F.R. 63, Subpart EEEE.** If one or more of the events identified in paragraphs 7.5.4.a through 7.5.4.d occur since the filing of the Notification of Compliance Status or the last Compliance report, you must submit a subsequent Compliance report as specified in 7.4.10 and 7.4.11. The subsequent Compliance report shall be submitted according to the schedule in 40 C.F.R. §63.2386(b).
  - a. Any storage tank or transfer rack became subject to control under 40 C.F.R. 63, Subpart EEEE; or
  - b. Any storage tank equal to or greater than 18.9 cubic meters (5,000 gallons) became part of the affected source but is not subject to any of the emission limitations, operating limits, or work practice standards of 40 C.F.R. 63, Subpart EEEE.
  - c. Any transfer rack (except those racks at which only unloading of organic liquids occurs) became part of the affected source; or

d. Any of the information required in 40 C.F.R. §§63.2386(c)(1), (c)(2), or (c)(3) has changed.

[45CSR13, R13-1823, 4.5.4; 45CSR34; 40 C.F.R. §§63.2343(b)(2)(i), (c)(2)(i), and (d)]

- 7.5.5. **40** C.F.R. **63**, **Subpart NNNN.** The permittee shall submit all required applicable reports and notifications per the requirements of 40 C.F.R. §§63.9005, 63.9050, and 63.9065; Tables 6 and 7 to 40 C.F.R. 63, Subpart NNNNN; and 40 C.F.R. 63, Subpart A. [45CSR13, R13-1823, 4.5.5; 45CSR34; 40 C.F.R. §§63.9005, 63.9050, 63.9065; Tables 6 and 7 to 40 C.F.R. 63, Subpart NNNNN; 40 C.F.R. 63, Subpart A]
- 7.5.6. 40 C.F.R. 63, Subpart FFFF. The permittee shall submit all required applicable reports and notifications per the requirements of 40 C.F.R. §§63.2450, 63.2515, 63.2520, 63.2540; Tables 11 and 12 to 40 C.F.R. 63, Subpart FFFF; and 40 C.F.R. 63, Subpart A, and as applicable in referenced 40 C.F.R. 63, Subparts F, G, H, SS, UU, WW, and GGG, and 40 C.F.R. 65, Subpart F. [45CSR13, R13-1823, 4.5.6; 45CSR34; 40 C.F.R. §§63.2450, 63.2515, 63.2520, 63.2540; Tables 11 and 12 to 40 C.F.R. 63, Subpart FFFF; 40 C.F.R. 63, Subparts A, F, G, H, SS, UU, WW, and GGG; 40 C.F.R. 65, Subpart F]
- 7.5.7. **40** C.F.R. **63**, Subpart DDDDD. The permittee shall submit all required applicable reports and notifications per the requirements of 40 C.F.R. §§63.7545(e)(1) and (8); 40 C.F.R. §63.7550(b) and (c)(1); and 40 C.F.R. **63**, Subpart A. [45CSR34, 40 C.F.R. **63**, Subpart A; 40 C.F.R. §63.7545; 40 C.F.R. §63.7550]

# 7.6. Compliance Plan

7.6.1. None.

# 8.0 Source-Specific Requirements [T5 Area]

# 8.1. Limitations and Standards

8.1.1. Emissions released to the atmosphere shall be limited to the pollutants and associated maximum emission rates set forth in the following Table 8.1.1:

**Table 8.1.1.** 

| Emission                 | Source ID (Description)  | Control | Pollutant  | Emission Limit           |                                      |
|--------------------------|--|---------|--|--------------------------|--------------------------------------|
| Point ID                 | Source ID (Description)  | Device  | Ponutant   | pph                      | tpy                                  |
| Т5НТЕ                    | T5HT (#1 Tank)   | None    | ODC  | 0.2                      | 0.01                                 |
| 1311112                  | 13111 (//1 Talik)  |         | VOC  | 27.4                     | 0.06                                 |
| T5HUE                    | T5HU (#2 Tank)   | None    | ODC  | 0.2                      | 0.01                                 |
| 131101                   | 13110 ("2 14111)   |         | VOC  | 27.4                     | 0.06                                 |
| T5HVE                    | T5HV (#3 Tank)   | None    | ODC  | 0.2                      | 0.01                                 |
| 131111                   | 1311 (//3 14111)   |         | VOC  | 27.4                     | 0.06                                 |
| T5HWE                    | T5HW (#4 Tank)   | None    | ODC  | 0.2                      | 0.01                                 |
| 1311112                  | 1311 (// 1 141114)   |         | VOC  | 27.4                     | 0.06                                 |
| T5HXE                    | T5HX (#5 Tank)   | None    | ODC  | 0.2                      | 0.01                                 |
|                          | 131121 (#3 141111)   |         | VOC  | 27.4                     | 0.06                                 |
| T5HN (Area<br>Emissions) | T5HN (Raw Material System)   | None    | VOC  | 2.2                      | 0.01                                 |
| T5HC & T5HD              | T5HC (#4 Polykettle)   | None    | ODC  | 0.1                      | 0.02                                 |
| (Area Emissions)         | T5HD (#5 Polykettle)   |         | VOC  | 1.7                      | 7.14                                 |
| TALLOE                   | T5HC (#4 Polykettle)<br>T5HN (Raw Material System)   | None    | ODC  | 0.8                      | 0.15                                 |
| T5HCE                    | T5HW (#4 Tank)<br>T5HP (Raw Material Tank)   |         | VOC  | 17.10                    | 3.30                                 |
| TELLOTIA                 | Ź  | None    | ODC  | 0.7                      | 0.01                                 |
| T5HCE2                   | T5HC (#4 Polykettle)   |         | VOC  | 152.0                    | 1.33                                 |
| T5HDE                    | T5HD (#5 Polykettle) T5HX (#5 Tank) T5HT(#1 Tank) T5HU (#2 Tank) T5HV (#3 Tank) T5HP (Raw Material Tank) | None    | ODC<br>VOC   | 0.78<br>32.30            | 0.15<br>3.30                         |
| T5HDE2                   | T5HD (#5 Polykettle)   | None    | ODC  | 0.7                      | 0.01                                 |
| 1011012                  | (iii Torjitewie)   |         | VOC  | 152.0                    | 1.33                                 |
| Т5НАЕ                    | T5HA (#1 Heater)   | None    | NOx<br>CO<br>PM (Total, 2.5, 10)<br>SO <sub>2</sub><br>VOC | 0.5<br>0.4<br>0.1<br>0.1 | 1.90<br>1.60<br>0.15<br>0.02<br>0.11 |

| Emission | Source ID (Description) | Control   | Pollutant           | Emissio | n Limit |
|----------|-------------------------|-----------|---------------------|---------|---------|
| Point ID | Source ID (Description) | Device    | Ponutant            | pph     | tpy     |
|          |                         |           | NOx                 | 0.5     | 1.80    |
|          |                         |           | CO                  | 0.4     | 1.51    |
| T5HBE    | T5HBE T5HB (#2 Heater)  | None      | PM (Total, 2.5, 10) | 0.1     | 0.14    |
|          |                         |           | $SO_2$              | 0.1     | 0.02    |
|          |                         |           |                     | 0.1     | 0.10    |
|          |                         | T5HGC     | PM                  | 0.5     | 1.22    |
| T5HGE    | T5HG (#1 Dryer)         | (Cyclone) | $PM_{10}$           | 0.1     | 0.22    |
|          |                         |           | VOC                 | 0.06    | 0.15    |
|          |                         | T5HIC     | PM                  | 0.7     | 0.92    |
| T5HIE    | T5HIE T5HI (#2 Dryer)   |           | $PM_{10}$           | 0.2     | 0.17    |
|          |                         |           | VOC                 | 0.1     | 0.11    |
| Т5НҮЕ    | T5HY (Chiller)          | None      | Methanol (67-56-1)  | 0.11    | 0.780   |

Note: The hourly emission rate is the largest of the sources feeding the stack, not the sum of the sources feeding the stack. The annual limit reflects the total of all sources. Also, aborted batches from T5HC and T5HD vent to T5HCE and T5HCE2, and T5HDE and T5HDE2, resulting in a higher potential emission rate.

Compliance with the above hourly particulate matter emission limits for T5HGE and T5HIE shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate emission limit. [45CSR13, R13-1353, A.1 and B.2, 45CSR§7-4.1]

- 8.1.2. Heater #1 [T5HA] is a natural gas-fired heater limited to a maximum heat output of 4,300,000 BTU per hour and a maximum fuel consumption rate of 4,300 standard cubic feet of natural gas per hour. [45CSR13, R13-1353, A.2]
- 8.1.3. Heater #2 [T5HB] is a natural gas-fired heater limited to a maximum heat output of 4,100,000 BTU per hour and a maximum fuel consumption rate of 4,100 standard cubic feet of natural gas per hour. [45CSR13, R13-1353, A.3]
- 8.1.4. Emissions from the Line #1 Dryer T5HG, shall be vented to the mechanical collector, T5HGC, and then to the atmosphere through emission point T5HGE. [45CSR13, R13-1353, A.4]
- 8.1.5. Emissions from the Line #2 Dryer, T5HI, shall be vented to the mechanical collector, T5HIC, and then to the atmosphere through emission point T5HIE. [45CSR13, R13-1353, A.5]
- 8.1.6. Acetonitrile (CAS 107-13-1) shall be emitted from Source T5HN through Emission Points T5HCE at a total maximum hourly rate of 0.01 pounds per hour and a total maximum annual rate of 15 pounds per year. [45CSR13, R13-1353, A.6]
- 8.1.7. Reserved.
- 8.1.8. Reserved.

- 8.1.9. Emissions from the Methanol Brine System, T5HY, are emitted through emission point T5HYE. Methanol emissions from T5HYE and equipment leaks shall be limited to 0.78 tons of methanol per year. [45CSR13, R13-1353, A.11]
- 8.1.10. Compliance with all annual emission and/or operating limits shall be determined using a twelve month rolling total. A twelve month rolling total shall mean a sum at any given time during the previous twelve (12) consecutive calendar months. [45CSR13, R13-1353, A.12]
- 8.1.11. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air form any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. (T5HAE and T5HBE) [45CSR§2-3.1]
- 8.1.12. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. (T5HGE, T5HIE, T5HFE, and T5HZE) [45CSR13, R13-1353, B.2; 45CSR\$7-3.1.]
- 8.1.13. The provisions of 8.1.12. shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (T5HGE, T5HIE, T5HFE, and T5HZE) [45CSR13, R13-1353, B.2; 45CSR\$7-3.2.]
- 8.1.14. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7.

| Emission Unit | Emission Point | 45CSR7 Hourly Particulate |
|---------------|----------------|---------------------------|
|               |                | Emission Limit            |
|               |                | pph                       |
| T5HF          | T5HFE          | 0.002                     |
| T5HZ          | T5HZE          | 14                        |

[45CSR13, R13-1353, B.2; 45CSR§7-4.1.]

## 8.1.15. 40 C.F.R. 63, Subpart DDDDD (Boiler MACT)

Sources T5HA and T5HB are existing process heaters that shall comply with the requirements of 40 C.F.R. 63, Subpart DDDDD – "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters".

[45CSR34; 40 C.F.R. §63.7495(b)]

a. T5HA and T5HB have heat input capacities of <5 million BTUs/hr, therefore the permittee shall conduct tune-ups for these sources every five (5) years as specified in Condition 7.1.21.d.(i)-(v). The burner inspection may be delayed until the next scheduled or unscheduled shut down, but the Permittee must inspect each burner at least once every 72 months. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. Each 5-year tune-up specified in Condition 7.1.21.d.(i)-(v) must be conducted no more than 61 months after the previous tune-up.

[45CSR34; 40 C.F.R. §§63.7500(a)(1) and (e), Table 3, Item #1; 40 C.F.R. §63.7505(a); 40 C.F.R. §63.7515(d); 40 C.F.R. §§ 63.7540(a)(12) and (13)]

b. At all times, you must operate and maintain any affected source (as defined in 40 C.F.R. § 63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[45CSR34; 40 C.F.R. §63.7500(a)(3)]

## **8.2.** Monitoring Requirements

- 8.2.1. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2 (8.1.12 and 8.1.13. of this permit), the permittee shall conduct opacity monitoring and record keeping for emission points T5HGE and T5HIE. Monitoring shall be conducted at least once per month. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for 1 minute to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within three (3) days of the first signs of visible emissions. A 45CSR7A evaluation will not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions. (T5HGE, T5HIE) [45CSR13, R13-1353, B.3, 45CSR§30-5.1.c]
- 8.2.2. To ensure compliance with the hourly and annual emission rates of particulate matter as set forth in 8.1.1, process control interlocks shall be utilized that shuts down the operation of the dryers T5HG and T5HI, in the event the process conditions exceed the alarm levels preset and continuously monitored within the cyclones T5HGC and T5HIC for more than 10 seconds. A documented log shall be maintained when these interlocks are tripped and the operation continues for up to or greater than thirty (30) minutes in duration. At a minimum, the following information must be documented for each logged malfunction:
  - a. The equipment involved and associated cause of the malfunction
  - b. Steps taken to correct the malfunction
  - c. Steps taken to minimize emissions during the malfunction
  - d. The duration of the malfunction
  - e. The estimated increase in emissions during the malfunction
  - f. Any changes or modifications to equipment or procedures that would help prevent future recurrence of the malfunction

These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" (as defined by 45CSR13), and made available to the Director or his duly authorized representative upon request. [45CSR13, R13-1353, B.6]

# 8.3. Testing Requirements

8.3.1. None.

## 8.4. Recordkeeping Requirements

8.4.1. For the purpose of determining compliance with the permit limits based on the maximum annual operating parameters of the natural gas-fired heaters set forth in 8.1.2 and 8.1.3, and the associated emission limits through Emission Points T5HAE and T5HBE established in Requirement 8.1.1, the permittee shall maintain monthly records of the heaters' operating schedules and associated natural gas consumption rates. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request.

[45CSR13, R13-1353, B.4]

- 8.4.2. For the purpose of determining compliance with the permit limits based on the maximum permitted emission rates as described in 8.1.1, the permittee shall maintain monthly calculations of the average hourly and total annual emissions associated with the operation of all affected sources. In addition, the permittee shall record and document all operating parameters and production records used to calculate the monthly emissions estimates. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request. [45CSR13, R13-1353, B.5]
- 8.4.3. Records of the visible emission observations required by 8.2.1 shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a "Responsible Official" and made available to the Director or his duly authorized representative upon request. (T5HGE, T5HIE) [45CSR13, R13-1353, B.3]
- 8.4.4. Additional record keeping requirements are provided in 8.2.2.
- 8.4.5. For each storage tank subject to 40 C.F.R. 63, Subpart EEEE having a capacity of less than 18.9 cubic meters (5,000 gallons) and for each transfer rack subject to this subpart that only unloads organic liquids (i.e., no organic liquids are loaded at any of the transfer racks), you must keep documentation that verifies that each storage tank and transfer rack is not required to be controlled. The documentation must be kept up-to-date (i.e., all such emission sources at a facility are identified in the documentation regardless of when the documentation was last compiled) and must be in a form suitable and readily available for expeditious inspection and review according to 40 C.F.R. §63.10(b)(1), including records stored in electronic form in a separate location.
  - The documentation may consist of identification of the tanks and transfer racks identified in 5.4.24 on a plant site plan or process and instrumentation diagram (P&ID). (T5HY) [45CSR34; 40 C.F.R. §63.2343(a)]
- 8.4.6. For each storage tank subject to 40 C.F.R. 63, Subpart EEEE having a capacity of 18.9 cubic meters (5,000 gallons) or more that is not subject to control based on the criteria specified in Table 2 of 40 C.F.R. 63, Subpart EEEE, items 1 through 6, you must keep documentation, including a record of the annual average true vapor pressure of the total Table 1 organic HAP in the stored organic liquid, that verifies the storage tank is not required to be controlled under 40 C.F.R. 63, Subpart EEEE. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to 40 C.F.R. §63.10(b)(1), including records stored in electronic form in a separate location. [45CSR34; 40 C.F.R. §863.2343(b) and (b)(3)]

- 8.4.7. For each transfer rack subject to 40 C.F.R. 63, Subpart EEEE that loads organic liquids but is not subject to control based on the criteria specified in Table 2 of 40 C.F.R. 63, Subpart EEEE, items 7 through 10, you must keep documentation, including the records specified in 40 C.F.R. §63.2390(d), that verifies the transfer rack is not required to be controlled under 40 C.F.R. 63, Subpart EEEE. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to 40 C.F.R. §63.10(b)(1), including records stored in electronic form in a separate location. [45CSR34; 40 C.F.R. §863.2343(c) and (c)(3)]
- 8.4.8 **40** C.F.R. 63, Subpart DDDDD. The permittee shall keep a copy of each notification and report submitted to comply with 40 C.F.R 63 Subpart DDDDD, including all documentation supporting the Initial Notification or Notification of Compliance Status or periodic compliance reports submitted, according to the requirement in § 63.10(b)(2)(xiv) and § 63.10(b)(2)(viii).

[45CSR34, 40 C.F.R. §§ 63.7555 (a)(1),(2); 45 CSR 34]

- For process heaters T5HA and T5HB, the permittee shall comply with recordkeeping requirements of 40 C.F.R. §63.7540(a)(12) and maintain a 5-year report containing the tune-up data specified by 40 C.F.R. §63.7540(a)(10)(vi)(A) through (C):
  - (i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen volume percent, measured at high fire or typical operating load, before and after the tuneup of the boiler or process heater;
  - (ii) A description of any corrective actions taken as a part of the tune-up; and
  - (iii) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

[45CSR34, 40 C.F.R. §§63.7540(a)(10)(vi) and (a)(12)]

## 8.5. Reporting Requirements

- 8.5.1. If one or more of the events identified in paragraphs 8.5.1.1 through 8.5.1.4 occur since the filing of the Notification of Compliance Status or the last Compliance report, you must submit a subsequent Compliance report as specified in 8.4.6 and 8.4.7. The subsequent Compliance report shall be submitted according to the schedule in 40 C.F.R. §63.2386(b).
  - 8.5.1.1. Any storage tank or transfer rack became subject to control under 40 C.F.R. 63, Subpart EEEE; or
  - 8.5.1.2. Any storage tank equal to or greater than 18.9 cubic meters (5,000 gallons) became part of the affected source but is not subject to any of the emission limitations, operating limits, or work practice standards of 40 C.F.R. 63, Subpart EEEE.
  - 8.5.1.3. Any transfer rack (except those racks at which only unloading of organic liquids occurs) became part of the affected source; or
  - 8.5.1.4. Any of the information required in 40 C.F.R. §§63.2386(c)(1), (c)(2), or (c)(3) has changed.

[45CSR34; 40 C.F.R. §§63.2343(b)(2)(i), (c)(2)(i), and (d)]

8.5.2. **40 C.F.R. 63, Subpart DDDDD.** The permittee shall submit all required applicable reports and notifications per the requirements of 40 C.F.R. §§63.7545(e)(1) and (8); 40 C.F.R. §63.7550(b) and (c)(1); and 40 C.F.R. 63, Subpart A.

[45CSR34, 40 C.F.R. 63, Subpart A; 40 C.F.R. §63.7545; 40 C.F.R. §63.7550]

# 8.6. Compliance Plan

8.6.1. None.

## 9.0 Source-Specific Requirements [T6 Area]

#### 9.1. Limitations and Standards

- 9.1.1. Maximum daily production shall not exceed 12 batches per day on reactor #6 (T6IB) and #7 (T6IC) or 15 batches per day on reactor #8 (T6ID) and #9 (T6IU). The maximum annual production rates shall not exceed 2920 batches per year on reactors #6 (T6IB) and #7 (T6IC) or 3650 batches per year on reactors #8 (T6ID) and #9 (T6IU). [45CSR13, R13-0815, 4.1.1]
- 9.1.2. During homopolymer production, emissions generated from reactors #6 (T6IB), #7 (T6IC), #8 (T6ID), and #9 (T6IU) shall be routed to recovery equipment in the monomer area until the reactor pressure drops to 2 psig (max. 2.5 psig, average 2 psig). During copolymer production, reactors #8 (T6ID) and #9 (T6IU) shall be vented to monomer area control equipment, emission point T7IME, until the reactor pressure drops to 5 psig (max. 5.5 psig, average 5 psig) or to the monomer's area recovery equipment until the reactor pressure drops to 2 psig (max. 2.5 psig, average 2 psig). Recovery and control equipment in the monomer area are permitted by R13-1823, and/or any Amendments thereto. [45CSR13, R13-0815, 4.1.2]
- 9.1.3. Both scrubbers having air pollution control devices, ID No. T6IFC and T6IZC, shall be operated at all times emissions are generated from the No. 1, 2, or 3 dryers designated as ID No. T6IV, T6IE, and T6IF respectively. [45CSR13, R13-0815, 4.1.3]
- 9.1.4. The packed bed scrubber, ID No. T6IFC, as well as the deep bed scrubber, ID No. T6IZC shall be maintained and operated according to manufacturers' specifications, standard facility maintenance procedures and schedules as well as maintained and operated in accordance with the information submitted in Permit Application R13-0815. Compliance with this requirement shall be demonstrated by monitoring and recording the following hourly average operating parameters:

**Table 9.1.4** 

| Control Device               | Inlet Gas Flow<br>SCFM | Type of Liquor | Liq. Flow Rate gpm | Press. Drop inch W.C. |
|------------------------------|------------------------|----------------|--------------------|-----------------------|
| Packed Bed Scrubber<br>T6IFC | 24,000 (max)           | Buffered water | 50 (minimum)       | 10 (max)              |
| Deep Bed Scrubber<br>T6IZC   | 24,000 (max)           | Buffered water | 3 (minimum)        | 20 (max)              |

[45CSR13, R13-0815, 4.1.4 and 4.2.1]

9.1.5. The permittee shall not exceed the following maximum hourly and annual emission limits:

**Table 9.1.5** 

| Emission | Source Description | Control Pollutant |            | Emission Limit            |              |
|----------|--------------------|-------------------|------------|---------------------------|--------------|
| Point    |                    | Device            |            | Hourly (pph) <sup>1</sup> | Annual (tpy) |
| T6IIE    | T6II (#1 Wt. Tank) | None              | ODC<br>VOC | 0.1<br>4.7                | 0.01<br>0.01 |

| Emission | Source Description   | Control | Pollutant   | Emissio                        | n Limit                         |
|----------|--|---------|---|--------------------------------|---------------------------------|
| Point    |  | Device  |   | Hourly<br>(pph) <sup>1</sup>   | Annual (tpy)                    |
| Т6ІЈЕ    | T6IJ (#2 Wt. Tank)   | None    | ODC<br>VOC  | 0.1<br>4.7                     | 0.01<br>0.01                    |
| T6IKE    | T6IK (#3 Wt. Tank)   | None    | ODC<br>VOC  | 0.1<br>4.7                     | 0.01<br>0.01                    |
| T6ILE    | T6IL (#4 Wt. Tank)   | None    | ODC<br>VOC  | 0.1<br>4.7                     | 0.01<br>0.01                    |
| Area     | T6PI (Feed System)   | None    | Acetonitrile (107-13-<br>1)<br>VOC                              | 0.01<br>17.86                  | 0.001<br>1.09                   |
| Area     | T6PJ (Raw Material System)   | None    | VOC   | 7.5                            | 0.04                            |
| T6IBE    | T6II (#1 Wt. Tank) T6PB (Feed System) T6PI (Feed System) T6IB (Reactor #6) T6QJ (#6 Tank) T6PJ (Raw Material System)                                     | None    | VOC<br>ODC<br>Acetonitrile (107-13-<br>1)<br>Toluene (108-88-3) | 43.9<br>0.30<br>0.01<br>0.01   | 10.30<br>0.42<br>0.001<br>0.001 |
| T6ICE    | T6IJ (#2 Wt. Tank) T6PB (Feed System) T6PI (Feed System) T6IC (Reactor #7) T6QK (#7 Tank) T6PJ (Raw Material System)                                     | None    | VOC<br>ODC<br>Acetonitrile (107-13-<br>1)<br>Toluene (108-88-3) | 43.9<br>0.30<br>0.01<br>0.01   | 10.30<br>0.42<br>0.001<br>0.001 |
| T6IDE    | T6IK (#3 Wt. Tank) T6PB (Feed System) T6PI (Feed System) T6ID (Reactor #8) T6QL (#8 Tank) T6PJ (Raw Material System)                                     | None    | VOC<br>ODC<br>Acetonitrile (107-13-<br>1)<br>Toluene (108-88-3) | 43.9<br>0.30<br>0.01<br>0.01   | 14.38<br>0.58<br>0.001<br>0.001 |
| T6IUE    | T6IL (#4 Wt. Tank) T6PB (Feed System) T6PI (Feed System) T6IU (Reactor #9) T6QM (#9 Zinc Chloride Tank) T6PJ (Raw Material System) T5HM (Monomer System) | None    | VOC<br>ODC<br>Acetonitrile (107-13-<br>1)<br>Toluene (108-88-3) | 122.50<br>0.36<br>0.01<br>0.01 | 18.42<br>0.49<br>0.01<br>0.01   |
| Area     | T6QI (Knockout Pot)  | None    | VOC<br>ODC  | 0.1<br>0.1                     | 0.01<br>0.01                    |
| Т6РСЕ    | T6PC (#6 Decanter)   | None    | VOC Acetonitrile (107-13- 1) Toluene (108-88-3) ODC             | 4.20<br>0.01<br>0.01<br>0.1    | 2.30<br>0.001<br>0.001<br>0.10  |
| T6PDE    | T6PD (#7 Decanter)   | None    | VOC<br>Acetonitrile (107-13-<br>1)<br>Toluene (108-88-3)<br>ODC | 4.20<br>0.01<br>0.01<br>0.1    | 2.30<br>0.001<br>0.001<br>0.10  |

| Emission | Source Description   |   |   | <b>Emission Limit</b>        |                                |
|----------|--|---|---|------------------------------|--------------------------------|
| Point    |  | Device  |   | Hourly<br>(pph) <sup>1</sup> | Annual (tpy)                   |
|          |  |   |   |                              |                                |
| T6PEE    | T6PE (#8 Decanter)   | None  | VOC<br>Acetonitrile (107-13-<br>1)<br>Toluene (108-88-3)<br>ODC | 4.20<br>0.01<br>0.01<br>0.1  | 2.59<br>0.001<br>0.001<br>0.11 |
| T6PFE    | T6PF (#9 Decanter)   | None  | VOC<br>Acetonitrile (107-13-<br>1)<br>Toluene (108-88-3)<br>ODC | 4.20<br>0.01<br>0.01<br>0.1  | 2.59<br>0.001<br>0.001<br>0.11 |
| Area     | T6PT (Decanter)  | None  | VOC<br>Acetonitrile (107-13-<br>1)<br>Toluene (108-88-3)<br>ODC | 6.30<br>0.01<br>0.01<br>0.1  | 0.70<br>0.001<br>0.001<br>0.01 |
| T6PGE    | T6QG (Feed Tank)<br>T6QH(Feed Tank)                            | None  | VOC<br>ODC<br>HAP   | 0.87<br>0.01<br>0.01         | 1.52<br>0.01<br>0.01           |
| T6PGE    | T6PG (#3 Stab Tank)<br>T6PH (#4 Stab Tank)                     | None  | PM <sub>10</sub>  | 0.10                         | 0.02                           |
| Т6РМЕ    | T6IW (#1 Float Tank)   | None  | PM <sub>10</sub>  | 0.1                          | 0.01                           |
| T6IGE    | T6IG (#2 Float Tank)<br>T6IH (#3 Float Tank)                   | None  | PM <sub>10</sub>  | 0.1                          | 0.01                           |
| T6IZCE   | T6IV (#1 Dryer)<br>T6IE (#2 Dryer)<br>T6IF (#3 Dryer)          | Wet Collector<br>Wet Collector<br>Wet Collector | VOC<br>PM <sub>10</sub>   | 0.50<br>0.3                  | 2.23<br>0.33                   |
| T6IEE    | T6IE (#2 Dryer)  | None  | VOC<br>PM <sub>10</sub>   | 1.10<br>0.5                  | 0.03<br>0.01                   |
| T6IFE    | T6IF (#3 Dryer)  | None  | VOC<br>PM <sub>10</sub>   | 1.10<br>0.5                  | 0.03<br>0.01                   |
| T6IXE    | T6IX (#1 Chiller Cooler Vent)                                  | None  | PM <sub>10</sub>  | 0.1                          | 0.044                          |
| T6IYE    | T6IY (#3 Chiller Cooler Vent)<br>T6IY (#3 Chiller Cooler Vent) | None<br>None                                    | PM <sub>10</sub>  | 0.1                          | 0.044                          |
| T6SJE    | T6SJ (Solid-liquid separation tank)                            | None  | VOC<br>ODC<br>Acetonitile                                       | 0.87<br>0.01<br>0.01         | 0.16<br>0.01<br>0.01           |
| T6SKE    | T6SK Cooling Tower   | None  | PM  | 0.02                         | 0.09                           |
| T6SLE    | T6SL Container Loading   | None  | VOC   | 0.41                         | 0.57                           |

<sup>&</sup>lt;sup>1</sup> The hourly rate is the largest of the sources feeding the stack. This rate does not represent the sum of emissions. The annual rate reflects the total of all sources venting through the emission point.

Compliance with the above emission limits shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate emission limits for emission points T6PME, T6IGE, T6IZCE, T6IEE, T6IFE, T6IXE, T6IYE, T6PGE, and T6SKE.

### [45CSR13, R13-0815, 4.1.5 and 5.1.4; 45CSR§7-4.1.]

- 9.1.6. Compliance with all annual emission and/or operating limits shall be determined using a twelve month rolling total. A twelve month rolling total shall mean a sum at any given time during the previous twelve (12) consecutive calendar months. [45CSR13, R13-0815, 4.1.8]
- 9.1.7. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. (T6PME, T6IGE, T6IZCE, T6IEE, T6IFE, T6IYE, T6PKE, T6PNE, T6POE, T6PPE, T6PRE, T6PSE, T6PXE, T6PZE, T6SBE, T6SEE, T6PGE, and T6SKE) [45CSR13, R13-0815, 5.1.2; 45CSR\$7-3.1.]
- 9.1.8. The provisions of 9.1.7. shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (T6PME, T6IGE, T6IZCE, T6IEE, T6IFE, T6IXE, T6IYE, T6PKE, T6PNE, T6POE, T6PPE, T6PRE, T6PSE, T6PXE, T6PZE, T6SBE, T6SEE, T6PGE, and T6SKE) [45CSR13, R13-0815, 5.1.3; 45CSR§7-3.2.]
- 9.1.9. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7.

| Emission Unit | Emission Point | 45CSR7 Hourly Particulate Emission Limit pph |
|---------------|----------------|--|
| T6PK          | T6PKE          | 1.6  |
| T6PN          | T6PNE          | 1.6  |
| Т6РО          | Т6РОЕ          | 1.6  |
| T6PP          | Т6РРЕ          | 1.6  |
| T6PR          | T6PRE          | 13.0   |
| T6PS          | T6PSE          | 13.0   |
| T6PX          | T6PXE          | 4.0  |
| T6PZ          | T6PZE          | 14.8   |
| T6SB          | T6SBE          | 8.8  |
| T6SE          | T6SEE          | 14.8   |

[45CSR13, R13-0815, 5.1.4; 45CSR§7-4.1.]

### 9.2. Monitoring Requirements

9.2.1. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2 (9.1.7 and 9.1.8 of this permit), the permittee shall conduct opacity monitoring and record keeping for all emission points and equipment subject to an opacity limit under 45CSR7. Monitoring shall be conducted at least once per month. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for 1 minute to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within twenty-four (24) hours of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within twenty-four (24) hours after the visible emission and the sources are operating at normal conditions. [45CSR§30-5.1.c.]

## 9.3. Testing Requirements

9.3.1. For the purpose of determining compliance with the emission limits of the dryer units T6IE, T6IF, and T6IV in Specific Requirements 9.1.5, the permittee shall conduct a compliance test of the permitted facility within ninety (90) days of the date the 60-minute average production rate exceeds 120% of the rate demonstrated during the most recent test, conducted on August 13 and August 15, 2004.

A test protocol shall be submitted to DAQ for approval within thirty (30) days of the test date. The Director shall be notified at least fifteen (15) days in advance of the actual dates and times at which the tests will be conducted. The results of emission testing shall be submitted to the DAQ within sixty (60) days of the actual test date.

[45CSR13, R13-0815, 5.1.6.7]

#### 9.4. Recordkeeping Requirements

- 9.4.1. For the purpose of determining compliance with the permit limits as described in 9.1.1, 9.1.2, 9.1.3, 9.1.4, and 9.1.5, the permittee shall maintain monthly calculations of the average hourly and total annual emissions associated with the operation of all affected sources. In addition, the permittee shall record and document all operating parameters and production records used to calculate or verify the monthly emission estimates. This information shall be maintained for at least five (5) years following the date of each record, report, occurrence, measurement, maintenance, or corrective action. At a minimum, the most recent two (2) years of data shall be maintained on-site. The remaining three (3) years of data may be maintained off-site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, or DVDs, or magnetic tape disks), on microfilm, or on microfiche. At a time prior to being submitted to the Director, all records shall be certified and signed by a "Responsible Official" utilizing the Certification of Data Accuracy statement. [45CSR13, R13-0815, 5.1.6.4 and 5.1.6.5]
- 9.4.2. Malfunctions of the scrubber (T6IFC) or deep bed scrubber (T6IZC) must be documented in writing for periods exceeding thirty (30) minutes in duration and records maintained at the facility for a period of five (5) years. At a minimum, the following information must be documented for each malfunction:
  - a. The equipment involved and associated cause of the malfunction
  - b. Steps taken to correct the malfunction

- c. Steps taken to minimize emissions during the malfunction
- d. The duration of the malfunction
- e. The estimated increase in emissions during the malfunction
- f. Any changes or modifications to equipment or procedures that would help prevent future recurrence of the malfunction

[45CSR13, R13-0815, 5.1.6.6]

9.4.3. Records of the visible emission observations required by 9.2.1 shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. [45CSR§30-5.1.c.]

# 9.5. Reporting Requirements

9.5.1. None.

# 9.6. Compliance Plan

9.6.1. None.

### 10.0 Source-Specific Requirements [Mineral Spirits Parts Cleaners (C1LD, T1JG)]

#### 10.1. Limitations and Standards

- 10.1.1. The owner or operator of a cold cleaning facility shall:
  - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
  - b. Store waste solvent in covered containers.
  - c. Close the cover whenever parts are not being handled in the cleaner.
  - d. Drain the cleaned parts until dripping ceases.
  - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge (psig).
  - f. Degrease only materials that are neither porous nor absorbent.

[45CSR§§21-30.3.a.4, 30.3.a.5, 30.3.a.6, 30.3.a.7, 30.3.a.8, 30.3.a.9 (State-Enforceable Only)]

#### 10.2. Monitoring Requirements

10.2.1. None.

# 10.3. Testing Requirements

10.3.1. Test Method ASTM D323-72 shall be used for measuring the solvent true vapor pressure. [45CSR§21-30.4.e. (State-Enforceable Only)]

#### 10.4. Recordkeeping Requirements

- 10.4.1. Each owner or operator of a solvent metal cleaning source subject to this 45CSR§21-30 shall maintain the following records in a readily accessible location for at least 5 years and shall make these records available to the Director upon verbal or written request:
  - a. A record of central equipment maintenance, such as replacement of the carbon in a carbon adsorption unit.
  - b. The results of all tests conducted in accordance with the requirements in section 45CSR§21-30.4 (10.3.1).

[45CSR§21-30.5. and 45CSR§30-5.1.c. (State-Enforceable Only)]

# 10.5. Reporting Requirements

- 10.5.1. Except as provided in section 45CSR§21-9.3, the owner or operator of any facility containing sources subject to 45CSR§21-5 shall, for each occurrence of excess emissions expected to last more than 7 days, within 1 business day of becoming aware of such occurrence, supply the Director by letter with the following information.
  - a. The name and location of the facility;
  - b. The subject sources that caused the excess emissions;
  - c. The time and date of first observation of the excess emissions; and
  - d. The cause and expected duration of the excess emissions.
  - e. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
  - f. The proposed corrective actions and schedule to correct the conditions causing the excess emissions.

[45CSR§21-5.2]

# 10.6. Compliance Plan

10.6.1. None.

### 11.0 Source-Specific Requirements [C4 Area]

#### 11.1. Limitations and Standards

11.1.1. Emissions to the atmosphere of  $PM_{10}$  shall not exceed the hourly and annual emission limits as set forth in Table 11.1.1.

Table 11.1.1 – PM<sub>10</sub> Emission Limits

| <b>Emission Point ID</b> | Source ID      | Emissio      | n Limit      |
|--------------------------|----------------|--------------|--------------|
|                          |                | <u>(pph)</u> | <u>(tpy)</u> |
| <u>C4AEE</u>             | C4AE (Cleaner) | 0.07         | <u>0.04</u>  |

Compliance with the hourly particulate matter emission limit above shall demonstrate compliance with the less stringent hourly particulate matter emission limit of 45CSR§7-4.1.

[45CSR13, R13-3645, 4.1.1 and 5.1.1; 45CSR§7-4.1]

11.1.2. Emissions to the atmosphere of VOC shall not exceed the hourly and annual emission limits as set forth in Table 11.1.2.

**Table 11.1.2 – VOC Emission Limits** 

| <b>Emission Point ID</b> | Source ID       | <b>Emission Limit</b> |              |  |  |  |  |
|--------------------------|-----------------|-----------------------|--------------|--|--|--|--|
|                          |                 | <u>(pph)</u>          | <u>(tpy)</u> |  |  |  |  |
| <u>C4ACE</u>             | C4AC (Extruder) | <u>0.17</u>           | 0.40         |  |  |  |  |
|                          | C4AD (Treater)  |                       |              |  |  |  |  |
| <u>C4AEE</u>             | C4AE (Cleaner)  | <u>0.14</u>           | 0.09         |  |  |  |  |

#### [45CSR13, R13-3645, 4.1.2]

11.1.3. Emissions to the atmosphere of HAP shall not exceed the hourly and annual emission limits as set forth in Table 11.1.3.

**Table 11.1.3 – HAP Emission Limits** 

| <b>Emission Point ID</b> | Source ID       | Emissio      | n Limit     |
|--------------------------|-----------------|--------------|-------------|
|                          |                 | <u>(pph)</u> | (tpy)       |
| <u>C4ACE</u>             | C4AC (Extruder) | <u>0.01</u>  | 0.03        |
|                          | C4AD (Treater)  |              |             |
| <u>C4AEE</u>             | C4AE (Cleaner)  | <u>0.01</u>  | <u>0.01</u> |

#### [45CSR13, R13-3645, 4.1.3]

- 11.1.4. Process equipment C4AA and C4AB shall be vented to the baghouse (Equipment ID C4AAC1). [45CSR13, R13-3645, 4.1.4]
- 11.1.5. The permittee shall maintain and operate the baghouse and any other air emissions control devices installed at the C-4 Area in accordance with proper operational guidelines to minimize emissions. For the baghouse and any other air emissions control devices installed in the C-4 Area, the permittee shall keep accurate records of filter changes and maintenance activities, and of malfunctions and other operational shutdowns which result in excess emissions.

The referenced baghouse and other control devices include, but are not limited to those identified as: baghouse C4AAC1 and other collectors (liquid ring vacuum pump) C4AEC1.

For each malfunction or operational shutdown of a control device that results in excess emissions, the following additional information must be recorded, at a minimum:

- a. The equipment involved and associated cause of the malfunction.
- b. Steps taken to correct the malfunction.
- c. Steps taken to minimize emissions during the malfunction.
- d. The duration of the malfunction.
- e. The estimated increase in emissions during the malfunction.
- f. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

#### [45CSR13, R13-3645, 4.1.6]

11.1.6. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in 45CSR7 subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.

[45CSR13, R13-3645, 5.1.1; 45CSR§7-3.1]

11.1.7. The provision of condition 11.1.6 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.

[45CSR13, R13-3645, 5.1.1; 45CSR\$7-3.2]

#### 11.2. Monitoring Requirements

11.2.1. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2 (conditions 11.1.6 and 11.1.7), the permittee shall conduct opacity monitoring and record keeping for all emission points and equipment subject to an opacity limit under 45CSR7, including, but not limited to, the emission points C4AAE and C4AEE. The opacity monitoring and record keeping shall include visual emission checks for all emission points subject to a particulate matter emission limit contained in this permit.

Monitoring shall be conducted at least once per month. The checks shall be conducted by personnel trained in the practices and limitations of 40 CFR 60 Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within three (3) days of the first signs of visible emissions.

A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions.

Records shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and, if necessary, all corrective actions taken.

#### [45CSR13, R13-3645, 4.2.1]

11.2.2. Compliance monitoring shall be accomplished by the use of process information and process knowledge to calculate the estimated emissions from the C-4 Compounding Area.

#### [45CSR13, R13-3645, 4.2.2] (C4AA, C4AB, C4AC, C4AD, C4AE)

11.2.3. Compliance with all annual emission and/or operating limits shall be determined using a twelve (12) month rolling total. A twelve month rolling total shall mean a sum in any given month of the previous twelve (12) consecutive calendar months.

**Table 11.2.3.(a) Process Interlock Settings** 

| <b>Control Device ID</b> | <b>Description</b>      | Compliance Monitoring & Interlock Settings                       |
|--------------------------|-------------------------|--|
| C4AAC1                   | <u>Baghouse</u>         | The baghouse shall have a low delta P interlock set              |
|                          |                         | at 1" w.c. to detect bag failure, which shuts the                |
|                          |                         | system down. A high delta P alarm shall be set at 6"             |
|                          |                         | w.c. to monitor for restricted or overloaded bags. If            |
|                          |                         | the pressure drop range exceeds 4.0 inches H <sub>2</sub> O then |
|                          |                         | cleaning shall be initiated.                                     |
| C4AEC1                   | Liquid-ring Vacuum Pump | If flow to the vacuum pump is > 5 gallons per minute,            |
|                          |                         | the pump will be shut down for maintenance check                 |
|                          |                         | and repair.  |

Note: These parameters are continuously measured by the DCS, which shall produce an hourly average in order to justify compliance with proper operation of the equipment.

Table 11.2.3.(b) Parametric Monitoring of Control Equipment

| Control Device ID | <u>Description</u>      | Monitoring Parameter             |
|-------------------|-------------------------|----------------------------------|
| C4AAC1            | Baghouse                | Min. Baghouse Delta P (<1 in.    |
|                   |                         | <u>H<sub>2</sub>O)</u>           |
| <u>C4AAC1</u>     | <u>Baghouse</u>         | Visible Emissions Observation    |
|                   |                         | (like Method 22) while the stack |
|                   |                         | <u>is running</u>                |
| C4AEC1            | Liquid-ring Vacuum Pump | Max. Flow Rate (>5 gallons per   |
|                   |                         | minute)                          |

Note: If any exceedance of the parameters listed above are observed during process operations, corrective action shall be taken immediately. For each exceedance, a corrective action report shall be generated. This report shall include the duration of the malfunction, the corrective actions taken, and an estimate of the emissions generated.

#### [45CSR13, R13-3645, 4.2.3]

#### 11.3. Testing Requirements

11.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.

[45CSR13, R13-3645, 5.1.1; 45CSR§7-8.1]

11.3.2. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.

[45CSR13, R13-3645, 5.1.1; 45CSR\$7-8.2]

# 11.4. Recordkeeping Requirements

11.4.1. For the purpose of determining compliance with the maximum emission limits set forth in Section 11.1, the permittee shall maintain records equivalent to the example recordkeeping form supplied as Appendix F. [45CSR13, R13-3645, 4.4.1]

# 11.5. Reporting Requirements

11.5.1. None.

## 11.6. Compliance Plan

11.6.1. None.

Appendix A: R13-2365 Attachments (C1 Area)

# Attachment A Monthly Records

Chemours Washington Works Teflon PFA Area (C1) Permit R13-2365

Current month:
Data entered by:
Date entered:
Reviewed by:
Date reviewed:
Delegated Authority:

| Equipment                                    | Equipment ID No. | Value | Monthly Monitoring Parameter  |  |  |  |  |  |
|--|------------------|-------|---|--|--|--|--|--|
| Comonomer cylinders                          | C1FW             |       | Cylinder disconnects – Comonomer A  |  |  |  |  |  |
| Comonomer cylinders                          | C1FW             |       | Cylinder disconnects – Comonomer B  |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | Aborted batches – after comonomer addition  |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | Aborted batches – after kickoff   |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | Normal batches – Product C  |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | Normal batches – All FP products  |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | Normal batches – All dispersion productions   |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | Maximum pressure after venting to monomers area   |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | Sumped batches  |  |  |  |  |  |
| Totes  | C1FR             |       | # of totes prepared   |  |  |  |  |  |
| Dryer  | C1FS             |       | Maximum dispersion flow to filter (lb/hr)   |  |  |  |  |  |
| Dried polymer production                     | N/A              |       | lb polymer  |  |  |  |  |  |
| Extruder                                     | C1FV             |       | Maximum hourly screw speed  |  |  |  |  |  |
| Polymer to mixer                             | N/A              |       | lb polymer  |  |  |  |  |  |
| Reactor                                      | C1FE             |       | Maximum bin weight for month  |  |  |  |  |  |
| Reactor production                           | C1FE             |       | # of batches  |  |  |  |  |  |
| Reactor                                      | C1FH             |       | Maximum bin weight for month  |  |  |  |  |  |
| Reactor production                           | C1FH             |       | # of batches  |  |  |  |  |  |
| Extruder burnout oven                        | C1GR and C1PU    |       | Small packs cleaned   |  |  |  |  |  |
| Extruder burnout oven                        | C1GR and C1PU    |       | Large packs cleaned   |  |  |  |  |  |
| C1FSC1 filter delta P                        | C1FSC1           |       | Maximum value (while running) (hourly average)  |  |  |  |  |  |
| C1FEC scrubbing liquid conc., %              | C1FEC            |       | Minimum value (while running)   |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | # of completed GenX commercial dispersion batches included in count above                             |  |  |  |  |  |
| Reactor                                      | C1FQ             |       | # of aborted GenX commercial dispersion batches included in count above                               |  |  |  |  |  |
| Sump   | C1GK             |       | # of sumped GenX commercial dispersion batches included in count above                                |  |  |  |  |  |
| Extruder/Gear Pump                           | C1FV             |       | Total lbs of GenX commercial cube production (fluorinated and nonfluorinated) included in count above |  |  |  |  |  |
| Condenser System                             | C1NGC            |       | Maximum cooling supply temperature while venting for month  |  |  |  |  |  |
| Wet Collecting System-Scrubber               | C1PGC2           |       | Maximum circulating filter delta P and Minimum Total Water Flow to Scrubber                           |  |  |  |  |  |
| Adsorption System – Plate Dry Carbon<br>Beds | C1PGC3           |       | Maximum and Minimum delta P across carbon beds (hourly average)                                       |  |  |  |  |  |

| Farinment      | Equipment                 |       | Monthly Monitoring   |
|----------------|---------------------------|-------|--|
| Equipment      | ID No.                    | Value | Parameter  |
| Baghouse       | С1РНС                     |       | Visible Emission Observed (like Method 22)(while the stack is running) |
| Baghouse       | C1PLC                     |       | Visible Emission Observed (like Method 22)(while the stack is running) |
| Tank           | C1NB                      |       | # of batches   |
| Tank           | C1NC                      |       | # of batches   |
| Product System | C1NG, C1NH                |       | # of batches   |
| Tank           | C1PA                      |       | Monthly additions  |
| Process System | C1PN                      |       | Maximum hourly rate  |
| Hopper         | C1PM                      |       | Rework monthly production  |
| Product System | C1PP, C1PQ,<br>C1PR, C1PS |       | Max. fill weight   |
| Tank           | C1NF                      |       | Monthly fills  |

# Attachment B Monthly Emissions

Chemours Washington Works Teflon PFA Area (C1) Permit R13-2365

|                    |                                |              |                  |              |          |              |          | M            | onthly Em | nissions     | (lb)     |              |                  |              |           |              |          |
|--------------------|--------------------------------|--------------|------------------|--------------|----------|--------------|----------|--------------|-----------|--------------|----------|--------------|------------------|--------------|-----------|--------------|----------|
| <b>Emission Pt</b> | <b>Equipment ID</b>            |              | M <sub>2.5</sub> |              | ic Acid  |              | NOx      |              | VOC       |              | ODC      |              | PM <sub>10</sub> |              | tonitrile |              | HF       |
|                    |                                | max<br>lb/hr | lb/month         | max<br>lb/hr | lb/month | max<br>lb/hr | lb/month | max<br>lb/hr | lb/month  | max<br>lb/hr | lb/month | max<br>lb/hr | lb/month         | max<br>lb/hr | lb/month  | max<br>lb/hr | lb/month |
| C1FCE              | C1FC                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FEE              | C1FA, FB,<br>FD, FE, GN,<br>FH |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FFE              | C1FF                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FGE              | C1FG                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FQE              | C1FQ, GH                       |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FSE              | C1FS, C1FK                     |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FUE              | C1FU                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FVE1             | C1FV                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FVE2             | C1FV                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1FWE              | C1FW                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GAE              | C1GA                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GBE              | C1GB                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GCE              | C1GC                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GDE              | C1GD                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GJE              | C1GJ                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
|                    | C1GP, GS, GT                   |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GQE              | C1GQ                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GRE              | C1GR and<br>C1PU               |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GVE              | C1GV                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1GXE              | C1GX                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1MGE              | C1MG                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1NPE              | CINP                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| Area               | C1FW                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| Area               | C1GK                           |              |                  |              |          |              |          |              |           |              |          |              |                  | ·            |           |              |          |
| C1NBE              | C1NB                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1NCE              | C1NC                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1NDE              | C1ND                           |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |

|   |                           |              |                  |              |          |              |          | M            | onthly Em | issions      | (lb)     |              |                  |              |           |              |          |
|---|---------------------------|--------------|------------------|--------------|----------|--------------|----------|--------------|-----------|--------------|----------|--------------|------------------|--------------|-----------|--------------|----------|
| <b>Emission Pt</b>                                | Equipment ID              | P            | M <sub>2.5</sub> |              | ic Acid  |              | NOx      |              | VOC       |              | ODC      |              | PM <sub>10</sub> |              | tonitrile |              | HF       |
| ID  | Equipment ID              | max<br>lb/hr | lb/month         | max<br>lb/hr | lb/month | max<br>lb/hr | lb/month | max<br>lb/hr | lb/month  | max<br>lb/hr | lb/month | max<br>lb/hr | lb/month         | max<br>lb/hr | lb/month  | max<br>lb/hr | lb/month |
| C1NEE   | C1NE                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1NFE   | C1NF                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1NGE (combined)                                  | C1NG, C1NH,<br>C1PA       |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PCE   | C1PC, C1PD,<br>C1PE, C1PF |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PGE   | C1PG, C1PB                |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PHE   | C1PH                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PIE   | C1PI                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PKE   | C1PK                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PJE   | C1PJ                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PME   | C1PM                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PLE   | C1PL                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PNE   | C1PN                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1POE   | C1PO                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PPE,<br>C1PQE,<br>C1PRE,<br>C1PSE<br>(combined) | C1PP, C1PQ,<br>C1PR, C1PS |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1PTE   | C1PT                      |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |
| C1QBE   | C1QB, C1QC,<br>C1QD       |              |                  |              |          |              |          |              |           |              |          |              |                  |              |           |              |          |

# **Attachment C Annual Emissions**

Chemours Washington Works Teflon PFA Area (C1) Permit R13-2365

| E D4  |                           |  |  | VO | C Emission | ns (lb) |  |  |                   |
|---|---------------------------|--|--|----|------------|---------|--|--|-------------------|
| Emission Pt<br>ID                                 | Equipment ID              |  |  |    |            |         |  |  | 12 Month<br>Total |
| C1FCE,<br>GAE, GBE,<br>GCE                        | C1FC, GA,<br>GB, GC       |  |  |    |            |         |  |  |                   |
| C1FFE, FGE  | C1FF, FG                  |  |  |    |            |         |  |  |                   |
| C1FQE   | C1FQ, GH                  |  |  |    |            |         |  |  |                   |
| C1FSE   | C1FS                      |  |  |    |            |         |  |  |                   |
| C1FVE1  | C1FV                      |  |  |    |            |         |  |  |                   |
| C1FVE2  | C1FV                      |  |  |    |            |         |  |  |                   |
| C1FWE   | C1FW                      |  |  |    |            |         |  |  |                   |
| C1GDE   | C1GD                      |  |  |    |            |         |  |  |                   |
| C1GXE   | C1GX                      |  |  |    |            |         |  |  |                   |
| C1GZE   | C1GZ                      |  |  |    |            |         |  |  |                   |
| C1MBE   | C1MB                      |  |  |    |            |         |  |  |                   |
| C1NPE   | C1NP                      |  |  |    |            |         |  |  |                   |
| Area  | C1FW                      |  |  |    |            |         |  |  |                   |
| Area  | C1GK                      |  |  |    |            |         |  |  |                   |
| C1NBE   | C1NB                      |  |  |    |            |         |  |  |                   |
| CINCE   | C1NC                      |  |  |    |            |         |  |  |                   |
| C1NGE   | C1NG, C1NH,               |  |  |    |            |         |  |  |                   |
| (combined)  | C1PA                      |  |  |    |            |         |  |  |                   |
| C1PCE   | C1PC, C1PD,<br>C1PE, C1PF |  |  |    |            |         |  |  |                   |
| C1PGE   | C1PB, C1PG                |  |  |    |            |         |  |  |                   |
| C1PNE   | C1PN                      |  |  |    |            |         |  |  |                   |
| C1GRE   | C1GR and C1PU             |  |  |    |            |         |  |  |                   |
| C1POE   | C1PO                      |  |  |    |            |         |  |  |                   |
| C1PPE,<br>C1PQE,<br>C1PRE,<br>C1PSE<br>(combined) | C1PP, C1PQ,<br>C1PR, C1PS |  |  |    |            |         |  |  |                   |

| Emission Dt       | Equipment ID | VOC Emissions (lb) |  |  |  |  |  |  |  |  |  |                   |  |
|-------------------|--------------|--------------------|--|--|--|--|--|--|--|--|--|-------------------|--|
| Emission Pt<br>ID |              |                    |  |  |  |  |  |  |  |  |  | 12 Month<br>Total |  |
| C1PTE             | C1PT         |                    |  |  |  |  |  |  |  |  |  |                   |  |
| C1QEE             | C1QE         |                    |  |  |  |  |  |  |  |  |  |                   |  |

| Emission Dt       |                     |  |  | OD | C Emission | ıs (lb) |  |  |                   |
|-------------------|---------------------|--|--|----|------------|---------|--|--|-------------------|
| Emission Pt<br>ID | <b>Equipment ID</b> |  |  |    |            |         |  |  | 12 Month<br>Total |
| C1FQE             | C1FQ, GH            |  |  |    |            |         |  |  |                   |
| C1GDE             | C1GD                |  |  |    |            |         |  |  |                   |
| Area              | C1GK                |  |  |    |            |         |  |  |                   |
|                   |                     |  |  |    |            |         |  |  |                   |

# **Attachment C Annual Emissions**

Chemours Washington Works Teflon PFA Area (C1) Permit R13-2365

| <b>Emission Pt</b>                  |  |  |  | PM | 10 Emission | ns (lb) |  |  |                   |
|-------------------------------------|--|--|--|----|-------------|---------|--|--|-------------------|
| ID                                  | <b>Equipment ID</b>                    |  |  |    |             |         |  |  | 12 Month<br>Total |
| C1FCE,<br>GAE, GBE,<br>GCE          | C1FC, GA,<br>GB, GC                    |  |  |    |             |         |  |  |                   |
| C1GDE                               | C1GD                                   |  |  |    |             |         |  |  |                   |
| C1FEE                               | C1FE                                   |  |  |    |             |         |  |  |                   |
| C1FFE, FGE                          |  |  |  |    |             |         |  |  |                   |
| C1FSE                               | C1FS, C1FK                             |  |  |    |             |         |  |  |                   |
| C1FUE                               | C1FU                                   |  |  |    |             |         |  |  |                   |
| C1FVE1                              | C1FV                                   |  |  |    |             |         |  |  |                   |
| C1GJE                               | C1GJ                                   |  |  |    |             |         |  |  |                   |
| C1GPE                               | C1GS, GT                               |  |  |    |             |         |  |  |                   |
| C1GQE                               | C1GQ                                   |  |  |    |             |         |  |  |                   |
| C1GVE                               | C1GV                                   |  |  |    |             |         |  |  |                   |
| C1GZE                               | C1GZ                                   |  |  |    |             |         |  |  |                   |
| C1MGE                               | C1MG                                   |  |  |    |             |         |  |  |                   |
| C1PGE                               | C1PG                                   |  |  |    |             |         |  |  |                   |
| C1PHE                               | C1PH                                   |  |  |    |             |         |  |  |                   |
| C1PIE                               | C1PI                                   |  |  |    |             |         |  |  |                   |
| C1PLE                               | C1PL                                   |  |  |    |             |         |  |  |                   |
| C1PME                               | C1PM                                   |  |  |    |             |         |  |  |                   |
| C1PNE                               | C1PN                                   |  |  |    |             |         |  |  |                   |
| C1POE                               | C1PO                                   |  |  |    |             |         |  |  |                   |
| C1PPE,<br>C1PQE,<br>C1PRE,<br>C1PSE | C1PP, C1PQ,<br>C1PR,<br>C1PS(combined) |  |  |    |             |         |  |  |                   |

# **Attachment C Annual Emissions**

Chemours Washington Works Teflon PFA Area (C1) Permit R13-2365

| <b>Emission Pt</b>                                |   |  |  | PM <sub>2</sub> | .5 Emissio | ns (lb) |  |  |                   |
|---|---|--|--|-----------------|------------|---------|--|--|-------------------|
| ID  | <b>Equipment ID</b>                     |  |  |                 |            |         |  |  | 12 Month<br>Total |
| C1POE   | C1PO                                    |  |  |                 |            |         |  |  |                   |
| C1PPE,<br>C1PQE,<br>C1PRE,<br>C1PSE<br>(combined) | C1PP, C1PQ,<br>C1PR, C1PS<br>(combined) |  |  |                 |            |         |  |  |                   |
|   |   |  |  |                 |            |         |  |  |                   |

| <b>Emission Pt</b> |                     |  |  | HI | Emission | s (lb) |  |  |                   |
|--------------------|---------------------|--|--|----|----------|--------|--|--|-------------------|
| ID                 | <b>Equipment ID</b> |  |  |    |          |        |  |  | 12 Month<br>Total |
| C1FEE              | C1FA, FB,<br>FD, FE |  |  |    |          |        |  |  |                   |
| CIFEE              | FD, FE              |  |  |    |          |        |  |  |                   |
| C1FVE2             | C1FV                |  |  |    |          |        |  |  |                   |
| C1GRE              | C1GR                |  |  |    |          |        |  |  |                   |
| C1PNE              | C1PN                |  |  |    |          |        |  |  |                   |
| C1GZE              | C1GZ                |  |  |    |          |        |  |  |                   |
| C1MLE              | C1ML                |  |  |    |          |        |  |  |                   |
|                    |                     |  |  |    |          |        |  |  |                   |

| Emission Dt       |                     |  |  | Aceton | itrile Emis | sions (lb) |  |  |                   |
|-------------------|---------------------|--|--|--------|-------------|------------|--|--|-------------------|
| Emission Pt<br>ID | <b>Equipment ID</b> |  |  |        |             |            |  |  | 12 Month<br>Total |
| C1FQE             | C1FQ                |  |  |        |             |            |  |  |                   |
| C1FWE             | C1FW                |  |  |        |             |            |  |  |                   |
| C1GDE             | C1GD                |  |  |        |             |            |  |  |                   |
| Area              | C1FW                |  |  |        |             |            |  |  |                   |
| Area              | C1GK                |  |  |        |             |            |  |  |                   |
|                   |                     |  |  |        |             |            |  |  |                   |

| Emission Dt       |                     |  | N | litric Acid | (lb) |  |  |                   |
|-------------------|---------------------|--|---|-------------|------|--|--|-------------------|
| Emission Pt<br>ID | <b>Equipment ID</b> |  |   |             |      |  |  | 12 Month<br>Total |
| C1NFE             | C1NF                |  |   |             |      |  |  |                   |
| C1PGE             | C1PG                |  |   |             |      |  |  |                   |
| C1PTE             | C1PT                |  |   |             |      |  |  |                   |
| C1PCE             | C1PC                |  |   |             |      |  |  |                   |
| C1NFE             | C1NF                |  |   |             |      |  |  |                   |
|                   |                     |  |   |             |      |  |  |                   |

| Emission Dt | $NO_x$ (lb)         |  |  |  |  |  |  |  |  |  |  |                   |
|-------------|---------------------|--|--|--|--|--|--|--|--|--|--|-------------------|
| ID          | <b>Equipment ID</b> |  |  |  |  |  |  |  |  |  |  | 12 Month<br>Total |
| C1MLE       | C1ML                |  |  |  |  |  |  |  |  |  |  |                   |
|             |                     |  |  |  |  |  |  |  |  |  |  |                   |

Appendix B: R13-1953 Attachments (C2 Area)

# Attachment A - Monthly Recordkeeping (Equipment)

# Chemours Washington Works – Area (C2) – Permit R13-1953

| Current Month:   |  |
|------------------|--|
| Data entered by: |  |
| Date entered:    |  |
| Reviewed by:     |  |
| Date Reviewed:   |  |

| E-minus and ID      |       | Monthly Monitoring                                    |
|---------------------|-------|---|
| Equipment ID        | Value | Parameter   |
| C2DP                |       | # of times system deinventoried through System #1     |
| C2DF                |       | # of times system deinventoried through System #2     |
| C2EP                |       | # of times system deinventoried through System #1     |
| CZEI                |       | # of times system deinventoried through System #2     |
| C2DX – tank         |       | # of times system deinventoried through System #1     |
| C2DA – talik        |       | # of times system deinventoried through System #2     |
| C2DX – bottom valve |       | # of times system deinventoried through System #1     |
| C2DA – bottom varve |       | # of times system deinventoried through System #2     |
| C2DX – top valve    |       | # of times system deinventoried through System #1     |
| C2DA – top varve    |       | # of times system deinventoried through System #2     |
| C2DY – tank         |       | # of times system deinventoried through System #1     |
| C2D I — talik       |       | # of times system deinventoried through System #2     |
| C2DY – bottom valve |       | # of times system deinventoried through System #1     |
| C2D 1 Oottom varve  |       | # of times system deinventoried through System #2     |
| C2DY – top valve    |       | # of times system deinventoried through System #1     |
| C2D1 top varve      |       | # of times system deinventoried through System #2     |
| C2DR                |       | # of times system deinventoried through System #1     |
| CZDK                |       | # of times system deinventoried through System #2     |
| C2EE                |       | # of times system deinventoried through System #1     |
|                     |       | # of times system deinventoried through System #2     |
| Facility            |       | # of completed batches                                |
| Facility            |       | # of completed GenX batches                           |
| C2DA                |       | # of completed dispersion batches                     |
| C2DA                |       | # of GenX dispersion batches                          |
| C2DT                |       | Max pph held for one hour during the month            |
| C2DW                |       | max pph held for one hour during the month            |
| C2EH                |       | max pph held for one hour during the month            |
| C2DT, C2DW, C2EH    |       | max pph rate of all TDD for one hour during the month |
| C2DS                |       | pounds of flake to flake packout                      |
| C2EN                |       | max pph for month conveyed from TDD to compactor      |
| C2ER                |       | max RPM held for one hour                             |
| C2ER                |       | total rework weight for month                         |
|                     |       | # of makeup cartridges used                           |
| C2EV                |       | # of ink cartridges used                              |
|                     |       | # of wash bottles used                                |

# Attachment B - Monthly Emissions Chemours Washington Works - Area (C2) - Permit R13-1953

| Emission | Ei                                     | VO      | OC       | OI      | OC .     | PN      | $I_{10}$ | I.      | IF       | Toluene  | Total HAPs |
|----------|--|---------|----------|---------|----------|---------|----------|---------|----------|----------|------------|
| Point ID | Equipment ID                           | max pph | lb/month | lb/month | lb/month   |
| C2DAE    | C2DA, C2DE,<br>C2EC, C2KW,<br>C2KX     |         |          |         |          |         |          |         |          |          |            |
| C2DHE    | C2DH                                   |         |          |         |          |         |          |         |          |          |            |
| C2DKE    | C2DK                                   |         |          |         |          |         |          |         |          |          |            |
| C2DSE    | C2DS                                   |         |          |         |          |         |          |         |          |          |            |
| C2DTE    | C2DW, C2EH                             |         |          |         |          |         |          |         |          |          |            |
| C2EFE    | C2EJ, C2EF                             |         |          |         |          |         |          |         |          |          |            |
| C2EGE    | C2EG                                   |         |          |         |          |         |          |         |          |          |            |
| C2EJE    | C2EJ, C2DG                             |         |          |         |          |         |          |         |          |          |            |
| C2ENE    | C2EN                                   |         |          |         |          |         |          |         |          |          |            |
| C2ERE    | C2ER                                   |         |          |         |          |         |          |         |          |          |            |
| C2ETE    | C2ET                                   |         |          |         |          |         |          |         |          |          |            |
| C2EUE    | C2DO, C2EU                             |         |          |         |          |         |          |         |          |          |            |
| C2EVE    | C2EV                                   |         |          |         |          |         |          |         |          |          |            |
| C2KDE    | C2KD                                   |         |          |         |          |         |          |         |          |          |            |
| C2KOE1   | C2KO                                   |         |          |         |          |         |          |         |          |          |            |
| C2KPE    | C2KP                                   |         |          |         |          |         |          |         |          |          |            |
| C2KUE    | C2KU                                   | -       |          |         |          | -       |          |         |          |          |            |
| C2KLE    | C2KL                                   |         |          |         |          |         |          |         |          |          |            |
| C2KNE    | C2KN                                   |         |          |         |          |         |          |         |          |          |            |
| C2EBE    | C2EA1, C2EA2,<br>C2EB2, C2EB1,<br>C2KJ |         |          |         |          |         |          |         |          |          |            |

# Attachment C – Annual Emissions Chemours Washington Works – Area (C2) – Permit R13-1953

| Emission | Equipment ID                        |  |  | , | VOC Em | issions (lb | o) |  |                |
|----------|-------------------------------------|--|--|---|--------|-------------|----|--|----------------|
| Point ID | <b>Equipment ID</b>                 |  |  |   |        |             |    |  | 12 Month Total |
| C2DAE    | C2DA, C2DE, C2EC,<br>C2KW, C2KX     |  |  |   |        |             |    |  |                |
| C2DHE    | C2DH                                |  |  |   |        |             |    |  |                |
| C2DKE    | C2DK                                |  |  |   |        |             |    |  |                |
| C2EFE    | C2EJ, C2EF                          |  |  |   |        |             |    |  |                |
| C2EGE    | C2EG                                |  |  |   |        |             |    |  |                |
| C2EJE    | C2EJ, C2DG                          |  |  |   |        |             |    |  |                |
| C2ERE    | C2ER                                |  |  |   |        |             |    |  |                |
| C2ETE    | C2ET                                |  |  |   |        |             |    |  |                |
| C2EVE    | C2EV                                |  |  |   |        |             |    |  |                |
| C2KDE    | C2KD                                |  |  |   |        |             |    |  |                |
| C2DTE    | C2DW, C2EH                          |  |  |   |        |             |    |  |                |
| C2EBE    | C2EA1, C2EA2, C2EB2,<br>C2EB1, C2KJ |  |  |   |        |             |    |  |                |
|          | Totals                              |  |  |   |        |             |    |  |                |

| Emission | Equipment ID |  |  |  | ODC Emi | issions (lb | ) |  |                |
|----------|--------------|--|--|--|---------|-------------|---|--|----------------|
| Point ID |              |  |  |  |         |             |   |  | 12 Month Total |
| C2EFE    | C2EJ, C2EF   |  |  |  |         |             |   |  |                |
| C2EJE    | C2EJ, C2DG   |  |  |  |         |             |   |  |                |
|          | Totals       |  |  |  |         |             |   |  |                |

# Attachment C – Annual Emissions Chemours Washington Works – Area (C2) – Permit R13-1953

| Emission | u Woun.                             |  |  |  | PM <sub>10</sub> Em | issions (lb | o) |  |                |
|----------|-------------------------------------|--|--|--|---------------------|-------------|----|--|----------------|
| Point ID | Equipment ID                        |  |  |  |                     |             |    |  | 12 Month Total |
| C2DKE    | C2DK                                |  |  |  |                     |             |    |  |                |
| C2DSE    | C2DS                                |  |  |  |                     |             |    |  |                |
| C2DTE    | C2DW, C2EH                          |  |  |  |                     |             |    |  |                |
| C2EGE    | C2EG                                |  |  |  |                     |             |    |  |                |
| C2ENE    | C2EN                                |  |  |  |                     |             |    |  |                |
| C2ERE    | C2ER                                |  |  |  |                     |             |    |  |                |
| C2EUE    | C2DO, C2EU                          |  |  |  |                     |             |    |  |                |
| C2KPE    | C2KP                                |  |  |  |                     |             |    |  |                |
| C2KUE    | C2KU                                |  |  |  |                     |             |    |  |                |
| C2DHE    | C2DH                                |  |  |  |                     |             |    |  |                |
| C2KLE    | C2KL                                |  |  |  |                     |             |    |  |                |
| C2KNE    | C2KN                                |  |  |  |                     |             |    |  |                |
| C2EBE    | C2EA1, C2EA2, C2EB2,<br>C2EB1, C2KJ |  |  |  |                     |             |    |  |                |
|          | Totals                              |  |  |  |                     |             |    |  |                |

# Attachment C – Annual Emissions Chemours Washington Works – Area (C2) – Permit R13-1953

| Emission | Equipment ID        |   |  |  | HF Emis | ssions (lb) | ) |  |                |
|----------|---------------------|---|--|--|---------|-------------|---|--|----------------|
| Point ID | Equipment ID        |   |  |  |         |             |   |  | 12 Month Total |
| C2DHE    | C2DH                |   |  |  |         |             |   |  |                |
| C2ERE    | C2ER                |   |  |  |         |             |   |  |                |
| C2ETE    | C2ET                |   |  |  |         |             |   |  |                |
| C2KDE    | C2KD                |   |  |  |         |             |   |  |                |
| C2KOE1   | C2KO                |   |  |  |         |             |   |  |                |
| C2KUE    | C2KU                |   |  |  |         |             |   |  |                |
| C2EBE    | C2EA1, C2EA2, C2EB2 | • |  |  |         |             |   |  |                |
|          | Totals              |   |  |  |         |             |   |  |                |

| Emission | Equipment ID        | Total HAPs (lb) |  |  |  |  |  |  |  |  |  |                |
|----------|---------------------|-----------------|--|--|--|--|--|--|--|--|--|----------------|
| Point ID | Equipment ID        |                 |  |  |  |  |  |  |  |  |  | 12 Month Total |
| C2EVE    | C2EV                |                 |  |  |  |  |  |  |  |  |  |                |
| C2EFE    | C2EF, C2EJ          |                 |  |  |  |  |  |  |  |  |  |                |
| C2EJE    | C2DG, C2EJ          |                 |  |  |  |  |  |  |  |  |  |                |
| C2DHE    | C2DH                |                 |  |  |  |  |  |  |  |  |  |                |
| C2EBE    | C2EA1, C2EA2, C2EB2 |                 |  |  |  |  |  |  |  |  |  |                |
| Totals   |                     |                 |  |  |  |  |  |  |  |  |  |                |

# Attachment D – Monthly Recordkeeping – Control Devices and Inherent Process Devices Chemours Washington Works – Area (C2) – Permit R13-1953

Current Month:
Data entered by:
Date entered:
Reviewed by:
Date reviewed:

| <b>Equipment Name</b> | ID No. | Interlock Tripped?<br>(Yes or No) |
|-----------------------|--------|-----------------------------------|
| Scrubber              | C2DWC2 |                                   |
| Scrubber              | C2EHC2 |                                   |
| Scrubber              | C2DTC3 |                                   |

Appendix C: R13-2391 Attachments (C3 Area)

# ATTACHMENT A TELOMERS AREA (C3) Permit R13-2391 MONTHLY EQUIPMENT RECORD SHEET

| Activity or Equipment Description   | <b>Equipment ID No.</b> | M              | onthly Monitoring              |
|-------------------------------------|-------------------------|----------------|--------------------------------|
|                                     |                         | Value Recorded | Parameter Monitored            |
| C3 Line 3 Batches Reacted           | Facility                |                | # of batches reacted on Line 3 |
| C3 Line 2 Batches Reacted           | Facility                |                | # of batches reacted on Line 2 |
| Product A Trailers                  | Facility                |                | # of Product A trailers loaded |
| Product A Trailers                  | Facility                |                | # of Product A trailers loaded |
| (T71MC Down)                        |                         |                |                                |
| Product B Trailers                  | Facility                |                | # of Product B trailers loaded |
| Product B Trailers                  | Facility                |                | # of Product B trailers loaded |
| (T71MC Down)                        |                         |                |                                |
| Product C Trailers                  | Facility                |                | # of Product C trailers loaded |
| Product C Trailers                  | Facility                |                | # of Product C trailers loaded |
| (T71MC Down)                        |                         |                |                                |
| Cleaning Reactor Line 2             | СЗНІ                    |                | # of times L2 Reactor cleaned  |
| Cleaning Reactor Line 3             | СЗНО                    |                | # of times L3 Reactor cleaned  |
| Tank                                | C3HN                    |                | # of tank cleanings            |
| Tank                                | C3IL                    |                | # of tank cleanings            |
| Tank                                | C3HS                    |                | # of tank cleanings            |
| Tank                                | СЗНТ                    |                | # of tank cleanings            |
| Tank                                | C3IH                    |                | # of tank cleanings            |
| Tank                                | C3ID                    |                | # of tank cleanings            |
| Tank                                | C3IE                    |                | # of tank cleanings            |
| Tank                                | СЗНХ                    |                | # of tank cleanings            |
| Tank                                | C3IX                    |                | # of tank cleanings            |
| Tank                                | C3IY                    |                | # of tank cleanings            |
| Maximum Value for Changing Out      | C3HGC (Line 2)          |                | Maximum Value                  |
| Scrubber Fluid                      |                         |                |                                |
| Number of Times Calculated Variable | C3HGC (Line 2)          |                | # of Times                     |
| Exceeded '63'                       |                         |                |                                |
| Maximum Value for Changing Out      | C3HPC (Line 3)          |                | Maximum Value                  |
| Scrubber Fluid                      |                         |                |                                |
| Number of Times Calculated Variable | C3HPC (Line 3)          |                | # of Times                     |
| Exceeded >63'                       |                         |                |                                |

# ATTACHMENT B TELOMERS AREA (C3) Permit R13-2391 MONTHLY EMISSIONS RECORD

Month:

Year:

|          |           | Month:    |          | Year:     |          |           |            |
|----------|-----------|-----------|----------|-----------|----------|-----------|------------|
| Emission | Source ID | V(        |          | Н         |          |           | <b>T10</b> |
| Point ID |           | Max lb/hr | Lb/month | Max lb/hr | Lb/month | Max lb/hr | Lb/month   |
| C3HG2E   | C3HG      |           |          |           |          |           |            |
|          | C3HG      |           |          |           |          |           |            |
| C3HGE    | СЗНН      |           |          |           |          |           |            |
|          | СЗНІ      |           |          |           |          |           |            |
|          | СЗНЈ      |           |          |           |          |           |            |
|          | C3HT      |           |          |           |          |           |            |
| C3HIE    | C3IH      |           |          |           |          |           |            |
|          | C3IK      |           |          |           |          |           |            |
|          | C3IJ      |           |          |           |          |           |            |
|          | СЗНК      |           |          |           |          |           |            |
|          | C3HL      |           |          |           |          |           |            |
|          | C3IF      |           |          |           |          |           |            |
|          | C3IL      |           |          |           |          |           |            |
|          | C3HM      |           |          |           |          |           |            |
|          | СЗНР      |           |          |           |          |           |            |
|          | C3IV      |           |          |           |          |           |            |
|          | СЗНО      |           |          |           |          |           |            |
|          | C3HQ      |           |          |           |          |           |            |
| CALIDE   | C3HN      |           |          |           |          |           |            |
| СЗНРЕ    | C3HS      |           |          |           |          |           |            |
|          | C3HD      |           |          |           |          |           |            |
|          | C3ID      |           |          |           |          |           |            |
|          | СЗНХ      |           |          |           |          |           |            |
|          | C3IE      |           |          |           |          |           |            |
|          | C3IT      |           |          |           |          |           |            |
|          | C3IG      |           |          |           |          |           |            |
|          | СЗНА      |           |          |           |          |           |            |
|          | СЗНВ      |           |          |           |          |           |            |
|          | C3IX      |           |          |           |          |           |            |
|          | C3IY      |           |          |           |          |           |            |
| 60777    | C3IZ      |           |          |           |          |           |            |
| C3IPE    | СЗЈА      |           |          |           |          |           |            |
| AREA     | C3IW      |           |          |           |          |           |            |
| COL      | IG2E      |           | MONTHL   | Y TOTALS  |          |           |            |
|          | HGE       |           |          |           |          |           |            |
|          | HIE       |           |          |           |          |           |            |
|          | HPE       |           |          |           |          |           |            |
|          | IPE       |           |          |           |          |           |            |
|          | EA        |           |          |           |          |           |            |
|          | CAL -     |           |          |           |          |           |            |
| 101      |           |           |          | 1         |          |           |            |

# ATTACHMENT C Permit R13-2391 Annual Emissions Log

| <b>Current Month:</b> |  |
|-----------------------|--|
|                       |  |

**Table C.1. – VOC Emissions (pounds)** 

| Emission<br>Point ID | Emission  | `* |  | Month | s |  |  | 12<br>Month |
|----------------------|-----------|----|--|-------|---|--|--|-------------|
| Point ID             | Source ID |    |  |       |   |  |  | Total       |
|                      | СЗНІ      |    |  |       |   |  |  |             |
| C3HIE                | СЗНЈ      |    |  |       |   |  |  |             |
| CSTILE               | С4НТ      |    |  |       |   |  |  |             |
|                      | C3IH      |    |  |       |   |  |  |             |
|                      | C3IK      |    |  |       |   |  |  |             |
|                      | C3IJ      |    |  |       |   |  |  |             |
|                      | СЗНО      |    |  |       |   |  |  |             |
|                      | C3HQ      |    |  |       |   |  |  |             |
|                      | C3HN      |    |  |       |   |  |  |             |
|                      | C3HS      |    |  |       |   |  |  |             |
|                      | C3HD      |    |  |       |   |  |  |             |
|                      | C3ID      |    |  |       |   |  |  |             |
| СЗНРЕ                | СЗНХ      |    |  |       |   |  |  |             |
|                      | C3IE      |    |  |       |   |  |  |             |
|                      | C3IL      |    |  |       |   |  |  |             |
|                      | C3IT      |    |  |       |   |  |  |             |
|                      | СЗНА      |    |  |       |   |  |  |             |
|                      | СЗНВ      |    |  |       |   |  |  |             |
|                      | СЗНЕ      |    |  |       |   |  |  |             |
|                      | C3HR      |    |  |       |   |  |  |             |
|                      | C3IX      |    |  |       |   |  |  |             |
|                      | C3IY      |    |  |       |   |  |  |             |
|                      | C3IZ      |    |  |       |   |  |  |             |
| C3IPE                | СЗЈА      |    |  |       |   |  |  |             |
| тот                  | ΓAL -     |    |  |       |   |  |  |             |

**Table C.4. – Annual Production (batches)** 

Line 3 Batches Produced

Line 2 Batches Produced

12 Month Total

# ATTACHMENT C Permit R13-2391 Annual Emissions Log

Current Month:

| E • •                                | E   |       | Months |  |  |  |        |   |  |  |          |  | 12                   |
|--------------------------------------|---|-------|--------|--|--|--|--------|---|--|--|----------|--|----------------------|
| Emission<br>Point ID                 | Emission<br>Source ID                         |       |        |  |  |  |        |   |  |  |          |  | Month<br>Total       |
|                                      | C3HL  |       |        |  |  |  |        |   |  |  |          |  |                      |
| C3HGE                                | СЗНМ  |       |        |  |  |  |        |   |  |  |          |  |                      |
|                                      | C3IV  |       |        |  |  |  |        |   |  |  |          |  |                      |
| C3HPE                                | C3IF  |       |        |  |  |  |        |   |  |  |          |  |                      |
|                                      | СЗНР  |       |        |  |  |  |        |   |  |  |          |  |                      |
| AREA                                 | C3IW  |       |        |  |  |  |        |   |  |  |          |  |                      |
|                                      | TOTAL –                                       |       |        |  |  |  |        |   |  |  |          |  |                      |
|                                      |   |       |        |  |  |  |        |   |  |  |          |  |                      |
| le C.3. – PN                         | M10 Emissions                                 | (poun | ds)    |  |  |  | Marah  |   |  |  | <u> </u> |  | 12                   |
| le C.3. – PM<br>Emission<br>Point ID |   | (poun | ds)    |  |  |  | Months | 5 |  |  |          |  |                      |
| Emission                             | M10 Emissions                                 | (poun | ds)    |  |  |  | Months | 8 |  |  |          |  | 12<br>Month<br>Total |
| Emission<br>Point ID                 | M10 Emissions Emission Source ID              | (poun | ds)    |  |  |  | Months | 8 |  |  |          |  | Month                |
| Emission<br>Point ID                 | M10 Emissions Emission Source ID C3HG         | (poun | ds)    |  |  |  | Months | S |  |  |          |  | Month                |
| Emission<br>Point ID<br>C3HGE        | Emission<br>Source ID<br>C3HG                 | (poun | ds)    |  |  |  | Months | 5 |  |  |          |  | Montl                |
| Emission<br>Point ID<br>C3HGE        | Emission<br>Source ID<br>C3HG<br>C3HH<br>C3HG | (poun | ds)    |  |  |  | Months | S |  |  |          |  | Montl                |

**Months** 

Appendix D: R13-1823 Attachments (T1, T2, T3, T4, & T7 Areas)

ATTACHMENT A
Chemours Washington Works
Teflon Monomers Area
Recordkeeping for Process Emissions

| Current Month:   |  |
|------------------|--|
| Data entered by: |  |
| Date entered:    |  |
| Reviewed by:     |  |
| Date reviewed:   |  |

|  | Equip.    | Emission | Monthl | y Parameters |                  |
|--|-----------|----------|--------|--------------|------------------|
| Equipment                                    | ID        | Pt. ID   | Max/hr | Total        | Units            |
| No. 6 Furnace - Process                      | T1CA      | T1CAE    |        |              | MM scf           |
| No. 7 Furnace - Process                      | T1CB      | T1CBE    |        |              | MM scf           |
| No. 8 Furnace - Process                      | T1CC      | T1CCE    |        |              | MM scf           |
| No. 9 Furnace - Process                      | T1CD      | T1CDE    |        |              | MM scf           |
|  |           |          |        |              | lb 36%           |
| Cooler/Absorber Air Stripper                 | T2ES      | T2ERE    |        |              | (wt) HCl         |
| Emergency Generator                          | Т7ЈЈ      | T7JJE    |        |              | Hrs<br>Operation |
| Efficigency Generator                        | 1 / 33    | 1/JJE    |        |              | hrs              |
| Column - Process Vent (Problems with C/A)    | T2XM      | T7XIE    |        |              | vented           |
|  |           |          |        |              | hrs              |
| Column - Process Vent (High Inerts)          | T2XM      | T7XIE    |        |              | vented           |
|  |           |          |        |              | lbs              |
| Primary Column - Condenser Operating Vents   | T1XD      | T7XIE    |        |              | vented           |
| Divition of the D                            | #1DD #    | maxue.   |        |              | Tank             |
| Distillate Storage Tanks - Process           | T1BP-T    | T7XIE    |        |              | vents            |
| Brine Sent to T/C                            | T4GM      | T7MIE    |        |              | lbs              |
| Brine System - Starting Inventory            | T7AB      | T7ABE    | *      |              | gal              |
| Brine System - Ending Inventory              | T7AB      | T7ABE    | *      |              | gal              |
| Brine System - Amount Added                  | T7AB      | T7ABE    | *      |              | gal              |
| Brine System - Amount Shipped in Waste       | T7AB      | T7ABE    | *      |              | gal              |
| Brine System - Amount Spilled                | T7AB      | T7ABE    | *      |              | gal              |
| Number of hours Cooler Absorber Vent went to |           |          |        |              | hrs/this         |
| NTFS   | T2XH&T2XL | T2ERE    | n/a    |              | month            |
| Average Brine Storage Tank Vapor Pressure    | T7AA      | T7AAE    |        | n/a          | psia             |
| MGH Vent Stack                               | T1GN      | T1GNE    |        |              | pph-VOC          |

**Thermal Converter Feed Rates:** 

|   | Equip.      | T/C<br>Operating | T/C not<br>Operating |       |     |         |
|---|-------------|------------------|----------------------|-------|-----|---------|
| Equipment                                       | ID          |                  | ax/hr                | Total |     | Max/hr  |
| Recovery Column - Process - Thermal Con.        | T4GM        |                  |                      |       |     | Units   |
| FP/D Autoclaves #8 & #9 (PFA only)              | T6ID & T6IU |                  |                      | *     | *   | lb OH   |
| PFA Autoclave (Aqueous) -Aborted Batches        | C1FQ        |                  |                      | *     | *   | batches |
| PFA Autoclave (Aqueous) -Normal Batches         | C1FQ        |                  |                      | *     | *   | batches |
| L3 Extruder Vent                                | C2ES        | N/A              |                      | *     |     | batches |
| Telomers Vent Accumulator                       | C3IZ        |                  |                      | N/A   | N/A | lb feed |
| Heels Column Process Vent                       | T4XK        |                  |                      |       |     |         |
| Heels Column Pot Vent                           | T4XK        |                  |                      | **    | **  | lb OH   |
| Portable Container Facility - Thermal Converter | T7EM        |                  |                      | **    | **  | lb feed |
| Thermal Converter Combustion Emissions          | T7IMC       |                  |                      | **    | **  | lb F23  |
|   | •           |                  |                      | •     | •   | MM scf  |

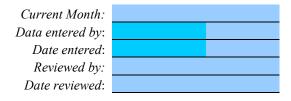
<sup>\*</sup> These vent to the Mixed Gas Holder when the T/C is down.

<sup>\*\*</sup> These streams are not vented when the T/C is down.

# **ATTACHMENT B**

Chemours Washington Works Teflon Monomers Area

## **Recordkeeping for Maintenance Emissions**



| Equipment                        | Equipment<br>ID | Emission<br>Pt. ID | Maintenance<br>operation | Current<br>Month<br>No.<br>of Events | Permit<br>Frequency<br>(per yr) <sup>a</sup> |
|----------------------------------|-----------------|--------------------|--------------------------|--------------------------------------|--|
| Mixed Gas Holder                 | T1GN            | T1GNE              | Clear                    |                                      | 2  |
| Storage Tank & Vaporizer         | T1LF            | T2ERE<br>T7XIE     | Clear                    |                                      | 2  |
| Coolers - Press. Purge           | T1DD-F          | T7IME              | Clear                    |                                      | 156  |
| Bag Filters - Press. Purge       | T1DG&H          | T7IME              | Clear                    |                                      | 16   |
| Column & Piping - Press. Purge   | T1XD            | T7IME              | Clear                    |                                      | 3  |
| Column - Maintenance - PP        | T4GM            | T7IME              | Clear                    |                                      | 3  |
| Storage Tank - Thermal Converter | T4GO            | T7IME              | Clear                    |                                      | 3  |
| Storage Tanks - Maintenance      | T1BP-T          | T7XIE              | Evacuate                 |                                      | 9  |
| Column - Evacuate Column         | T4GS            | T7XIE              | Evacuate                 |                                      | 3  |
| Column - Detox/Dry               | T4GS            | T7XIE              | Detox/dry<br>Column      |                                      | 2  |
| Storage Tank                     | T4GU, T4GV      | T7XIE              | Evacuate                 |                                      | 10   |
| Shipping Tank                    | T4GW            | T7XIE              | Evacuate                 |                                      | 3  |
| Shipping Tank                    | T4GX            | T7XIE              | Evacuate                 |                                      | 3  |
| Cylinder Loading                 | T4KA            | T7XIE              | Evacuate                 |                                      | 600  |
| Cylinder Loading                 | T4KA            | T7XIE              | Evacuate                 |                                      | 250  |
| Feed Tank                        | T4KB            | T7XIE              | Evacuate                 |                                      | 3  |
| Tank Truck Loading               | T4KC            | T7XIE              | Evacuate                 |                                      | 12   |
| Tank Car Loading                 | T4KD            | T7XIE              | Evacuate                 |                                      | 6  |

<sup>&</sup>lt;sup>a</sup> This is the frequency that was assumed in calculation emission limits for the R13 permit.

# ATTACHMENT C

Chemours Washington Works Teflon Monomers Area Recordkeeping for Control Devices

| Current Month:   |  |
|------------------|--|
| Data entered by: |  |
| Date entered:    |  |
| Reviewed by:     |  |
| Date reviewed:   |  |

| Date reviewed:   |       |  |
|--|-------|--|
| North Tank Farm Scrubber (T2ERC)   | Value | Units                                      |
| Minimum Liquor Flow  |       | lb/hr                                      |
| Maximum Scrubber Temperature   |       | Deg C                                      |
| Minimum Re-circulation Pump Current (or Minimum Liquor Flow and Maximum Scrubber Temperature)                  |       | amps                                       |
| Thermal Converter - Combustion (T7IMC)   | Value | Units                                      |
| Minimum Combustion Chamber Temperature   |       | Deg F                                      |
| Maximum Waste Gas Feed Rate  |       | lb/hr                                      |
| Maximum Charge Rate (HFC-23 from tank car unloading for CISWI)   |       | lb/hr                                      |
| Thermal Converter - Scrubber (T7IMC)   | Value | Units                                      |
| Maximum Gas Stream Flow  |       | pph  |
| Minimum Pressure Drop Across the Wet Scrubber  |       | in. wc                                     |
| Minimum Re-circulated Liquor Flow (1st Stage)  |       | gpm  |
| Minimum Re-circulation Pump Current (1st Stage)  |       | amps                                       |
| Minimum Scrubber Liquor Flow (4 <sup>th</sup> Stage)<br>(Dilute Na <sub>2</sub> SO <sub>3</sub> , pH adjusted) |       | gpm  |
| Liquor Oxidation/Reduction Potential (4 <sup>th</sup> Stage)   |       | Millivolts vs<br>Ag/AgCl ref.<br>electrode |
| Minimum Scrubber Liquor pH (4 <sup>th</sup> Stage)   |       |  |
| Maximum Scrubber Effluent pH (4 <sup>th</sup> Stage)   |       |  |
| Neutralization System Scrubber (T7JDC)   |       | Units                                      |
| Scrubber Liquor Flow   |       | gpm  |
| Daily Confirmation of Blower Operation   |       |  |
| South Stillhouse Scrubber (T7XIC)  |       | Units                                      |
| Maximum Scrubber Temperature   |       | Deg F                                      |
| Minimum Scrubber Liquor Circulation Rate   |       | gpm  |
| Maximum Vent Flow Discharge Rate   |       | lb/hr HCl                                  |

# **ATTACHMENT D – Monthly**

# **Process Emissions**

|                                    | Emission | PRIORITY POLLUTANT            |       |          |  |
|------------------------------------|----------|-------------------------------|-------|----------|--|
| Emission Point Name                | Pt. ID   | Max<br>lb/hr                  | Limit | lb/month |  |
| Furnace                            | T1CAE    |                               |       |          |  |
| Furnace                            | T1CBE    |                               |       |          |  |
| Furnace                            | T1CCE    |                               |       |          |  |
| Furnace                            | T1CDE    |                               |       |          |  |
| Dryers                             | T1DBE    |                               |       |          |  |
| Raw Material Unloading             | T1JBE    |                               |       |          |  |
| North Tank Farm Scrubber           | T2ERE    |                               |       |          |  |
| Trailer Loading                    | T2EXE    |                               |       |          |  |
| Analyzer                           | T2EYE    |                               |       |          |  |
| Storage Tank                       | T4GBE    |                               |       |          |  |
| Cooling Tower                      | T7AKE    |                               |       |          |  |
| Portable Container Facility        | T7EME    |                               |       |          |  |
| Thermal Converter Stack            | T7IME    |                               |       |          |  |
| Lime Silo                          | T7IOE    |                               |       |          |  |
| Emergency Generator                | T7JJE    |                               |       |          |  |
| South Central Vent Stack           | T7XIE    |                               |       |          |  |
| MGH Vent Stack                     | T1GNE    |                               |       |          |  |
| Total Monthly Process Emissions    |          |                               |       |          |  |
|                                    |          | Monthly Process HAP Emissions |       |          |  |
|                                    | Emission |                               |       |          |  |
|                                    |          | Max                           |       |          |  |
| Emission Point Name                | Pt. ID   | lb/hr                         | Limit | lb/month |  |
| North Tank Farm Scrubber           | T2ERE    |                               |       |          |  |
| Storage Tank                       | T4GBE    |                               |       |          |  |
| Brine System Losses                | T7XIE    |                               |       |          |  |
| Portable Container Facility        | T7EME    |                               |       |          |  |
| Thermal Converter Stack - Process  | T7IME    |                               |       |          |  |
| Waste Acid Neutralization Tanks    | T7JDE    |                               |       |          |  |
| South Central Vent Stack - Process | T7XIE    |                               |       |          |  |
| Total Monthly Process Emissions    |          |                               |       |          |  |

**Monthly Maintenance Emissions** 

|                                     |          | Monthly Maintenance Emissions (lb) |     |    |  |
|-------------------------------------|----------|------------------------------------|-----|----|--|
|                                     | Emission |                                    |     |    |  |
| Emission Point Name                 | Pt. ID   | VOC                                | HCl | HF |  |
| Mixed Gas Holder                    | T1GNE    |                                    |     |    |  |
| No. 1 F22 Feed Pump                 | T1LHE    |                                    |     |    |  |
| No. 2 F22 Feed Pump                 | T1LIE    |                                    |     |    |  |
| North Tank Farm Scrubber            | T2ERE    |                                    |     |    |  |
| Toluene Storage Tank                | T4GBE    |                                    |     |    |  |
| Methanol Storage Tank               | T4GCE    |                                    |     |    |  |
| Thermal Converter Stack             | T7IME    |                                    |     |    |  |
| South Central Vent Stack            | T7XIE    |                                    |     |    |  |
| Total Monthly Maintenance Emissions |          |                                    |     |    |  |

# **ATTACHMENT E - Annual Emissions Annual Emissions - Running 12 Month Totals**

|  |                 | Process VOC Emissions (lb) |                           |                |               |
|--|-----------------|----------------------------|---------------------------|----------------|---------------|
|  | Emission        | Month-Year                 | Month-Year                |                | Permit        |
| Emission Point Name                              | Pt. ID          |                            |                           |                | Limit (TPY)   |
| No. 6 TFE Furnace - Combustion                   | T1CAE           |                            |                           |                |               |
| No. 7 TFE Furnace - Combustion                   | T1CBE           |                            |                           |                |               |
| No. 8 TFE Furnace - Combustion                   | T1CCE           |                            |                           |                |               |
| No. 9 TFE Furnace - Combustion                   | T1CDE           |                            |                           |                |               |
| MGH - Recycle Gas Dryers #1                     | T1DBE           |                            |                           |                |               |
| F22 Unloading                                    | T1JBE           |                            |                           |                |               |
| North Tank Farm Scrubber                         | T2ERE           |                            |                           |                |               |
| TFE-CO2 Loading (Local)                          | T2EXE           |                            |                           |                |               |
| TFE-CO2 Analyzer                                 | T2EYE           |                            |                           |                |               |
| T4 Area Storage Tank                             | T4GBE           |                            |                           |                |               |
| Portable Container Facility (Local)              | T7EME           |                            |                           |                |               |
| Thermal Converter                                | T7IME           |                            |                           |                |               |
| Emergency Generator                              | T7JJE           |                            |                           |                |               |
| South Central Vent Stack                         | T7XIE           |                            |                           |                |               |
| MGH Vent Stack                                   | T1GNE           |                            |                           |                |               |
| Total Process VOC Emissions (lb)                 |                 |                            |                           |                |               |
|  |                 |                            | Process SO <sub>2</sub> I | Emissions (lb) | Ė             |
|  | Emission        | Month-Year                 |                           | Month-Year     | Permit        |
| Emission Point Name                              | Pt. ID          | - Worth-Tear               | - Worth-Tear              | - Worth-Tear   | Limit (TPY)   |
| No. 6 TFE Furnace - Combustion                   | T1CAE           |                            |                           |                | Emme (11-1)   |
| No. 7 TFE Furnace - Combustion                   | T1CBE           |                            |                           |                |               |
| No. 8 TFE Furnace - Combustion                   | T1CCE           |                            |                           |                |               |
| No. 9 TFE Furnace - Combustion                   | T1CDE           |                            |                           |                |               |
| Thermal Converter                                | T7IME           |                            |                           |                |               |
| Emergency Generator                              | T7JJE           |                            |                           |                |               |
| Emergency concrator                              | 17002           |                            |                           | -              |               |
| Total Process SO <sub>2</sub> Emissions (lb)     |                 |                            |                           |                |               |
| Total 1 Toccss GO2 Ethissions (ib)               |                 | Ī                          | Droces NO I               | Emissians (lb) |               |
|  | Funicaion       | Manth Van                  | Process NO <sub>x</sub> I |                | Permit        |
| Emission Point Name                              | Emission Pt. ID | Month-Year                 | Month-Year                | Month-Year     | Limit (TPY)   |
| No. 6 TFE Furnace - Combustion                   | T1CAE           |                            |                           | <del></del>    | Lillill (1P1) |
| No. 7 TFE Furnace - Combustion                   | T1CAE           |                            |                           |                |               |
| No. 8 TFE Furnace - Combustion                   | T1CGE           |                            |                           |                |               |
|  | T1CDE           |                            |                           |                |               |
| No. 9 TFE Furnace - Combustion Thermal Converter | T7IME           |                            |                           |                |               |
| Emergency Generator                              | T7JJE           |                            |                           |                |               |
| Efficigency Generator                            | 1733            | 1                          | l .                       | 1              |               |
| Total Process NO <sub>x</sub> Emissions (lb)     |                 |                            |                           |                |               |
|  |                 | Process CO Emissions (lb)  |                           |                |               |
|  | Emission        | Month-Year                 | Month-Year                | Month-Year     | Permit        |
| <b>Emission Point Name</b>                       | Pt. ID          |                            |                           |                | Limit (TPY)   |
| No. 6 TFE Furnace - Combustion                   | T1CAE           |                            |                           |                |               |
| No. 7 TFE Furnace - Combustion                   | T1CBE           |                            |                           |                |               |
| No. 8 TFE Furnace - Combustion                   | T1CCE           |                            |                           |                |               |
| No. 9 TFE Furnace - Combustion                   | T1CDE           |                            |                           |                |               |
| Thermal Converter                                | T7IME           |                            |                           |                |               |
| Emergency Generator                              | T7JJE           |                            |                           |                |               |
| Total Process CO Emissions (III)                 |                 |                            |                           |                |               |
| Total Process CO Emissions (lb)                  |                 |                            |                           |                | <u> </u>      |

|   |          |            | Process PM <sub>10</sub> | Emissions (lb)   |             |
|---|----------|------------|--------------------------|------------------|-------------|
|   | Emission | Month-Year |                          | Month-Year       | Permit      |
| Emission Point Name                             | Pt. ID   |            |                          | <del>-</del>     | Limit (TPY) |
| No. 6 TFE Furnace - Combustion                  | T1CAE    |            |                          |                  |             |
| No. 7 TFE Furnace - Combustion                  | T1CBE    |            |                          |                  |             |
| No. 8 TFE Furnace - Combustion                  | T1CCE    |            |                          |                  |             |
| No. 9 TFE Furnace - Combustion                  | T1CDE    |            |                          |                  |             |
| Cooling Tower                                   | T7AKE    |            |                          |                  |             |
| Thermal Converter                               | T7IME    |            |                          |                  |             |
| Lime Silo                                       | T7IOE    |            |                          |                  |             |
| Emergency Generator                             | T7JJE    |            |                          |                  |             |
|   |          |            |                          |                  |             |
| Total Process PM <sub>10</sub> Emissions (lb)   |          |            |                          |                  |             |
|   | ļ        |            | Process HCI E            |                  |             |
|   | Emission | Month-Year | Month-Year               | Month-Year       | Permit      |
| Emission Point Name                             | Pt. ID   |            | <del>-</del>             |                  | Limit (TPY) |
| North Tank Farm Scrubber                        | T2ERE    |            |                          |                  |             |
| Thermal Converter Stack                         | T7IME    |            |                          |                  |             |
| Neutralization System Scrubber                  | T7JDE    |            |                          |                  |             |
| South Central Vent Stack                        | T7XIE    |            |                          |                  |             |
|   |          |            |                          |                  |             |
| Total Process HCI Emissions (lb)                |          |            |                          |                  |             |
|   |          |            | Process HF E             | missions (lb)    |             |
|   | Emission | Month-Year | Month-Year               | Month-Year       | Permit      |
| Emission Point Name                             | Pt. ID   |            |                          |                  | Limit (TPY) |
| Portable Container Facility                     | T7EME    |            |                          |                  |             |
| Thermal Converter Stack                         | T7IME    |            |                          |                  |             |
|   |          |            |                          |                  |             |
| Total Process HF Emissions (lb)                 |          |            |                          |                  |             |
|   |          |            |                          | hloride Emission |             |
|   | Emission | Month-Year | Month-Year               | Month-Year       | Permit      |
| Emission Point Name                             | Pt. ID   | -          |                          |                  | Limit (TPY) |
| Brine System Losses                             | T7XIE    |            |                          |                  |             |
| Thermal Converter Stack                         | T7IME    |            |                          |                  |             |
|   |          |            |                          |                  |             |
| Total Process Methylene Chloride Emissions (lb) | <u> </u> |            |                          |                  |             |
|   |          |            |                          | e Emissions (lb) |             |
|   | Emission | Month-Year | Month-Year               | Month-Year       | Permit      |
| Emission Point Name                             | Pt. ID   |            | -                        |                  | Limit (TPY) |
| Storage Tank                                    | T4GBE    |            |                          |                  |             |
| Thermal Converter Stack                         | T7IME    |            |                          |                  |             |
|   |          |            |                          |                  |             |
| Total Process Toluene Emissions (lb)            |          |            |                          |                  |             |

|              | Total Maintenance Emissions (lb) |            |                |                       |  |  |  |  |  |
|--------------|----------------------------------|------------|----------------|-----------------------|--|--|--|--|--|
| Pollutant    | Month-Year                       | Month-Year | Month-Year<br> | Permit<br>Limit (TPY) |  |  |  |  |  |
| VOC          |                                  |            |                |                       |  |  |  |  |  |
| HCI          |                                  |            |                |                       |  |  |  |  |  |
| HF           |                                  |            |                |                       |  |  |  |  |  |
| Methanol     |                                  |            |                |                       |  |  |  |  |  |
| Toluene      |                                  |            |                |                       |  |  |  |  |  |
| Acetonitrile |                                  |            |                |                       |  |  |  |  |  |

# **ATTACHMENT F - Furnace Log**

| Date | Furnace | Startup | Shutdown |
|------|---------|---------|----------|
|      |         |         |          |
|      |         |         |          |
|      |         |         |          |
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|      |         |         |          |
|      |         |         |          |

| No. 6 TFE Furnace - Process | T1CA |
|-----------------------------|------|
| No. 7 TFE Furnace - Process | T1CB |
| No. 8 TFE Furnace - Process | T1CC |
| No. 9 TFE Furnace - Process | T1CD |

### **ATTACHMENT G - Malfunction Log**

Date Equipment Malfunction Cause Duration Action Ibs. Preventing Corrective Emissions, Future Occurrences

# ATTACHMENT H - Odor Log

Date Cause Actions Taken

| Appendix E: R13-3223 Attachment A f | or the Fluoropolymer Production Area |
|-------------------------------------|--------------------------------------|
|-------------------------------------|--------------------------------------|

| Emission Point<br>Identification | Source<br>Identification | Source Description         | Control<br>Device | Service<br>(VOC/HAP/TAP) | Affected<br>R13 Permit | Included in<br>Original R21 |     | ently<br>ect to: | Other Applicable Regulations -<br>Citation<br>(MACT/BACT/NSPS/NESHAP |
|----------------------------------|--------------------------|----------------------------|-------------------|--------------------------|------------------------|-----------------------------|-----|------------------|--|
| identification                   | Identification           |                            | Identification    | (VOC/HAP/TAP)            | KIS FERIIII            | RACM Plan                   | R21 | R27              | etc.)  |
| C1-P Area                        | C1FW-3                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1-P Area                        | C1FW-4                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1-P Area                        | C1FW-5                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1-P Area                        | C1FW-6                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FQE                            | C1FW-3                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FQE                            | C1FW-4                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FQE                            | C1FW-5                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FQE                            | C1FW-6                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FWE                            | C1FW-1                   | Cylinder Deinventory       | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FWE                            | C1FW-2                   | Cylinder Change            | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FWE                            | C1FW-3                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FWE                            | C1FW-4                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FWE                            | C1FW-5                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1FWE                            | C1FW-6                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1GYE                            | C1FW-3                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1GYE                            | C1FW-4                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1GYE                            | C1FW-5                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1GYE                            | C1FW-6                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1XGE                            | C1FW-3                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1XGE                            | C1FW-4                   | System Deinventory         | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1XGE                            | C1FW-5                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C1XGE                            | C1FW-6                   | System Inventory           | None              | VOC                      | R13-2365               | No                          | Yes | No               |  |
| C2DAE                            | C2EC                     | Mix Tank                   | None              | VOC                      | R13-1953               | No                          | Yes | No               |  |
| C2EJE                            | C2DP                     | Ingred. System Maintenance | None              | VOC                      | R13-1953               | No                          | Yes | No               |  |
| C2EJE                            | C2DG                     | Reactor                    | None              | VOC                      | R13-1953               | Yes                         | Yes | No               |  |
| C2EJE                            | C2DR                     | Ingred. System Maintenance | None              | VOC                      | R13-1953               | No                          | Yes | No               |  |
| C2EJE                            | C2DX                     | Ingred. System Maintenance | None              | VOC                      | R13-1953               | No                          | Yes | No               |  |
| C2EJE                            | C2DY                     | Ingred. System Maintenance | None              | VOC                      | R13-1953               | No                          | Yes | No               |  |
| C2EJE                            | C2EE                     | Ingred. System Maintenance | None              | VOC                      | R13-1953               | No                          | Yes | No               |  |
| C2EFE                            | C2EF                     | Reactor                    | None              | VOC                      | R13-1953               | No                          | Yes | No               |  |

| Emission Point<br>Identification | Source<br>Identification | Source Description           | Control<br>Device | Service<br>(VOC/HAP/TAP) | Affected<br>R13 Permit | Included in<br>Original R21 |     | ently | Other Applicable Regulations -<br>Citation<br>(MACT/BACT/NSPS/NESHAP |
|----------------------------------|--------------------------|------------------------------|-------------------|--------------------------|------------------------|-----------------------------|-----|-------|--|
| Identification                   | Identification           |                              | Identification    | (VOC/HAP/TAP)            | KIS FERIIII            | RACM Plan                   | R21 | R27   | etc.)  |
| С2ЕЈЕ                            | C2EP-1                   | Ingred. System Maintenance   | None              | VOC                      | R13-1953               | No                          | Yes | No    |  |
| C3 Area                          | Section C                | Brine System - LDAR          | None              | TAP-M                    |                        | No                          | No  | Yes   | Consolidated with T Area Brine<br>System                             |
| C3HGE                            | СЗНІ                     | Reactor                      | None              | VOC                      | R13-2391               | Yes                         | Yes | No    |  |
| C3HGE                            | C3HI-1                   | Reactor Maintenance          | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| C3HGE                            | СЗНЈ                     | Distillation Column          | None              | VOC                      | R13-2391               | Yes                         | Yes | No    |  |
| C3HGE                            | C3HT-1                   | Tank Maintenance             | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| C3HGE                            | C3IH-1                   | Tank Maintenance             | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| C3HGE                            | C3IK-1                   | Tank Maintenance             | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| C3HGE                            | C3IL-1                   | Tank Maintenance             | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| СЗНРЕ                            | C3HA-1                   | Scrubber Maintenance         | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| СЗНРЕ                            | C3HB-1                   | Scrubber Maintenance         | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| СЗНРЕ                            | C3HN-1                   | Tank Maintenance             | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| СЗНРЕ                            | СЗНО                     | Reactor                      | None              | VOC                      | R13-2391               | Yes                         | Yes | No    |  |
| СЗНРЕ                            | С3НО-1                   | Reactor Maintenance          | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| СЗНРЕ                            | C3HS-1                   | Tank Maintenance             | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| СЗНРЕ                            | C3ID-1                   | Tank Maintenance             | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| СЗНРЕ                            | C3IT                     | Tank Maintenance             | None              | VOC                      | R13-2391               | No                          | Yes | No    |  |
| CDRE                             | System                   | System Inventory             | None              | VOC                      |                        | No                          | Yes | No    |  |
| T Area                           | Section T                | Brine System - LDAR          | None              | TAP-M                    | R13-1823               | No                          | No  | Yes   | 40 CFR 63.2346 (OLD MACT)  |
| T1GNE                            | T1GN                     | Accumulator Maintenance      | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T4GBE                            | T4GB                     | Tank Maintenance             | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T4GME                            | T4GM                     | Column Maintenance           | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| Т5НСЕ                            | T5HC                     | Reactor                      | None              | VOC                      | R13-1353               | Yes                         | Yes | No    |  |
| T5HDE                            | T5HD                     | Reactor                      | None              | VOC                      | R13-1353               | Yes                         | Yes | No    |  |
| T6IUE                            | Т5НМ                     | Monomer System               | None              | VOC                      | R13-1353               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| Т5НСЕ                            | T5HN                     | Monomer System               | None              | VOC                      | R13-1353               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T7XIE                            | T5HP                     | Salt Tanks                   | None              | VOC                      | R13-1353               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| Т5НТЕ                            | Т5НТ                     | Refrigerated Monomer Storage | None              | VOC                      | R13-1353               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |

| Emission Point<br>Identification | Source<br>Identification | Source Description           | Control<br>Device | Service<br>(VOC/HAP/TAP) | Affected<br>R13 Permit | Included in<br>Original R21 |     | ently | Other Applicable Regulations -<br>Citation<br>(MACT/BACT/NSPS/NESHAP |
|----------------------------------|--------------------------|------------------------------|-------------------|--------------------------|------------------------|-----------------------------|-----|-------|--|
|                                  | Tuentmenton              |                              | Identification    | (, ochmu, 1111)          | Tero r er mit          | RACM Plan                   | R21 | R27   | etc.)  |
| T5HUE                            | T5HU                     | Refrigerated Monomer Storage | None              | VOC                      | R13-1353               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T5HVE                            | T5HV                     | Refrigerated Monomer Storage | None              | VOC                      | R13-1353               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| Т5НСЕ                            | T5HW                     | Weigh Tanks                  | None              | VOC                      | R13-1353               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T5HDE                            | T5HX                     | Weigh Tanks                  | None              | VOC                      | R13-1353               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T6IBE                            | T6IB                     | Reactor                      | None              | VOC                      | R13-0815               | Yes                         | Yes | No    |  |
| T6IBE                            | T6IL-1                   | Ingred. Tank Maintenance     | None              | VOC                      | R13-0815               | No                          | Yes | No    |  |
| T6ICE                            | T6IC                     | Reactor                      | None              | VOC                      | R13-0815               | Yes                         | Yes | No    |  |
| T6ICE                            | T6IJ-1                   | Ingred. Tank Maintenance     | None              | VOC                      | R13-0815               | No                          | Yes | No    |  |
| T6IDE                            | T6ID                     | Reactor                      | None              | VOC                      | R13-0815               | Yes                         | Yes | No    |  |
| T6IDE                            | T6IK-1                   | Ingred. Tank Maintenance     | None              | VOC                      | R13-0815               | No                          | Yes | No    |  |
| T6IDE                            | T6PB-1                   | Ingred. Tank Maintenance     | None              | VOC                      | R13-0815               | No                          | Yes | No    |  |
| T6IDE                            | T6PI-1                   | Ingred. Tank Maintenance     | None              | VOC                      | R13-0815               | No                          | Yes | No    |  |
| T6IDE                            | T6PJ-1                   | Ingred. Tank Maintenance     | None              | VOC                      | R13-0815               | No                          | Yes | No    |  |
| T6PGE                            | T6PG                     | Process Tank                 | None              | VOC                      | R13-0815               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T6PGE                            | Т6РН                     | Process Tank                 | None              | VOC                      | R13-0815               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| Area                             | Т6РТ                     | Decanter                     | None              | VOC                      | R13-0815               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T6IBE                            | T6QJ                     | Salt Tank                    | None              | VOC                      | R13-0815               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T6ICE                            | T6QK                     | Salt Tank                    | None              | VOC                      | R13-0815               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T6IDE                            | T6QL                     | Salt Tank                    | None              | VOC                      | R13-0815               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T6IUE                            | T6QM                     | Salt Tank                    | None              | VOC                      | R13-0815               | No                          | Yes | No    | Intermittent maintenance emissions only.                             |
| T6IUE                            | T6IL-1                   | Ingred. Tank Maintenance     | None              | VOC                      | R13-0815               | No                          | Yes | No    |  |
| T6IUE                            | T6IU                     | Reactor                      | None              | VOC                      | R13-0815               | No                          | Yes | No    |  |
| T7IME                            | C1GH                     | Ingred. System S/U           | T7IMC             | VOC                      | R13-2365               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                                 |
| T7IME                            | T1BW                     | Acid Absorber                | T7IMC             | VOC                      | R13-1823               | Yes                         | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                                 |

| Emission Point<br>Identification | Source<br>Identification | Source Description                | Control<br>Device | Service<br>(VOC/HAP/TAP) | Affected<br>R13 Permit | Included in<br>Original R21 |     | ently | Other Applicable Regulations - Citation (MACT/BACT/NSPS/NESHAP |
|----------------------------------|--------------------------|-----------------------------------|-------------------|--------------------------|------------------------|-----------------------------|-----|-------|--|
| Identification                   | Identification           |                                   | Identification    | (VOC/MAI/TAI)            | K13 1 et illit         | RACM Plan                   | R21 | R27   | etc.)  |
| T7IME                            | T1BX                     | Acid Absorber                     | T7IMC             | VOC                      | R13-1823               | Yes                         | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1CV                     | Dryer Maintenance                 | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1DD                     | New Cooler Maintenance            | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | TIDE                     | New Cooler Maintenance            | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1DF                     | New Cooler Maintenance            | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1DG                     | Bag Filter Maintenance            | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1DH                     | Bag Filter Maintenance            | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1DU                     | High Press. Piping<br>Maintenance | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1XA                     | New Compressor Maintenance        | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1XC                     | Acid Absorber                     | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1XD                     | New Column Maintenance            | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1XG                     | New Column Maintenance            | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T1XO                     | New Column Maintenance            | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T2EB                     | Monomer Purification              | T7IMC             |                          |                        | Yes                         |     |       | Removed from Service (Note #4)                                 |
| T7IME                            | T4GA                     | Column                            | T7IMC             | VOC                      | R13-1823               | Yes                         | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T4GO                     | Column Maintenance                | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7IME                            | T4XK                     | New Column (replaced TFL)         | T7IMC             | VOC                      | R13-1823               | No                          | Yes | No    | 45 CSR 18, 40 CFR 60 Subpart<br>DDDD                           |
| T7XIE                            | T1BB                     | Compressor Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BC                     | Compressor Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BD                     | Compressor Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BE                     | Air Cooler Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BF                     | Air Cooler Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BG                     | Air Cooler Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BH                     | Air Cooler Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |

West Virginia Department of Environmental Protection • Division of Air Quality Approved: October 1, 2021 • Modified: May 21, 2024 Draft/Proposed

| Emission Point<br>Identification | Source<br>Identification | Source Description                | Control<br>Device | Service<br>(VOC/HAP/TAP) | Affected<br>R13 Permit | Included in<br>Original R21 |     | ently | Other Applicable Regulations - Citation (MACT/BACT/NSPS/NESHAP |
|----------------------------------|--------------------------|-----------------------------------|-------------------|--------------------------|------------------------|-----------------------------|-----|-------|--|
| identification                   | Identification           |                                   | Identification    | (VOC/HAI/TAI)            | KIS Fermit             | RACM Plan                   | R21 | R27   | etc.)  |
| T7XIE                            | T1BI                     | Air Cooler Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BJ                     | Air Cooler Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BO-1                   | #2 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BO-2                   | #2 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BP-1                   | #1 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BP-2                   | #1 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BR-1                   | #3 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BR-2                   | #3 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BS-1                   | #4 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BS-2                   | #4 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BT-1                   | #5 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1BT-2                   | #5 Tank Maintenance               | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1CB                     | Furnance Maintenance #7           | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1CC                     | Furnance Maintenance #8           | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1CD                     | Furnance Maintenance #9           | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1CW                     | Emergency Storage Tank<br>Maint.  | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1DS                     | Tank Maintenance                  | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1DT                     | Intercooler Maintenance           | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1DU                     | High Press. Piping<br>Maintenance | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1EE                     | On-Line Analyzer<br>Maintenance   | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1EV                     | Furnance Maintenance #6           | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1OU                     | New Column Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1XA                     | New Compressor Maintenance        | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1XD                     | New Column Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T1XG                     | New Column Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T2XJ                     | New Column Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T2XM                     | New Column Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T2XN                     | New Column Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |
| T7XIE                            | T2XS                     | New Column Maintenance            | None              | VOC                      | R13-1823               | No                          | Yes | No    |  |

| Emission Point<br>Identification | Source<br>Identification | Source Description       | Control<br>Device | Service<br>(VOC/HAP/TAP) | Affected<br>R13 Permit | Included in<br>Original R21 |     | ently<br>ect to: | Other Applicable Regulations -<br>Citation<br>(MACT/BACT/NSPS/NESHAP |
|----------------------------------|--------------------------|--------------------------|-------------------|--------------------------|------------------------|-----------------------------|-----|------------------|--|
|                                  |                          |                          | Identification    | ,                        |                        | RACM Plan                   | R21 | R27              | etc.)  |
| T7XIE                            | T2XV                     | New Column Maintenance   | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T3FB                     | New Cooler Maintenance   | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GO                     | Tank Maintenance         | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GP                     | Tank Maintenance         | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GQ                     | Tank Maintenance         | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GS                     | Tank Maintenance         | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GT                     | Extract Col. Maintenance | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GU                     | Column Maintenance       | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GV                     | Ingred. Tank Maintenance | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GW                     | Ingred. Tank Maintenance | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4GX                     | Ingred. Tank Maintenance | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4KA                     | Ingred. Tank Maintenance | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4KB                     | Container Maintenance    | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4KC                     | Container Maintenance    | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4KD                     | Container Maintenance    | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| T7XIE                            | T4XK                     | New Column Maintenance   | None              | VOC                      | R13-1823               | No                          | Yes | No               |  |
| TAAE                             | T7AA                     | Brine System Tank        | None              | TAP-M                    | R13-1823               | No                          | No  | Yes              | 40 CFR 63.2346 (OLD MACT)  |

Note #1 - Formaldehyde (TAP-F) does not qualify as a MACT Wastewater under any Standard.

Note #2 - MON MACT has a process vent definition cut-off at 50 ppm. Below this there are no controls since it is not considered to be a process vent.

Note #3 - The WWTP located at Washington Works does not receive any Group 1 Streams as defined by the rule. Hence the applicability of 40 CFR 63.135 and 40 CFR 63.145 are very, very limited.

Note #4 – The Affected R13 Permit refers to the most current version of that Permit.

Appendix F: R13-3645 Attachment (C4 Area)

#### **ATTACHMENT A – MONTHLY EMISSIONS**

Chemours Washington Works – Area (C4) – Permit R13-3645

#### Current Month:

| Emission | Equipment ID        | VOC     |          | ODC     |          | <u>PM<sub>10</sub></u> |                 | Н       | F        | Total HAPs |                 |
|----------|---------------------|---------|----------|---------|----------|------------------------|-----------------|---------|----------|------------|-----------------|
| Point ID |                     | max pph | lb/month | max pph | lb/month | max pph                | <u>lb/month</u> | max pph | lb/month | max pph    | <u>lb/month</u> |
| C4AAE    | C4AA Resin Hopper   |         |          |         |          |                        |                 |         |          |            |                 |
| C4AAE    | C4AB Reclaim Hopper |         |          |         |          |                        |                 |         |          |            |                 |
| C4ACE    | C4AC Extruder       |         |          |         |          |                        |                 |         |          |            |                 |
| C4ACE    | C4AD Treater        |         |          |         |          |                        |                 |         |          |            |                 |
| C4AEE    | C4AE Cleaner        |         |          |         |          |                        |                 |         |          |            |                 |