

West Virginia Department of Environmental Protection

Harold D. Ward
Cabinet Secretary

Title V Operating Permit Revision

For Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Action Number: MM05 **SIC:** 2821
Name of Permittee: Celanese Polymer Products, LLC
Facility Name/Location: Washington Works
County: Wood County
Permittee Mailing Address: P.O. Box 2600, Washington, WV 26181-2600

Description of Permit Revision: This permit revision includes the changes made under R13-3574A which clarify that the Company is a minor source of Hazardous Air Pollutants (HAPs).

Title V Permit Information:

Permit Number: R30-10700208-2021 (8 of 14)
Issued Date: February 22, 2021
Effective Date: March 08, 2021
Expiration Date: February 22, 2026

Directions To Facility: From I-77, take Exit 176 to U.S. Route 50W toward Athens, Ohio. At the last exit prior to the bridge, exit from Route 50 Bypass onto DuPont Road (Route 892). At the light, turn left onto DuPont Road. Approximately one mile from the turn, the facility is on the right.

THIS PERMIT REVISION IS ISSUED IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL ACT (W.VA. CODE §§ 22-5-1 ET SEQ.) AND 45CSR30 - "REQUIREMENTS FOR OPERATING PERMITS." THE PERMITTEE IDENTIFIED AT THE FACILITY ABOVE IS AUTHORIZED TO OPERATE THE STATIONARY SOURCES OF AIR POLLUTANTS IDENTIFIED HEREIN IN ACCORDANCE WITH ALL TERMS AND CONDITIONS OF THIS PERMIT.

Laura M. Crowder

Laura M. Crowder

Digitally signed by: Laura M. Crowder
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Laura M. Crowder
Director, Division of Air Quality

March 21, 2025

Date Issued

Permit Number: **R30-10700208-2021 (8 of 14)**
Permittee: ~~DuPont~~ Celanese Polymer Products, LLC
Facility Name: **Washington Works**
Business Unit: **Specialty Compounding Division**
Mailing Address: **P.O. Box 2600, Washington, WV 26181-2600**

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
Mailing Address:	P. O. Box 2600, Washington, WV 26181-2600
Telephone Number:	(304) 863-4240
Type of Business Entity:	Corporation
Facility Description:	Production of polymer blends and mixtures
SIC Codes:	2821
UTM Coordinates:	442.27km Easting • 4,346.57 km Northing • Zone 17

Permit Writer: Beena Modi

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 Point ID	Control Device	Emission Unit ID	Emission Unit Description	Year Installed
S293-E-01A	S293-C-01A Bag Filter	S293-S-01A	Bulk Storage Silo	1991
S293-E-01B	S293-C-01B Bag Filter	S293-S-01B	Bulk Storage Silo	1991
S293-E-01C	S293-C-01C Bag Filter	S293-S-01C	Bulk Storage Silo	1991
S293-E-01D	S293-C-01D Bag Filter	S293-S-01D	Bulk Storage Silo	1991
S293-E-01E	S293-C-01E Bag Filter	S293-S-01E	Bulk Storage Silo	1991
S293-E-01F	S293-C-01F Bag Filter	S293-S-01F	Bulk Storage Silo	2023
S293-E-02A	None	S293-S-02A	SA Extruder – Vacuum Port	1991
S293-E-03A	S293-C-03A Wet Venturi Scrubber	S293-S-02A	SA Extruder Die	1991 and 2018
S293-E-02B	None	S293-S-02B	SB Extruder – Vacuum Port	1991
S293-E-03B	S293-C-03B Wet Venturi Scrubber	S293-S-02B	SB Extruder Die	1991 and 2016
S293-E-02C	None	S293-S-02C	SC Extruder – Vacuum Port	1991
S293-E-03C	S293-C-03C Wet Venturi Scrubber	S293-S-02C	SC Extruder Die	1991 and 2019
S293-E-02D	None	S293-S-02D	SD Extruder – Vacuum Port	1991
S293-E-03D	S293-C-03D Wet Venturi Scrubber	S293-S-02D	SD Extruder Die	1991 and 2015
S293-E-02E	None	S293-S-02E	SE Extruder – Vacuum Port	2021
S293-E-03E	S293-C-03E Wet Venturi Scrubber	S293-S-02E	SE Extruder Die	2021
S293-E-02F	None	S293-S-02F	SF Extruder – Vacuum Port	1995

Emission Point ID	Control Device	Emission Unit ID	Emission Unit Description	Year Installed
S293-E-03F	S293-C-03F Wet Venturi Scrubber	S293-S-02F	SF Extruder Die	1995 and 2013
S293-E-04A	S293-C-04A Cyclone Separator	S293-S-03A	Screen SA	2015
		S293-S-14A	Receiver Bin SA	1991
	None	S293-S-10A	Extruder Pelletizer	2015
S293-E-04B	S293-C-04B Cyclone Separator	S293-S-03B	Screen SB	2015
	None	S293-S-14B	Receiver Bin SB	1991
	None	S293-S-10B	Extruder Pelletizer	2015
S293-E-04C	S293-C-04C Cyclone Separator	S293-S-03C	Screen SC	2015
		S293-S-14C	Receiver Bin SC	1991
	None	S293-S-10C	Extruder Pelletizer	2015
S293-E-04D	S293-C-04D Cyclone Separator	S293-S-03D	Screen SD	2015
	None	S293-S-14D	Receiver Bin SD	1991
	None	S293-S-10D	Extruder Pelletizer	2015
S293-E-04E	S293-C-04E Cyclone Separator	S293-S-03E	Screen SE	2021
	None	S293-S-14E	Receiver Bin SE	2021
	None	S293-S-10E	Extruder Pelletizer	2021
S293-E-04F	S293-C-04F Cyclone Separator	S293-S-03F	Screen SF	2015
	None	S293-S-14F	Receiver Bin SF	1995
	None	S293-S-10F	Extruder Pelletizer	2015
S293-E-05A	None	S293-S-04A	Impact Separator SA	1991
S293-E-05B	None	S293-S-04B	Impact Separator SB	1991
S293-E-05C	None	S293-S-04C	Impact Separator SC	1991
S293-E-05D	None	S293-S-04D	Impact Separator SD	1991
S293-E-05E	None	S293-S-04E	Impact Separator SE	2021
S293-E-05F	None	S293-S-04F	Impact Separator SF	1995
S293-E-06A	None	S293-S-06A	SA Quench Unit	1991
		S293-S-07A	SA Plop Buggy	2011

Emission Point ID	Control Device	Emission Unit ID	Emission Unit Description	Year Installed
S293-E-06B	None	S293-S-06B	SB Quench Unit	1991
		S293-S-07B	SB Plop Buggy	2011
S293-E-06C	None	S293-S-06C	SC Quench Unit	1991
		S293-S-07C	SC Plop Buggy	2011
S293-E-06D	None	S293-S-06D	SD Quench Unit	1991
		S293-S-07D	SD Plop Buggy	2011
S293-E-06E	None	S293-S-06E	SE Quench Unit	2021
		S293-S-07E	SE Plop Buggy	2021
S293-E-06F	None	S293-S-06F	SF Quench Unit	1995
		S293-S-07F	SF Plop Buggy	2011
S293-E-042	None	S293-S-070	Dinamec® Oven	1996
S293-E-049 General Area	S293-C-031 Baghouse #1	S293-S-038	Area Hoods	1991
S293-E-049 General Area	S293-C-031 Baghouse #1	S293-S-078	Miscellaneous Hoods	1991
S293-E-050	S293-C-050 Baghouse #2	S293-S-075	Blend Scales	1999
		S293-S-077	Tornado Mill	1999
S293-E-066	None	S293-S-066	Cold Solvent Cleaner	1991
S293-E-067	None	S293-S-067	Rework Conveyor	2006
S293-E-068	None	S293-S-068	Packaging Transfer Station	2006
S293-E-060	None	S293-S-060	Hot Water Generator, Natural gas fired, 0.40 MM Btu/hr	2019
S293-E-061	None	S293-S-061	Hot Water Generator, Natural gas fired, 0.40 MM Btu/hr	2019
S293-E-062	None	S293-S-062	Hot Water Generator, Natural gas fired, 0.40 MM Btu/hr	2019
S293-E-079	None	S293-S-079	Bushing Shucker	1991

1.2. Active R13, R14, and R19 Permits

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

Permit Number	Date of Issuance
R13-1533P	December 5, 2023
R13-3574A	September 26, 2022 August 14, 2024

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 Standards
CBI	Confidential Business Information	PM	Particulate Matter
CEM	Continuous Emission Monitor	PM₁₀	Particulate Matter less than 10µm in diameter
CES	Certified Emission Statement	pph	Pounds per Hour
C.F.R. or CFR	Code of Federal Regulations	ppm	Parts per Million
CO	Carbon Monoxide	PSD	Prevention of Significant Deterioration
C.S.R. or CSR	Codes of State Rules	psi	Pounds per Square Inch
DAQ	Division of Air Quality	SIC	Standard Industrial Classification
DEP	Department of Environmental Protection	SIP	State Implementation Plan
FOIA	Freedom of Information Act	SO₂	Sulfur Dioxide
HAP	Hazardous Air Pollutant	TAP	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	TPY	Tons per Year
HP	Horsepower	TRS	Total Reduced Sulfur
lbs/hr or lb/hr	Pounds per Hour	TSP	Total Suspended Particulate
LDAR	Leak Detection and Repair	USEPA	United States Environmental Protection Agency
m	Thousand	UTM	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	VEE	Visual Emissions Evaluation
mm	Million	VOC	Volatile Organic Compounds
mmBtu/hr	Million British Thermal Units per Hour		
mmft³/hr or mmcf/hr	Million Cubic Feet Burned per Hour		
NA or N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
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:
- 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.
 - 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.
 - 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.
 - 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:
- 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
 - 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)(145)]
- 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:
- 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.
 - 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.
 - Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

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

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

[40 C.F.R. 68]

- 3.1.9. The 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 R13-3574.

Note: For the Specialty Compounding Division, the affected permit is R13-1533 and the R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B, and the hourly and annual emission limits for the affected sources are provided in 4.1.1.

[45CSR13, R13-3574, 4.1.1]

- 3.1.10. The permitted sources identified in Attachment A of R13-3574 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 Attachment A of R13-3574, are also demonstrated. The applicable requirements set forth by 45CSR21 shall include, but not be limited to, the following: **[45CSR13, R13-3574, 4.1.2]**

3.1.10.1. The permittee shall maintain the aggregated hourly and annual VOC control efficiency of 90% or greater, on a site-wide basis, for all existing sources listed or required to be listed as part of the original facility-wide Reasonably Available Control Measures (RACM) plan, as identified in Attachment A of R13-3574. **[45CSR13, R13-3574, 4.1.2.1; 45CSR§21-40.3.a.1 (State-Enforceable only)]**

3.1.10.2. On or after May 1, 1996, construction or modification of any emission source resulting in a maximum theoretical emissions (MTE) of VOCs equaling or exceeding six (6) pounds per hour and not listed or required to be listed in the facility-wide RACM plan shall require the prior approval by the Director of an emission control plan that meets the definition of reasonable available control technology (RACT) on a case-by-case basis for both fugitive and non-fugitive VOC emissions from such source. All sources constructed or modified on or after May 1, 1996 shall be subject to the following: **[45CSR13, R13-3574, 4.1.2.2; 45CSR§21-40.3.c (State-Enforceable only)]**

a. The RACT control plan(s) shall be embodied in a permit in accordance to 45CSR13. **[45CSR13, R13-3574, 4.1.2.2.a; 45CSR§21-40.4.e (State-Enforceable only)]**

b. The MTE and associated emission reductions of the constructed or modified source will not be calculated into the site-wide aggregate hourly and annual emissions reduction requirements set forth in Section 3.1.10.1. **[45CSR13, R13-3574, 4.1.2.2.b]**

3.1.10.3. If a modification to an existing source with current MTE below the threshold of six (6) pounds per hour of VOCs causes an increase in the MTE that results in the source exceeding the six (6) pounds per hour threshold for the first time, the source shall be subject to RACT in accordance to Section 3.1.10.2. **[45CSR13, R13-3574, 4.1.2.3; 45CSR§21-40.3.c (State-Enforceable only)]**

3.1.10.4. Physical changes to or changes in the method of operation of an existing emission source listed or required to be listed as part of the facility-wide RACM plan, that results in an increase in VOC emissions of any amount, shall require the prior approval by the Director of an emission control plan that meets the definition of RACT on a case-by-case basis for both fugitive and non-fugitive VOC emissions from the source. All sources modified on or after May 1, 1996 shall be subject to the following; **[45CSR13, R13-3574, 4.1.2.4; 45CSR§21-40.3.c (State-Enforceable only)]**

- a. The RACT control plan (s) shall be embodied in a permit in accordance to 45CSR13. **[45CSR13, R13-3574, 4.1.2.4.a; 45CSR§21-40.4.e (State-Enforceable only)]**
- b. The facility-wide RACM plan shall be modified to include the RACT analysis conducted on the modified source(s). **[45CSR13, R13-3574, 4.1.2.4.b]**
- c. The MTE and associated emission reductions of the modified source shall be recalculated as part of the site-wide aggregate hourly and annual emissions reduction requirements to demonstrate compliance with the minimum 90% reduction rate as set forth in 3.1.10.1 of this permit. **[45CSR13, R13-3574, 4.1.2.4.c]**

3.1.10.5. In the event the facility-wide RACM plan is modified to delete an existing emission source, and any associated pollution control equipment, due to the source being permanently removed from service or reassigned to service not subject to the requirements of 45CSR§21-40, the MTE shall be recalculated to demonstrate that the 90% facility-wide VOC reduction requirement set forth in Section 3.1.10.1 is still being met. In the event such a modification results in the site-wide aggregate hourly and annual emissions reduction being recalculated to a rate less than 90%, the RACM plan shall be revised to include all new and/or modified sources and their associated control technologies constructed on or after May 1, 1996, in order to meet the requirements set forth in 3.1.10.1. **[45CSR13, R13-3574, 4.1.2.5]**

3.1.10.6. In the event a source and associated emission point identified in Attachment A of R13-3574 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 R13-3574. **[45CSR13, R13-3574, 4.1.2.6]**

Note: For the Specialty Compounding Division, the affected permit is R13-1533 and the R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

- 3.1.11. The permitted sources identified in Attachment A of R13-3574 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 Attachment A of R13-3574 are also demonstrated. The applicable requirements set forth by 45CSR27 shall include, but not be limited to, the following: **[45CSR13, R13-3574, 4.1.3]**

3.1.11.1. The permittee shall employ the best available technology (BAT) for the purpose of reducing toxic air pollutants (TAP) associated with the applicable sources and emission points identified in Attachment A of R13-3574. **[45CSR13, R13-3574, 4.1.3.1; 45CSR§27-3.1 (State-Enforceable only)]**

3.1.11.2. The permittee shall employ BAT for the purpose of preventing and controlling fugitive emissions of TAP to the atmosphere as a result of routing leakage from those sources and their associated equipment identified in Attachment A of R13-3574 as operating in TAP service. **[45CSR13, R13-3574, 4.1.3.2; 45CSR§27-4.1 (State-Enforceable only)]**

Note: For the Specialty Compounding Division, the affected permit is R13-1533 and the R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

3.1.12. In the event a source and associated emission point identified in Attachment A of R13-3574 are subject to the MACT standards of 40 C.F.R. 63, then compliance with the applicable MACT requirements identified in the affected 45CSR13 permit shall demonstrate compliance with the BAT requirements set forth in 3.1.11.

Note: For the Specialty Compounding Division, the affected permit is R13-1533 and the R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

[45CSR13, R13-3574, 4.1.4; 45CSR§27-3.1 (State-Enforceable only)]

3.1.13. The permittee shall maintain total Hazardous Air Pollutant (HAP) emissions below 25 tons per year combined or 10 tons per year of any single HAP.
[45CSR13, R13-3574, 4.1.6]

3.2. Monitoring Requirements

3.2.1. 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 Attachment A of R13-3574 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 R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

[45CSR13, R13-3574, 4.2.1; 45CSR§21-40.3.a.2 (State-Enforceable only)]

3.2.2. The permittee shall implement and maintain a LDAR program for the applicable sources and emission points identified in Attachment A of R13-3574 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 R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

[45CSR13, R13-3574, 4.2.2; 45CSR§27-4.1 (State-Enforceable only)]

- 3.2.3. In the event a source and associated emission point identified in Attachment A of R13-3574 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 Specialty Compounding Division, the affected permit is R13-1533 and the R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

[45CSR13, R13-3574, 4.2.3; 45CSR§21-37.1.c (State-Enforceable only); 45CSR§27-4.1 (State-Enforceable only)]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary’s delegated authority and any established equivalency determination methods which are applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5 as applicable.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the

Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

- d. The permittee shall submit a report of the results of the stack test within 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)(145-156) and 45CSR13]

- 3.3.2. 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, R13-3574, 4.3.1; 45CSR§21-40.3.a.2 (State-Enforceable only)]**
- 3.3.3. In the event a source and associated emission point identified in Attachment A of R13-3574 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 Specialty Compounding Division, the affected permit is R13-1533 and the R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

[45CSR13, R13-3574, 4.3.2; 45CSR§21-37.1.c (State-Enforceable only); 45CSR§27-4.1 (State-Enforceable only)]

3.4. Recordkeeping Requirements

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

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

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-1533, 4.4.1 and R13-3574, 4.4.1]

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

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

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

- 3.4.4. Unless granted a variance pursuant to 45CSR§21-9.3, or as approved by the Director as part of a required Start-up, Shutdown, and Malfunction (SSM) Plan mandated under 40 C.F.R. §63.6(e) or another applicable Section of 40 C.F.R. 63, the owner or operator of the facility shall operate all emission control equipment listed in Attachment A of R13-3574 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 Specialty Compounding Division, the affected permit is R13-1533 and the R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

[45CSR13, R13-3574, 4.4.4]

- 3.4.5. 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 Attachment A of R13-3574.

Note: For the Specialty Compounding Division, the affected permit is R13-1533 and the R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

[45CSR13, R13-3574, 4.4.5]

- 3.4.6. **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, R13-3574, 4.4.2]**
- 3.4.7. **Records of Malfunctions of Air Pollution Control Equipment.** For all air emissions control devices listed in Section 1.0, the permittee shall keep accurate records of the occurrence and duration of malfunctions and other operational shutdowns of the air pollution control equipment which result in excess emissions.

For each such case, the following information must be recorded:

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

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

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

These records may be maintained electronically or in hard copy form, and shall be made available for review upon request of the Director or his duly authorized representative. **[45CSR13, R13-3574, 4.4.3]**

~~3.4.8. Your site remediation activities are not subject to the requirements of 40 C.F.R. 63, Subpart GGGGG, except for the recordkeeping requirements in this paragraph, provided that you meet the requirements specified in paragraphs (c)(1) through (c)(3) of this section.~~

~~3.4.8.1. You determine that the total quantity of the HAP listed in Table 1 of 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 mega gram (Mg) annual. 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.~~

~~3.4.8.2. You must prepare and maintain at your facility written documentation to support your determination that the total HAP quantity in your remediation materials for the year is less than 1 Mg. The documentation must include a description of your methodology and data used for determining the total HAP content of the remediation material.~~

~~3.4.8.3. Your Title V permit does not have to be reopened or revised solely to include the recordkeeping requirement specified in 3.4.8.2. However, the requirement must be included in your permit the next time the permit is renewed, reopened, or revised for another reason.~~

~~**[45CSR34; 40 C.F.R. §63.7881(c)]**~~

3.4.8. The permittee shall maintain the site-wide Hazardous Air Pollutant (HAP) emissions records in accordance with condition 3.1.13 on a twelve (12) month rolling total. These records shall be made available for inspection upon request of the Secretary in accordance with Section 2.0 and shall be maintained in accordance with Section 3.0.
[45CSR13, R13-3574, 4.4.6]

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, or 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:

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

US EPA:

Section Chief
 U. S. Environmental Protection Agency, Region III
 Enforcement and Compliance Assurance Division
 Air, RCRA, and Toxics Branch (3ED21)
 Four Penn Center
 1600 John F. Kennedy Boulevard
 Philadelphia, PA 19103-2852

DAQ Compliance and Enforcement¹:

DEPAirQualityReports@wv.gov

¹For 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:

DEPAirQualityReports@wv.gov

US EPA:

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. 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 Attachment A of R13-3574 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 R13-3574 Attachment A listing for only those sources in the Specialty Compounding Division is provided in APPENDIX B.

[45CSR13, R13-3574, 4.5.1; 45CSR§21-40.4.c.1. State-Enforceable Only]

3.6. Compliance Plan

- 3.6.1. None.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- a. 40 C.F.R. 60, Subpart K - “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.” There are no petroleum liquid storage tanks in the Specialty Compounding Division.
 - b. 40 C.F.R. 60, Subpart Ka - “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.” There are no petroleum liquid storage tanks in the Specialty Compounding Division.
 - c. 40 C.F.R. 60, Subpart Kb - “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.” There are no volatile organic liquid storage tanks in the Specialty Compounding Division.
 - d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.” The Specialty Compounding Division does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.

- e. 40 C.F.R. 60, Subpart VVa – “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.” The Specialty Compounding Division does not produce any intermediates or final products any of the materials listed in 40 C.F.R. §60.489a.
- f. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” The Specialty Compounding Division does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- 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 Specialty Compounding Division does not produce 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 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Specialty Compounding Division.
- i. 40 C.F.R. 63, Subpart F – “National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- j. 40 C.F.R. 63, Subpart G – “National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- k. 40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- l. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations.” The Specialty Compounding Division does not receive off-site materials as specified in paragraph 40 C.F.R. §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §§63.680(a)(2)(i) through (a)(2)(vi).
- m. 40 C.F.R. 63, Subpart YY – “National Emission Standards for Hazardous Air Pollutant for Source Categories: Generic Maximum Achievable Control Technology Standards.” The Specialty Compounding Division is not one of the source categories and affected sources specified in 40 C.F.R. §§63.1103(a) through (h).
- n. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” The Specialty Compounding Division does not produce the materials listed in 40 C.F.R. §63.1310.

- o. 40 C.F.R. 63, Subpart JJJJJJ – “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.” Under Subpart JJJJJJ, gas-fired boilers are exempt from this regulation. Specialty Compounding Division’s hot water generators are considered gas-fired boilers.
- op. 40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline).” The Specialty Compounding Division does not operate an organic liquids distribution (OLD) operation or does not handle material organic liquids as defined in §63.2406.
- oq. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” The Specialty Compounding Division does not produce an intermediate or final product that meets the definition of a “surface coated” plastic part.
- or. 40 C.F.R. 63, Subpart WWWW - “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Specialty Compounding Division does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- os. 40 C.F.R. 63, Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines.” The Specialty Compounding Division does not have a stationary Reciprocating Internal Combustion Engine (RICE) as defined by 40 C.F.R. §63.6675.
- ot. 40 C.F.R. 63, Subpart GGGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation.” The site is no longer a major source of HAPs and is not subject to the major source MACT requirements in accordance with §63.7881(a)(3). The Specialty Compounding Division also does not conduct site remediation as defined by 40 C.F.R. §63.7957 that meets all three of the conditions specified in 40 C.F.R. §§63.7881(a)(1) through (a)(3).
- ou. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” The Specialty Compounding Division does not produce, blend, or manufacture coatings as part of the manufacturing process.
- ov. 40 C.F.R. 63, Subpart NNNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” The Specialty Compounding Division is not an HCl production facility as defined by 40 C.F.R. §63.9075.
- ow. 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 Specialty Compounding Division does not conduct motor vehicle maintenance involving CFCs on site.
- ox. 40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.” Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The Specialty Compounding Division does not use, manufacture, nor distribute these materials.
- oy. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The Specialty Compounding Division does not contain any fuel burning units subject to the sulfur dioxide weight emission standards of 45CSR§10-3. Also, per 45CSR§10-4.1.e, manufacturing process source

operations in the Specialty Compounding Division are exempt from the sulfur dioxide concentration limits of 45CSR§10-4.1 because the potential to emit of sulfur dioxide is less than 500 pounds per year.

- ~~yz.~~ 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The Specialty Compounding Division is not subject to any requirements under 40 C.F.R. 60.
- ~~zaa.~~ 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, the Specialty Compounding Division is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- ~~aaab.~~ 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in Specialty Compounding Division have maximum theoretical emissions of 6 pounds per hour or more and are not subject to the requirements of this section.
- ~~bbcc.~~ 45CSR§27-4.1 – “To Prevent and Control the Emissions of Toxic Air Pollutants: Fugitive Emissions of Toxic Air Pollutants.” The equipment in the Specialty Compounding Division is not in “toxic air pollutant service” as defined by 45CSR§27-2.11 is not subject to the requirements of 45CSR§27-4.1.
- ~~eedd.~~ 40 C.F.R. Part 64 – *Compliance Assurance Monitoring*. None of the emission units listed in the renewal application (and any revised application pages) have pre-control device emissions of a regulated air pollutant greater than the major source threshold for that pollutant; therefore, none of the emission units meet applicability criterion of 40 C.F.R. §64.2(a)(3). Thus CAM is not applicable to any emission unit listed in the SCD renewal application.
- ~~deee.~~ 40 C.F.R. 63, Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters” is not applicable to natural gas fired hot water generators (Emission Unit IDs S293-S-060, S293-S-061, and S293-S-062) per §63.7491(d) and §63.7575. The generators are tankless units used on demand for comfort heating of the living space in the building. They are exempt from the requirements of the subpart because they fit the definition of a “hot water heater” in §63.7575: “Hot water heater also means a tankless unit that provides on demand hot water”. Also, the site is no longer a major source of HAPs and is not subject to the major source MACT requirements.

4.0 R13-1533 and 45CSR7 Requirements

4.1 Limitations and Standards

- 4.1.1. The permittee shall not exceed the following maximum hourly and annual emission limits for PM, PM₁₀, VOC, CO, and indicated HAPs.

Table 4.1.1 – PM, PM₁₀, VOC, CO, and HAP Emission Limits

Emission Point ID Number	Control Device ID Number	Emission Source Name and ID No.	Pollutant	Maximum Emissions	
				Lb/hr	(tpy)
S293-E-01A	S293-C-01A	Bulk Storage Silo S293-S-01A	PM	0.07	0.04
S293-E-01B	S293-C-01B	Bulk Storage Silo S293-S-01B	PM	0.07	0.04
S293-E-01C	S293-C-01C	Bulk Storage Silo S293-S-01C	PM	0.07	0.04
S293-E-01D	S293-C-01D	Bulk Storage Silo S293-S-01D	PM	0.07	0.04
S293-E-01E	S293-C-01E	Bulk Storage Silo S293-S-01E	PM	0.07	0.04
S293-E-01F	S293-C-01F	Bulk Storage Silo S293-S-01F	PM	0.07	0.04
			VOC	0.02	0.07
			Formaldehyde	0.01	0.01
S293-E-02A S293-E-02B S293-E-02C S293-E-02D S293-E-02E S293-E-02F	None	Vacuum System Exhaust (Each) S293-S-02A S293-S-02B S293-S-02C S293-S-02D S293-S-02E S293-S-02F	PM ₁₀	0.01	0.05
			VOC	0.09	0.38
			CO	0.03	0.14
			Formaldehyde	0.09	0.38
			Benzene	0.01	0.01
			Total HAPs ¹	0.10	0.43
S293-E-ANA S293-E-ANB S293-E-ANC S293-E-AND S293-E-ANE S293-E-ANF	None	Virtual emission point (Each) to combine the acrylonitrile emissions from sources S293-S-02(x) Dies and S293-S-(x) Vacuum Ports	Acrylonitrile	0.03	0.01

Emission Point ID Number	Control Device ID Number	Emission Source Name and ID No.	Pollutant	Maximum Emissions	
				Lb/hr	(tpy)
S293-E-03A S293-E-03B S293-E-03C S293-E-03D S293-E-03E S293-E-03F	S293-C-03A S293-C-03B S293-C-03C S293-C-03D S293-C-03E S293-C-03F	Extrusion Die Exhaust (Each) S293-S-02A S293-S-02B S293-S-02C S293-S-02D S293-S-02E S293-S-02F	PM	0.10	0.41
			PM ₁₀	0.10	0.41
			VOC	0.09	0.38
			CO	0.03	0.14
			Formaldehyde	0.02	0.05
			Total HAPs ¹	0.05	0.21

Emission Point ID Number	Control Device ID Number	Emission Source Name and ID No.	Pollutant	Maximum Emissions	
				Lb/hr	(tpy)
S293-E-04A S293-E-04B S293-E-04C S293-E-04D S293-E-04E S293-E-04F	S293-C-04A S293-C-04B S293-C-04C S293-C-04D S293-C-04E S293-C-04F	Cooler/Screener (Each)	PM	0.65	2.80
		S293-S-03A	PM ₁₀	0.04	0.15
		S293-S-03B	PM _{2.5}	0.02	0.07
		S293-S-03C	Formaldehyde	0.11	0.44
		S293-S-03D			
		S293-S-03E			
S293-E-05A S293-E-05B S293-E-05C S293-E-05D S293-E-05E S293-E-05F	None	S293-S-03F			
		Receiver Bins			
		S293-S-14A			
		S293-S-14B			
		S293-S-14C			
		S293-S-14D			
		S293-S-14E			
		S293-S-14F			
		Pelletizer Exhaust			
		S293-S-10A			
		S293-S-10B			
		S293-S-10C			
S293-S-10D					
S293-S-10E					
S293-S-10F					
S293-E-05A S293-E-05B S293-E-05C S293-E-05D S293-E-05E S293-E-05F	None	Impact Separator (Each)	PM	0.02	0.06
		S293-S-04A	Formaldehyde	0.01	0.02
		S293-S-04B			
		S293-S-04C			
		S293-S-04D			
		S293-S-04E			
		S293-S-04F			

Emission Point ID Number	Control Device ID Number	Emission Source Name and ID No.	Pollutant	Maximum Emissions		
				Lb/hr	(tpy)	
S293-E-06A S293-E-06B S293-E-06C S293-E-06D S293-E-06E S293-E-06F	None	Quench Bath (Each) S293-S-06A S293-S-06B S293-S-06C S293-S-06D S293-S-06E S293-S-06F	Acetaldehyde	0.01	0.01	
			Carbon Monoxide	0.01	0.01	
			Formaldehyde	0.02	0.04	
		Plop Buggy S293-S-07A S293-S-07B S293-S-07C S293-S-07D S293-S-07E S293-S-07F		PM ₁₀	0.21	0.03
				Total HAPs ¹	0.21	0.06
				PM	0.21	0.03
				VOC's	0.03	0.04
S293-E-049	S293-C-031	Area Dust Hoods S293-S-038 S293-S-078	PM	0.03	0.06	
			Total HAPs ¹	0.01	0.01	

¹ The emissions of total HAPs identified in Table 4.1.1 of this permit may consist of any one, or a combination of the following pollutants: Formaldehyde (50-00-0), Methanol (67-56-1), Acetaldehyde (75-07-0), Phenol (108-95-2), Benzene (71-43-2), Antimony Compounds, Acrolein (107-02-8), Acrylonitrile (107-13-1), and Aniline (62-53-3).

Compliance with the above hourly particulate matter emission limits for S293-E-01A, S293-E-01B, S293-E-01C, S293-E-01D, S293-E-01E, S293-E-01F, S293-E-02A, S293-E-02B, S293-E-02C, S293-E-02D, S293-E-02E, S293-E-02F, S293-E-03A, S293-E-03B, S293-E-03C, S293-E-03D, S293-E-03E, S293-E-03F, S293-E-04A, S293-E-04B, S293-E-04C, S293-E-04D, S293-E-04E, S293-E-04F, S293-E-05A, S293-E-05B, S293-E-05C, S293-E-05D, S293-E-05E, S293-E-05F, S293-E-06A, S293-E-06B, S293-E-06C, S293-E-06D, S293-E-06E, S293-E-06F, and S293-E-049 shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate emission limits.

[45CSR13, R13-1533, 4.1.1; 45CSR§7-4.1]

4.1.2. Emissions, prior to the release to the atmosphere, from emission sources S293-S-01A, S293-S-01B, S293-S-01C, S293-S-01D, S293-S-01E, and S293-E-01F shall be routed through control devices S293-C-01A, S293-C-01B, S293-C-01C, S293-C-01D, S293-C-01E, and S293-C-01F respectively at all times the respective source(s) are in operation.

[45CSR13, R13-1533, 4.1.2]

4.1.3. Emissions, prior to the release to the atmosphere, from emission sources S293-S-03A and S293-S-14A, S293-S-03B, S293-S-03C and S293-S-14C, S293-S-03D, S293-S-03E, and S293-S-03F, shall be routed through control devices S293-C-04A, S293-C-04B, S293-C-04C, S293-C-04D, S293-C-04E, and S293-C-04F respectively at all times the respective source(s) are in operation.

[45CSR13, R13-1533, 4.1.3]

- 4.1.4. Emissions, prior to the release to the atmosphere, from emission sources S293-S-02A (die), S293-S-02B (die), S293-S-02C (die), S293-S-02D (die), S293-S-02E (die), S293-S-02F (die) shall be routed through control devices S293-C-03A, S293-C-03B, S293-C-03C, S293-C-03D, S293-C-03E, and S293-C-03F respectively at all times the respective source(s) are in operation. Control devices, referenced in 4.1.2, 4.1.3 and 4.1.4 shall be maintained and operated to perform to the specifications addressed in the permit application R13-1533C. **[45CSR13, R13-1533, 4.1.4]**
- 4.1.5. The permittee shall not cause, suffer, allow or permit emissions of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in 4.1.6. (*S293-E-02A, S293-E-02B, S293-E-02C, S293-E-02D, S293-E-02E, S293-E-02F, S293-E-03A, S293-E-03B, S293-E-03C, S293-E-03D, S293-E-03E, S293-E-03F, S293-E-04A, S293-E-04B, S293-E-04C, S293-E-04D, S293-E-04E, S293-E-04F, S293-E-05A, S293-E-05B, S293-E-05C, S293-E-05D, S293-E-05E, S293-E-05F, S293-E-049, S293-E-06A, S293-E-06B, S293-E-06C, S293-E-06D, S293-E-06E, S293-E-06F, S293-E-050, S293-E-042, S293-E-067 and S293-E-068*) **[45CSR13, R13-1533, 4.1.5; 45CSR§7-3.1]**
- 4.1.6. The provisions of 4.1.5 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. (*S293-E-02A, S293-E-02B, S293-E-02C, S293-E-02D, S293-E-02E, S293-E-02F, S293-E-03A, S293-E-03B, S293-E-03C, S293-E-03D, S293-E-03E, S293-E-03F, S293-E-04A, S293-E-04B, S293-E-04C, S293-E-04D, S293-E-04E, S293-E-04F, S293-E-05A, S293-E-05B, S293-E-05C, S293-E-05D, S293-E-05E, S293-E-05F, S293-E-049, S293-E-06A, S293-E-06B, S293-E-06C, S293-E-06D, S293-E-06E, S293-E-06F, S293-E-050, S293-E-042, S293-E-067 and S293-E-068*) **[45CSR13, R13-1533, 4.1.6; 45CSR§7-3.2]**
- 4.1.7. The permittee shall not cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to Section 4.1.8 is required to have a full enclosure and be equipped with a particulate matter control device. (*S293-E-01A, S293-E-01B, S293-E-01C, S293-E-01D, S293-E-01E, and S293-E-01F*) **[45CSR13, R13-1533, 4.1.7; 45CSR§7-3.7]**
- 4.1.8. The permittee shall not cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design, or operations and maintenance procedures, to minimize the emission of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate emissions reasonably achievable. **[45CSR13, R13-1533, 4.1.8; 45CSR§7-5.1]**
- 4.1.9. The permittee shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. **[45CSR13, R13-1533, 4.1.9; 45CSR§7-5.2]**
- 4.1.10. The permitted facility shall comply with all applicable requirements of 45CSR27 – “To Prevent and Control the Emissions of Toxic Air Pollutants.” The facility shall limit total emissions of formaldehyde from each specific emission point in Section 4.1.1 to the maximum hourly and annual limits set in Section 4.1.1. These requirements replace and supercede the formaldehyde limiting requirements pertaining to equipment covered by R13-1533 found in Consent Order CO-R27-92-19. **[45CSR13, R13-1533, 4.1.10; 45CSR27]**

- 4.1.11. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, operate, and maintain all pollution control equipment listed in Section 1.0 (except for Control Device S293-C-050) and associated monitoring equipment in 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, R13-1533, 4.1.11; 45CSR13, R13-3574, 4.1.5; 45CSR§13-5.10]
- 4.1.12. 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 Points	Emission Units	45CSR7 Hourly Particulate Emission Limit pph
S293-E-050	S293-S-075, S293-S-077	20
S293-E-042	S293-S-070	2.4
S293-E-067	S293-S-067	10
S293-E-068	S293-S-068	3

[45CSR§7-4.1]

- 4.1.13. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§7-9.1]
- 4.1.14. The Permittee shall meet the following requirements for the operation of wet scrubbers S293-C-03A, S293-C-03B, S293-C-03C, S293-C-03D, S293-C-03E, and S293-C-03F based on a sixty minute rolling average while material is being produced:

Minimum liquor flow rate to the scrubbers of 12 gal/min.

[45CSR13, R13-1533, 4.1.12]

4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the opacity limits set forth in Sections 4.1.5, 4.1.6, and 4.1.7 the permittee shall conduct visual emissions monitoring for all emission points and equipment subject to a visual emissions or opacity limit under 45CSR7, including, the emission points addressed in Section 4.1.1 and S293-E-050, S293-E-042, S293-E-067 and S293-E-068.

Monitoring shall be conducted at least once per month. These checks shall be performed during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct a visual emission

evaluation per 45CSR7A within three (3) days of the first identification of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions.

(S293-E-02A, S293-E-02B, S293-E-02C, S293-E-02D, S293-E-02E, S293-E-02F, S293-E-03A, S293-E-03B, S293-E-03C, S293-E-03D, S293-E-03E, S293-E-03F, S293-E-04A, S293-E-04B, S293-E-04C, S293-E-04D, S293-E-04E, S293-E-04F, S293-E-05A, S293-E-05B, S293-E-05C, S293-E-05D, S293-E-05E, S293-E-05F, S293-E-049, S293-E-050, S293-E-06A, S293-E-06B, S293-E-06C, S293-E-06D, S293-E-06E, S293-E-06F, S293-E-042, S293-E-067 and S293-E-068)

[45CSR13, R13-1533, 4.2.1; 45CSR§30-5.1.c]

- 4.2.2. The Permittee shall continuously monitor liquor flow rates to Scrubbers S293-C-03A, S293-C-03B, S293-C-03C, S293-C-03D, S293-C-03E, and S293-C-03F during periods of operation.

[45CSR13, R13-1533, 4.2.2]

4.3. Testing Requirements

- 4.3.1. **Stack testing.** At such reasonable times as the Secretary may designate, the permittee may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases when the Secretary has the reason to believe that an emission limitation is being violated. For cause, the Secretary may request the permittee to install such stack gas monitoring devices as the Secretary deems necessary to determine continuing compliance. The data from such devices shall be readily available for review on-site or at such other reasonable location that the Secretary may specify. At the request of the Secretary, such data shall be made available for inspection or copying and the Secretary may require periodic submission of excess emission reports. Compliance with this streamlined requirement assures compliance with 45CSR§7-8.1 and 45CSR§13-6.1. **[45CSR13, R13-1533, 4.3.1; 45CSR§7-8.1; 45CSR§13-6.1]**

- 4.3.2. **Compliance testing.** Any such test to determine compliance with particulate matter limitations set forth in Section 4.1.1 shall be conducted in accordance with Method 5 of 40 C.F.R. 60, Appendix A, Method 201 or 201A of 40 C.F.R. 51, or other such appropriate method approved by the Secretary. All such compliance tests must consist of not less than three (3) test runs; any test run duration shall not be less than sixty (60) minutes and no less than thirty (30) standard cubic feet of exhaust gas must be sampled during each test run. Such tests shall be conducted under such reasonable operating conditions as the Secretary may specify. The Secretary, or a duly authorized representative, may option to witness or conduct such stack tests. Should the Secretary exercise this option to conduct such tests, the registrant shall provide all necessary sampling connections and sampling ports located in a manner as the Secretary may require, power for test equipment and required safety equipment in place such as scaffolding, railings and ladders in order to comply with generally accepted good safety practices.

[45CSR13, R13-1533, 4.3.2; 45CSR§7-8.1]

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

[45CSR13, R13-1533, 4.3.3; 45CSR§7-4.12]

- 4.3.4. **Opacity testing.** Any test to determine compliance with the visible emission (opacity) limitations set forth in Sections 4.1.5, 4.1.6, and 4.1.7 shall be conducted by personnel appropriately trained for the task. Personnel performing the visual emissions observation shall be trained and familiar with the limitations and restrictions associated with 40 C.F.R. 60, Appendix A, Method 22. Any person performing an opacity observation for compliance assessment in the event of visible emissions must be a certified visible emission

observer in accordance with 45CSR7A – “Compliance Test Procedures for 45CSR7 – *To Prevent and Control Particulate Air Pollution from Manufacturing Process 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, R13-1533, 4.3.4]

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

[45CSR13, R13-1533, 4.3.5]

- 4.3.6. **Alternative test methods.** The Secretary may require a different test method or approve an alternative method in light of any technology advancements that may occur and may conduct or require such other tests as may be deemed necessary to evaluate air pollution emissions.

[45CSR13, R13-1533, 4.3.6; 45CSR§7-8.2]

4.4. Recordkeeping Requirements

- 4.4.1. To demonstrate compliance with emission limits in Section 4.1.1, the permittee shall maintain monthly and annual production records in a format similar to that in Appendix A – Attachments B and D. The records may be kept in an electronic format provided a legible copy may be produced upon request by the Director or their authorized representative.

[45CSR13, R13-1533, 4.4.4]

- 4.4.2. To demonstrate compliance with the emission limits of 4.1.1, the permittee shall maintain monthly and annual records of emissions in a format similar to that in Appendix A – Attachments C and D. The records may be kept in an electronic format provided a legible copy may be produced upon request by the Director or their authorized representative.

[45CSR13, R13-1533, 4.4.5]

- 4.4.3. The permittee shall maintain records of all monitoring data required by Section 4.2.1 documenting the date and time of each visible emission check, the emission point or equipment identification number, the name or means of identification of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. Such records shall be equivalent to the example form supplied as Appendix A - Attachment A. 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. Data records equivalent to Appendix A - Attachment A may be kept in electronic format provided a legible copy may be produced upon request by the Director or their authorized representative.

[45CSR13, R13-1533, 4.4.6]

4.4.4. **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, R13-1533, 4.4.3]

4.4.5. In the event that an applicable MACT (Maximum Available Control Technology) Standard requiring a Startup, Shutdown, and Malfunction (SSM) Plan should be promulgated in the future, the SSM Plan would supersede the provisions of Section 4.4.4. Until that time, or until notice from the permittee in writing to the Director of plans to adopt the SSM Plan, the provisions of Section 4.4.4 will remain in force. **[45CSR13, R13-1533, 4.4.8]**

4.4.6. Records required by this permit shall be maintained in accordance with Condition 3.4.2 and 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, the records may be submitted according to the procedures set forth in 45CSR31 – “Confidential Information.” **[45CSR13, R13-1533, 4.4.9]**

4.4.7. **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, R13-1533, 4.4.2]**

4.4.8. The permittee shall monitor all fugitive particulate emission sources as required by 4.1.8 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]**

- 4.4.9. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures as required by 4.1.9 applied at the facility. These records shall be maintained on site.
[45CSR§30-5.1.c]
- 4.4.10. The permittee shall maintain and operate all air emissions control devices, listed in Section 4.1, in accordance with proper operational guidelines to minimize emissions. For the referenced air emissions control devices, the permittee shall keep accurate records of calibrations and maintenance activities, and of malfunctions and other operational shutdowns that result in excess emissions. The referenced control devices include all those identified in Sections 1.0 and 4.1. For each malfunction or operational shutdown of a control device that results in excess emissions, the information specified in 4.4.4 must be recorded, at a minimum. These records may be maintained electronically or in hard copy form, and shall be made available for review upon request of the Director or his duly authorized representative.
[45CSR13, R13-1533, 4.4.7]

4.5. Reporting Requirements

- 4.5.1 None.

4.6. Compliance Plan

- 4.6.1. None.

5.0 Cold Solvent Cleaner (S293-E-066) Requirements

5.1 Limitations and Standards

- 5.1.1. The owner or operator of a cold cleaning facility shall:
- Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - Store waste solvent in covered containers.
 - Close the cover whenever parts are not being handled in the cleaner.
 - Drain the cleaned parts until dripping ceases.
 - 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.
 - 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]

5.2 Monitoring Requirements

- 5.2.1. None.

5.3 Testing Requirements

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

5.4 Recordkeeping Requirements

- 5.4.1. Each owner or operator of a solvent metal cleaning source subject to this 45CSR§21-30 shall maintain the following records in a readily accessible location for at least 5 years and shall make these records available to the Director upon verbal or written request:
- A record of central equipment maintenance, such as replacement of the carbon in a carbon adsorption unit.
 - The results of all tests conducted in accordance with the requirements in section 45CSR§21-30.4 (5.3.1).

[45CSR§21-30.5. State-Enforceable only; 45CSR§30-5.1.c.]

5.5 Reporting Requirements

- 5.5.1. Except as provided in section 45CSR§21-9.3, the owner or operator of any facility containing sources subject to 45CSR§21-5 shall, for each occurrence of excess emissions expected to last more than 7 days, within 1

business day of becoming aware of such occurrence, supply the Director by letter with the following information.

- a. The name and location of the facility;
- b. The subject sources that caused the excess emissions;
- c. The time and date of first observation of the excess emissions; and
- d. The cause and expected duration of the excess emissions.
- e. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
- f. The proposed corrective actions and schedule to correct the conditions causing the excess emissions.

[45CSR§21-5.2]

5.6. Compliance Plan

- 5.6.1. None.

6.0 Hot Water Generators (S293-S-060, S293-S-061, and S293-S-062) Requirements

6.1 Limitations and Standards

- 6.1.1. 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.
[45CSR§2-3.1]

6.2 Monitoring Requirements

- 6.2.1. Compliance with the visible emission requirements of 6.1.1 shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of subsection 3.1. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control.
[45CSR§2-3.2]

6.3 Testing Requirements

- 6.3.1. None.

6.4 Recordkeeping Requirements

- 6.4.1. None.

6.5 Reporting Requirements

- 6.5.1. None.

6.6 Compliance Plan

- 6.6.1. None.

**Appendix A – Attachment A
 Monthly Opacity Monitoring Record**

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

Stack/Vent ID	Stack/Vent Description	Date of Observation	Time of Observation	Name of Observer	Visible Plume? Yes/No	Fill these columns as needed if there is a visible plume observed.		Comments
						Near 20% Opacity? Yes/No	Method 9 Compliance Status?	
S293-E-01A	Silo A							
S293-E-01B	Silo B							
S293-E-01C	Silo C							
S293-E-01D	Silo D							
S293-E-01E	Silo E							
S293-E-01F	Silo F							
S293-E-02A	Extruder SA – Vacuum System Exhaust							
S293-E-02B	Extruder SB – Vacuum System Exhaust							
S293-E-02C	Extruder SC – Vacuum System Exhaust							
S293-E-02D	Extruder SD – Vacuum System Exhaust							
S293-E-02E	Extruder SE – Vacuum System Exhaust							
S293-E-02F	Extruder SF – Vacuum System Exhaust							
S293-E-03A	Extruder SA – Die							
S293-E-03B	Extruder SB – Die							
S293-E-03C	Extruder SC – Die							
S293-E-03D	Extruder SD – Die							
S293-E-03E	Extruder SE – Die							
S293-E-03F	Extruder SF – Die							
S293-E-04A	Extruder SA – Cooler/Screeners, Pelletizer, & Bins							
S293-E-04B	Extruder SB – Cooler/Screeners, Pelletizer, & Bins							
S293-E-04C	Extruder SC – Cooler/Screeners, Pelletizer, & Bins							
S293-E-04D	Extruder SD – Cooler/Screeners, Pelletizer, & Bins							
S293-E-04E	Extruder SE – Cooler/Screeners, Pelletizer, & Bins							

Stack/Vent ID	Stack/Vent Description	Date of Observation	Time of Observation	Name of Observer	Visible Plume? Yes/No	Fill these columns as needed if there is a visible plume observed.		
						Near 20% Opacity? Yes/No	Method 9 Compliance Status?	Comments
S293-E-04F	Extruder SF – Cooler/Screener, Pelletizer, & Bins							
S293-E-05A	Extruder SA – Impact Separator							
S293-E-05B	Extruder SB – Impact Separator							
S293-E-05C	Extruder SC – Impact Separator							
S293-E-05D	Extruder SD – Impact Separator							
S293-E-05E	Extruder SE – Impact Separator							
S293-E-05F	Extruder SF – Impact Separator							
S293-E-049	Area Dust Hoods							
SCD	All PM emitting stacks							

Observer Name	Latest Certification Date	Certification Expiration Date	Current Date	Certification Current?

**Appendix A – Attachment B
 Monthly Production Records**

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

Product	Extruder SA		Extruder SB		Extruder SC		Extruder SD		Extruder SE		Extruder SF		Total Production
	Max. ¹ PU/hr	PU/month	Max. ¹ PU/hr	PU/month	Max. ¹ PU/hr	PU/month	Max. ¹ PU/hr	PU/month	Max. ¹ PU/hr	PU/month	Max. ¹ PU/hr	PU/month	
A													
B													
C													
D													
E													
F													
G													
H1													
H2													
H3													
Max. ¹													
Totals													

¹ Note: The max. PU/hr values are the highest values for the month for each product.

**Appendix A-Attachment C
 Monthly Emissions Records**

Month: _____

Equipment Description	Emission Point ID	PM		PM ₁₀		CO		VOC	
		Max. lb/hr	lb/month	Max. lb/hr	lb/month	Max. lb/hr	lb/month	Max. lb/hr	lb/month
Silo A	S293-E-01A								
Silo B	S293-E-01B								
Silo C	S293-E-01C								
Silo D	S293-E-01D								
Silo E	S393-E-01E								
Silo F	S293-E-01F								
Extruder SA – Vacuum System Exhaust	S293-E-02A								
Extruder SB – Vacuum System Exhaust	S293-E-02B								
Extruder SC – Vacuum System Exhaust	S293-E-02C								
Extruder SD – Vacuum System Exhaust	S293-E-02D								
Extruder SE – Vacuum System Exhaust	S293-E-02E								
Extruder SF – Vacuum System Exhaust	S293-E-02F								
Extruder SA – Die	S293-E-03A								
Extruder SB – Die	S293-E-03B								
Extruder SC – Die	S293-E-03C								
Extruder SD – Die	S293-E-03D								
Extruder SE – Die	S293-E-03E								
Extruder SF – Die	S293-E-03F								
Extruder SA – Cooler/Screeners, Pelletizer, & Bins	S293-E-04A								
Extruder SB – Cooler/Screeners, Pelletizer, & Bins	S293-E-04B								
Extruder SC – Cooler/Screeners, Pelletizer, & Bins	S293-E-04C								
Extruder SD – Cooler/Screeners, Pelletizer, & Bins	S293-E-04D								
Extruder SE – Cooler/Screeners, Pelletizer, & Bins	S293-E-04E								
Extruder SF – Cooler/Screeners, Pelletizer, & Bins	S293-E-04F								
Extruder SA – Impact Separator	S293-E-05A								
Extruder SB – Impact Separator	S293-E-05B								
Extruder SC – Impact Separator	S293-E-05C								
Extruder SD – Impact Separator	S293-E-05D								
Extruder SE – Impact Separator	S293-E-05E								
Extruder SF – Impact Separator	S293-E-05F								
Area Dust Hoods	S293-E-049								

**Appendix A-Attachment C
 Monthly Emissions Records**

Month: _____

Equipment Description	Emission Point ID	Acetaldehyde		Formaldehyde		Phenol		Benzene	
		Max. lb/hr	lb/month	Max. lb/hr	lb/month	Max. lb/hr	lb/month	Max. lb/hr	lb/month
Extruder SA – Vacuum System Exhaust	S293-E-02A								
Extruder SB – Vacuum System Exhaust	S293-E-02B								
Extruder SC – Vacuum System Exhaust	S293-E-02C								
Extruder SD – Vacuum System Exhaust	S293-E-02D								
Extruder SE – Vacuum System Exhaust	S293-E-02E								
Extruder SF – Vacuum System Exhaust	S293-E-02F								
Extruder SA – Die	S293-E-03A								
Extruder SB – Die	S293-E-03B								
Extruder SC – Die	S293-E-03C								
Extruder SD – Die	S293-E-03D								
Extruder SE – Die	S293-E-03E								
Extruder SF – Die	S293-E-03F								
Extruder SA – Cooler/Screenener, Pelletizer, & Bins	S293-E-04A								
Extruder SB – Cooler/Screenener, Pelletizer, & Bins	S293-E-04B								
Extruder SC – Cooler/Screenener, Pelletizer, & Bins	S293-E-04C								
Extruder SD – Cooler/Screenener, Pelletizer, & Bins	S293-E-04D								
Extruder SE – Cooler/Screenener, Pelletizer, & Bins	S293-E-04E								
Extruder SF – Cooler/Screenener, Pelletizer, & Bins	S293-E-04F								
Extruder SA – Impact Separator	S293-E-05A								
Extruder SB – Impact Separator	S293-E-05B								
Extruder SC – Impact Separator	S293-E-05C								
Extruder SD – Impact Separator	S293-E-05D								
Extruder SE – Impact Separator	S293-E-05E								
Extruder SF – Impact Separator	S293-E-05F								
Area Dust Hoods	S293-E-049								

**Appendix A-Attachment C
Monthly Emissions Records**

Month: _____

Equipment Description	Emission Point ID	Antimony Compounds		Acrolein		Acrylonitrile		Aniline	
		Max. lb/hr	lb/month	Max. lb/hr	lb/month	Max. lb/hr	lb/month	Max. lb/hr	lb/month
Extruder SA – Vacuum System Exhaust	S293-E-02A								
Extruder SB – Vacuum System Exhaust	S293-E-02B								
Extruder SC – Vacuum System Exhaust	S293-E-02C								
Extruder SD – Vacuum System Exhaust	S293-E-02D								
Extruder SE – Vacuum System Exhaust	S293-E-02E								
Extruder SF – Vacuum System Exhaust	S293-E-02F								
Extruder SA – Die	S293-E-03A								
Extruder SB – Die	S293-E-03B								
Extruder SC – Die	S293-E-03C								
Extruder SD – Die	S293-E-03D								
Extruder SE – Die	S293-E-03E								
Extruder SF – Die	S293-E-03F								
Extruder SA – Cooler/Screeners, Pelletizer, & Bins	S293-E-04A								
Extruder SB – Cooler/Screeners, Pelletizer, & Bins	S293-E-04B								
Extruder SC – Cooler/Screeners, Pelletizer, & Bins	S293-E-04C								
Extruder SD – Cooler/Screeners, Pelletizer, & Bins	S293-E-04D								
Extruder SE – Cooler/Screeners, Pelletizer, & Bins	S293-E-04E								
Extruder SF – Cooler/Screeners, Pelletizer, & Bins	S293-E-04F								
Extruder SA – Impact Separator	S293-E-05A								
Extruder SB – Impact Separator	S293-E-05B								
Extruder SC – Impact Separator	S293-E-05C								
Extruder SD – Impact Separator	S293-E-05D								
Extruder SE – Impact Separator	S293-E-05E								
Extruder SF – Impact Separator	S293-E-05F								
Area Dust Hoods	S293-E-049								

**Appendix A – Attachment D
 Annual Emissions and Production Records**

Date: _____

Equipment Description	Emission Point ID	PM Emissions (lb)												12 Month Total (lb/yr)
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	
Silo A	S293-E-01A													
Silo B	S293-E-01B													
Silo C	S293-E-01C													
Silo D	S293-E-01D													
Silo E	S293-E-01E													
Silo F	S293-E-01F													
Extruder SA – Vacuum System Exhaust	S293-E-02A													
Extruder SB – Vacuum System Exhaust	S293-E-02B													
Extruder SC – Vacuum System Exhaust	S293-E-02C													
Extruder SD – Vacuum System Exhaust	S293-E-02D													
Extruder SE – Vacuum System Exhaust	S293-E-02E													
Extruder SF– Vacuum System Exhaust	S293-E-02F													
Extruder SA – Die	S293-E-03A													
Extruder SB – Die	S293-E-03B													
Extruder SC – Die	S293-E-03C													
Extruder SD – Die	S293-E-03D													
Extruder SE – Die	S293-E-03E													
Extruder SF – Die	S293-E-03F													
Extruder SA – Cooler/Screeners, Pelletizer, & Bins	S293-E-04A													
Extruder SB – Cooler/Screeners, Pelletizer, & Bins	S293-E-04B													
Extruder SC – Cooler/Screeners, Pelletizer, & Bins	S293-E-04C													
Extruder SD – Cooler/Screeners, Pelletizer, & Bins	S293-E-04D													
Extruder SE – Cooler/Screeners, Pelletizer, & Bins	S293-E-04E													
Extruder SF – Cooler/Screeners, Pelletizer, & Bins	S293-E-04F													
Extruder SA – Impact Separator	S293-E-05A													
Extruder SB – Impact Separator	S293-E-05B													
Extruder SC – Impact Separator	S293-E-05C													
Extruder SD – Impact Separator	S293-E-05D													
Extruder SE – Impact Separator	S293-E-05E													
Extruder SF – Impact Separator	S293-E-05F													
Area Dust Hoods	S293-E-049													
Total PM Emissions														

Equipment Description	Emission Point ID	PM ₁₀ Emissions (lb)												12 Month Total (lb/yr)
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	
Extruder SA – Vacuum System Exhaust	S293-E-02A													
Extruder SB – Vacuum System Exhaust	S293-E-02B													
Extruder SC – Vacuum System Exhaust	S293-E-02C													
Extruder SD – Vacuum System Exhaust	S293-E-02D													
Extruder SE – Vacuum System Exhaust	S293-E-02E													
Extruder SF – Vacuum System Exhaust	S293-E-02F													
Extruder SA – Die	S293-E-03A													
Extruder SB – Die	S293-E-03B													
Extruder SC – Die	S293-E-03C													
Extruder SD – Die	S293-E-03D													
Extruder SE – Die	S293-E-03E													
Extruder SF – Die	S293-E-03F													
Total PM₁₀ Emissions														

Appendix A – Attachment D Annual Emissions and Production Records

Date: _____

Equipment Description	Emission Point ID	CO Emissions (lb)											12 Month Total (lb/yr)	
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY		
Extruder SA – Vacuum System Exhaust	S293-E-02A													
Extruder SB – Vacuum System Exhaust	S293-E-02B													
Extruder SC – Vacuum System Exhaust	S293-E-02C													
Extruder SD – Vacuum System Exhaust	S293-E-02D													
Extruder SE – Vacuum System Exhaust	S293-E-02E													
Extruder SF – Vacuum System Exhaust	S293-E-02F													
Extruder SA – Die	S293-E-03A													
Extruder SB – Die	S293-E-03B													
Extruder SC – Die	S293-E-03C													
Extruder SD – Die	S293-E-03D													
Extruder SE – Die	S293-E-03E													
Extruder SF – Die	S293-E-03F													
Total CO Emissions														

Equipment Description	Emission Point ID	VOC Emissions (lb)												12 Month Total (lb/yr)	
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY		
Extruder SA – Vacuum System Exhaust	S293-E-02A														
Extruder SB – Vacuum System Exhaust	S293-E-02B														
Extruder SC – Vacuum System Exhaust	S293-E-02C														
Extruder SD – Vacuum System Exhaust	S293-E-02D														
Extruder SE – Vacuum System Exhaust	S293-E-02E														
Extruder SF – Vacuum System Exhaust	S293-E-02F														
Extruder SA – Die	S293-E-03A														
Extruder SB – Die	S293-E-03B														
Extruder SC – Die	S293-E-03C														
Extruder SD – Die	S293-E-03D														
Extruder SE – Die	S293-E-03E														
Extruder SF – Die	S293-E-03F														
Extruder SA – Cooler/Screeners, Pelletizer, & Bins	S293-E-04A														
Extruder SB – Cooler/Screeners, Pelletizer, & Bins	S293-E-04B														
Extruder SC – Cooler/Screeners, Pelletizer, & Bins	S293-E-04C														
Extruder SD – Cooler/Screeners, Pelletizer, & Bins	S293-E-04D														
Extruder SE – Cooler/Screeners, Pelletizer, & Bins	S293-E-04E														
Extruder SF – Cooler/Screeners, Pelletizer, & Bins	S293-E-04F														
Extruder SA – Impact Separator	S293-E-05A														
Extruder SB – Impact Separator	S293-E-05B														
Extruder SC – Impact Separator	S293-E-05C														
Extruder SD – Impact Separator	S293-E-05D														
Extruder SE – Impact Separator	S293-E-05E														
Extruder SF – Impact Separator	S293-E-05F														
Total VOC Emissions															

Equipment Description	Emission Point ID	Acetaldehyde Emissions (lb)												12 Month Total (lb/yr)	
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY		
Extruder SA – Vacuum System Exhaust	S293-E-02A														
Extruder SB – Vacuum System Exhaust	S293-E-02B														
Extruder SC – Vacuum System Exhaust	S293-E-02C														
Extruder SD – Vacuum System Exhaust	S293-E-02D														
Extruder SE – Vacuum System Exhaust	S293-E-02E														
Extruder SF – Vacuum System Exhaust	S293-E-02F														
Extruder SA – Die	S293-E-03A														
Extruder SB – Die	S293-E-03B														
Extruder SC – Die	S293-E-03C														
Extruder SD – Die	S293-E-03D														
Extruder SE – Die	S293-E-03E														
Extruder SF – Die	S293-E-03F														
Total Acetaldehyde Emissions															

Appendix A – Attachment D Annual Emissions and Production Records

Date: _____

Equipment Description	Emission Point ID	Formaldehyde Emissions (lb)												12 Month Total (lb/yr)	
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY		
Extruder SA – Vacuum System Exhaust	S293-E-02A														
Extruder SB – Vacuum System Exhaust	S293-E-02B														
Extruder SC – Vacuum System Exhaust	S293-E-02C														
Extruder SD – Vacuum System Exhaust	S293-E-02D														
Extruder SE – Vacuum System Exhaust	S293-E-02E														
Extruder SF – Vacuum System Exhaust	S293-E-02F														
Extruder SA – Die	S293-E-03A														
Extruder SB – Die	S293-E-03B														
Extruder SC – Die	S293-E-03C														
Extruder SD – Die	S293-E-03D														
Extruder SE – Die	S293-E-03E														
Extruder SF – Die	S293-E-03F														
Extruder SA – Cooler/Screeners, Pelletizer, & Bins	S293-E-04A														
Extruder SB – Cooler/Screeners, Pelletizer, & Bins	S293-E-04B														
Extruder SC – Cooler/Screeners, Pelletizer, & Bins	S293-E-04C														
Extruder SD – Cooler/Screeners, Pelletizer, & Bins	S293-E-04D														
Extruder SE – Cooler/Screeners, Pelletizer, & Bins	S293-E-04E														
Extruder SF – Cooler/Screeners, Pelletizer, & Bins	S293-E-04F														
Extruder SA – Impact Separator	S293-E-05A														
Extruder SB – Impact Separator	S293-E-05B														
Extruder SC – Impact Separator	S293-E-05C														
Extruder SD – Impact Separator	S293-E-05D														
Extruder SE – Impact Separator	S293-E-05E														
Extruder SF – Impact Separator	S293-E-05F														
Total Formaldehyde Emissions															

Appendix A – Attachment D Annual Emissions and Production Records

Date: _____

Equipment Description	Emission Point ID	Methanol Emissions (lb)												12 Month Total (lb/yr)	
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY		
Extruder SA – Vacuum System Exhaust	S293-E-02A														
Extruder SB – Vacuum System Exhaust	S293-E-02B														
Extruder SC – Vacuum System Exhaust	S293-E-02C														
Extruder SD – Vacuum System Exhaust	S293-E-02D														
Extruder SE – Vacuum System Exhaust	S293-E-02E														
Extruder SF – Vacuum System Exhaust	S293-E-02F														
Extruder SA – Die Pelletizer Exhaust	S293-E-03A														
Extruder SB – Die Pelletizer Exhaust	S293-E-03B														
Extruder SC – Die Pelletizer Exhaust	S293-E-03C														
Extruder SD – Die Pelletizer Exhaust	S293-E-03D														
Extruder SE – Die	S293-E-03E														
Extruder SF – Die	S293-E-03F														
Extruder SA – Cooler/Screeners, Pelletizer, & Bins	S293-E-04A														
Extruder SB – Cooler/Screeners, Pelletizer, & Bins	S293-E-04B														
Extruder SC – Cooler/Screeners, Pelletizer, & Bins	S293-E-04C														
Extruder SD – Cooler/Screeners, Pelletizer, & Bins	S293-E-04D														
Extruder SE – Cooler/Screeners, Pelletizer, & Bins	S293-E-04E														
Extruder SF – Cooler/Screeners, Pelletizer, & Bins	S293-E-04F														
Extruder SA – Impact Separator	S293-E-05A														
Extruder SB – Impact Separator	S293-E-05B														
Extruder SC – Impact Separator	S293-E-05C														
Extruder SD – Impact Separator	S293-E-05D														
Extruder SE – Impact Separator	S293-E-05E														
Extruder SF – Impact Separator	S293-E-05F														
Total Methanol Emissions															

Equipment Description	Emission Point ID	Phenol Emissions (lb)												12 Month Total (lb/yr)
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	
Extruder SA – Vacuum System Exhaust	S293-E-02A													
Extruder SB – Vacuum System Exhaust	S293-E-02B													
Extruder SC – Vacuum System Exhaust	S293-E-02C													
Extruder SD – Vacuum System Exhaust	S293-E-02D													
Extruder SE – Vacuum System Exhaust	S293-E-02E													
Extruder SF – Vacuum System Exhaust	S293-E-02F													
Extruder SA – Die	S293-E-03A													
Extruder SB – Die	S293-E-03B													
Extruder SC – Die	S293-E-03C													
Extruder SD – Die	S293-E-03D													
Extruder SE – Die	S293-E-03E													
Extruder SF – Die	S293-E-03F													
Total Phenol Emissions														

Equipment Description	Emission Point ID	Benzene Emissions (lb)												12 Month Total (lb/yr)
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	
Extruder SA – Vacuum System Exhaust	S293-E-02A													
Extruder SB – Vacuum System Exhaust	S293-E-02B													
Extruder SC – Vacuum System Exhaust	S293-E-02C													
Extruder SD – Vacuum System Exhaust	S293-E-02D													
Extruder SE – Vacuum System Exhaust	S293-E-02E													
Extruder SF – Vacuum System Exhaust	S293-E-02F													
Total Benzene Emissions														

Appendix A – Attachment D Annual Emissions and Production Records

Date: _____

Equipment Description	Emission Point ID	Acrylonitrile Emissions (lb)												12 Month Total (lb/yr)
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	
Extruder SA – Vacuum System Exhaust	S293-E-02A													
Extruder SA – Die	S293-E-03A													
Extruder SB – Vacuum System Exhaust	S293-E-02B													
Extruder SB – Die	S293-E-03B													
Extruder SC – Vacuum System Exhaust	S293-E-02C													
Extruder SC – Die	S293-E-03C													
Extruder SD – Vacuum System Exhaust	S293-E-02D													
Extruder SD – Die	S293-E-03D													
Extruder SE – Vacuum System Exhaust	S293-E-02E													
Extruder SE – Die	S293-E-03E													
Extruder SF – Vacuum System Exhaust	S293-E-02F													
Extruder SF – Die	S293-E-03F													
Total Acrylonitrile Emissions														

Equipment Description	Emission Point ID	Acrolein Emissions (lb)												12 Month Total (lb/yr)
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	
Extruder SA – Vacuum System Exhaust	S293-E-02A													
Extruder SB – Vacuum System Exhaust	S293-E-02B													
Extruder SC – Vacuum System Exhaust	S293-E-02C													
Extruder SD – Vacuum System Exhaust	S293-E-02D													
Extruder SE – Vacuum System Exhaust	S293-E-02E													
Extruder SF – Vacuum System Exhaust	S293-E-02F													
Extruder SA – Die	S293-E-03A													
Extruder SB – Die	S293-E-03B													
Extruder SC – Die	S293-E-03C													
Extruder SD – Die	S293-E-03D													
Extruder SE – Die	S293-E-03E													
Extruder SF – Die	S293-E-03F													
Total Acrolein Emissions														

Equipment Description	Emission Point ID	Antimony Compounds Emissions (lb)												12 Month Total (lb/yr)
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	
Area Dust Hoods														

Appendix A – Attachment D Annual Emissions and Production Records

Date: _____

Equipment Description	Emission Point ID	Aniline Emissions (lb)												12 Month Total (lb/yr)
		MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	
Extruder SA – Vacuum System Exhaust	S293-E-02A													
Extruder SB – Vacuum System Exhaust	S293-E-02B													
Extruder SC – Vacuum System Exhaust	S293-E-02C													
Extruder SD – Vacuum System Exhaust	S293-E-02D													
Extruder SE – Vacuum System Exhaust	S293-E-02E													
Extruder SF – Vacuum System Exhaust	S293-E-02F													
Extruder SA – Die	S293-E-03A													
Extruder SB – Die	S293-E-03B													
Extruder SC – Die	S293-E-03C													
Extruder SD – Die	S293-E-03D													
Extruder SE – Die	S293-E-03E													
Extruder SF – Die	S293-E-03F													
Total Aniline Emissions														

Product	Production (Production Units - PU)												12 Month Total (lb/yr)	
	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY	MMM-YY		
A														
B														
C														
D														
E														
F														
G														
H1														
H2														
H3														

CERTIFICATION OF DATA ACCURACY

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

Signature¹
(please use blue ink)

_____ Responsible Official or Authorized Representative

_____ Date

Name & Title
(please print or type)

_____ Name

_____ Title

Telephone No. _____

Fax No. _____

- ¹ This form shall be signed by a “Responsible Official.” “Responsible Official” means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.

Emission Point Identification	Source Identification	Source Description	Control Device Identification	Service (VOC/HAP/TAP)	Affected R13 Permit	Original R21 RACM Plan	Subject to:		Other Applicable Regulations - Citation (MACT/BACT/NSPS/NESHAP etc.)
							R21	R27	
S293-E-01F	293-S-01F	Bulk Storage Silo	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-02A	S293-S-02A (Vac)	Extruder	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-02B	S293-S-02B (Vac)	Extruder	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-02C	S293-S-02C (Vac)	Extruder	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-02D	S293-S-02D (Vac)	Extruder	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-02E	S293-S-02E (Vac)	Extruder	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-02F	S293-S-02F (Vac)	Extruder	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-03A	S293-S-032A (Die)	Extruder	S293-C-03A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-03B	S293-S-032B (Die)	Extruder	S293-C-03B	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-03C	S293-S-032C (Die)	Extruder	293-C-03C	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-03D	S293-S-032D (Die)	Extruder	293-C-03D	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-03E	S293-S-02E (Die)	Extruder	S293-C-03E	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-03F	S293-S-02F (Die)	Extruder	S293-C-03F	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-04A	S293-S-043A S293-S-14A & S293-S-10A	Cooler/Screenener/ Pelletizer/Receiver Bin	S293-C-04A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-04B	S293-S-043B S293-S-14B & S293-S-10B	Cooler/Screenener/ Pelletizer/Receiver Bin	S293-C-04B	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-04C	S293-S-043C S293-S-14C & S293-S-10C	Cooler/Screenener/ Pelletizer/Receiver Bin	S293-C-04C	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-04D	S293-S-043D S293-S-14D & S293-S-10D	Cooler/Screenener/ Pelletizer/Receiver Bin	S293-C-04D	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-04E	S293-S-043E S293-S-14E & S293-S-10E	Cooler/Screenener/ Pelletizer/Receiver Bin	S293-C-04E	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-04F	S293-S-043F S293-S-14F & S293-S-10F	Cooler/Screenener/ Pelletizer/Receiver Bin	S293-C-04F	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(j), 40 CFR 63.2480(a) 40CFR63 Subpart A

Emission Point Identification	Source Identification	Source Description	Control Device Identification	Service (VOC/HAP/TAP)	Affected R13 Permit	Original R21 RACM Plan	Subject to:		Other Applicable Regulations - Citation (MACT/BACT/NSPS/NESHAP etc.)
							R21	R27	
S293-E-05A	S293-S-0504A	Impact Separator	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-05B	S293-S-0504B	Impact Separator	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-05C	S293-S-0504C	Impact Separator	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-05D	S293-S-0504D	Impact Separator	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-05E	S293-S-0504E	Impact Separator	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-05F	S293-S-0504F	Impact Separator	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-06A	S293-S-06A & S293-S-07A	Quench Unit/Plop Buggy	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-06B	S293-S-06B & S293-S-07B	Quench Unit/Plop Buggy	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-06C	S293-S-06C & S293-S-07C	Quench Unit/Plop Buggy	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-06D	S293-S-06D & S293-S-07D	Quench Unit/Plop Buggy	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-06E	S293-S-06E & S293-S-07E	Quench Unit/Plop Buggy	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A
S293-E-06F	S293-S-06F & S293-S-07F	Quench Unit/Plop Buggy	N/A	TAP-F	R13-1533	No	No	Yes	40 CFR 63.2550(i), 40 CFR 63.6(e)(3) excluding 40 CFR 63.2525(i), 40 CFR 63.2480(a) 40CFR63 Subpart A

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

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

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

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