



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: August 24, 2017 Effective Date: September 21, 2018
Revision Date: September 21, 2018 Expiration Date: August 23, 2022
Revision Type: Amendment

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 46-00124

Federal Tax Id - Plant Code: 23-2988831-1

Owner Information

Name: MONTGOMERY CHEM LLC
Mailing Address: 901 CONSHOHOCKEN RD
CONSHOHOCKEN, PA 19428-1054

Plant Information

Plant: MONTGOMERY CHEM LTD/CONSHOHOCKEN
Location: 46 Montgomery County 46944 Plymouth Township
SIC Code: 2819 Manufacturing - Industrial Inorganic Chemicals, Nec

Responsible Official

Name: JAMES MCSTRAVICK
Title:
Phone: (215) 977 - 1020

Permit Contact Person

Name: LARRY STEWART
Title: VP ENGINEERING
Phone: (610) 567 - 0877

[Signature] _____
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER

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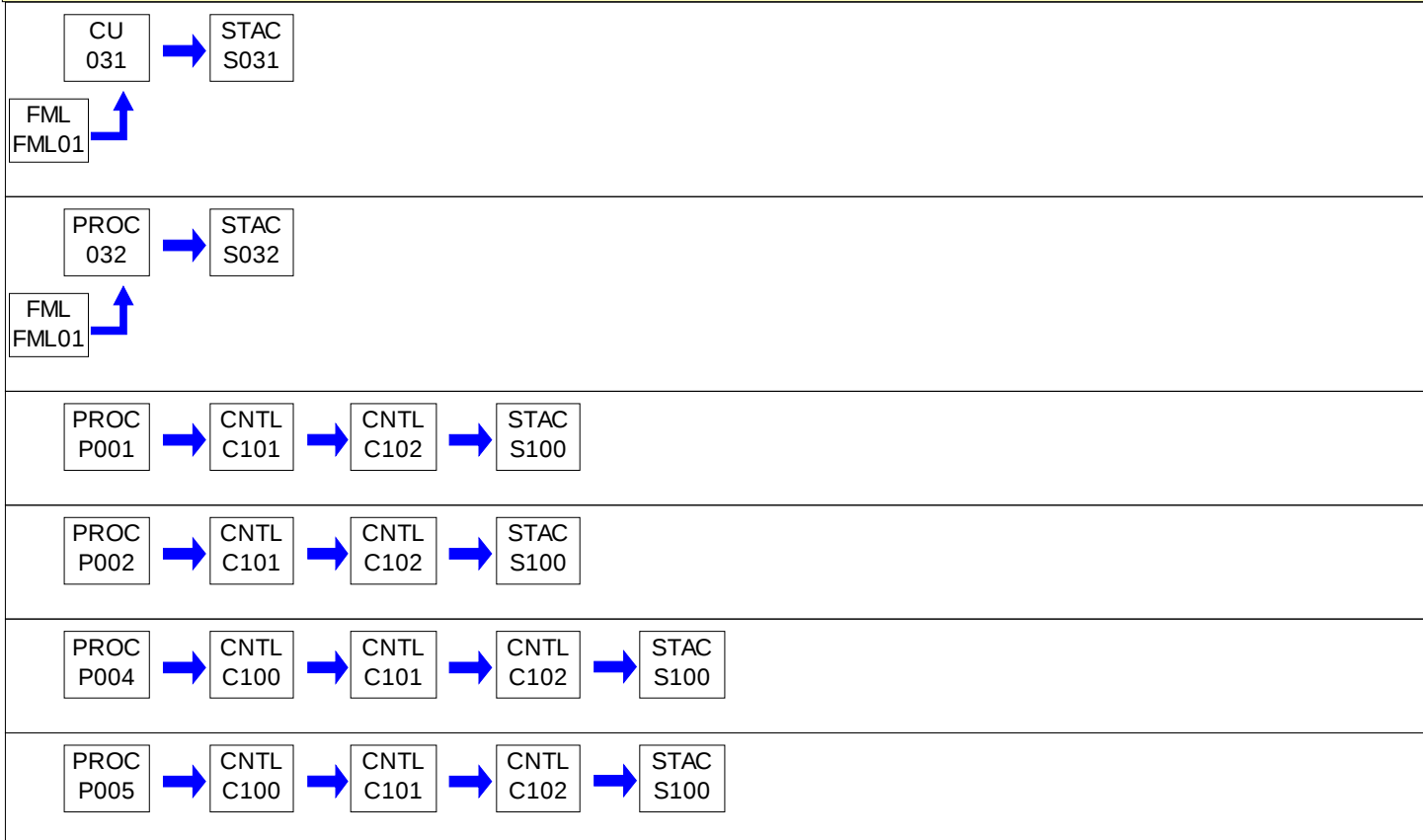
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SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	500 HP SUPERIOR BOILER	20.922 MMBTU/HR	
032	THERMAL FLUID HEATER	2.400 MMBTU/HR	
1150591	DEGREASING UNIT		
P001	P001 TRI METHYL BORATE REACTION & SEPARATION	N/A	TRIMETHYL BORATE
P002	P002 TRI-METHYL BORATE EXTRACTION/STORAGE	N/A	TRIMETHYL BORATE
P004	P004 SODIUM BOROHYDRIDE REACTION	N/A	SODIUM BOROHYDRIDE
P005	P005 HYDROLYSIS SECTION	N/A	METHANOL
P006	P006 SODIUM BOROHYDRIDE SEPARATION	N/A	METHANOL
P007	P007 MINERAL OIL SEPARATION/DRYING		
P008	P008 RECYCLE/WASTE	N/A	METHANOL
P010	DEGREASING UNIT		
C100	BREAK TANK T-801	N/A	METHANOL
C101	EJECTOR VENTURI SCRUBBERS (2 TOTAL) T-802	N/A	METHANOL
C102	PACKED BED SCRUBBER T-803	N/A	METHANOL
FML01	NATURAL GAS		
S031	BOILER STACK		
S032	THERMAL FLUID BOILER STACK		
S100	SCRUBBER SYSTEM STACK		

PERMIT MAPS



**PERMIT MAPS**

PROC
P006 → CNTL
C101 → CNTL
C102 → STAC
S100

PROC
P008 → CNTL
C101 → CNTL
C102 → STAC
S100

SECTION B. General Title V Requirements

#001 [25 Pa. Code § 121.1]

Definitions

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 121.7]

Prohibition of Air Pollution

No person may permit air pollution as that term is defined in the act.

#003 [25 Pa. Code § 127.512(c)(4)]

Property Rights

This permit does not convey property rights of any sort, or any exclusive privileges.

#004 [25 Pa. Code § 127.446(a) and (c)]

Permit Expiration

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

Permit Renewal

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

Transfer of Ownership or Operational Control

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

- (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

SECTION B. General Title V Requirements

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

Inspection and Entry

(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#009 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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.

#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

Duty to Provide Information

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or

SECTION B. General Title V Requirements

to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

(a) This Title V 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 a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#013 [25 Pa. Code § 127.522(a)]

Operating Permit Application Review by the EPA

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#014 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with

SECTION B. General Title V Requirements

25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]

Severability Clause

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction, or US EPA to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

Fee Payment

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.

(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

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(e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.

(f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#019 [25 Pa. Code §§ 127.14(b) & 127.449]

Authorization for De Minimis Emission Increases

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

- (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

The Department may disapprove or condition de minimis emission increases at any time.

(b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
- (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
- (4) Space heaters which heat by direct heat transfer.

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(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#020 [25 Pa. Code §§ 127.11a & 127.215]

Reactivation of Sources

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#021 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department,

SECTION B. General Title V Requirements

the device or technique may be used for control of malodors.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]**Submissions**

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given on the permit transmittal letter,
or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Office of Air Enforcement and Compliance Assistance (3AP20)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]**Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code §§ 127.511 & Chapter 135]**Recordkeeping Requirements**

(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

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(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#026 [25 Pa. Code § 127.513]

Compliance Certification

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #022 of this section.

#027 [25 Pa. Code § 127.3]

Operational Flexibility

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

- (1) Section 127.14 (relating to exemptions)

SECTION B. General Title V Requirements

- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

Risk Management

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,

(2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

SECTION B. General Title V Requirements

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #26 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

Permit Shield

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

- (a) construction or demolition of buildings or structures;
- (b) grading, paving and maintenance of roads and streets;
- (c) use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets;
- (d) clearing of land;
- (e) stockpiling of materials;
- (f) open burning operations, as specified in 25 Pa. Code § 129.14;
- (g) blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting;
- (h) coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations); and
- (i) sources and classes of sources other than those identified in (a)-(h), above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) the emissions are of minor significance with respect to causing air pollution; and
 - (2) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition #002(a) -- (i) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

005 [25 Pa. Code §123.41]

Limitations

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (a). Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (b). Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]

Exceptions

The limitations of Condition #004, of this Section, shall not apply to a visible emission in either of the following instances:

- (a). When the presence of uncombined water is the only reason for failure to meet the limitations.
- (b). When the emission results from the sources specified in Condition #001, of this Section.

SECTION C. Site Level Requirements

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The volatile organic compound (VOC) emissions from this facility shall not exceed 24.9 tons per year on a 12-month rolling period.

008 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material in the Southeast Air Basin except where the open burning operations result from:

- (1) a fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer;
- (2) any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department;
- (3) a fire set for the prevention and control of disease or pests, when approved by the Department;
- (4) a fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation;
- (5) a fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure;
- (6) a fire set solely for recreational or ceremonial purposes; or
- (7) a fire set solely for cooking food.

Throughput Restriction(s).

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall limit the production of sodium borohydride from this facility as follows:

- (a). Less than or equal to 6,500 pounds per day.
- (b). Less than or equal to 995,657 pounds per year on a 12-month rolling sum basis.

II. TESTING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A, of this Permit, may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

011 [25 Pa. Code §123.43]

Measuring techniques

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

- (a) The permittee shall monitor the facility, once per operating day, for the following:
 - (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
 - (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
 - (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).

SECTION C. Site Level Requirements

(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:

- (1) be investigated;
- (2) be reported to the facility management, or individual(s) designated by the permittee;
- (3) have appropriate corrective action taken (for emissions that originate on-site); and
- (4) be recorded in a permanent written log.

(c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.

(d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

(e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or Department findings.

012 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (a). A device approved by the Department and maintained to provide accurate opacity measurements.
- (b). Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the amount of methanol that is delivered to the facility.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the amount of sodium borohydride that is produced on a daily basis and on a monthly basis.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

The permittee shall maintain a VOC emission tracking system to document compliance with the emissions limitations stated elsewhere in this permit and to document the emissions from the facility.

IV. RECORDKEEPING REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

- (a). Date, time, and location of the incident(s).
- (b). The cause of the event.
- (c). The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

SECTION C. Site Level Requirements

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of each delivery of methanol to this facility.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records of the amount of sodium borohydride produced on a daily and monthly basis.

(b). The owner or operator shall calculate and record the total amount of sodium borohydride produced on a 12-month rolling sum basis.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) emissions increase of minor significance without notification to the Department.
- (b) de minimis increases with notification to the Department, via letter.
- (c) increases resulting from a Request for Determination (RFD) to the Department.
- (d) increases resulting from the issuance of a plan approval and subsequent operating permit.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

The permittee shall keep records from the established VOC emission tracking system to document compliance with the emissions limitations stated elsewhere in this permit and to document the emissions from the facility.

V. REPORTING REQUIREMENTS.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall, within two (2) hours of discovery of any occurrence, notify the Department, at (484) 250-5920, of any malfunction of the source(s) or associated air pollution control devices listed in Section A, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or of a regulation contained in 25 Pa. Code Article III.

(b). Malfunction(s) which occur at this facility, and pose(s) an imminent danger to public health, safety, welfare and the environment, and would violate permit conditions if the source were to continue to operate after the malfunction, shall immediately be reported to the Department by telephone at the above number.

(c). A written report shall be submitted to the Department within two (2) working days following the notification of the incident, and shall describe the following:

- (1). The malfunction(s).
- (2). The emission(s).
- (3). The duration.
- (4). Any corrective action taken.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The Department reserves the right to require further reductions in fugitive emissions from equipment leaks as more data is accumulated.

SECTION C. Site Level Requirements

(b). With the establishment of a facility-wide emission limit for methanol, the owner or operator may be subject to additional monitoring, recordkeeping, and reporting requirements in compliance with the requirements of 25 Pa. Code § 127.512(h).

(c). The establishment of a facility-wide emission limit is not considered a Plantwide Applicability Limit (PAL), so future changes to this facility are subject to new source review.

023 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]

The permittee shall submit the following:

(a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit. The annual certificate of compliance shall be submitted to the Department in paper form, and EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov

(b) A semi-annual deviation report, due by October 1, of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

024 [25 Pa. Code §135.3]**Reporting**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

If the permittee has been previously advised by the Department to submit a source report, the permittee shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported, including those sources listed in the Miscellaneous Section of this permit.

The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.**# 025 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in Condition #001(a) to (f) of this section, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(a). Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(b). Application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(c). Paving and maintenance of roadways.

(d). Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

SECTION C. Site Level Requirements

026 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall use the following work practices for the prevention of fugitive volatile organic compound and/or hazardous air pollutant emissions:

- (a). All lids from drums and containers containing volatile organic compounds and hazardous air pollutants shall be kept closed except when the contents are being transferred.
- (b). Any spills of volatile organic compounds and hazardous air pollutants shall be cleaned up as soon as possible.

027 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee may not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #019(g), of Section B, of this permit.

028 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A of this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III, or any other applicable rule promulgated under the Clean Air Act.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect ***

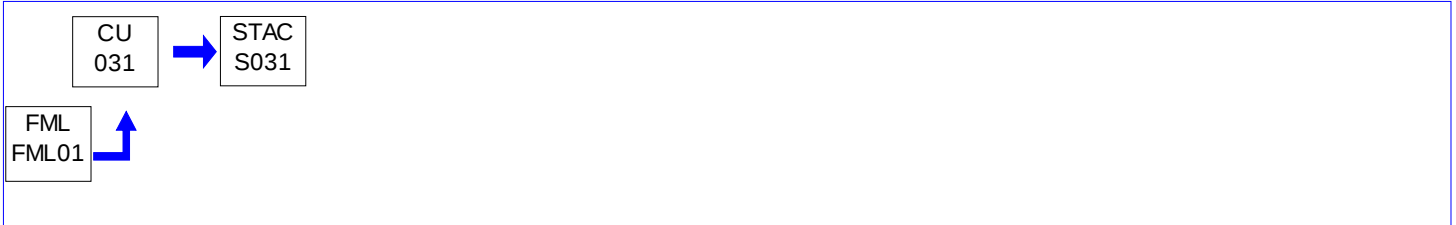
SECTION D. Source Level Requirements

Source ID: 031

Source Name: 500 HP SUPERIOR BOILER

Source Capacity/Throughput: 20.922 MMBTU/HR

Conditions for this source occur in the following groups: BOILER REQUIREMENTS



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly natural gas consumption records in accordance with 40 CFR §60.48c(g)(2)

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The boiler shall be equipped with low NOx burners with flue gas recirculation (FGR).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices.

VII. ADDITIONAL REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall install and maintain the necessary meter(s) to determine and to record amount of natural gas consumption.



SECTION D. Source Level Requirements

***** Permit Shield in Effect. *****

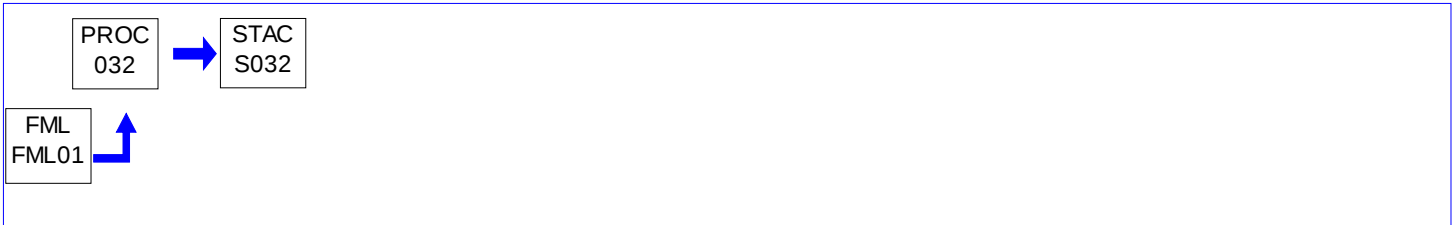
SECTION D. Source Level Requirements

Source ID: 032

Source Name: THERMAL FLUID HEATER

Source Capacity/Throughput: 2.400 MMBTU/HR

Conditions for this source occur in the following groups: BOILER REQUIREMENTS

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: 1150591

Source Name: DEGREASING UNIT

Source Capacity/Throughput:

I. RESTRICTIONS.

Operation Hours Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93, 40 C.F.R. § 63.6640(f) and 40 C.F.R. § 63.6602 and Table 2c of 40 C.F.R. Part 63, Subpart ZZZZ.]

(a). In accordance with the requirements of 25 Pa. Code § 129.93, the permittee shall limit the operation of this source to less than 500 hours in any consecutive 12-month rolling sum period.

(b). In accordance with 40 C.F.R. § 63.6640(f), the permittee shall operate the source for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this condition for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (3) and (4) of this condition counts as part of the 100 hours per calendar year allowed by this paragraph (2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2) of this condition. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2) of this condition. Except as provided in paragraphs (4)(i) and (ii) of this condition, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

SECTION D. Source Level Requirements

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The following are applicable to tests for the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)-(15).

(3) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.6625(h).]

(a). The permittee shall monitor the following for this source on a monthly basis:

(1). Each type of operation for which the source was in operation (idling time during periods of start-up or shut-down, emergency use, use during maintenance testing, non-emergency use).

(2). The total hours of operation for each type of operation.

(3). If the engine is used for the purposes specified in 40 C.F.R. § 63.6640(f)(2)(ii) or (iii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(b). The permittee shall monitor the hours of operation of the engine required in paragraph (a)(2) above as recorded through a non-resettable hour meter in accordance with 40 C.F.R. § 40 C.F.R. § 63.6625(f).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition was also derived from 40 C.F.R. §§ 63.6625(i), 63.6655(a)(4), 63.6655(d), and 63.6655(e).]

a). The permittee shall keep records of all oil changes, air filter changes, inspections and maintenance for all belts and

SECTION D. Source Level Requirements

hoses and any inspections and/or other maintenance that has been performed on this source to demonstrate that the source was operated in accordance with manufacturer's specifications or in accordance with the site-specified maintenance plan.

(b). If a fuel analysis program from 40 C.F.R. § 63.6625(i) is used as an alternative to the fuel changing schedule from 40 C.F.R. § 63.6602 and Table 2c of 40 C.F.R. Part 63, Subpart ZZZZ, the permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition was also derived from 40 C.F.R. §§ 63.6655(a)(4) and 63.6655(f).]

(a). The permittee shall keep records of the following for this source on a monthly basis:

(1). Each type of operation for which the source was in operation (idling time during periods of start-up or shut down, emergency use, use during maintenance testing, non-emergency use).

(2). The total hours of operation for each type of operation for this source, and a calculation of the combined hours of operation for all types of operation on a 12-month rolling sum basis.

(3). If the engine is used for the purposes specified in 40 C.F.R. § 63.6640(f)(2)(ii) or (iii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(b). The permittee shall keep records of the hours of operation of the engine required in paragraph (a)(2) above as recorded through a non-resettable hour meter.

(c). The permittee shall keep records of all inspections and/or maintenance performed on this source including the name of the service company and technicians in a permanently bound logbook.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the engine as an emergency engine. In contrary, the engine will be considered a non-emergency engine.

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

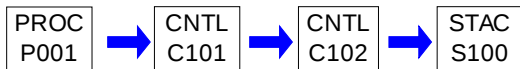
Source ID: P001

Source Name: P001 TRI METHYL BORATE REACTION & SEPARATION

Source Capacity/Throughput:

N/A

TRIMETHYL BORATE



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall monitor all equipment for leaks of HAPs using a Department approved method. The procedures from 40 C.F.R. Part 63, Subpart UU that are used for compliance with the equipment leak detection under the MON MACT may be used to demonstrate compliance with this requirement.

(b). The owner or operator shall use the instrumentation or sensory monitoring techniques specified in the chosen method of equipment leak detection in paragraph (a) above.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following for this source on a daily basis when this source is in operation:

(a). The throughput of material through each piece of equipment listed under this source.

(b). The content of each stream entering and leaving each piece of equipment.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2343(c)(3).]

For each transfer rack subject to 40 C.F.R. Part 63, Subpart EEEE that loads organic liquids but is not subject to control based on the criteria specified in Table 2 to 40 C.F.R. Part 63, Subpart EEEE, items 7 through 10, the owner or operator must keep documentation, including the records specified in Condition #009 [40 C.F.R. §63.2390(d)], that verifies the transfer rack is not required to be controlled under 40 C.F.R. Part 63, Subpart EEEE. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to 40 C.F.R. §63.10(b)(1), including records stored in electronic form in a separate location.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records of all monitoring for equipment leaks for Area P-001.

(b). The owner or operator shall keep records of all detected leaks found and any corrective action taken.

SECTION D. Source Level Requirements

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of all tests, calculations, or estimates of the composition of each stream and content of each vessel operating in Area P-001.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of the following for this source on a daily basis when this source is in operation:

- (a). The throughput of material through each piece of equipment listed under this source.
- (b). The content of each stream entering and leaving each piece of equipment.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a monthly basis, the owner or operator shall estimate and record the following:

- (a). The amount of methanol and trimethyl borate that is vented to the scrubber system.
- (b). The amount of methanol and trimethyl borate that is emitted as fugitive emissions from equipment leaks.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition was also derived from 40 C.F.R. §63.2390(d).]

The owner or operator must keep records of the total actual annual facility-level organic liquid loading volume as defined in 40 C.F.R. § 63.2406 through transfer racks to document the applicability, or lack thereof, of the emission limitations in table 2 of 40 C.F.R. Part 63, Subpart EEEE, items 7 through 10.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition was also derived from 40 C.F.R. § 63.2343(b).]

Recordkeeping for the Methanol Storage Tank from 40 C.F.R. Part 63, Subpart EEEE

For each storage tank having a capacity of 18.9 cubic meters (5,000 gallons) or more that is not subject to control based on the criteria specified in Table 2 of 40 C.F.R. Part 63, Subpart EEEE, items 1 through 6, the owner or operator must keep documentation, including a record of the annual average true vapor pressure of the total organic HAP in the stored organic liquid, that verifies the storage tank is not required to be controlled under 40 C.F.R. Part 63, Subpart EEEE. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to 40 C.F.R. §63.10(b)(1), including records stored in electronic form in a separate location.

V. REPORTING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2343(b).]

SECTION D. Source Level Requirements

Reporting for the Methanol Storage Tank

For each storage tank subject to this subpart having a capacity of 18.9 cubic meters (5,000 gallons) or more that is not subject to control based on the criteria specified in Table 2 of 40 C.F.R. Part 63, Subpart EEEE, items 1 through 6, the owner or operator must comply with the requirements specified below [from 40 C.F.R. § 63.2343(b)(1) through (b)(3)].

(b)(1). The owner or operator must submit a subsequent Compliance report according to the schedule in §63.2386(b) whenever any of the events in 40 C.F.R. § 63.2343 (d) occur, as applicable.

(2). The owner's or operator's subsequent Compliance reports must contain the information in 40 C.F.R. §63.2386(c)(1), (2), (3) and, as applicable, in 40 C.F.R. §63.2386(d)(3) and (4). If you are already submitting a subsequent Compliance report under 40 C.F.R. §63.2386(d), you do not need to submit a separate subsequent Compliance report for each storage tank that meets the conditions specified above (i.e., a single subsequent Compliance report should be submitted).

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §63.2343(d).]

Reporting Requirements for Methanol Storage Tanks and Transfer Racks from 40 C.F.R. Part 63, Subpart EEEE

If one or more of the events identified below occur since the filing of the Notification of Compliance Status or the last Compliance report, you must submit a subsequent Compliance report as specified in Condition #010(b)(2) [40 C.F.R. §63.2343(b)(2)] and Condition #012(b)(2) [40 C.F.R. §63.2343(c)(2)].

- (a). Any storage tank or transfer rack became subject to control under 40 C.F.R. Part 63, Subpart EEEE; or
- (b). Any storage tank equal to or greater than 18.9 cubic meters (5,000 gallons) became part of the affected source but is not subject to any of the emission limitations, operating limits, or work practice standards of 40 C.F.R. Part 63, Subpart EEEE; or
- (c). Any transfer rack (except those racks at which only unloading of organic liquids occurs) became part of the affected source; or
- (d). Any of the information required in 40 C.F.R. §63.2386(c)(1), §63.2386(c)(2), or §63.2386(c)(3) has changed.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2343(c).]

Reporting for Transfer Racks on the Methanol Storage Tank

For each transfer rack subject to 40 C.F.R. Part 63, Subpart EEEE that loads organic liquids but is not subject to control based on the criteria specified in Table 2 of 40 C.F.R. Part 63, Subpart EEEE, items 7 through 10, the owner or operator must comply with the requirements specified below (40 C.F.R. § 63.2343(c)(1) and (c)(2)):

(a)(1). The owner or operator must submit the information in Condition #014(a), (b), (c), and (j)(1)[40 C.F.R. §63.2386(c)(1), (2), (3), and (10)(i)] in either the Notification of Compliance Status, according to the schedule specified in Table 12 to 40 C.F.R. Part 63, Subpart EEEE, or a first Compliance report, according to the schedule specified in Condition #013 [40 C.F.R. §63.2386(b)], whichever occurs first.

(2)(i). If the owner or operator submits the first Compliance report before your Notification of Compliance Status, the Notification of Compliance Status must contain the information specified in Condition #011(c) and (d) [40 C.F.R. §63.2386(d)(3) and (4)] if any of the changes identified in Condition #011 [40 C.F.R. § 63.2343(d)] have occurred since the filing of the first Compliance report. If none of the changes identified in Condition #011 have occurred since the filing of the

SECTION D. Source Level Requirements

first Compliance report, the owner or operator does not need to report the information specified in Condition #014(j)(1) [40 C.F.R. §63.2386(c)(10)(i)] when the owner or operator submits the Notification of Compliance Status.

(ii). If the owner or operator submits the Notification of Compliance Status before the first Compliance report, the first Compliance report must contain the information specified in Condition #015(c) and (d) [40 C.F.R. §63.2386(d)(3) and (4)] if any of the changes specified in Condition #011 have occurred since the filing of the Notification of Compliance Status.

(3). If the owner or operator is already submitting a Notification of Compliance Status or a first Compliance report under Condition #014 [40 C.F.R. §63.2386(c)], the owner or operator does not need to submit a separate Notification of Compliance Status or first Compliance report for each transfer rack that meets the conditions identified in Condition #010 [40 C.F.R. § 63.2343(b)] (i.e., a single Notification of Compliance Status or first Compliance report should be submitted).

(b)(1). The owner or operator must submit a subsequent Compliance report according to the schedule in Condition #013 [40 C.F.R. § 63.2386(b)] whenever any of the events in Condition #015 [40 C.F.R. § 63.2386(d)] occur, as applicable.

(2). Your subsequent Compliance reports must contain the information in Condition #014 (a), (b), and (c) [40 C.F.R. § 63.2386(c)(1), (2), (3)] and, as applicable, in Condition #015 [40 C.F.R. § 63.2386(d)(3) and (4)]. If you are already submitting a subsequent Compliance report under Condition #015 [40 C.F.R. § 63.2386(d)], the owner or operator does not need to submit a separate subsequent Compliance report for each transfer rack that meets the conditions identified in Condition #014 [40 C.F.R. § 63.2386(c)] (i.e., a single subsequent Compliance report should be submitted).

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition was also derived from 40 C.F.R. § 63.2386(b).]

Schedule for 40 C.F.R. Part 63, Subpart EEEE Compliance Reports Required for the Methanol Storage Tank

Unless the Administrator has approved a different schedule for submission of reports under 40 C.F.R. § 63.10(a), the owner or operator must submit each report according to table 11 of 40 C.F.R. Part 63, Subpart EEEE and by the dates shown in paragraphs below, by the dates shown in 40 C.F.R. Part 63, Subpart SS, and by the dates shown in table 12 of 40 C.F.R. Part 63, Subpart EEEE, whichever are applicable.

(a). Subsequent Compliance Reports

(1). Each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(2). Each subsequent Compliance report must be postmarked no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(b). For each affected source that is subject to permitting regulations pursuant to 40 C.F.R. Part 70 or 40 C.F.R. Part 71, if the permitting authority has established dates for submitting semiannual reports pursuant to 40 C.F.R. § 70.6(a)(3)(iii)(A) or 40 C.F.R. § 71.6(a)(3)(iii)(A), the owner or operator may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (a) and (b) above.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2386(c).]

The subsequent Compliance report must contain the information specified in paragraphs below.

(a). Company name and address.

(b). Statement by a responsible official, including the official's name, title, and signature, certifying that, based on information

SECTION D. Source Level Requirements

and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

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

(d). Any changes to the information listed in 40 C.F.R. § 63.2382(d)(2) that have occurred since the submittal of the Notification of Compliance Status.

(e). If you had a SSM during the reporting period and you took actions consistent with your SSM plan, the Compliance report must include the information described in 40 C.F.R. § 63.10(d)(5)(i).

(f). If there are no deviations from any emission limitation or operating limit that applies to you and there are no deviations from the requirements for work practice standards, a statement that there were no deviations from the emission limitations, operating limits, or work practice standards during the reporting period.

(g). If there were no periods during which the CMS was out of control as specified in 40 C.F.R. § 63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

(h). For closed vent systems and control devices used to control emissions, the information specified in paragraphs (h)(1) and (2) below [40 C.F.R. § 63.2386(c)(8)(i) through (ii)] or those planned routine maintenance activities that would require the control device to not meet the applicable emission limit.

(1). A description of the planned routine maintenance that is anticipated to be performed for the control device during the next 6 months. This description must include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods.

(2). A description of the planned routine maintenance that was performed for the control device during the previous 6 months. This description must include the type of maintenance performed and the total number of hours during those 6 months that the control device did not meet the applicable emission limit due to planned routine maintenance.

(i). A listing of all transport vehicles into which organic liquids were loaded at transfer racks that are subject to control based on the criteria specified in table 2 to this subpart, items 7 through 10, during the previous 6 months for which vapor tightness documentation as required in 40 C.F.R. § 63.2390(c) was not on file at the facility.

(j). Transfer racks.

(1). A listing of all transfer racks (except those racks at which only unloading of organic liquids occurs) and of tanks greater than or equal to 18.9 cubic meters (5,000 gallons) that are part of the affected source but are not subject to any of the emission limitations, operating limits, or work practice standards of 40 C.F.R. Part 63, Subpart EEEE.

(2). If the information specified in paragraph (j)(1) above has already been submitted with the Notification of Compliance Status, the information specified in Condition #015(c) and (d) [40 C.F.R. § 63.2386(d)(3) and (4)], as applicable, shall be submitted instead.

015 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2386(d).]

Subsequent Compliance reports . Subsequent Compliance reports must contain the information in Condition #014 [40 C.F.R. § 63.2386(c)(1) through (9)] and, where applicable, the information in paragraphs (a) through (d) below [40 C.F.R. § 63.2386(d)(1) through (4)].

(a). For each deviation from an emission limitation occurring at an affected source where the owner or operator is using a CMS to comply with an emission limitation in this subpart, the owner or operator must include in the Compliance report the applicable information below [40 C.F.R. § 63.2386(d)(1)(i) through (xi)]. This includes periods of SSM.

SECTION D. Source Level Requirements

- (1). The date and time that each malfunction started and stopped.
 - (2). The dates and times that each CMS was inoperative, except for zero (low-level) and high-level checks.
 - (3). For each CMS that was out of control, the information in 40 C.F.R. § 63.8(c)(8).
 - (4). The date and time that each deviation started and stopped, and whether each deviation occurred during a period of SSM, or during another period.
 - (5). A summary of the total duration of the deviations during the reporting period, and the total duration as a percentage of the total emission source operating time during that reporting period.
 - (6). A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
 - (7). A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percentage of the total emission source operating time during that reporting period.
 - (8). An identification of each organic HAP that was potentially emitted during each deviation based on the known organic HAP contained in the liquid(s).
 - (9). A brief description of the emission source(s) at which the CMS deviation(s) occurred.
 - (10). A brief description of each CMS that was out of control during the period.
 - (11). The date of the latest certification or audit for each CMS.
 - (12). A brief description of any changes in CMS, processes, or controls since the last reporting period.
- (b). Include in the Compliance report the information in the paragraphs below [40 C.F.R. § 63.2386(d)(2)(i) through (iii)], as applicable.
- (1). For each storage tank and transfer rack subject to control requirements, include periods of planned routine maintenance during which the control device did not comply with the applicable emission limits in table 2 of 40 C.F.R. Part 63, Subpart EEEE.
 - (2). For each storage tank controlled with a floating roof, include a copy of the inspection record (required in §63.1065(b)) when inspection failures occur.
 - (3). If you elect to use an extension for a floating roof inspection in accordance with §63.1063(c)(2)(iv)(B) or (e)(2), include the documentation required by those paragraphs.
- (c)(1). A listing of any storage tank that became subject to controls based on the criteria for control specified in table 2 of 40 C.F.R. Part 63, Subpart EEEE, items 1 through 6, since the filing of the last Compliance report.
- (2). A listing of any transfer rack that became subject to controls based on the criteria for control specified in table 2 of 40 C.F.R. Part 63, Subpart EEEE, items 7 through 10, since the filing of the last Compliance report.
- (d)(1). A listing of tanks greater than or equal to 18.9 cubic meters (5,000 gallons) that became part of the affected source but are not subject to any of the emission limitations, operating limits, or work practice standards of 40 C.F.R. Part 63, Subpart EEEE, since the last Compliance report.
- (2). A listing of all transfer racks (except those racks at which only the unloading of organic liquids occurs) that became part of the affected source but are not subject to any of the emission limitations, operating limits, or work practice standards of 40 C.F.R. Part 63, Subpart EEEE, since the last Compliance report.

SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID No. P001 (Area P-001) includes, but is not limited to, the following equipment:

- (a). A 13,000-gallon aboveground storage tank for methanol. This source vents to the scrubber system via a common dry header.
- (b). A mixing vessel. This source vents to the scrubber system via a common dry header.
- (c). A reactive distillation column with a reboiler, condenser, and vessel to contain condensate. This source vents to the scrubber system via a common dry header.
- (d). All piping, connectors, pumps, heat exchangers, and valves used in association with the equipment listed in paragraphs (a), (b), and (c) above.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The facility shall keep a copy of the current Leak Detection and Repair (LDAR) written plan. A plan was submitted in the Initial Notification and Pre-compliance Report dated January 17, 2012. Any new or replacement of regulated LDAR equipment shall be added to the LDAR plan and shall meet the requirements of 40 C.F.R. § 63.2346(c).

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

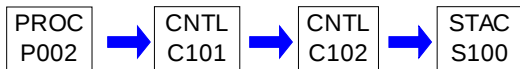
Source ID: P002

Source Name: P002 TRI-METHYL BORATE EXTRACTION/STORAGE

Source Capacity/Throughput:

N/A

TRIMETHYL BORATE



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall monitor all equipment for leaks of HAPs using a Department approved method. The procedures from 40 C.F.R. Part 63, Subpart UU that are used for compliance with the equipment leak detection under the MON MACT may be used to demonstrate compliance with this requirement.

(b). The owner or operator shall use the instrumentation or sensory monitoring techniques specified in the chosen method of equipment leak detection in paragraph (a) above.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following for this source on a daily basis when this source is in operation:

(a). The throughput of material through each piece of equipment listed under this source.

(b). The content of each stream entering and leaving each piece of equipment.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records of all monitoring for equipment leaks for Area P-002.

(b). The owner or operator shall keep records of all detected leaks found and any corrective action taken.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of the following for this source on a daily basis when this source is in operation:

(a). The throughput of material through each piece of equipment listed under this source.

(b). The content of each stream entering and leaving each piece of equipment.

SECTION D. Source Level Requirements

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a monthly basis, the owner or operator shall estimate and record the following:

- (a). The amount of methanol and trimethyl borate that is vented to the scrubber system.
- (b). The amount of methanol and trimethyl borate that is emitted as fugitive emissions from equipment leaks.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID No. P002 (Area P-002) includes, but is not limited to, the following equipment:

- (a). A liquid/liquid extraction/decanting process. This source vents to the scrubber system via a common dry header.
- (b). An evaporation process.
- (c). A series of storage tanks for Trimethyl Borate. These sources vent to the scrubber system via a common dry header.
- (d). All piping, connectors, pumps, heat exchangers, and valves used in association with the equipment listed in paragraphs (a), (b), and (c) above.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The facility shall keep a copy of the current Leak Detection and Repair (LDAR) written plan. A plan was submitted in the Initial Notification and Pre-compliance Report dated January 17, 2012. Any new or replacement of regulated LDAR equipment shall be added to the LDAR plan and shall meet the requirements of 40 C.F.R. § 63.2346(c).

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

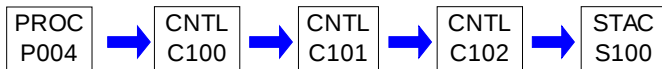
Source ID: P004

Source Name: P004 SODIUM BOROHYDRIDE REACTION

Source Capacity/Throughput:

N/A

SODIUM BOROHYDRIDE



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall monitor all equipment for leaks of HAPs using a Department approved method. The procedures from 40 C.F.R. Part 63, Subpart UU that are used for compliance with the equipment leak detection under the MON MACT may be used to demonstrate compliance with this requirement.

(b). The owner or operator shall use the instrumentation or sensory monitoring techniques specified in the chosen method of equipment leak detection in paragraph (a) above.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following for this source on a daily basis when this source is in operation:

(a). The throughput of material through each piece of equipment listed under this source.

(b). The content of each stream entering and leaving each piece of equipment.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records of all monitoring for equipment leaks for Area P-004.

(b). The owner or operator shall keep records of all detected leaks found and any corrective action taken.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of the following for this source on a daily basis when this source is in operation:

(a). The throughput of material through each piece of equipment listed under this source.

(b). The content of each stream entering and leaving each piece of equipment.

SECTION D. Source Level Requirements**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

On a monthly basis, the owner or operator shall estimate and record the following:

- (a). The amount of methanol and trimethyl borate that is vented to the Break Tank (Source ID No. C100).
- (b). The amount of methanol and trimethyl borate that is emitted as fugitive emissions from equipment leaks.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Source ID No. P004 (Area P-004) includes, but is not limited to, the following equipment:

- (a). Two reactors in series. Each reactor vents to the break tank (Source ID No. C100).
- (b). A vessel used for cool down of products.
- (c). All piping, connectors, pumps, heat exchangers, and valves used in association with the equipment listed in paragraphs (a) and (b) above.

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: P005

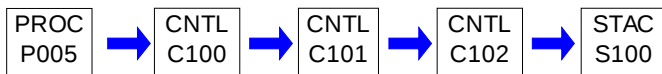
Source Name: P005 HYDROLYSIS SECTION

Source Capacity/Throughput:

N/A

METHANOL

Conditions for this source occur in the following groups: LDAR FOR MON MACT
MON MACT REPORTING



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator of pumps, valves, connectors, and agitators used in organic HAP service (contents of stream or vessel equal to or greater than 5 percent methanol) and used in heavy liquid service, and pressure relief devices used in organic HAP service and in liquid service shall monitor the listed equipment for leaks using the methods described in 40 C.F.R. § 63.1029.

Monitoring method. Unless otherwise specified in 40 C.F.R. § 63.1021(b), 40 C.F.R. § 63.1036, or 40 C.F.R. § 63.1037, the owner or operator shall comply with 40 C.F.R. § 63.1029(b)(1) and (b)(2). Pumps, valves, connectors, and agitators in heavy liquid service; pressure relief devices in light liquid or heavy liquid service; and instrumentation systems shall be monitored within 5 calendar days by the method specified in 40 C.F.R. § 63.1023(b) and, as applicable, 40 C.F.R. § 63.1023(c), if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, unless the potential leak is repaired as required in 40 C.F.R. § 63.1029(c).

(b). The owner or operator shall use the instrumentation or sensory monitoring techniques specified in 40 C.F.R. § 63.1023 for the determination of leaks from the equipment specified in paragraph (a) above.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following for this source on a daily basis when this source is in operation:

(a). The throughput of material through each piece of equipment listed under this source.

(b). The content of each stream entering and leaving each piece of equipment.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records of all monitoring for equipment leaks for Area P-005 in accordance with

SECTION D. Source Level Requirements

Section E, Source Group LDAR for MON MACT, Condition #001 and 40 C.F.R. § 63.1038.

(b). The owner or operator shall keep records of all detected leaks and repairs in accordance with Section E, Source Group LDAR for MON MACT, Condition #002 and 40 C.F.R. § 63.1024.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 25 Pa. Code § 122.3 and 40 C.F.R. § 60.486(i) and (j).]

(a). The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in 40 C.F.R. §60.480(d) [40 C.F.R. Part 60, Subpart VV]:

- (1). An analysis demonstrating the design capacity of the affected facility,
- (2). A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol, and
- (3). An analysis demonstrating that equipment is not in VOC service.

(b). Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of the following for this source on a daily basis when this source is in operation:

- (a). The throughput of material through each piece of equipment listed under this source.
- (b). The content of each stream entering and leaving each piece of equipment.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a monthly basis, the owner or operator shall estimate and record the following:

- (a). The amount of methanol that is vented to the Break Tank (Source ID No. C100).
- (b). The amount of methanol that is emitted as fugitive emissions from equipment leaks.

V. REPORTING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The information related to 40 C.F.R. Part 63, Subpart FFFF for this source shall be reported to the Administrator and the Department in accordance with the conditions listed in Section E, Source Group MON MACT REPORTING.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall report equipment leaks and repairs from this source in accordance with the reporting conditions of Section E, Source Group LDAR for MON MACT [40 C.F.R. Part 63, Subpart UU].

SECTION D. Source Level Requirements**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID No. P005 (Area P-005) includes, but is not limited to, the following equipment:

- (a). Two reactors in series. The gaseous emissions from one reactor are vented to the other reactor, then the second reactor is vented to the break tank (Source ID No. C100).
- (b). All piping, connectors, pumps, heat exchangers, and valves used in association with the equipment listed in paragraph (a) above.

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: P006

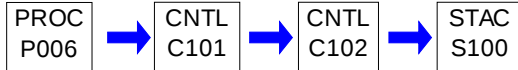
Source Name: P006 SODIUM BOROHYDRIDE SEPARATION

Source Capacity/Throughput:

N/A

METHANOL

Conditions for this source occur in the following groups: HEAT EXCHANGER LEAKS
LDAR FOR MON MACT
MON MACT REPORTING



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall monitor equipment that is in HAP service (composition of stream or stored contents equal to or greater than 5 percent methanol) for leaks of HAPs using the procedures from 40 C.F.R. Part 63, Subpart UU as follows:

(1). Valves used in light liquid service - 40 C.F.R. § 63.1025. The frequency of monitoring the valves in light liquid service is provided under 40 C.F.R. § 63.1025(b)(3) and as follows:

(i). If the greater of two (2) valves or two (2) percent of valves, as calculated using the procedure in 40 C.F.R. § 63.1025(c), the owner or operator shall monitor each valve in this unit once per month.

(ii). At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, the owner or operator shall monitor each valve once each quarter, except as provided in paragraphs (iii) through (v) below [40 C.F.R. § 63.1025(b)(3)(iii) through (v)]. Monitoring data generated before the regulated source became subject to the referencing subpart and meeting the criteria of either §63.1023(b)(1) through (b)(5), or §63.1023(b)(6), may be used to qualify initially for less frequent monitoring under paragraphs (b)(3)(iii) through (b)(3)(v) of this section.

(iii). At process units with less than 1 percent leaking valves, the owner or operator may elect to monitor each valve once every two quarters

(iv). At process units with less than 0.5 percent leaking valves, the owner or operator may elect to monitor each valve once every four quarters.

(v). At process units with less than 0.25 percent leaking valves, the owner or operator may elect to monitor each valve once every 2 years.

(vi). The owner or operator shall keep a record of the monitoring schedule for each process unit.

(2). Pumps used in light liquid service - 40 C.F.R. § 63.1026. The owner or operator shall monitor pumps under this source for leaks on a monthly basis in accordance with § 63.1026(b)(1).

(3). Connectors used in light liquid service - 40 C.F.R. § 63.1027 or 40 C.F.R. § 63.1029 in accordance with the conditions

SECTION D. Source Level Requirements

of 40 C.F.R. § 63.2480(b)(4).

(i). From 40 C.F.R. § 63.1027(a) Compliance schedule. The owner or operator shall monitor all connectors in each process unit initially for leaks by the later of either 12 months after the compliance date as specified in 40 C.F.R. Part 63, Subpart FFFF or 12 months after initial startup. If all connectors in each process unit have been monitored for leaks prior to the compliance date specified in 40 C.F.R. Part 63, Subpart FFFF, no initial monitoring is required provided either no process changes have been made since the monitoring or the owner or operator can determine that the results of the monitoring, with or without adjustments, reliably demonstrate compliance despite process changes. If required to monitor because of a process change, the owner or operator is required to monitor only those connectors involved in the process change.

(ii). From 40 C.F.R. § 63.1027(b)(3). Monitoring periods. The owner or operator shall perform monitoring, subsequent to the initial monitoring required in paragraph (a)(3)(i) above [40 C.F.R. § 63.1027(a)], as specified in the paragraphs below [40 C.F.R. § 63.1027(b)(3)(i) through (b)(3)(iii)], and shall comply with the requirements of paragraphs 40 C.F.R. § 63.1027(b)(3)(iv) and (b)(3)(v). The required period in which monitoring must be conducted shall be determined from 40 C.F.R. § 63.1027(b)(3)(i) through (b)(3)(iii) using the monitoring results from the preceding monitoring period. The percent leaking connectors shall be calculated as specified in 40 C.F.R. § 63.1027(c).

(A). If the percent leaking connectors in the process unit was greater than or equal to 0.5 percent, then monitor within 12 months (1 year).

(B). If the percent leaking connectors in the process unit was greater than or equal to 0.25 percent but less than 0.5 percent, then monitor within 4 years. An owner or operator may comply with the requirements of this paragraph by monitoring at least 40 percent of the connectors within 2 years of the start of the monitoring period, provided all connectors have been monitored by the end of the 4 year monitoring period.

(C). If the percent leaking connectors in the process unit was less than 0.25 percent, then monitor as provided in paragraph (a)(3)(ii)(C)(1) below [40 C.F.R. § 63.1027(b)(3)(iii)(A)] and either paragraph (a)(3)(ii)(C)(2) or (a)(3)(ii)(C)(3) below [40 C.F.R. § 63.1027(b)(3)(iii)(B) or (b)(3)(iii)(C)], as appropriate.

(1). An owner or operator shall monitor at least 50 percent of the connectors within 4 years of the start of the monitoring period.

(2). If the percent leaking connectors calculated from the monitoring results in paragraph (a)(3)(ii)(C)(1) above [40 C.F.R. § 63.1027(b)(3)(iii)(A)] is greater than or equal to 0.35 percent of the monitored connectors, the owner or operator shall monitor as soon as practical, but within the next 6 months, all connectors that have not yet been monitored during the monitoring period. At the conclusion of monitoring, a new monitoring period shall be started pursuant to paragraph 40 C.F.R. § 63.1027(b)(3), based on the percent leaking connectors of the total monitored connectors.

(3). If the percent leaking connectors calculated from the monitoring results in paragraph (a)(3)(ii)(C)(1) [40 C.F.R. § 63.1027(b)(3)(iii)(A)] is less than 0.35 percent of the monitored connectors, the owner or operator shall monitor all connectors that have not yet been monitored within 8 years of the start of the monitoring period.

(D). If, during the monitoring conducted pursuant to paragraph (a)(3)(ii)(A) through (a)(3)(ii)(C) above [40 C.F.R. § 63.1027(b)(3)(i) through (b)(3)(iii)], a connector is found to be leaking, it shall be re-monitored once within 90 days after repair to confirm that it is not leaking.

(E). The owner or operator shall keep a record of the start date and end date of each monitoring period under this section for each process unit.

(4). Pressure relief devices in gas and vapor service - 40 C.F.R. § 63.1030. Each pressure relief valve shall be monitored as follows:

(i). Compliance standard. Except during pressure releases as provided for in paragraph (c) of this section, or as otherwise specified in 40 C.F.R. §§ 63.1036, 63.1037, or 40 C.F.R. § 63.1030(d) and (e), each pressure relief device in gas and vapor service shall be operated with an instrument reading of less than 500 parts per million as measured by the

SECTION D. Source Level Requirements

method specified in 40 C.F.R. § 63.1023(b) and, as applicable, 40 C.F.R. § 63.1023(c).

(ii). Pressure relief requirements.

(A). After each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million, as soon as practical, but no later than 5 calendar days after each pressure release, except as provided in 40 C.F.R. § 63.1024(d).

(B). The pressure relief device shall be monitored no later than five calendar days after the pressure to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured by the method specified in 40 C.F.R. § 63.1023(b) and, as applicable, 40 C.F.R. § 63.1023(c).

(iii). The owner or operator shall record the dates and results of the monitoring required by 40 C.F.R. § 63.1030(c)(2) following a pressure release including the background level measured and the maximum instrument reading measured during the monitoring.

(5). Sampling connection system standards - 40 C.F.R. § 63.1032. The owner or operator shall conduct the work practice standards in 40 C.F.R. § 63.1032 to minimize fugitive emissions from the waste containers used for the discarded samples.

(6). Valves, pumps, connectors, and sampling valves in heavy liquid service and pressure relief devices in liquid service - 40 C.F.R. § 63.1029.

Monitoring method. Unless otherwise specified in 40 C.F.R. § 63.1021(b), 40 C.F.R. § 63.1036, or 40 C.F.R. § 63.1037, the owner or operator shall comply with 40 C.F.R. § 63.1029(b)(1) and (b)(2). Pumps, valves, connectors, and agitators in heavy liquid service; pressure relief devices in light liquid or heavy liquid service; and instrumentation systems shall be monitored within 5 calendar days by the method specified in 40 C.F.R. § 63.1023(b) and, as applicable, 40 C.F.R. § 63.1023(c), if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, unless the potential leak is repaired as required in 40 C.F.R. § 63.1029(c).

(b). The owner or operator shall use the instrumentation or sensory monitoring techniques specified in 40 C.F.R. § 63.1023 for the determination of leaks from the equipment specified in paragraph (a) above.

[Compliance with the condition above also demonstrates compliance with the applicable requirements of 40 C.F.R. Part 60, Subpart VV and the applicable requirements from 25 Pa. Code § 129.71.]

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor for leaks from the affected heat exchanger(s) associated with this source in accordance with the monitoring conditions of Section E, Source Group HEAT EXCHANGER LEAKS [40 C.F.R. § 63.104].

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following for this source on a daily basis when this source is in operation:

(a). The throughput of material through each piece of equipment listed under this source.

(b). The content of each stream entering and leaving each piece of equipment.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records of all monitoring for equipment leaks for Area P-006 in accordance with

SECTION D. Source Level Requirements

Section E, Source Group LDAR for MON MACT, Condition #001 and 40 C.F.R. § 63.1038.

(b). The owner or operator shall keep records of all detected leaks and repairs in accordance with Section E, Source Group LDAR for MON MACT, Condition #002 and 40 C.F.R. § 63.1024.

[Compliance with the condition above also demonstrates compliance with the applicable requirements of 40 C.F.R. Part 60, Subpart WW and 25 Pa. Code § 129.71.]

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of leak monitoring and detected leaks from the affected heat exchanger(s) associated with this source in accordance with the recordkeeping conditions of Section E, Source Group HEAT EXCHANGER LEAKS [40 C.F.R. § 63.104].

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of the following for this source on a daily basis when this source is in operation:

- (a). The throughput of material through each piece of equipment listed under this source.
- (b). The content of each stream entering and leaving each piece of equipment.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a monthly basis, the owner or operator shall estimate and record the following:

- (a). The amount of methanol that is vented to the scrubber system.
- (b). The amount of methanol that is emitted as fugitive emissions from equipment leaks.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of weekly visual pump checks for leaks.

V. REPORTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The information related to 40 C.F.R. Part 63, Subpart FFFF for this source shall be reported to the Administrator and the Department in accordance with the conditions listed in Section E, Source Group MON MACT REPORTING [40 C.F.R. Part 63, Subpart FFFF].

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall report equipment leaks and repairs from this source in accordance with the reporting conditions of Section E, Source Group LDAR for MON MACT [40 C.F.R. Part 63, Subpart UU].

[Compliance with the condition above also demonstrates compliance with the applicable requirements of 40 C.F.R. Part 60, Subpart WW and 25 Pa. Code § 129.71.]

SECTION D. Source Level Requirements

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall report leaks from the affected heat exchanger(s) associated with this source in accordance with the reporting conditions of Section E, Source Group HEAT EXCHANGER LEAKS [40 C.F.R. § 63.104].

VI. WORK PRACTICE REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 25 Pa. Code § 129.71 and 40 C.F.R. § 63.1033.]

The owner or operator shall:

- (a). Install a second valve, blind flange, plug, cap or other equivalent sealing system on open ended lines, except for safety pressure relief valves.
- (b). Perform a weekly visual check of pumps in light liquid service for indications of leaks.
- (c). Check, by methods referenced in 25 Pa. Code § 139.14 and/or 40 C.F.R. § 63.1023(b), a safety relief valve within 24 hours after it has vented to the atmosphere to assure that the safety relief valve has resealed.
- (d). The initiation and maintenance of a log of leaking components. The log shall contain, at a minimum, the total number of components checked, the total number of components found leaking, the location of the leaking component, the type of component, for example, valve, seal and the like, the tag identification number, the date on which the component was discovered to be leaking, date of repair, leak detection instrument reading after repairs, the components that cannot be repaired until a process shutdown that will not occur within 15 days from the date of detection and a record of the calibration of the leak detection monitoring instrument. The monitoring log shall be retained by the owner for 2 years after the date on which an entry was made. The log shall be made available to the Department upon oral or written request.

VII. ADDITIONAL REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID No. P006 (Area P-006) includes, but is not limited to, the following equipment:

- (a). Two centrifuges.
- (b). A decanting process. This source vents to the scrubber system via a common wet header.
- (c). A distillation column with a reboiler and condenser. This source vents to the scrubber system via a common wet header.
- (d). All piping, connectors, pumps, heat exchangers, and valves used in association with the equipment listed in paragraphs (a), (b), and (c) above.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: P007

Source Name: P007 MINERAL OIL SEPARATION/DRYING

Source Capacity/Throughput:

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Source ID No. P007 (Area P-007) includes, but is not limited to, the following equipment:

- (a). Storage/separation Tanks.
- (b). Clay Beds.
- (c). Centrifuges.
- (d). All piping, connectors, pumps, heat exchangers, and valves used in association with the equipment listed in paragraphs (a), (b), and (c) above.

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: P008

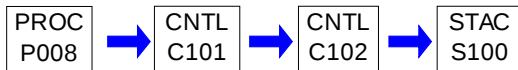
Source Name: P008 RECYCLE/WASTE

Source Capacity/Throughput:

N/A

METHANOL

Conditions for this source occur in the following groups: HEAT EXCHANGER LEAKS
LDAR FOR MON MACT
MON MACT REPORTING



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor for leaks from the affected heat exchanger(s) associated with this source in accordance with the monitoring conditions of Section E, Source Group HEAT EXCHANGER LEAKS [40 C.F.R. § 63.104].

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following for this source on a daily basis when this source is in operation:

- The throughput of material through each piece of equipment listed under this source.
- The content of each stream entering and leaving each piece of equipment.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall monitor equipment that is in HAP service (composition of stream or stored contents equal to or greater than 5 percent methanol) for leaks of HAPs using the procedures from 40 C.F.R. Part 63, Subpart UU as follows:

(1). Valves used in light liquid service - 40 C.F.R. § 63.1025. The frequency of monitoring the valves in light liquid service is provided under 40 C.F.R. § 63.1025(b)(3) and as follows:

(i). If the greater of two (2) valves or two (2) percent of valves, as calculated using the procedure in 40 C.F.R. § 63.1025(c), the owner or operator shall monitor each valve in this unit once per month.

(ii). At process units with less than the greater of 2 leaking valves or 2 percent leaking valves, the owner or operator shall monitor each valve once each quarter, except as provided in paragraphs (iii) through (v) below [40 C.F.R. § 63.1025(b)(3)(iii) through (v)]. Monitoring data generated before the regulated source became subject to the referencing subpart and meeting the criteria of either §63.1023(b)(1) through (b)(5), or §63.1023(b)(6), may be used to qualify initially for less frequent monitoring under paragraphs (b)(3)(iii) through (b)(3)(v) of this section.

SECTION D. Source Level Requirements

(iii). At process units with less than 1 percent leaking valves, the owner or operator may elect to monitor each valve once every two quarters

(iv). At process units with less than 0.5 percent leaking valves, the owner or operator may elect to monitor each valve once every four quarters.

(v). At process units with less than 0.25 percent leaking valves, the owner or operator may elect to monitor each valve once every 2 years.

(vi). The owner or operator shall keep a record of the monitoring schedule for each process unit.

(2). Pumps used in light liquid service - 40 C.F.R. § 63.1026. The owner or operator shall monitor pumps under this source for leaks on a monthly basis in accordance with § 63.1026(b)(1).

(3). Connectors used in light liquid service - 40 C.F.R. § 63.1027 or 40 C.F.R. § 63.1029 in accordance with the conditions of 40 C.F.R. § 63.2480(b)(4).

(i). From 40 C.F.R. § 63.1027(a) Compliance schedule. The owner or operator shall monitor all connectors in each process unit initially for leaks by the later of either 12 months after the compliance date as specified in 40 C.F.R. Part 63, Subpart FFFF or 12 months after initial startup. If all connectors in each process unit have been monitored for leaks prior to the compliance date specified in 40 C.F.R. Part 63, Subpart FFFF, no initial monitoring is required provided either no process changes have been made since the monitoring or the owner or operator can determine that the results of the monitoring, with or without adjustments, reliably demonstrate compliance despite process changes. If required to monitor because of a process change, the owner or operator is required to monitor only those connectors involved in the process change.

(ii). From 40 C.F.R. § 63.1027(b)(3). Monitoring periods. The owner or operator shall perform monitoring, subsequent to the initial monitoring required in paragraph (a)(3)(i) above [40 C.F.R. § 63.1027(a)], as specified in the paragraphs below [40 C.F.R. § 63.1027(b)(3)(i) through (b)(3)(iii)], and shall comply with the requirements of paragraphs 40 C.F.R. § 63.1027(b)(3)(iv) and (b)(3)(v). The required period in which monitoring must be conducted shall be determined from 40 C.F.R. § 63.1027(b)(3)(i) through (b)(3)(iii) using the monitoring results from the preceding monitoring period. The percent leaking connectors shall be calculated as specified in 40 C.F.R. § 63.1027(c).

(A). If the percent leaking connectors in the process unit was greater than or equal to 0.5 percent, then monitor within 12 months (1 year).

(B). If the percent leaking connectors in the process unit was greater than or equal to 0.25 percent but less than 0.5 percent, then monitor within 4 years. An owner or operator may comply with the requirements of this paragraph by monitoring at least 40 percent of the connectors within 2 years of the start of the monitoring period, provided all connectors have been monitored by the end of the 4 year monitoring period.

(C). If the percent leaking connectors in the process unit was less than 0.25 percent, then monitor as provided in paragraph (a)(3)(ii)(C)(1) below [40 C.F.R. § 63.1027(b)(3)(iii)(A)] and either paragraph (a)(3)(ii)(C)(2) or (a)(3)(ii)(C)(3) below [40 C.F.R. § 63.1027(b)(3)(iii)(B) or (b)(3)(iii)(C)], as appropriate.

(1). An owner or operator shall monitor at least 50 percent of the connectors within 4 years of the start of the monitoring period.

(2). If the percent leaking connectors calculated from the monitoring results in paragraph (a)(3)(ii)(C)(1) above [40 C.F.R. § 63.1027(b)(3)(iii)(A)] is greater than or equal to 0.35 percent of the monitored connectors, the owner or operator shall monitor as soon as practical, but within the next 6 months, all connectors that have not yet been monitored during the monitoring period. At the conclusion of monitoring, a new monitoring period shall be started pursuant to paragraph 40 C.F.R. § 63.1027(b)(3), based on the percent leaking connectors of the total monitored connectors.

(3). If the percent leaking connectors calculated from the monitoring results in paragraph (a)(3)(ii)(C)(1) [40 C.F.R. § 63.1027(b)(3)(iii)(A)] is less than 0.35 percent of the monitored connectors, the owner or operator shall monitor all

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connectors that have not yet been monitored within 8 years of the start of the monitoring period.

(D). If, during the monitoring conducted pursuant to paragraph (a)(3)(ii)(A) through (a)(3)(ii)(C) above [40 C.F.R. § 63.1027(b)(3)(i) through (b)(3)(iii)], a connector is found to be leaking, it shall be re-monitored once within 90 days after repair to confirm that it is not leaking.

(E). The owner or operator shall keep a record of the start date and end date of each monitoring period under this section for each process unit.

(4). Pressure relief devices in gas and vapor service - 40 C.F.R. § 63.1030. Each pressure relief valve shall be monitored as follows:

(i). Compliance standard. Except during pressure releases as provided for in paragraph (c) of this section, or as otherwise specified in 40 C.F.R. §§ 63.1036, 63.1037, or 40 C.F.R. § 63.1030(d) and (e), each pressure relief device in gas and vapor service shall be operated with an instrument reading of less than 500 parts per million as measured by the method specified in 40 C.F.R. § 63.1023(b) and, as applicable, 40 C.F.R. § 63.1023(c).

(ii). Pressure relief requirements.

(A). After each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million, as soon as practical, but no later than 5 calendar days after each pressure release, except as provided in 40 C.F.R. § 63.1024(d).

(B). The pressure relief device shall be monitored no later than five calendar days after the pressure to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured by the method specified in 40 C.F.R. § 63.1023(b) and, as applicable, 40 C.F.R. § 63.1023(c).

(iii). The owner or operator shall record the dates and results of the monitoring required by 40 C.F.R. § 63.1030(c)(2) following a pressure release including the background level measured and the maximum instrument reading measured during the monitoring.

(5). Sampling connection system standards - 40 C.F.R. § 63.1032. The owner or operator shall conduct the work practice standards in 40 C.F.R. § 63.1032 to minimize fugitive emissions from the waste containers used for the discarded samples.

(6). Valves, pumps, connectors, and sampling valves in heavy liquid service and pressure relief devices in liquid service - 40 C.F.R. § 63.1029.

Monitoring method. Unless otherwise specified in 40 C.F.R. § 63.1021(b), 40 C.F.R. § 63.1036, or 40 C.F.R. § 63.1037, the owner or operator shall comply with 40 C.F.R. § 63.1029(b)(1) and (b)(2). Pumps, valves, connectors, and agitators in heavy liquid service; pressure relief devices in light liquid or heavy liquid service; and instrumentation systems shall be monitored within 5 calendar days by the method specified in 40 C.F.R. § 63.1023(b) and, as applicable, 40 C.F.R. § 63.1023(c), if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, unless the potential leak is repaired as required in 40 C.F.R. § 63.1029(c).

(b). The owner or operator shall use the instrumentation or sensory monitoring techniques specified in 40 C.F.R. § 63.1023 for the determination of leaks from the equipment specified in paragraph (a) above.

[Compliance with the condition above also demonstrates compliance with the applicable requirements of 40 C.F.R. Part 60, Subpart VV and the applicable requirements from 25 Pa. Code § 129.71.]

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of leak monitoring and detected leaks from the affected heat exchanger(s)

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associated with this source in accordance with the recordkeeping conditions of Section E, Source Group HEAT EXCHANGER LEAKS [40 C.F.R. § 63.104].

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of the following for this source on a daily basis when this source is in operation:

- (a). The throughput of material through each piece of equipment listed under this source.
- (b). The content of each stream entering and leaving each piece of equipment.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a monthly basis, the owner or operator shall estimate and record the following:

- (a). The amount of methanol that is vented to the scrubber system.
- (b). The amount of methanol that is emitted as fugitive emissions from equipment leaks.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of weekly visual pump checks for leaks.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records of all monitoring for equipment leaks for Area P-008 in accordance with Section E, Source Group LDAR for MON MACT, Condition #001 and 40 C.F.R. § 63.1038.

(b). The owner or operator shall keep records of all detected leaks and repairs in accordance with Section E, Source Group LDAR for MON MACT, Condition #002 and 40 C.F.R. § 63.1024.

[Compliance with the condition above also demonstrates compliance with the applicable requirements of 40 C.F.R. Part 60, Subpart VV and 25 Pa. Code § 129.71.]

V. REPORTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The information related to 40 C.F.R. Part 63, Subpart FFFF for this source shall be reported to the Administrator and the Department in accordance with the conditions listed in Section E, Source Group MON MACT REPORTING [40 C.F.R. Part 63, Subpart FFFF].

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall report equipment leaks and repairs from this source in accordance with the reporting conditions of Section E, Source Group LDAR for MON MACT [40 C.F.R. Part 63, Subpart UU].

[Compliance with the condition above also demonstrates compliance with the applicable requirements of 40 C.F.R. Part 60, Subpart VV and 25 Pa. Code § 129.71.]

SECTION D. Source Level Requirements

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall report leaks from the affected heat exchanger(s) associated with this source in accordance with the reporting conditions of Section E, Source Group HEAT EXCHANGER LEAKS [40 C.F.R. § 63.104].

VI. WORK PRACTICE REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 25 Pa. Code § 129.71 and 40 C.F.R. § 63.1033.]

The owner or operator shall:

- (a). Install a second valve, blind flange, plug, cap or other equivalent sealing system on open ended lines, except for safety pressure relief valves.
- (b). Perform a weekly visual check of pumps in light liquid service for indications of leaks.
- (c). Check, by methods referenced in 25 Pa. Code § 139.14 and/or 40 C.F.R. § 63.1023(b), a safety relief valve within 24 hours after it has vented to the atmosphere to assure that the safety relief valve has resealed.
- (d). The initiation and maintenance of a log of leaking components. The log shall contain, at a minimum, the total number of components checked, the total number of components found leaking, the location of the leaking component, the type of component; for example, valve, seal and the like; the tag identification number, the date on which the component was discovered to be leaking, date of repair, leak detection instrument reading after repairs, the components that cannot be repaired until a process shutdown that will not occur within 15 days from the date of detection and a record of the calibration of the leak detection monitoring instrument. The monitoring log shall be retained by the owner for 2 years after the date on which an entry was made. The log shall be made available to the Department upon oral or written request.

VII. ADDITIONAL REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID No. P008 (Area P-008) includes, but is not limited to, the following equipment:

- (a). An aboveground storage tank for spent methanol. This source vents to the scrubber system via a common wet header.
- (b). A distillation column with a reboiler, condenser, and vessel to contain condensate. This source vents to the scrubber system via a common dry header.
- (c). All piping, connectors, pumps, heat exchangers, and valves used in association with the equipment listed in paragraphs (a) and (b) above.

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: P010

Source Name: DEGREASING UNIT

Source Capacity/Throughput:

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the solvent usage for the parts degreaser on a material balance basis.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of solvent usage for parts degreaser on a monthly basis.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §129.63]

Degreasing operations

For each parts washer that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts:

(a) The parts washer shall have a freeboard ratio of 0.50 or greater.

(b) The parts washer shall have a permanent, conspicuous label summarizing the following operating requirements:

(1) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(2) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.

(3) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.

(4) Air agitated solvent baths may not be used.

(5) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

(6) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

SECTION D. Source Level Requirements

(7) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

(8) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

(c) The parts washer shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.

(d) The permittee may not use any solvent in a parts washer with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

(e) Solvents purchased by the permittee shall contain the following information:

- (1) The name and address of the solvent supplier.
- (2) The type of solvent including the product or vendor identification number.
- (3) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).

(f) The requirements of paragraph (d) do not apply to the following, pursuant to 25 Pa. Code § 129.63(a)(7):

- (1) Cold cleaning machines used in extreme cleaning service;
- (2) Cold cleaning machines for which the permittee demonstrates, and the Department approves in writing, that compliance with paragraph (d) would result in unsafe operating conditions; and,
- (3) Immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: C100

Source Name: BREAK TANK T-801

Source Capacity/Throughput:

N/A

METHANOL

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following for this source on a daily basis:

- (a). The pressure of the tank.
- (b). The temperature of the tank.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of the following for this source on a daily basis:

- (a). The pressure of the tank.
- (b). The temperature of the tank.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records for each event where the pressure of this tank exceeds the pressure setting for the pressure relief valve.

(b). For each event when the pressure exceeds the pressure setting for the pressure relief valve, the owner or operator shall estimate the amount of trimethyl borate and/or methanol that is vented to the scrubber system.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall operate and maintain this source in accordance with manufacturer's specifications and good engineering practices.



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: C101

Source Name: EJECTOR VENTURI SCRUBBERS (2 TOTAL) T-802

Source Capacity/Throughput:

N/A

METHANOL

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall perform a stack test for the collection efficiency and emissions from Source ID Nos. C101 and C102 using the Department-approved procedures, every five (5) years or once within the life of the permit. Such testing shall be conducted at least 12 months prior to the expiration of this permit. The stack test results shall be submitted for review no later than 6 months before the permit expiration.

(b) At least sixty (60) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for volatile organic compounds and methanol. Tests shall be conducted in accordance with the provisions of U.S. EPA Methods 1A, 2A or 2C, 3, 4, and 308 or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor the following operating parameters for each venturi scrubber on a daily basis, using the EPA approved method:

(a). The inlet pressure for the gases vented to each venturi scrubber (target pressure = 14.65 psia, minimum pressure = 13.5 psia, maximum pressure = 15.9 psia. At a inlet pressure greater than 15.0 psia, the permittee shall investigate inlet pressure and take corrective action.

(b). The inlet temperature of the gases vented to each venturi scrubber.

(c). The inlet pressure of the recirculating water stream entering each venturi scrubber.

(d). The inlet temperature of the recirculating water stream entering each venturi scrubber.

(e). The pressure of the storage tank for the scrubber fluid.

(f). The flow rate of recirculating water entering each venturi scrubber.

(g). The pressure drop across the two (2) venturi scrubbers shall be 10 to 80 psi.

(h). The blower fan (venturi tank to packed bed column) speed shall be 700 to 3600 rpm

The above paramaters are monitored every 15 minutes (average) by a PLC.

[Note: Alternative Monitoring was EPA approved on June 20, 2018]

SECTION D. Source Level Requirements

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). The owner or operator shall keep records of the following operating parameters for each venturi scrubber on a daily basis:

- (1). The inlet pressure for the gases vented to each venturi scrubber.
- (2). The inlet temperature of the gases vented to each venturi scrubber.
- (3). The inlet pressure of the recirculating water stream entering each venturi scrubber.
- (4). The inlet temperature of the recirculating water stream entering each venturi scrubber.
- (5). The pressure of the storage tank for the scrubber fluid.
- (6). The flow rate of recirculating water entering each venturi scrubber.
- (7). The pressure drop across the two (2) venturi scrubbers.
- (8). The blower fan speed (venturi tank to packed bed column).

(b). The owner or operator shall keep records of design information, including, but not limited to, the area of the nozzle from which the water enters the venturi scrubber and the area of the venturi throat on file.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.993(a)(2).]

A venturi scrubber shall be operated at all times when process and/or storage tank emissions are being vented to the scrubber system.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall install, operate, and maintain this source in accordance with manufacturer's specifications and good engineering practice.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: C102

Source Name: PACKED BED SCRUBBER T-803

Source Capacity/Throughput:

N/A

METHANOL

Conditions for this source occur in the following groups: MON MACT REPORTING

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2450, § 63.2455, and 40 C.F.R. Part 63, Subpart FFFF, Table 1.]

The owner or operator shall maintain the Total Resource Effectiveness (TRE) Index at a value equal to or greater than 1.9 for the exhaust for this scrubber system.

[Note: In regards to the hierarchy of applicability for the emissions restrictions under 40 C.F.R. § 63.2450, the storage tanks or transfer operations connected to this scrubber system are considered to be Group 2 and have no other requirements associated with them. This scrubber system controls emissions from more than the sources covered by 40 C.F.R. Part 63, Subpart FFFF. Since Group 1 Continuous Process Vents are the only sources with emission standards associated with their operation, the emission limit above was applied to all the sources that vent to this scrubber system.]

[Compliance with the above condition for TRE also demonstrates compliance with the emission standards of 40 C.F.R. Part 60, Subpart NNN for the distillation columns in Production Areas P-006 and P-008 (Source ID Nos. P006 and P008) in accordance with 40 C.F.R. § 63.2535(h).]

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall limit the emissions of methanol from this packed bed scrubber to less than or equal to the following:

- (a). 2.3 pounds per hour.
- (b). 9.69 tons per year on a 12-month rolling sum basis.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall perform a stack test for the collection efficiency and emissions from Source ID Nos. C101 and C102 using the Department-approved procedures, every five (5) years or once within the life of the permit. Such testing shall be conducted at least 12 months prior to the expiration of this permit. The stack test results shall be submitted for review no later than 6 months before the permit expiration.

(b) At least sixty (60) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for volatile organic compounds and methanol. Tests shall be conducted in accordance with the provisions of U.S. EPA Methods 1A, 2A or 2C, 3, 4, and 308 or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

SECTION D. Source Level Requirements

(e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall monitor, using the EPA approved method the fresh water flow inlet rate for the scrubber every 15 minutes (average reading from PLC).

(a). During plant operation, the fresh water flow rate shall be 4.9 to 5.1 lb/min.

Alternative Operation: Plant shutdown

(b). During shut down periods, the fresh water flow rate shall be a minimum of 1.9 lb/min. to control tank breathing losses.

[Note: Alternative Monitoring was EPA approved on June 20, 2018]

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.998(a)(3).]

Recovery device monitoring records during TRE index value determination.

For process vents that require control of emissions under 40 C.F.R. Part 63, Subpart FFFF, owners or operators using a recovery device to maintain a TRE above a level specified in 40 C.F.R. Part 63, Subpart FFFF shall maintain the continuous records specified below and in 40 C.F.R. § 63.998(a)(3)(i) through (v), as applicable, and submit reports as specified in 40 C.F.R. § 63.999(a)(2)(iii)(C).

(a). All measurements and calculations performed to determine the TRE index value of the vent stream shall be made in a manner specified in 40 C.F.R. Part 63, Subpart FFFF.

[Compliance with the condition above also demonstrates compliance with the applicable requirements from 40 C.F.R. Part 60, Subpart NNN for the distillation columns in Production Areas P-006 and P-008 (Source ID Nos. P006 and P008) in accordance with 40 C.F.R. § 63.2535(h).]

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.998(c)(1).]

Recovery device regulated source monitoring records

Monitoring system records. For process vents, the owner or operator subject to 40 C.F.R. Part 63, Subpart SS shall keep the records specified below, as well as records specified elsewhere in 40 C.F.R. Part 63, Subpart SS.

(a). For a CPMS used to comply with 40 C.F.R. Part 63, a record of the procedure used for calibrating the CPMS.

(b). For a CPMS used to comply with 40 C.F.R. Part 63, Subpart SS, records of the information specified below and in 40 C.F.R. § 63.998(c)(ii)(A) through (H), as indicated in 40 C.F.R. Part 63, Subpart FFFF.

SECTION D. Source Level Requirements

- (1). The date and time of completion of calibration and preventive maintenance of the CPMS.
- (2). The "as found" and "as left" CPMS readings, whenever an adjustment is made that affects the CPMS reading and a "no adjustment" statement otherwise.
- (3). The start time and duration or start and stop times of any periods when the CPMS is inoperative.
- (4). Records of the occurrence and duration of each start-up, shutdown, and malfunction of CPMS used to comply with this subpart during which excess emissions (as defined in 40 C.F.R. Part 63, Subpart FFFF) occur.
- (5). For each start-up, shutdown, and malfunction during which excess emissions as defined in 40 C.F.R. Part 63, Subpart FFFF occur, records whether the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.
- (6). Records documenting each start-up, shutdown, and malfunction event.
- (7). Records of CPMS start-up, shutdown, and malfunction event that specify that there were no excess emissions during the event, as applicable.
- (8). Records of the total duration of operating time.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.998(b)(5).]

Alternative recordkeeping. For any parameter with respect to any item of equipment associated with a process vent, the owner or operator may implement the recordkeeping requirements in paragraphs (a) and (b) below [40 C.F.R. § 63.998(b)(5)(i) or (ii)] as alternatives to the recordkeeping provisions listed in Condition #005 [40 C.F.R. § 63.998(b)(1) through (3)]. The owner or operator shall retain each record required by paragraphs (a) and (b) below [40 C.F.R. § 63.998(b)(5)(i) or (ii)] as provided in 40 C.F.R. Part 63, Subpart FFFF.

(a). The owner or operator may retain only the daily average value, and is not required to retain more frequently monitored operating parameter values, for a monitored parameter with respect to an item of equipment, if the requirements under this paragraph [40 C.F.R. § 63.998(b)(5)(i)(A) through (F)] are met. The owner or operator shall notify the Administrator in the Notification of Compliance Status as specified in Condition #015 [40 C.F.R. § 63.999(b)(5)] or, if the Notification of Compliance Status has already been submitted, in the Periodic Report immediately preceding implementation of the requirements of this paragraph, as specified in Condition #013(b) [40 C.F.R. § 63.999(c)(6)(iv)].

(1). The monitoring system is capable of detecting unrealistic or impossible data during periods of operation other than start-ups, shutdowns or malfunctions (e.g., a temperature reading of -200°C on a boiler), and will alert the operator by alarm or other means. The owner or operator shall record the occurrence. All instances of the alarm or other alert in an operating day constitute a single occurrence.

(2). The monitoring system generates a running average of the monitoring values, updated at least hourly throughout each operating day, that have been obtained during that operating day, and the capability to observe this average is readily available to the Administrator on-site during the operating day. The owner or operator shall record the occurrence of any period meeting the criteria under this paragraph [40 C.F.R. § 63.998(b)(5)(i)(B)(1) through (3)]. All instances in an operating day constitute a single occurrence.

(i). The running average is above the maximum or below the minimum established limits;

(ii). The running average is based on at least six one-hour average values; and

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(iii). The running average reflects a period of operation other than a start-up, shutdown, or malfunction.

(3). The monitoring system is capable of detecting unchanging data during periods of operation other than start-ups, shutdowns or malfunctions, except in circumstances where the presence of unchanging data is the expected operating condition based on past experience (e.g., pH in some scrubbers), and will alert the operator by alarm or other means. The owner or operator shall record the occurrence. All instances of the alarm or other alert in an operating day constitute a single occurrence.

(4). The monitoring system will alert the owner or operator by an alarm, if the running average parameter value calculated under paragraph (a)(2) above [40 C.F.R. § 63.998(b)(5)(i)(B)] reaches a set point that is appropriately related to the established limit for the parameter that is being monitored.

(5). The owner or operator shall verify the proper functioning of the monitoring system, including its ability to comply with the requirements of paragraph (a) [40 C.F.R. § 63.998(b)(5)(i)], at the times specified under this paragraph [40 C.F.R. § 63.998(b)(5)(i)(E)(1) through (3)]. The owner or operator shall document that the required verifications occurred.

(i). Upon initial installation.

(ii). Annually after initial installation.

(iii). After any change to the programming or equipment constituting the monitoring system that might reasonably be expected to alter the monitoring system's ability to comply with the requirements of this section.

(6). The owner or operator shall retain the records identified under this paragraph [40 C.F.R. § 63.998(b)(5)(i)(F)(1) through (4)].

(i). Identification of each parameter, for each item of equipment, for which the owner or operator has elected to comply with the requirements of paragraph (a) [40 C.F.R. § 63.998(b)(5)(i)].

(ii). A description of the applicable monitoring system(s), and of how compliance will be achieved with each requirement of paragraphs (a)(1) through (a)(5) above [40 C.F.R. § 63.998(b)(5)(i)(A) through (E)]. The description shall identify the location and format (e.g., on-line storage; log entries) for each required record. If the description changes, the owner or operator shall retain both the current and the most recent superseded description. The description, and the most recent superseded description, shall be retained as provided in 40 C.F.R. Part 63, Subpart FFFF, except as provided in paragraph (a)(6)(i) [40 C.F.R. § 63.998(b)(5)(i)(F)(1)].

(iii). A description, and the date, of any change to the monitoring system that would reasonably be expected to affect its ability to comply with the requirements of paragraph (a) above [40 C.F.R. § 63.998(b)(5)(i)].

(iv). Owners and operators subject to paragraph (a)(6)(ii) [40 C.F.R. § 63.998(b)(5)(i)(F)(2)] shall retain the current description of the monitoring system as long as the description is current, but not less than 5 years from the date of its creation. The current description shall be retained on-site at all times or be accessible from a central location by computer or other means that provides access within 2 hours after a request. The owner or operator shall retain the most recent superseded description at least until 5 years from the date of its creation. The superseded description shall be retained on-site (or accessible from a central location by computer that provides access within 2 hours after a request) at least 6 months after being superseded. Thereafter, the superseded description may be stored off-site.

(b). If an owner or operator has elected to implement the requirements of paragraph (a) [40 C.F.R. § 63.998(b)(5)(i)], and a period of 6 consecutive months has passed without an excursion as defined in Condition #008(a) [40 C.F.R. § 63.998(b)(6)(i)], the owner or operator is no longer required to record the daily average value for that parameter for that unit of equipment, for any operating day when the daily average value is less than the maximum, or greater than the minimum established limit. With approval by the Administrator, monitoring data generated prior to the compliance date of this subpart shall be credited toward the period of 6 consecutive months, if the parameter limit and the monitoring were required and/or approved by the Administrator.

(1). If the owner or operator elects not to retain the daily average values, the owner or operator shall notify the

SECTION D. Source Level Requirements

Administrator in the next Periodic Report, as specified in Condition #013 [40 C.F.R. § 63.999(c)(6)(i)]. The notification shall identify the parameter and unit of equipment.

(2). If there is an excursion as defined in Condition #008(a) [40 C.F.R. § (b)(6)(i)] on any operating day after the owner or operator has ceased recording daily averages as provided in paragraph (b) [40 C.F.R. § 63.998(b)(5)(ii)], the owner or operator shall immediately resume retaining the daily average value for each operating day, and shall notify the Administrator in the next Periodic Report, as specified in Condition #013 [40 C.F.R. § 63.999(c)]. The owner or operator shall continue to retain each daily average value until another period of 6 consecutive months has passed without an excursion as defined in Condition #008(a) [40 C.F.R. § 63.998(b)(6)(i)].

(3). The owner or operator shall retain the records specified in paragraphs (a)(1) through (a)(6) above [40 C.F.R. §§ 63.998(b)(5)(i)(A) through (F)] for the duration specified in a referencing subpart. For any week, if compliance with paragraphs (a)(1) through (a)(4) [40 C.F.R. § 63.998(b)(5)(i)(A) through (D)] does not result in retention of a record of at least one occurrence or measured parameter value, the owner or operator shall record and retain at least one parameter value during a period of operation other than a start-up, shutdown, or malfunction.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40. C.F.R. §§ 63.2455 and 63.998(b)(6).]

(a). For the purposes of 40 C.F.R Part 63, Subpart SS, an excursion means that the daily average value of monitoring data for a parameter is greater than the maximum, or less than the minimum established value, except as provided under this paragraph [40 C.F.R § 63.998(b)(6)(i)(A) and (B)].

(1). The daily average value during any startup, shutdown, or malfunction shall not be considered an excursion if the owner or operator operates the source during such periods in accordance with 40 C.F.R. § 63.1111(a) and maintains the records specified in Condition #009 [40 C.F.R. § 63.998(d)(3)].

(2). An excused excursion, as described in paragraph (b) below [40 C.F.R. § 63.998(b)(6)(ii)], does not count toward the number of excursions for the purposes of this subpart.

(b) One excused excursion for each control device or recovery device for each semiannual period is allowed. If a source has developed a startup, shutdown and malfunction plan, and a monitored parameter is outside its established range or monitoring data are not collected during periods of start-up, shutdown, or malfunction (and the source is operated during such periods in accordance with 40 C.F.R. § 63.1111(a)) or during periods of nonoperation of the process unit or portion thereof (resulting in cessation of the emissions to which monitoring applies), then the excursion is not a violation and, in cases where continuous monitoring is required, the excursion does not count as the excused excursion for determining compliance.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.998(d)(3).]

Regulated source and control equipment start-up, shutdown and malfunction records.

(a). Records shall be kept of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment or of air pollution control equipment used to comply with this part during which excess emissions (as defined in a referencing subpart) occur.

(b). For each start-up, shutdown, and malfunction during which excess emissions occur, records that the procedures specified in the source's start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. For example, if a start-up, shutdown, and malfunction plan includes procedures for routing control device emissions to a backup control device (e.g., the incinerator for a halogenated stream could be routed to a flare during periods when the primary control device is out of service), records must be kept of whether the plan was followed.

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These records may take the form of a "checklist," or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall:

- (a). calculate and record the methanol emissions from this source on a monthly and a 12-month rolling sum basis.
- (b). record the fresh water flow inlet rate for the scrubber on a daily basis.

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.999(b)(3).]

Operating range for monitored parameters.

The owner or operator shall submit as part of the Notification of Compliance Status for 40 C.F.R. Part 63, Subpart FFFF [Section E, Source Group MON MACT REPORTING, Condition #002], the operating range for each monitoring parameter identified for each recovery device as determined pursuant to 40 C.F.R. § 63.996(c)(6). The specified operating range shall represent the conditions for which the recovery device is being properly operated and maintained. This report shall include the information below and in 40 C.F.R. § 63.999(b)(3)(i) through (iii), as applicable, unless the range and the operating day have been established in the operating permit.

- (a). The specific range of the monitored parameter(s) for each emission point;
- (b). The rationale for the specific range for each parameter for each emission point, including any data and calculations used to develop the range and a description of why the range indicates proper operation of the recovery device, as specified below and in 40 C.F.R. § 63.999(b)(3)(ii)(A) or (C), as applicable.
 - (1). For a recovery device in which the TRE index value determination is required by 40 C.F.R. Part 63, Subpart FFFF, the specific range shall be based on the parameter values measured during the TRE index value determination and may be supplemented by engineering assessments and/or manufacturer's recommendations. TRE index value determinations are not required to be conducted over the entire range of permitted parameter values.
 - (2). The range may be based on ranges or limits previously established under 40 C.F.R. Part 63, Subpart FFFF.
- (c). A definition of the source's operating day for purposes of determining daily average values of monitored parameters. The definition shall specify the times at which an operating day begins and ends.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.999(c)(6).]

For process vents, periodic reports shall include the information specified below and in 40 C.F.R. § 63.999(c)(6)(i) through (iv).

- (a). Periodic reports shall be submitted to the Administrator and the Department as specified in Section E, Source Group MON MACT REPORTING, Condition #005. The periodic reports shall include the daily average values of monitored parameters, calculated as specified in Condition #011(a) [40 C.F.R. § 63.998(b)(3)(i)] for any days when the daily average value is outside the bounds as defined in Condition #018 [40 C.F.R. § 63.996(c)(3)(iii)], or the data availability requirements

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defined below and in 40 C.F.R. § 63.999(c)(6)(i)(A) through (D) are not met, whether these excursions are excused or unexcused excursions. For excursions caused by lack of monitoring data, the duration of periods when monitoring data were not collected shall be specified. An excursion means any of the cases listed in paragraphs (a)(1) through (a)(3) below [40 C.F.R. § 63.999(c)(6)(i)(A) through (C)]. If the owner or operator elects not to retain the daily average values pursuant to Condition #007(b)(1) [40 C.F.R. § 63.998(b)(5)(ii)(A)], the owner or operator shall report this in the Periodic Report.

- (1). When the daily average value of one or more monitored parameters is outside the permitted range.
 - (2). When the period of control or recovery device operation is 4 hours or greater in an operating day and monitoring data are insufficient to constitute a valid hour of data for at least 75 percent of the operating hours.
 - (3). When the period of control or recovery device operation is less than 4 hours in an operating day and more than one of the hours during the period of operation does not constitute a valid hour of data due to insufficient monitoring data.
 - (4). Monitoring data are insufficient to constitute a valid hour of data as used in paragraphs (2) and (3) above [40 C.F.R. § 63.999(c)(6)(i)(B) and (C)], if measured values are unavailable for any of the 15-minute periods within the hour.
- (b). If the owner or operator has chosen to use the alternative recordkeeping requirements of Condition #007 [40 C.F.R. § 63.998(b)(5)], and has not notified the Administrator in the Notification of Compliance Status [Section E, Source Group MON MACT REPORTING, Condition #002] that the alternative recordkeeping provisions are being implemented as specified in Condition #007 [40 C.F.R. § 63.999(b)(5)], the owner or operator shall notify the Administrator in the Periodic Report submitted immediately preceding implementation of the alternative. The notifications specified in Condition #007(b) [40 C.F.R. § 63.998(b)(5)(ii)] shall be included in the next Periodic Report following the identified event.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The information related to 40 C.F.R. Part 63, Subpart FFFF for this source shall be reported to the Administrator and the Department in accordance with the conditions listed in Section E, Source Group MON MACT REPORTING.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. 40 C.F.R. §§ 63.2455 and 63.999(b)(5).]

Alternative recordkeeping. The owner or operator shall notify the Administrator in the Notification of Compliance Status if the alternative recordkeeping requirements of Condition #007 [40 C.F.R. § 63.998(b)(5)] are being implemented. If the Notification of Compliance Status has already been submitted, the notification must be in the periodic report submitted immediately preceding implementation of the alternative, as specified in Condition #013 [40 C.F.R. § 63.999(c)(6)(iv)].

VI. WORK PRACTICE REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.993(a)(2).]

This packed bed scrubber shall be operated at all times when emissions are vented to it.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2455 and 63.996(c).]

Operation and maintenance of continuous parameter monitoring systems (CPMS).

- (a). All monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's

SECTION D. Source Level Requirements

specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.

(b). The owner or operator of a regulated source shall maintain and operate each CPMS as specified in 40 C.F.R. Part 63, Subpart SS, or in a relevant subpart, and in a manner consistent with good air pollution control practices.

(1). The owner or operator of a regulated source shall ensure the immediate repair or replacement of Continuous Parameter Monitoring System (CPMS) parts to correct "routine" or otherwise predictable CPMS malfunctions. The necessary parts for routine repairs of the affected equipment shall be readily available.

(2). If under the referencing subpart, an owner or operator has developed a start-up, shutdown, and malfunction plan, the plan is followed, and the CPMS is repaired immediately, this action shall be recorded as specified in 40 C.F.R. § 63.998(c)(1)(ii)(E).

(3). The Administrator's determination of whether acceptable operation and maintenance procedures are being used for the CPMS will be based on information that may include, but is not limited to, review of operation and maintenance procedures, operation and maintenance records as specified in 40 C.F.R. § 63.998(c)(1)(i) and (ii), manufacturer's recommendations and specifications, and inspection of the CPMS.

(c). All CPMS's shall be installed and operational, and the data verified as specified in this subpart either prior to or in conjunction with conducting performance tests. Verification of operational status shall, at a minimum, include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.

(d). All CPMS's shall be installed such that representative measurements of parameters from the regulated source are obtained.

(e). In accordance with the 40 C.F.R. Part 63, Subpart FFFF, except for system breakdowns, repairs, maintenance periods, instrument adjustments, or checks to maintain precision and accuracy, calibration checks, and zero and span adjustments, all continuous parameter monitoring systems shall be in continuous operation when emissions are being routed to the monitored device.

(f). The owner or operator shall establish a range for monitored parameters that indicates proper operation of the recovery device. In order to establish the range, the information required in 40 C.F.R. §63.999(b)(3) shall be submitted in the Notification of Compliance Status or the operating permit application or amendment. The range may be based upon a prior TRE index value determination, as applicable, or upon existing ranges or limits established under 40 C.F.R. Part 63, Subpart FFFF.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

***** Permit Shield in Effect. *****

SECTION E. Source Group Restrictions.

Group Name: BOILER REQUIREMENTS

Group Description: Subpart DDDDD requirements for boilers

Sources included in this group

ID	Name
031	500 HP SUPERIOR BOILER
032	THERMAL FLUID HEATER

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7555.]

The permittee shall keep records of all notifications and reports submitted to the Administrator or delegated authority to comply with 40 C.F.R. Part 63, Subpart DDDDD in accordance with 40 C.F.R. § 63.7555(a)(1), including all documentation supporting any Initial Notification or Notification of Compliance Status or annual compliance report submitted by the permittee, according to the requirements in 40 C.F.R. § 63.10(b)(2)(xiv).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7560.]

For compliance with the requirements of 40 C.F.R. Part 63, Subpart DDDDD, the permittee shall keep records in the following manner:

(a). The records shall be in a form suitable and readily available for expeditious review, according to 40 C.F.R. § 63.10(b)(1).

(b). As specified in 40 C.F.R. § 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c). The permittee shall keep each record on site, or the record shall be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 C.F.R. § 63.10(b)(1). The permittee may keep the records off site for the remaining 3 years.

V. REPORTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition was also derived from 40 C.F.R. § 63.7545.]

(a). The permittee shall submit to the Administrator and/or delegated authority all of the notifications in 40 C.F.R. §§ 63.7(b) and (c), 63.8(e), (f)(4), and (6), and 63.9(b) through (h) that apply to the source by the dates specified in 40 C.F.R. Part 63, Subparts A and DDDDD.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7550.]

SECTION E. Source Group Restrictions.

- (a). In accordance with 40 C.F.R. § 63.7550(b), the permittee shall submit annual compliance reports for this source. The annual compliance reports for this source shall be submitted in the following manner.
- (1). The first compliance report shall cover the period beginning on January 31, 2016 (the compliance date specified in 40 C.F.R. § 63.7495) and ending on January 31, 2017 for a source subject to only the requirements for an annual tune-up.
 - (2). The first annual compliance report must be postmarked or submitted no later than January 31, 2017.
 - (3). Each subsequent compliance report must cover the annual reporting period from January 1 through December 31.
 - (4). Each subsequent annual compliance report must be postmarked or submitted no later than January 31.
- (b). In accordance with 40 C.F.R. § 63.7550(c), the compliance report in paragraph (a) above shall contain the following information:
- (1). Company and Facility name and address.
 - (2). Process unit information, emissions limitations, and operating parameter limitations.
 - (3). Date of report and beginning and ending dates of the reporting period.
 - (4). The total operating time during the reporting period.
 - (5). Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual tune-up according to C.F.R. § 63.7540(a)(10). Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition was also derived from 40 C.F.R. § 63.7500(e)]

Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to 5 million Btu per hour must complete a tune-up every 5 years as specified in §63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour must complete a tune-up every 2 years as specified in §63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 to this subpart, or the operating limits in Table 4 to this subpart.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

*** Permit Shield in Effect. ***

SECTION E. Source Group Restrictions.

Group Name: HEAT EXCHANGER LEAKS

Group Description: Requirements for Monitoring, Recording, and Reporting Leaks in Heat Exchangers

Sources included in this group

ID	Name
P006	P006 SODIUM BOROHYDRIDE SEPARATION
P008	P008 RECYCLE/WASTE

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2490 and 63.104.]

Monitoring Requirements for the Heat Exchangers in Production Areas P-006 and P-008 (Where Content of Methanol Is Greater Than 5 Percent by Weight)

The owner or operator shall monitor the heat exchangers for leaks using the procedures in either paragraph (a) or paragraph (b) below.

(a). The owner or operator shall monitor the cooling water for the presence of one or more organic hazardous air pollutants or other representative substances whose presence in cooling water indicates a leak by complying with the requirements specified in paragraphs (a)(1) through (a)(6) below [40 C.F.R. § 63.104(b)(1) through (b)(6)]. The cooling water shall be monitored for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system.

(1). The cooling water shall be monitored quarterly to detect leaks.

(2)(i). For recirculating heat exchange systems (cooling tower systems), the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in table 4 of 40 C.F.R. Part 63, Subpart F.

(ii). For once-through heat exchange systems, the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in table 9 of 40 C.F.R. Part 63, Subpart G.

(3). The concentration of the monitored substance(s) in the cooling water shall be determined using any EPA-approved method listed in 40 C.F.R. Part 136 as long as the method is sensitive to concentrations as low as 10 parts per million and the same method is used for both entrance and exit samples. Alternative methods may be used upon approval by the Administrator.

(4). The samples shall be collected either at the entrance and exit of each heat exchange system or at locations where the cooling water enters and exits each heat exchanger or any combination of heat exchangers.

(i). For samples taken at the entrance and exit of recirculating heat exchange systems, the entrance is the point at which the cooling water leaves the cooling tower prior to being returned to the process equipment and the exit is the point at which the cooling water is introduced to the cooling tower after being used to cool the process fluid.

(ii). For samples taken at the entrance and exit of once-through heat exchange systems, the entrance is the point at which the cooling water enters and the exit is the point at which the cooling water exits the plant site or chemical

SECTION E. Source Group Restrictions.

manufacturing process units.

(iii). For samples taken at the entrance and exit of each heat exchanger or any combination of heat exchangers in chemical manufacturing process units, the entrance is the point at which the cooling water enters the individual heat exchanger or group of heat exchangers and the exit is the point at which the cooling water exits the heat exchanger or group of heat exchangers.

(5). A minimum of three sets of samples shall be taken at each entrance and exit as defined in paragraph (a)(4) above. The average entrance and exit concentrations shall then be calculated. The concentration shall be corrected for the addition of any makeup water or for any evaporative losses, as applicable.

(6). A leak is detected if the exit mean concentration is found to be greater than the entrance mean using a one-sided statistical procedure at the 0.05 level of significance and the amount by which it is greater is at least 1 part per million or 10 percent of the entrance mean, whichever is greater.

(b). The owner or operator shall monitor by using a surrogate indicator of heat exchange system leaks by complying with the requirements specified in paragraphs (b)(1) through (b)(3) below [40 C.F.R. § 63.104(c)(1) through (c)(3)]. Surrogate indicators that could be used to develop an acceptable monitoring program are ion specific electrode monitoring, pH, conductivity or other representative indicators.

(1). The owner or operator shall prepare and implement a monitoring plan that documents the procedures that will be used to detect leaks of process fluids into cooling water. The plan shall require monitoring of one or more surrogate indicators or monitoring of one or more process parameters or other conditions that indicate a leak. Monitoring that is already being conducted for other purposes may be used to satisfy the requirements of this section. The plan shall include the information specified in paragraphs (b)(1)(i) and (b)(1)(ii) below [40 C.F.R. § 63.104(c)(1)(i) and (c)(1)(ii)].

(i). A description of the parameter or condition to be monitored and an explanation of how the selected parameter or condition will reliably indicate the presence of a leak.

(ii). The parameter level(s) or conditions(s) that shall constitute a leak. This shall be documented by data or calculations showing that the selected levels or conditions will reliably identify leaks. The monitoring must be sufficiently sensitive to determine the range of parameter levels or conditions when the system is not leaking. When the selected parameter level or condition is outside that range, a leak is indicated.

(iii). The monitoring frequency which shall be no less frequent than monthly for the first 6 months and quarterly thereafter to detect leaks.

(iv). The records that will be maintained to document compliance with the requirements of this section.

(2). If a substantial leak is identified by methods other than those described in the monitoring plan and the method(s) specified in the plan could not detect the leak, the owner or operator shall revise the plan and document the basis for the changes. The owner or operator shall complete the revisions to the plan no later than 180 days after discovery of the leak.

(3). The owner or operator shall maintain, at all times, the monitoring plan that is currently in use. The current plan shall be maintained on-site, or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request. If the monitoring plan is superseded, the owner or operator shall retain the most recent superseded plan at least until 5 years from the date of its creation. The superseded plan shall be retained on-site (or accessible from a central location by computer or other means that provides access within two hours after a request) for at least 6 months after its creation.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition was also derived from 40 C.F.R. §§ 63.2490 and 63.104.]

(a). The owner or operator shall keep records for each event for which the heat exchangers in Production Areas P-006 and

SECTION E. Source Group Restrictions.

P-008 are monitored for leaks.

(b). Required records for 40 C.F.R. Part 63, Subpart F.

The owner or operator shall retain the records identified below [40 C.F.R. Required records. The owner or operator shall retain the records identified in paragraphs [40 C.F.R. § 63.104(f)(1)(i) through (f)(1)(iv)] as specified in 40 C.F.R. § 63.103(c)(1).

(i). Monitoring data required by this section indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;

(ii). Records of any leaks detected by procedures subject to Condition #001(b)(2) [40 C.F.R. § 63.104(c)(2)] and the date the leak was discovered;

(iii). The dates of efforts to repair leaks; and

(iv). The method or procedure used to confirm repair of a leak and the date repair was confirmed.

V. REPORTING REQUIREMENTS.**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2490 and 63.104.]

Reports.

If an owner or operator invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report required by 40 C.F.R. Part 63, Subpart FFFF. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported.

(a). The owner or operator shall report the presence of the leak and the date that the leak was detected.

(b). The owner or operator shall report whether or not the leak has been repaired.

(c). The owner or operator shall report the reason(s) for delay of repair. If delay of repair is invoked due to the reasons described in Condition #004(b)(2) [40 C.F.R. § 63.104(e)(2)], documentation of emissions estimates must also be submitted.

(d). If the leak remains unrepaired, the owner or operator shall report the expected date of repair.

(e). If the leak is repaired, the owner or operator shall report the date the leak was successfully repaired.

VI. WORK PRACTICE REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 40 C.F.R. §§ 63.2490 and 63.104.]

Work Practice Standards for Repair of Leaks in Heat Exchangers in Productions Areas P-006 and P-008 (Where the Methanol Content is Greater Than 5 Percent by Weight)

(a). If a leak is detected according to the criteria of Condition #001(a) or #001(b) [40 C.F.R. § 63.104(b) or § 63.104(c)], the owner or operator shall comply with the requirements in paragraphs (a)(1) and (a)(2) [40 C.F.R. § 63.104(d)(1) and (d)(2)], except as provided in paragraph (b) below [40 C.F.R. § 63.104 (e)].

(1). The leak shall be repaired as soon as practical but not later than 45 calendar days after the owner or operator receives results of monitoring tests indicating a leak. The leak shall be repaired unless the owner or operator

SECTION E. Source Group Restrictions.

demonstrates that the results are due to a condition other than a leak.

(2). Once the leak has been repaired, the owner or operator shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later.

(b). Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in paragraph (b)(1) or (b)(2) below [40 C.F.R. § 63.104(e)(1) or (e)(2)] is met. All time periods in paragraphs (b)(1) and (b)(2) [40 C.F.R. §§ 63.104(e)(1) and (e)(2)] shall be determined from the date when the owner or operator determines that delay of repair is necessary.

(1). If a shutdown is expected within the next 2 months, a special shutdown before that planned shutdown is not required.

(2). If a shutdown is not expected within the next 2 months, the owner or operator may delay repair as provided in paragraph (b)(2)(i) or (b)(2)(ii) below [40 C.F.R. § 63.104(e)(2)(i) or (e)(2)(ii)]. Documentation of a decision to delay repair shall state the reasons repair was delayed and shall specify a schedule for completing the repair as soon as practical.

(i). If a shutdown for repair would cause greater emissions than the potential emissions from delaying repair, the owner or operator may delay repair until the next shutdown of the process equipment associated with the leaking heat exchanger. The owner or operator shall document the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying repair as specified in paragraphs (b)(2)(i)(A) and (b)(2)(i)(B) below [40 C.F.R. § 63.104(e)(2)(i)(A) and (e)(2)(i)(B)].

(A). The owner or operator shall calculate the potential emissions from the leaking heat exchanger by multiplying the concentration of total hazardous air pollutants listed in table 4 of 40 C.F.R. Part 63, Subpart F in the cooling water from the leaking heat exchanger by the flowrate of the cooling water from the leaking heat exchanger by the expected duration of the delay. The owner or operator may calculate potential emissions using total organic carbon concentration instead of total hazardous air pollutants listed in table 4 of 40 C.F.R. Part 63, Subpart F.

(B). The owner or operator shall determine emissions from purging and depressurizing the equipment that will result from the unscheduled shutdown for the repair.

(ii). If repair is delayed for reasons other than those specified in paragraph (b)(2)(i) above [40 C.F.R. § 63.104(e)(2)(i)], the owner or operator may delay repair up to a maximum of 120 calendar days. The owner shall demonstrate that the necessary parts or personnel were not available.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

***** Permit Shield in Effect. *****

SECTION E. Source Group Restrictions.

Group Name: LDAR FOR MON MACT

Group Description: Equipment Leak Detection and Repair Requirements

Sources included in this group

ID	Name
P005	P005 HYDROLYSIS SECTION
P006	P006 SODIUM BOROHYDRIDE SEPARATION
P008	P008 RECYCLE/WASTE

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition was also derived from 40 C.F.R. § 63.1024.]

The condition below applies to sources in organic HAP service located in production areas P-005, P-006, P-008, and the proposed dry header, wet header, and header to the break tank associated with the proposed scrubber system.

Leak repair records. For each leak detected, the following information, as specified in paragraphs (f)(1) through (f)(5) of 40 C.F.R. § 63.1024, shall be recorded and maintained pursuant to the referencing subpart.

- (a). The date of first attempt to repair the leak.
- (b). The date of successful repair of the leak.
- (c). Maximum instrument reading measured by Method 21 of 40 C.F.R. part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
- (d). "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak as specified in paragraphs (f)(4)(i) and (f)(4)(ii) of 40 C.F.R. § 63.1024.
 - (1). The owner or operator may develop a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan, as required by the referencing subpart for the source, or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.
 - (2). If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
- (e). Dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.1038.]

SECTION E. Source Group Restrictions.

The condition below applies to sources in organic HAP service located in production areas P-005, P-006, P-008, and the proposed dry header, wet header, and header to the break tank associated with the proposed scrubber system.

(a). Recordkeeping system. An owner or operator of more than one regulated source that is in organic HAP service and is subject to the provisions of 40 C.F.R. Part 63, Subpart UU may comply with the recordkeeping requirements for these regulated sources in one recordkeeping system. The recordkeeping system shall identify each record by regulated source and the type of program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. The records required by 40 C.F.R. Part 63, Subpart UU are summarized in paragraphs (b) and (c) of 40 C.F.R. § 63.1038.

(b). General equipment leak records.

(1). As specified in 40 C.F.R. § 63.1022(a) and (b), the owner or operator shall keep general and specific equipment identification if the equipment is not physically tagged and the owner or operator is electing to identify the equipment subject to 40 C.F.R. Part 63 Subpart UU through written documentation such as a log or other designation.

(2). The owner or operator shall keep a written plan as specified in 40 C.F.R. § 63.1022(c)(4) for any equipment that is designated as unsafe- or difficult-to-monitor.

(3). The owner or operator shall maintain a record of the identity and an explanation as specified in 40. C.F.R. §63.1022(d)(2) for any equipment that is designated as unsafe-to-repair.

(4). As specified in 40. C.F.R. § 63.1022(e), the owner or operator shall maintain the identity of compressors operating with an instrument reading of less than 500 parts per million.

(5). The owner or operator shall keep records associated with the determination that equipment is in heavy liquid service as specified in 40 C.F.R. § 63.1022(f).

(6). The owner or operator shall keep records for leaking equipment as specified in 40 C.F.R. § 63.1023(e)(2).

(7). The owner or operator shall keep records for leak repair as specified in 40 C.F.R. § 63.1024(f) and records for delay of repair as specified in 40. C.F.R. § 63.1024(d).

(c). Specific equipment leak records.

(1). For valves, the owner or operator shall maintain the records specified in paragraphs (c)(1)(i) and (c)(1)(ii) of 40 C.F.R. § 63.1038.

V. REPORTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.1039.]

The condition below applies to sources in organic HAP service located in production areas P-005, P-006, P-008, and the proposed dry header, wet header, and header to the break tank associated with the proposed scrubber system.

(a). Initial Compliance Status Report (submitted January 20, 2012)

(b). Periodic Reports.

The owner or operator shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 C.F.R. § 63.1039, as applicable, in the Periodic Report specified in Section E, Source Group MON MACT REPORTING, Condition #005.

(1). For the equipment specified in paragraphs (b)(1)(i) through (b)(1)(v) of 40 C.F.R. § 63.1039, report in a summary format by equipment type, the number of components for which leaks were detected and for valves, pumps and connectors show the percent leakers, and the total number of components monitored. Also include the number of leaking components that were not repaired as required by § 63.1024, and for valves and connectors, identify the number of components that are

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determined by 40 C.F.R. § 63.1025(c)(3) to be nonrepairable.

- (i). Valves in gas and vapor service and in light liquid service pursuant to 40 C.F.R. § 63.1025(b) and (c).
- (ii). Pumps in light liquid service pursuant to 40 C.F.R. § 63.1026(b) and (c).
- (iii). Connectors in gas and vapor service and in light liquid service pursuant to 40 C.F.R. § 63.1027(b) and (c).
- (iv). Agitators in gas and vapor service and in light liquid service pursuant to 40 C.F.R. § 63.1028(c).

(2). Where any delay of repair is utilized pursuant to 40 C.F.R. § 63.1024(d), report that delay of repair has occurred and report the number of instances of delay of repair.

(3). If applicable, report the valve subgrouping information specified in 40 C.F.R. § 63.1025(b)(4)(iv).

(4) For pressure relief devices in gas and vapor service pursuant to 40 C.F.R. § 63.1030(b) and for compressors pursuant to 40 C.F.R. § 63.1031(f) that are to be operated at a leak detection instrument reading of less than 500 parts per million, report the results of all monitoring to show compliance conducted within the semiannual reporting period.

(4). Report, if applicable, the initiation of a monthly monitoring program for valves pursuant to 40 C.F.R. § 63.1025(b)(3)(i).

(5). Report, if applicable, the initiation of a quality improvement program for pumps pursuant to 40 C.F.R. § 63.1035.

(6). Where the alternative means of emissions limitation for batch processes is utilized, report the information listed in 40 C.F.R. § 63.1036(f).

(7). Report the information listed in paragraph (a) of 40 C.F.R. § 63.1039 for the Initial Compliance Status Report for process units or affected facilities with later compliance dates. Report any revisions to items reported in an earlier Initial Compliance Status Report if the method of compliance has changed since the last report.

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.1024.]

The condition below applies to sources in organic HAP service located in production areas P-005, P-006, P-008, and the proposed dry header, wet header, and header to the break tank associated with the proposed scrubber system.

(a) Leak repair schedule.

The owner or operator shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected, except as provided in paragraphs (d) and (e) of 40 C.F.R. § 63.1024. A first attempt at repair as defined in this subpart shall be made no later than 5 calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to, tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant into the lubricated packing.

(b). Leak identification removal

(1). Valves and connectors in gas/vapor and light liquid service. The leak identification on a valve in gas/vapor or light liquid service may be removed after it has been monitored as specified in 40 C.F.R. § 63.1025(d)(2), and no leak has been detected during that monitoring. The leak identification on a connector in gas/vapor or light liquid service may be removed after it has been monitored as specified in 40 C.F.R. § 63.1027(b)(3)(iv) and no leak has been detected during that monitoring.

(2). Other equipment. The identification that has been placed, pursuant to 40 C.F.R. § 63.1023(e)(1), on equipment determined to have a leak, except for a valve or for a connector in gas/vapor or light liquid service that is subject to the provisions of 40 C.F.R. § 63.1027(b)(3)(iv), may be removed after it is repaired.

(d). Delay of repair. Delay of repair is allowed for any of the conditions specified in paragraphs (d)(1) through (d)(5) of 40

SECTION E. Source Group Restrictions.

C.F.R. § 63.1024. The owner or operator shall maintain a record of the facts that explain any delay of repairs and, where appropriate, why the repair was technically infeasible without a process unit shutdown.

(1). Delay of repair of equipment for which leaks have been detected is allowed if repair within 15 days after a leak is detected is technically infeasible without a process unit or affected facility shutdown. Repair of this equipment shall occur as soon as practical, but no later than the end of the next process unit or affected facility shutdown, except as provided in paragraph (d)(5) of 40 C.F.R. § 63.1024.

(2). Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in regulated material service.

(3). Delay of repair for valves, connectors, and agitators is also allowed if the provisions of paragraphs (d)(3)(i) and (d)(3)(ii) of 40 C.F.R. § 63.1024 are met.

(i). The owner or operator determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair, and

(ii). When repair procedures are effected, the purged material is collected and destroyed, collected and routed to a fuel gas system or process, or recovered in a control device complying with either 40 C.F.R. § 63.1034 or 40 C.F.R. § 63.1021(b).

(4). Delay of repair for pumps is also allowed if the provisions of paragraphs (d)(4)(i) and (d)(4)(ii) of 40 C.F.R. § 63.1024 are met.

(i). Repair requires replacing the existing seal design with a new system that the owner or operator has determined under the provisions of 40 C.F.R. § 63.1035(d) will provide better performance or one of the specifications of paragraphs (d)(4)(i)(A) through (d)(4)(i)(C) of 40 C.F.R. § 63.1024 are met.

(A). A dual mechanical seal system that meets the requirements of 40 C.F.R. § 63.1026(e)(1) will be installed;

(B). A pump that meets the requirements of 40 C.F.R. § 63.1026(e)(2) will be installed; or

(C). A system that routes emissions to a process or a fuel gas system or a closed vent system and control device that meets the requirements of 40 C.F.R. § 63.1026(e)(3) will be installed; and

(ii). Repair is completed as soon as practical, but not later than 6 months after the leak was detected.

(5). Delay of repair beyond a process unit or affected facility shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit or affected facility shutdown, and valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit or affected facility shutdown will not be allowed unless the third process unit or affected facility shutdown occurs sooner than 6 months after the first process unit or affected facility shutdown.

(e). Unsafe-to-repair connectors. Any connector that is designated, as described in 40 C.F.R. § 63.1022(d), as an unsafe-to-repair connector is exempt from the requirements of 40 C.F.R. § 63.1027(d), and paragraph (a) of 40 C.F.R. § 63.1024.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2480.]

If complying with 40 C.F.R. Part 63, Subpart UU, then the owner or operator may elect to comply with the provisions in paragraphs (a) through (e) below [40 C.F.R. § 63.2480(b)(1) through (5)] as an alternative to the referenced provisions in 40 C.F.R. Part 63, Subpart UU.

(a). The requirements for pressure testing in 40 C.F.R. §63.1036(b) may be applied to all processes, not just batch processes.

(b). For the purposes of 40 C.F.R. Part 63, Subpart FFFF, pressure testing for leaks in accordance with 40 C.F.R. §63.1036(b) is not required after reconfiguration of an equipment train if flexible hose connections are the only disturbed equipment.

SECTION E. Source Group Restrictions.

- (c). For an existing source, the owner or operator is not required to develop an initial list of identification numbers for connectors as would otherwise be required under 40 C.F.R. §63.1022(b)(1).
- (d). For connectors in gas/vapor and light liquid service at an existing source, the owner or operator may elect to comply with the requirements in 40 C.F.R. §63.1029 for connectors in heavy liquid service, including all associated recordkeeping and reporting requirements, rather than the requirements of 40 C.F.R. §63.1027.
- (e). For pumps in light liquid service in an MCPU that has no continuous process vents and is part of an existing source, the owner or operator may elect to consider the leak definition that defines a leak to be 10,000 parts per million (ppm) or greater as an alternative to the values specified in 40 C.F.R. §63.1026(b)(2)(i) through (iii).

VII. ADDITIONAL REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The facility shall keep a copy of the current Leak Detection and Repair (LDAR) written plan. A plan was submitted in the Initial Notification and Pre-compliance Report dated January 17, 2012. Any new or replacement of regulated LDAR equipment shall be added to the LDAR plan and shall meet the requirements of 40 C.F.R. § 63.2346(c).

***** Permit Shield in Effect. *****

SECTION E. Source Group Restrictions.

Group Name: MON MACT REPORTING

Group Description: Reporting Requirements for MON MACT

Sources included in this group

ID	Name
C102	PACKED BED SCRUBBER T-803
P005	P005 HYDROLYSIS SECTION
P006	P006 SODIUM BOROHYDRIDE SEPARATION
P008	P008 RECYCLE/WASTE

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2515.]

(a). The owner or operator must submit all of the notifications in 40 C.F.R. §§ 63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to the owner or operator.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional Authority for this condition is also derived from 40 C.F.R. § 63.2520(b).]

Unless the Administrator has approved a different schedule for submission of reports under 40 C.F.R. §63.10(a), the owner or operator must submit each report by the date in Table 11 of 40 C.F.R. Part 63, Subpart FFF and according to the following paragraphs [40 C.F.R. § 63.2520(b)(1) through (5)].

(a). The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in 40 C.F.R. § 63.2445 and ending on June 30 or December 31, whichever date is the first date following the end of the first 6 months after the compliance date that is specified for your affected source in 40 C.F.R. § 63.2445.

(b). The first compliance report must be postmarked or delivered no later than August 31 or February 28, whichever date is the first date following the end of the first reporting period specified in paragraph (a) above [40 C.F.R. § 63.2520(b)(1)].

(c). Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(d). Each subsequent compliance report must be postmarked or delivered no later than August 31 or February 28, whichever date is the first date following the end of the semiannual reporting period.

SECTION E. Source Group Restrictions.

(e). For each affected source that is subject to permitting regulations pursuant to 40 C.F.R. Part 70 or 40 C.F.R. Part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 C.F.R. § 70.6(a)(3)(iii)(A) or 40 C.F.R. § 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (a) through (d) above [40 C.F.R. § 63.2520(b)(1) through (4)].

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2520(c).]

Precompliance report.

The owner or operator must submit a precompliance report to request approval for any of the items in the following paragraphs (1) through (7) [40 C.F.R. § 63.2520(c)(1) through (7)]. The Administrator will either approve or disapprove the report within 90 days after receiving it. If the Administrator disapproves the report, the owner or operator must still be in compliance with the emission limitations and work practice standards in 40 C.F.R. Part 63, Subpart FFFF by the compliance date. To change any of the information submitted in the report, the owner or operator must notify the Administrator 60 days before the planned change is to be implemented.

- (1). Requests for approval to set operating limits for parameters other than those specified in 40 C.F.R. §§ 63.2455 through 63.2485 and referenced therein. Alternatively, you may make these requests according to 40 C.F.R. § 63.8(f).
- (2). Descriptions of daily or per batch demonstrations to verify that control devices subject to 40 C.F.R. § 63.2460(c)(5) are operating as designed.
- (3). A description of the test conditions, data, calculations, and other information used to establish operating limits according to 40 C.F.R. § 63.2460(c)(3).
- (4). Data and rationale used to support an engineering assessment to calculate uncontrolled emissions in accordance with 40 C.F.R. § 63.1257(d)(2)(ii). This requirement does not apply to calculations of hydrogen halide and halogen HAP emissions as specified in 40 C.F.R. § 63.2465(b), to determinations that the total HAP concentration is less than 50 ppmv, or if you use previous test data to establish the uncontrolled emissions.
- (5). The pollution prevention demonstration plan required in 40 C.F.R. § 63.2495(c)(1), if you are complying with the pollution prevention alternative.
- (6). Documentation of the practices that you will implement to minimize HAP emissions from streams that contain energetics and organic peroxides, and rationale for why meeting the emission limit specified in tables 1 through 7 to 40 C.F.R. Part 63, Subpart FFFF would create an undue safety hazard.
- (7). For fabric filters that are monitored with bag leak detectors, an operation and maintenance plan that describes proper operation and maintenance procedures, and a corrective action plan that describes corrective actions to be taken, and the timing of those actions, when the PM concentration exceeds the set point and activates the alarm.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2520(d).]

Notification of compliance status report.

The owner or operator must submit a notification of compliance status report according to the schedule in paragraph (a) below [40 C.F.R. § 63.2520(d)(1)], and the notification of compliance status report must contain the information specified in paragraph (b) [40 C.F.R. § 63.2520 (d)(2) of this section.

- (a). The owner or operator must submit the notification of compliance status report to the Administrator and the Department

SECTION E. Source Group Restrictions.

within 150 days after commencement of operation of the scrubber system.

(b). The notification of compliance status report must include the following information [40 C.F.R. § 63.2520(d)(2)(i) through (ix)].

(1). The results of any applicability determinations, emission calculations, or analyses used to identify and quantify HAP usage or HAP emissions from the affected source.

(2). The results of emissions profiles, performance tests, engineering analyses, design evaluations, flare compliance assessments, inspections and repairs, and calculations used to demonstrate initial compliance according to 40 C.F.R. §§ 63.2455 through 63.2485. For performance tests, results must include descriptions of sampling and analysis procedures and quality assurance procedures.

(3). Descriptions of monitoring devices, monitoring frequencies, and the operating limits established during the initial compliance demonstrations, including data and calculations to support the levels you establish.

(4). All operating scenarios.

(5). Descriptions of worst-case operating and/or testing conditions for control devices.

(6). Identification of parts of the affected source subject to overlapping requirements described in 40 C.F.R. § 63.2535 and the authority under which you will comply.

(7). The information specified in §63.1039(a)(1) through (3) for each process subject to the work practice standards for equipment leaks in Table 6 to 40 C.F.R. Part 63, Subpart FFFF.

(8). Identify storage tanks for which you are complying with the vapor balancing alternative in 40 C.F.R. § 63.2470(e).

(9). Records as specified in 40 C.F.R. § 63.2535(l)(1) through (3) of process units used to create a PUG and calculations of the initial primary product of the PUG.

005 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 40 C.F.R. § 63.2520(e).]

Compliance report.

The compliance report must contain the information specified in in the following paragraphs [40 C.F.R. § 63.2520(e)(1) through (10)].

(a). Company name and address.

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

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

(d). For each SSM during which excess emissions occur, the compliance report must include records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.

(e). The compliance report must contain the information on deviations, as defined in 40 C.F.R. § 63.2550, according to (e)(1) through (e)(4) below [40 C.F.R. § 63.2520(e)(5)(i), (ii), (iii), and (iv)].

(1). If there are no deviations from any emission limit, operating limit or work practice standard specified in 40 C.F.R. Part 63, Subpart FFFF, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

SECTION E. Source Group Restrictions.

(2). For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where the owner or operator is not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in 40 C.F.R. Part 63, Subpart FFFF, the owner or operator must include the following information [40 C.F.R. § 63.2520(e)(5)(ii)(A) through (C)]. This includes periods of SSM.

(A). The total operating time of the affected source during the reporting period.

(B). Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(C). Operating logs of processes with batch vents from batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.

(3). For each deviation from an emission limit or operating limit occurring at an affected source where the owner or operator is using a CMS to comply with an emission limit in this subpart, the owner or operator must include the following information [40 C.F.R. § 63.2520(e)(5)(iii)(A) through (L)]. This includes periods of SSM.

(A). The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

(B). The date, time, and duration that each CEMS was out-of-control, including the information in 40 C.F.R. § 63.8(c)(8).

(C). The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(D). A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total operating time of the affected source during that reporting period.

(E). A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(F). A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the affected source during that reporting period.

(G). An identification of each HAP that is known to be in the emission stream.

(H). A brief description of the process units.

(I). A brief description of the CMS.

(J). The date of the latest CMS certification or audit.

(K). Operating logs of processes with batch vents from batch operations for each day(s) during which the deviation occurred.

(L). The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred.

(4). If you documented in your notification of compliance status report that an MCPU has Group 2 batch process vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by 40 C.F.R. § 63.2525(e) that exceeds an applicable HAP usage or emissions threshold.

(f). If you use a CEMS, and there were no periods during which it was out-of-control as specified in 40 C.F.R. § 63.8(c)(7), include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.

SECTION E. Source Group Restrictions.

(g). Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, you must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario.

(h). Records of process units added to a PUG as specified in 40 C.F.R. § 63.2525(i)(4) and records of primary product redeterminations as specified in 40 C.F.R. § 63.2525(i)(5).

(i). Applicable records and information for periodic reports as specified in referenced 40 C.F.R. Part 63, Subparts F, G, H, SS, UU, WW, and GGG and 40 C.F.R. part 65, Subpart F.

(j). Notification of process change.

(1). Except as specified in paragraph (j)(2) [40 C.F.R. § 63.2520(e)(10)(ii)], whenever the owner or operator makes a process change, or change any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, the owner or operator must document the change in the compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the following information [40 C.F.R. § 63.2520(e)(10)(i)(A) through (C)].

(A). A description of the process change.

(B). Revisions to any of the information reported in the original notification of compliance status report under Condition #002 [40 C.F.R. § 63.2520(d)].

(C). Information required by the notification of compliance status report under Condition #002 [40 C.F.R. § 63.2520(d)] for changes involving the addition of processes or equipment at the affected source.

(2). The owner or operator must submit a report 60 days before the scheduled implementation date of any of the changes identified below [40 C.F.R. § 63.2520(e)(10)(ii)(A), (B), or (C)].

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

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

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

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

***** Permit Shield in Effect. *****



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description
C102	PACKED BED SCRUBBER T-803
Emission Limit	
2.300 Lbs/Hr	Methanol
9.690 Tons/Yr	on a 12-month rolling sum basis Methanol

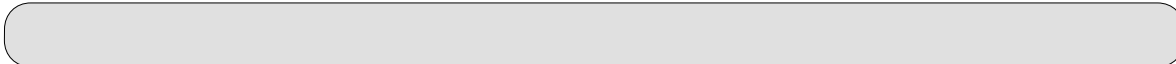
Site Emission Restriction Summary

Emission Limit	
24.900 Tons/Yr	on a 12-month rolling sum basis VOC

**SECTION H. Miscellaneous.**

APS 847790, Auth # 1034345 Initial Title V permit. Permit conditions derived from Plan Approval 46-0124A.

APS 847790, Auth # 1236256 Amendment to incorporate the EPA approval (June 20, 2018) of an alternative monitoring request in lieu of scrubber liquid density.



***** End of Report *****