



BVPV Styrenics LLC
400 Frankfort Road
Monaca, Pennsylvania 15061-2298
(724) 774-1000

December 29, 2022

Mark Gorog
Southwest Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

**Re: Notification of RACT III Applicability [25 Pa. Code §129.115(a)]
and Alternative RACT Compliance Analysis [25 Pa. Code §129.114(i)]
Title V Operating Permit No. 04-00033, Facility PF ID 245153
BVPV Styrenics LLC – Monaca, PA**

Dear Mr. Gorog:

BVPV Styrenics LLC (BVPV) is providing this summary of Reasonably Available Control Technology (RACT) applicability and compliance plans for its thermoplastic resin manufacturing facility located in Monaca, Beaver County, Pennsylvania (Facility) in accordance with the recently promulgated provisions of 25 Pa. Code §§129.111-129.115. This document represents the required notification of applicability and compliance proposal under 25 Pa. Code §129.115(a). In addition, this document includes the analysis of alternative RACT compliance required under 25 Pa. Code §129.114(i) for those sources at the Facility subject to alternative RACT determinations that were previously approved by the Pennsylvania Department of Environmental Protection (PADEP) under 25 Pa. Code §129.99.

Facility Background and RACT III Rule Applicability

The Facility manufactures thermoplastic resins, expandable polystyrene (EPS) resins, and ARCEL® advanced foam resin. The Facility operates pursuant to PADEP Title V Operating Permit (TVOP) No. 04-00033, Facility PF ID 245153.

On November 12, 2022, PADEP published 25 Pa. Code §§129.111-129.115, “Additional RACT Requirements for Major Sources of NO_x and VOCs for the 2015 Ozone NAAQS” also known as the RACT III Rule. The RACT III requirements or emissions limitations supersede the requirements or emissions limitations of a RACT permit previously issued in accordance with 25 Pa. Code §§129.91-129.95 and 129.96-129.100, except in cases where an existing RACT permit specifies more stringent requirements and/or emissions limitations. Compliance with applicable RACT III Rule requirements or emissions limitations must be demonstrated no later than January 1, 2023.



The RACT III Rule applies to major nitrogen oxides (NO_x) and/or major volatile organic compound (VOC) emitting facilities. Based on the ozone nonattainment status for Beaver County, PA, 25 Pa. Code §121.1 defines major NO_x and VOC emitting facilities as follows:

- Major NO_x emitting facility – a facility-wide NO_x potential to emit (PTE) greater than 100 tons per year (TPY).
- Major VOC emitting facility – a facility-wide VOC PTE greater than 50 TPY.

The Facility-wide NO_x PTE is less than 100 TPY; therefore, BVPV understands that the Facility is not subject to the NO_x provisions of RACT III. The Facility-wide VOC PTE is greater than 50 TPY and BVPV is a major VOC emitting facility subject to the VOC provisions of RACT III per 25 Pa. Code §129.111(a). This submittal is being made in accordance with the requirements of the RACT III Rule for the Facility's VOC emitting sources only.

Notification of Applicability and Compliance Proposal [25 Pa. Code §129.115(a)]

The following subsections provide the notification of applicability and compliance proposal required under 25 Pa. Code §129.115(a).

25 Pa. Code §129.115(a)(1) – Submission Deadline

Because the Facility is a major VOC emitting facility subject to 25 Pa. Code §129.111(a), this submittal is being made on or before December 31, 2022 per 25 Pa. Code §129.115(a)(1)(i).

25 Pa. Code §129.115(a)(2) – Identification of Air Contamination Sources That Commenced Operation on or Before August 3, 2018

Tables A-1 through A-4 of Attachment A provide the RACT III Rule Applicability Summary, which identifies the following:

- Air contamination sources that do not emit VOC or were removed from the Facility and are not required to be evaluated under the RACT III Rule (Table A-1).
- Air contamination sources that are exempt from the RACT III Rule on the basis that they emit less than 1 TPY of VOC (Table A-2).
- Air contamination sources exempted from 25 Pa. Code §§129.112-129.114 because they are already subject to certain Chapter 129 RACT requirements [i.e., §§129.56, 129.57, and 129.71] (Table A-2).
- Air contamination sources subject to a presumptive RACT requirement or RACT emissions limitation under 25 Pa. Code §129.112 (Table A-3).

- Air contamination sources subject to an alternative RACT requirement or RACT emissions limitation under 25 Pa. Code §129.114 (Table A-4).

25 Pa. Code §129.115(a)(3) – Identification of Air Contamination Sources That Commenced Operation After August 3, 2018

Not Applicable (N/A) – the Facility was a major VOC emitting facility prior to August 3, 2018. Therefore, 25 Pa. Code §129.111(b) does not apply.

25 Pa. Code §129.115(a)(4) – Identification of Air Contamination Sources That Emit Less Than 1 TPY

There are 65 air contamination sources at the Facility that are exempt from the RACT III Rule on the basis that they emit less than 1 TPY of VOC, as shown in Table A-2 of Attachment A.

25 Pa. Code §129.115(a)(5) – Air Contamination Source Information (Commenced Operation on or Before August 3, 2018)

Table A-5 of Attachment A provides a Source Inventory, including exempt sources, that lists the description, make, model, and location (as available) of each air contamination source subject to the RACT III Rule. The applicable RACT requirement or RACT emissions limitation for each source is provided in the RACT III Rule Applicability Summary as Tables A-1 through A-4 of Attachment A.

There have been no changes to the applicable presumptive RACT requirements or RACT emissions limitations since the promulgation of 25 Pa. Code §§129.96-129.100 (RACT 2). For the 61 sources at the Facility that require alternative RACT determinations, BVPV has determined that the alternative RACT requirements and/or RACT emissions limitations that were previously approved by PADEP under 25 Pa. Code §129.99(e) continue to represent RACT for these sources. The RACT-specific conditions reflected in TVOP No. 04-00033 are provided in Tables A-6 and A-7 of Attachment A. An analysis is presented below to certify that the alternative RACT determinations approved by PADEP under 25 Pa. Code §129.99(e) remain valid. BVPV proposes to comply with the RACT III Rule by maintaining compliance with the applicable RACT conditions of TVOP No. 04-00033. BVPV will meet the January 1, 2023 compliance deadline of the RACT III Rule through continued compliance with these conditions.

25 Pa. Code §129.115(a)(6) – Air Contamination Source Information (Commenced Operation After August 3, 2018)

N/A – 25 Pa. Code §129.115(a)(3) does not apply.

25 Pa. Code §129.115(a)(7) – Air Contamination Source Information (Sources That Emit Less Than 1 TPY)

Table A-5 of Attachment A provides a Source Inventory that includes a description, make, model, and location (as available) of each air contamination source subject to the RACT III Rule. Table A-2 of Attachment A lists the 65 sources that are exempt from the RACT III Rule on the basis that they emit less than 1 TPY of VOC. Emissions were calculated based on BVPV's annual emissions reporting and are limited under the source group emissions caps listed in Section E, Source Group Restrictions – Emissions Trading in TVOP No. 04-00033. The requirements pertaining to Source Group Restrictions – Emissions Trading are included in Table A-8 of Attachment A.

25 Pa. Code §129.115(b) – Demonstration of Compliance by Monitoring or Testing Procedures

N/A – 25 Pa. Code §129.115(b)(1) through (b)(5) are not applicable because the Facility does not maintain a continuous emissions monitoring system (CEMS) for any air contamination source subject to a VOC RACT requirement or VOC RACT emissions limitation under 25 Pa. Code §129.112.

N/A – 25 Pa. Code §129.115(b)(6) is not applicable because the sources subject to 25 Pa. Code §129.112 are only subject to work practice standards under 25 Pa. Code §129.112(c), and there are no applicable emissions limitations that require testing to demonstrate compliance for these sources.

Analysis of Alternative RACT Compliance [25 Pa. Code §129.114(i)]

As shown in Table A-4 of Attachment A, BVPV has identified 61 sources that require alternative RACT determinations and is proposing alternative RACT for VOC emissions because they do not fall into a presumptive RACT category under 25 Pa. Code §129.112. In accordance with 25 Pa. Code §129.114(i), an alternative RACT proposal, as required under 25 Pa. Code §129.114(d), is not necessary if the source in question was in operation prior to October 24, 2016, has not been modified or changed since October 24, 2016, and does not fall into one of the presumptive source categories subject to 25 Pa. Code §§129.112(c)(11) or (i)-(k). The 61 sources at the Facility that require alternative RACT determinations meet the stated criteria and therefore, this letter serves as a demonstration that BVPV can maintain compliance with the alternative RACT requirements and/or emissions limitations previously approved as RACT by PADEP.

The following subsections provide the analysis of alternative RACT compliance under 25 Pa. Code §129.114(i)(1)(i). Based on the summary in Attachment B, BVPV has determined that thermal oxidizers (TO), regenerative TO (RTO), and wet scrubbing are existing control technologies and that no new controls or new technologies are available at the time of submittal of this analysis. The annual cost for each technically feasible air cleaning device, air



pollution control technology, or technique approved under 25 Pa. Code §129.99(e) was greater than \$12,000 per ton of VOC emissions reduced. There were no alternative RACT requirements approved for BVPV under 25 Pa. Code §129.99(e) that were below the economic feasibility benchmark value, and therefore, 25 Pa. Code §129.114(i)(1)(ii) does not apply. Additionally, because BVPV did not identify any new or upgraded pollutant-specific air cleaning devices, air pollution control technologies, or techniques, a new technical and economic feasibility analysis per 25 Pa. Code §129.114(i)(2) is not required.

25 Pa. Code §129.114(i)(1)(i)(A) – Identification of New Air Cleaning Devices, Air Pollution Control Technologies, or Techniques

BVPV conducted an analysis of the RACT/Best Available Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) Clearinghouse (RBLC) to determine if any new air cleaning devices, air pollution control technologies, or techniques could be applied to the units onsite. A summary of the RBLC search results is provided in Attachment B. No additional air cleaning devices, air pollution control technologies, or techniques other than the aforementioned were discovered and the current emissions controls for the RACT III affected units are consistent with recent and historical BACT determinations.

25 Pa. Code §129.114(i)(1)(i)(B) – List Previously-Identified Technically Feasible Controls

Table 1 below shows a list of previously identified technically feasible air pollution control technologies evaluated under 25 Pa. Code §§129.92(b)(1)-(3) that were included in BVPV’s 25 Pa. Code §129.99(d) RACT 2 submittal previously and approved by PADEP.

**Table 1
Technically Feasible Air Pollution Control Technologies**

Source Group ID	Name	Control Technology Option	Feasibility	Rationale for Infeasibility ^(a)
101	D3 EPS/ D4 EPS Process Sources	RTO	Economically Infeasible	Approximately \$13,000-\$22,000/ton VOC reduced
201	ARCEL® Resin Process and D2 EPS Process Sources	RTO	Economically Infeasible	Approximately \$20,000-\$41,000/ton VOC reduced
301	Dylene Process Sources	RTO	Economically Infeasible	Approximately \$45,000/ton VOC reduced

^(a) Economic infeasibility demonstrations were submitted to PADEP in accordance with 25 Pa. Code §129.99(d), and the values provided herein reflect the cost effectiveness determinations previously approved by PADEP under 25 Pa. Code §129.99(e).

For RACT III, BVPV considered the feasibility of air pollution control technologies for Source Group ID 801 (Wastewater Treatment and Collection Sources). Given the

decentralized location of the Wastewater Treatment and Collection Sources at the Facility and the large size of certain collection ponds and basins, BVPV understands that there is no technically feasible control strategy capable of effectively capturing and reducing trace volatiles present in the wastewater. Additionally, the low miscibility of pentane and styrene in water would render an attempt at capturing and controlling trace volatiles infeasible.

The basins, sumps, and lagoons span a large area and are operated as open basins. Constructing an enclosure would be costly, cause engineering challenges, and require discontinuation of treatment operations during a lengthy construction period. Furthermore, the exhaust gas flow rate that would be required to vent the enclosure would be exceptionally high, resulting in low VOC concentrations (likely well below 100 parts per million). For these reasons, the use of add-on VOC control is considered technically infeasible. BVPV understands that collecting and controlling trace VOC from the Wastewater Treatment and Collection Sources is not a technically feasible control option and is therefore not RACT.

Based on the technical feasibility of the control technologies evaluated, BVPV proposes to continue using good air pollution control practices as RACT for VOC emissions associated with Source Group ID 801.

25 Pa. Code §129.114(i)(1)(i)(C) – Summary of Previous Economic Feasibility Analyses

As part of BVPV’s 25 Pa. Code §129.99(d) RACT 2 submittal, BVPV evaluated the cost effectiveness of add-on VOC controls, calculated consistent with the methods presented in the “EPA Air Pollution Control Cost Manual” (Sixth Edition, EPA/452/B-02-001, January 2002). BVPV evaluated RTO technology as the top level of available add-on VOC control to determine the economic feasibility of such controls for Source Groups 101, 201, and 301. A cost effectiveness evaluation was not required for the other technically feasible control technologies because the operation change previously evaluated and good air pollution control practices can be accommodated by BVPV at no cost and without physically modifying the emissions units. The results of the 25 Pa. Code §129.99(d) cost effectiveness evaluations, as applicable, are summarized in Table 1 above.

25 Pa. Code §129.114(i)(1)(i)(D) – Statement of Economic Infeasibility

Based on the economic feasibility analyses previously performed by BVPV and approved by PADEP, there are no economically feasible add-on control devices that can be applied to the alternative sources because the cost effectiveness remains greater than \$12,000 per ton of VOC emissions reduced (as summarized in Table 1 above). The cost of the control technologies evaluated has not considerably changed since the analysis was performed in 2016 and, considering increases in the cost of fuel and in certain economic indicators such as the Consumer Price Index (CPI), the control cost in 2022 dollars is expected to have increased. Therefore, the control technologies for which cost effectiveness was evaluated in BVPV’s 25 Pa. Code §129.99(d) RACT 2 submittal remain economically infeasible.

25 Pa. Code §129.114(i)(1)(i)(E) – Additional Information

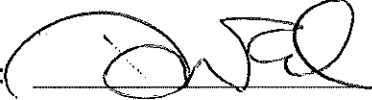
Upon request from PADEP, BVPV will provide additional information to support the Alternative RACT Compliance Analysis included herein.

Alternative RACT Compliance Summary

Based on the 25 Pa. Code §129.114(i) analysis provided above, BVPV has determined that the alternative RACT requirements and/or RACT 2 emissions limitations that were previously approved by PADEP under 25 Pa. Code §129.99(e) continue to represent RACT for the source groups evaluated. BVPV proposes to comply with the RACT III Rule by maintaining compliance with the applicable RACT conditions of TVOP No. 04-00033. Thus, BVPV will meet the January 1, 2023 compliance deadline of the RACT III Rule through continued compliance with these conditions. The RACT-specific conditions of TVOP No. 04-00033 are provided in Tables A-6 and A-7 of Attachment A.

Certification of Alternative RACT Compliance Analysis

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this 25 Pa. Code §129.114(i) Analysis of Alternative RACT Compliance are true, accurate, and complete.

Signature:  Date: 12/29/22
Name: TIMOTHY R. FORDS Title: REGIONAL MANUFACTURING LEADER

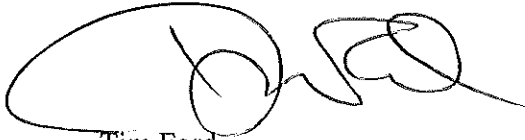


RACT III Rule Recordkeeping

In accordance with 25 Pa. Code §129.115(f), BVPV will keep sufficient records for demonstrating compliance with the RACT III Rule, including continued compliance with the RACT-specific recordkeeping conditions of the TVOP summarized in Tables A-6 and A-7 of Attachment A, and the NO_x exemption documentation per 25 Pa. Code §129.115(g). Per 25 Pa. Code §129.115(k), all records will be maintained for at least five years, and will be made available to PADEP upon receipt of a written request.

If you have any additional questions, please contact Andrea Davison, Sr. Environmental Engineer, at (724) 770 - 2339 or via email at Andrea.Davison@Styropek.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Ford', with a large, stylized initial 'T' and 'F'.

Tim Ford
Manufacturing Leader
Tim.Ford@Styropek.com

cc: Brent Shick (ALL4)
Andrea Davison (BVPV Styrenics LLC)



**ATTACHMENT A -
RACT III RULE APPLICABILITY AND COMPLIANCE SUMMARY**

Table A-1
RACT III Rule Applicability Summary of Sources Not Required to be Evaluated
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
101	D3 EPS Slave Feeder Lube Hopper	T-3543	N/A - Not a VOC source.	N/A
101	D3 Hi-Vac System #1	B-3945	N/A - Not a VOC source.	N/A
101	D3 Hi-Vac System #2	N/A	N/A - Not a VOC source.	N/A
101	D3 EPS Packaging Net Weigher	C-3355	N/A - Source not currently in operation.	N/A
101	D4 EPS #1 Dryer Check Bin #1410	T-4010	N/A - Source not currently in operation.	N/A
101	D4 EPS #1 Dryer Check Bin #1411	T-4011	N/A - Source not currently in operation.	N/A
101	D3/D4 EPS Packaging Line Lube Mixer/Container (Herchel - Fume Hood)	T-4012	N/A - Not a VOC source.	N/A
101	D4 EPS Line 1 Undersized Bin 1413	T-4338	N/A - Source not currently in operation.	N/A
101	D4 Cooling Tower	U-4581	N/A - Not a VOC source.	N/A
101	D4 EPS A Line 1 Feeder	T-4353	N/A - VOC Emissions controlled by PERS.	N/A
101	D4 EPS B Line 2 Feeder	T-4353	N/A - VOC Emissions controlled by PERS.	N/A
101	D4 EPS Flame Retardant Mixing Tank	T-4101	N/A - Not a VOC source.	N/A
101	D4 EPS Hi-Vac System	N/A	N/A - Not a VOC source.	N/A
101	D4 EPS Pneumatic Transfer Cyclones for 4B3 Airvey System	M-4210/M-4235	N/A - Not a VOC source.	N/A
101	D4 EPS Pneumatic Transfer Cyclones for 4B4 Airvey System	M-4183/M-4187/M-4190	N/A - Not a VOC source.	N/A
101	D4 EPS Reactor Feed Bin 4F1	T-4003	N/A - Not a VOC source.	N/A

Table A-1
RACT III Rule Applicability Summary of Sources Not Required to be Evaluated
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
101	D4 EPS Reactor Feed Bin 4F2	T-4004	N/A - Not a VOC source.	N/A
101	D4 EPS Silo #41 for Reactor Bead Bin 4F1	T-4220	N/A - Not a VOC source.	N/A
101	D4 EPS Silo #42 for Reactor Bead Bin 4F1	T-4221	N/A - Not a VOC source.	N/A
101	D4 EPS Silo #43 for Reactor Bead Bin 4F2	T-4151	N/A - Not a VOC source.	N/A
101	D4 EPS Silo #44 for Reactor Bead Bin 4F2	T-4152	N/A - Not a VOC source.	N/A
101	D4 EPS Silo #45 for Reactor Bead Bin 4F2	T-4153	N/A - Not a VOC source.	N/A
101	D4 EPS Sump Building Exhaust Fan	Sump	N/A - Not a VOC source.	N/A
101	Hydrogen Chloride Tank	T-3031	N/A - Not a VOC source.	N/A
201	Arcel Reactor Beads Feed Bin 441	T-2441	N/A - Not a VOC source.	N/A
201	PES Reactor 204	R-2204	N/A - Not in service	N/A
201	PES Silo 1	T-2726	N/A - Not a VOC source.	N/A
201	PES Silo 2	T-2747	N/A - Not a VOC source.	N/A
201	PES Silo 3	T-2748	N/A - Not a VOC source.	N/A
201	Sea Bulk Loading Filter Receiver	F-2908	N/A - Not a VOC source.	N/A
301	D3 Cooling Tower	U-3169	N/A - Not a VOC source.	N/A
301	D4 EPS Pneumatic Transfer Cyclone for 4B1 Airvey System	M-4061	N/A - Not a VOC source.	N/A

Table A-1
RACT III Rule Applicability Summary of Sources Not Required to be Evaluated
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
301	D4 EPS Pneumatic Transfer Cyclone for 4B2 Airvey System	M-4062	N/A - Not a VOC source.	N/A
301	Dylene #1 Processing String - #1 Fluidized Bed Dryer System	H-3407	N/A - Not a VOC source.	N/A
301	Dylene #1 Processing String - #1 Slurry Kettle	T-3415	N/A - Not a VOC source.	N/A
301	Dylene #1 Processing String - #2 Slurry Kettle	T-3417	N/A - Not a VOC source.	N/A
301	Dylene #2 Processing String - #1 Hold Tank	T-3433	N/A - Not a VOC source.	N/A
301	Dylene #2 Processing String - #2 Fluidized Bed Dryer System	H-3440	N/A - Not a VOC source.	N/A
301	Dylene #3 Processing String - #3 Fluidized Bed Dryer System	H-3458	N/A - Not a VOC source.	N/A
301	Dylene 270 Airvey System F1 Bin	T-3540	N/A - Not a VOC source.	N/A
301	Dylene 270 Airvey System F2 Bin	T-3993	N/A - Not a VOC source.	N/A
301	Dylene 270 Airvey System Pneumatic Cyclone	M-3538	N/A - Not a VOC source.	N/A
301	Dylene 720 Airvey System Pneumatic Cyclone	M-3519	N/A - Not a VOC source.	N/A
301	Dylene 720 Airvey System Railcar Filter Receiver	M-3582	N/A - Not a VOC source.	N/A
301	Dylene Airvey 280 System	M-3530	N/A - Not a VOC source.	N/A
301	Dylene Airvey 503 System	M-3534/M-3535	N/A - Not a VOC source.	N/A
301	Dylene B2 Airvey System	M-3588	N/A - Not a VOC source.	N/A
301	Dylene B3 Airvey System	M-3585	N/A - Not a VOC source.	N/A

Table A-1
RACT III Rule Applicability Summary of Sources Not Required to be Evaluated
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
301	Dylene B3 Airvey System Pneumatic Cyclone B3	M-3583	N/A - Not a VOC source.	N/A
301	Dylene B3/B4 Airvey System Pneumatic Cyclone B4	M-3594	N/A - Not a VOC source.	N/A
301	Dylene Bin 1200	T-3600	N/A - Not a VOC source.	N/A
301	Dylene Bin 1201	T-3595	N/A - Not a VOC source.	N/A
301	Dylene Bin 1203	T-3668	N/A - Not a VOC source.	N/A
301	Dylene Bin 1204	T-3667	N/A - Not a VOC source.	N/A
301	Dylene Bin 1205	T-3666	N/A - Not a VOC source.	N/A
301	Dylene Bin 1206	T-3669	N/A - Not a VOC source.	N/A
301	Dylene Bin 1213	T-3663	N/A - Not a VOC source.	N/A
301	Dylene Bin 1215	T-3665	N/A - Not a VOC source.	N/A
301	Dylene Bin 1216	T-3662	N/A - Not a VOC source.	N/A
301	Dylene Bulk Lime Storage Silo	T-3005	N/A - Not a VOC source.	N/A
301	Dylene Bulk Lime Weigh Hopper	T-3010	N/A - Not a VOC source.	N/A
301	Dylene Phosphoric Acid Tank	T-3380	N/A - Not a VOC source.	N/A
301	Dylene Railcar Loader	M-3582	N/A - Not a VOC source.	N/A
301	Dylene Screening Lines A/B Airvey System Cyclone A	M-3605	N/A - Not a VOC source.	N/A

Table A-1
RACT III Rule Applicability Summary of Sources Not Required to be Evaluated
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
301	Dylene Screening Lines A/B Airvey System Cyclone B	M-3611	N/A - Not a VOC source.	N/A
301	Dylene Screening Lines C/D Airvey System Cyclone C	M-3620	N/A - Not a VOC source.	N/A
301	Dylene Screening Lines C/D Airvey System Cyclone D	M-3617	N/A - Not a VOC source.	N/A
301	Dylene Truck Loading Pneumatic Cyclone	M-3577	N/A - Not a VOC source.	N/A
301	TCP Tank Reactor 3313	R-3313	N/A - Not a VOC source.	N/A
601	D3 Dylene Refeed Bin 522 Vent (T-3862)	T-3862	N/A - Not a VOC source.	N/A
601	D3 Dylene Refeed Bin 523 Vent (T-3865)	T-3865	N/A - Not a VOC source.	N/A
601	D3 Extrusion 501 Cyclone for the Pneumatic Conveying System	M-3770	N/A - Not a VOC source.	N/A
601	D3 Extrusion Line 3 & 4 Pellet Refeed Transfer Cyclones	M-3860/M-3863	N/A - Not a VOC source.	N/A
601	D3 Extrusion Line 3 Carter Day Dry (AK-7819 / Line 3 sweco screener	H-3894/S3893	N/A - Not a VOC source.	N/A
601	D3 Extrusion Mixer Diverter Scrap Dumpsters	Scrap Dumpsters	N/A - Not a VOC source.	N/A
601	D3 Extrusion Resin Feed Bin 513 Vent (T-3871)	T-3871	N/A - Not a VOC source.	N/A
601	D3 Extrusion Resin Feed Bin 514 Vent (T-3911)	T-3911	N/A - Not a VOC source.	N/A
601	D3 Extrusion Resin Feed Bin 515 Vent (T-3913)	T-3913	N/A - Not a VOC source.	N/A
601	D3 Extrusion, Packaging, and Blending Miscellaneous Equipment	Multiple Indoor Points	N/A - Not a VOC source.	N/A
701	Styrene Field Tank 8	T-0035	N/A - Source not currently in operation.	N/A

Table A-1
RACT III Rule Applicability Summary of Sources Not Required to be Evaluated
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
701	Styrene Field Tank 9	T-0025	N/A - Source not currently in operation.	N/A
801	Filter Plant HCl Tank	T-6102	N/A - Not a VOC source.	N/A
801	Fugitive Road Dust Emissions	Road dust	N/A - Not a VOC source.	N/A
801	Lime Storage Silo and Slaker	T-0103	N/A - Not a VOC source.	N/A
801	Process Refrigeration Systems	Multiple	N/A - Not a VOC source.	N/A

Table A-2
RACT III Rule Applicability Summary of Exempt Sources
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
101	D3 EPS Fugitive Equipment Leak Sources	N/A	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.71.	25 Pa. Code §129.111(a)
101	D4 EPS Cyclopentane Tank	T-3323	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.57.	25 Pa. Code §129.111(a)
101	D4 EPS Fugitive Equipment Leak Sources	N/A	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.71.	25 Pa. Code §129.111(a)
101	D4 EPS Isopentane Tank	T-3375	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.57.	25 Pa. Code §129.111(a)
101	D4 EPS Mixed Pentane Tank	T-1300	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.57.	25 Pa. Code §129.111(a)
201	ARCEL Cooling Tower	W-2840	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	ARCEL Hold Bin Tank 200	R-2200	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	ARCEL Hold Tank	T-2200	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	Arcel Isopentane Storage Tank	T-2530	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.57.	25 Pa. Code §129.111(a)
201	D2 Fugitive Equipment Leak Sources	N/A	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	D2 n-Pentane Storage Tank	T-2529	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.57.	25 Pa. Code §129.111(a)
201	D2 PES 370 Airvey System Pneumatic Cyclone (Line 1 to R202 ,R203, R204)	M-2M20	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	D2 PES 370 Airvey System Pneumatic Cyclone (Line 1 to R205)	M-2275	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	D2 PES 370 Airvey System Pneumatic Cyclone to 439 bin (Line 2)	M-2071	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	D2 PES Acid Wash Kettle 210 (Line 1 and Line 2)	K-2210	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	Package Vent Exhaust	N/A	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES 370 Airvey System Pneumatic Cyclone (Line 1 to 440 bin)	M-2351	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Acid Wash Kettle 210	K-2210	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Acid Wash Kettle 211	K-2211	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Additive Feed Tank - Line 1	T-2254	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Additive Mix Tank - Line 2	T-2113	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Additive MIX Tank (Line 1)	T-2036	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Bead Storage Silo #1	T-2726	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Butyl Acrylate Storage Tank	T-2116	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Catalyst Feed Tank - Line 2	T-2253	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Dewatering Dryer - Line 1	H-2249	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Dewatering Dryer - Line 2	H-2248	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Gala Dryer	H-2042	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Monomer Feed Tank - Line 1 and 2	T-2260	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Monomer Mix Tank - Line 1	T-2040	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Monomer MIX tank (Line 2)	T-2033	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES QC Packaging Bin	T-2706	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)

Table A-2
RACT III Rule Applicability Summary of Exempt Sources
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
201	PES Reactor 206 (Line 2)	R-2206	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Reactor 207 (Line 2)	R-2207	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Reactor 208 (Line 2)	R-2208	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Reactor 209 (Line 2)	R-2209	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Reactor R203 (Line 1)	R-2203	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Reactor R205 (Line 1)	R-2205	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
201	PES Slurry Hold Tank	T-2247	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
301	Containment Structure (incidents only)	N/A	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
301	Dylene #3 Processing String - #4 Hold Tank	T-3499	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
301	Dylene 504 Airvey System Filter Receiver	F-3502	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
301	Dylene General Fugitive Equipment Leak Sources	N/A	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
301	Dylene HAP Fugitive Equipment Leak Sources	N/A	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.71.	25 Pa. Code §129.111(a)
301	East Reactor Day Tank	T-3398	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
301	West Reactor Day Tank	T-3393	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
601	D3 Extrusion Line 3 Mixer Feed Chute	A-3883	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
601	D3 Extrusion Line 3 Mixer Feed Chute Collection Hood	A-3883	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
701	N-Pentane Storage Sphere	T-0065	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
701	Styrene Barge Unloading	Barge	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
701	Field Storage Fugitive Equipment Leak Sources	N/A	Exempt from the RACT III Rule because the source is subject to 25 Pa. Code §129.71.	25 Pa. Code §129.111(a)
701	Styrene Truck Loading	Trucks	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	Diesel Off Road Storage Tank	T-0762	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	Gasoline Storage Tank	T-0763	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	Gasoline Tank used by Paris	T-0850	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	Heaters	Various Heaters	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	Maintenance Burn Oven (Large) model IGG-1000	IGG-1000	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	Maintenance Shop Spray Paint Hood	Paint booth	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	Off Road Diesel Tank used by Paris	T-0841	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	On Road Diesel Tank used by Paris	T-0839	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
801	Waste Storage Pad	Waste pad	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
900	Swing Reactors-D3 EPS Production	900	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
901	17 HP Emergency Generator	901/M-6011	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)

Table A-2
RACT III Rule Applicability Summary of Exempt Sources
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
031	Boiler 1 (11.67 MMBtu/hr)	031	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
032	Boiler 2 (11.67 MMBtu/hr)	032	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
033	Boiler 3 (11.67 MMBtu/hr)	033	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
034	Boiler 4 (11.67 MMBtu/hr)	034	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
035	Boiler 5 (11.67 MMBtu/hr)	035	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
036	Boiler 6 (11.67 MMBtu/hr)	036	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
037	Boiler 7 (11.67 MMBtu/hr)	037	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
038	Boiler 8 (11.67 MMBtu/hr)	038	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
039	Boiler 9 (11.67 MMBtu/hr)	039	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
040	Boiler 10 (11.67 MMBtu/hr)	040	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
041	Boiler 11 (11.67 MMBtu/hr)	041	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)
042	Boiler 12 (11.67 MMBtu/hr)	042	Exempt from the RACT III Rule because potential VOC emissions are < 1.0 tpy.	25 Pa. Code §129.111(e)

Table A-3
RACT III Rule Applicability Summary of Sources Subject to 25 Pa. Code §129.112 (Presumptive Limits)
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
101	Pentane railcar loading and unloading (cyclopentane)	N/A	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(2)
101	Pentane railcar loading and/or unloading - (isopentane) - D4 EPS - (previously named D3 railcar unloading - D4 EPS in RACT II)	N/A	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(2)
701	Styrene Field Tank 6	T-0055	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(2)
701	Styrene Field Tank 7	T-0045	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(2)
801	Engr & maint. Bldg Furnace	Engr & maint. Bldg Furnace	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(4)
801	Fugitive Painting Emissions	Site Painting	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(2)
801	Lab Hoods (added to inventory list)	Various Lab Hoods	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(2)
801	Pilot Plant and Lab. Bldg. Furnace	Pilot Plant and Lab. Bldg. Furnace	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(4)
801	Storeroom Furnace	Storeroom Furnace	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(4)
801	Technology Bldg. Furnace	Technology Bldg. Furnace	Maintain and operate the source in accordance with manufacturer's specifications and good operating practices.	25 Pa. Code §129.112(c)(4)

Table A-4
RACT III Rule Applicability Summary for Sources Subject to 25 Pa. Code §129.114 (Case-by-Case Analysis)
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
101	D3 EPS #3 Acid Wash Kettle	K-3469	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D3 EPS #3 Hold Tank	T-3472	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D3 EPS #4 Acid Wash Kettle	K-3467	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D3 EPS Airveying Pneumatic Cyclone/Filter Receiver 1260	M-3684	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D3 EPS Airveying Pneumatic Cyclone/Filter Receiver 1265	M-3672	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D3 EPS Dryer #4	H-3480	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D3 EPS No. 4 Bird Centrifuge	M-3477	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D3 EPS Packaging Bin 1208	T-3562	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D3 EPS Packaging Bin 1218	T-3574	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D3 EPS Packaging Net Weigh Hopper	T-3353	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D3 EPS Sump	N/A	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS "A" Packaging Line Net Weigher Hopper	T-4381	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS "B" Packaging Line Net Weigher Hopper	T-4315	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS #1 Acid Wash Kettle	K-4275	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS #1 Bird Centrifuge	M-4290	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS #1 Fluidized Dryer	H-4301	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS #1 Gala Dryer	H-4300	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS #2 Acid Wash Kettle	K-4276	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS #2 Dryer Check Bin #1420	T-4242	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D4 EPS #2 Dryer Check Bin #1421	T-4243	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D4 EPS #2 Fluidized Dryer	H-4225	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)

Table A-4
RACT III Rule Applicability Summary for Sources Subject to 25 Pa. Code §129.114 (Case-by-Case Analysis)
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
101	D4 EPS #2 Gala Dryer	H-4223	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS #3 Acid Wash Kettle	K-4201	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS #4 Acid Wash Kettle	K-4202	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS 4B10 and 4B11 System Backup	M-4005/M-4251	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS Line 1 Packaging Bin 1412	T-4340	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D4 EPS Line 2 Packaging Bin 1422	T-4281	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
101	D4 EPS Pneumatic Transfer Cyclone for 4B10 Airvey System	M-4005	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS Pneumatic Transfer Cyclone for 4B11 Airvey System	M-4251	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS Reactor #401	R-4001	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	D4 EPS Reactor #402	R-4002	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	Pentane Emission Reduction System - PERS (DFTO)	G-4626	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	Pentane Emission Reduction system - PERS (RTO/RCO Oxidizer)	G-4625	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
101	Pentane railcar loading and unloading (normal)- D3 & D4 EPS	N/A	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
201	Arcel 330 Airvey Cyclone	M-2334	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
201	Arcel 380 Airvey System Pneumatic Cyclone	M-2021	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
201	Arcel Carter Day Dryer	H-2022	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
201	Arcel Carter Day Dryer Maxi Surge Bin	T-2015	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
201	Arcel Reactor 1 (199)	R-2199	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
201	Arcel Reactor 2 (201)	R-2201	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
201	Catalytic Oxidizer (CATOX)	Catalytic Oxidizer (CATOX)	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
201	D2 Railcar Unloading	N/A	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)

Table A-4
RACT III Rule Applicability Summary for Sources Subject to 25 Pa. Code §129.114 (Case-by-Case Analysis)
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	VOC RACT III Category	RACT III Citation
201	Package Bin Exhaust	T-2781	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
201	Waste Water Sump	Waste Water Sump	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Dylene Reactor 301	R-3301	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Dylene Reactor 302	R-3302	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Dylene Reactor 303	R-3303	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Dylene Reactor 304	R-3304	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Dylene Reactor 305	R-3305	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Dylene Reactor 306	R-3306	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Dylene Reactor 307 (Swing)	R-3307	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
301	Dylene Reactor 308 (Swing)	R-3308	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
301	Dylene Reactor 309 (Swing)	R-3309	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
301	Dylene Reactor 310 (Swing)	R-3310	Case-by-Case RACT analysis required because the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(d)
301	Dylene Reactor 311	R-3311	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Dylene Reactor 312	R-3312	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Styrene Emissions Reduction (SERS) Control Stack	N/A	Case-by-Case RACT analysis required because potential VOC emissions are > 2.7 tpy and the unit is not subject to 25 Pa. Code §129.112.	25 Pa. Code §129.114(c)
301	Wastewater	N/A	Case-by-Case RACT analysis required for Alternative RACT Proposal.	25 Pa. Code §129.114(d)(1)(i)
801	Aeration Lagoon	Aeration lagoon	Case-by-Case RACT analysis required for Alternative RACT Proposal.	25 Pa. Code §129.114(d)(1)(i)
801	North Basin	North basin	Case-by-Case RACT analysis required for Alternative RACT Proposal.	25 Pa. Code §129.114(d)(1)(i)
801	Quiescent Lagoon	Quiescent lagoon	Case-by-Case RACT analysis required for Alternative RACT Proposal.	25 Pa. Code §129.114(d)(1)(i)

Table A-5
Source Inventory
BVPV Styrenics LLC - Monaca, PA

TV Major Source Group	Source Name/Description	Source No.	Make ^(a)	Model ^(a)	Location/Process
101	D3 EPS #3 Acid Wash Kettle	K-3469	ACME Process Equipment Company	No model number	D3 EPS
101	D3 EPS #3 Hold Tank	T-3472	Richmond Eng Co. / Koppers	No model number	D3 EPS
101	D3 EPS #4 Acid Wash Kettle	K-3467	ACME Process Equipment Company	No model number	D3 EPS
101	D3 EPS Airveying Pneumatic Cyclone/Filter Receiver 1260	M-3684	FLO-TRONICS	150	D3 EPS
101	D3 EPS Airveying Pneumatic Cyclone/Filter Receiver 1265	M-3672	FLO-TRONICS	150	D3 EPS
101	D3 EPS Dryer #4	H-3480	General America Trans Corp.	No model number	D3 EPS
101	D3 EPS Fugitive Equipment Leak Sources	N/A	N/A	N/A	D3 EPS
101	D3 EPS No. 4 Bird Centrifuge	M-3477	Bird Machinery	A10-1.5	D3 EPS
101	D3 EPS Packaging Bin 1208	T-3562	FLO-TRONICS / KoppersCo Inc.	No model number	D3 EPS
101	D3 EPS Packaging Bin 1218	T-3574	FLO-TRONICS / KoppersCo Inc.	No model number	D3 EPS
101	D3 EPS Packaging Net Weigh Hopper	T-3353	Witherup	Serial number: 12606	D3 EPS
101	D3 EPS Packaging Net Weigher	C-3355	Unavailable	Unavailable	D3 EPS
101	D3 EPS Slave Feeder Lube Hopper	T-3543	Vibranetic	RD-2	D3 EPS
101	D3 EPS Sump	N/A	N/A	N/A	D3 EPS
101	D3 Hi-Vac System #1	B-3945	HI-VAC	230HC	D3 EPS
101	D3 Hi-Vac System #2	N/A	Unavailable	Unavailable	D3 EPS
101	D4 EPS #1 Dryer Check Bin #1410	T-4010	Unavailable	Unavailable	D4 EPS
101	D4 EPS #1 Dryer Check Bin #1411	T-4011	Unavailable	Unavailable	D4 EPS
101	D3/D4 EPS Packaging Line Lube Mixer/Container (Herchel - Fume Hood)	T-4012	Henschel	No model number	D3 EPS/D4 EPS
101	D4 Cooling Tower	U-4581	Marley Cooling Tower	No model number	D4 EPS
101	D4 EPS "A" Packaging Line Net Weigher Hopper	T-4381	Unavailable	Unavailable	D4 EPS
101	D4 EPS "B" Packaging Line Net Weigher Hopper	T-4315	Unavailable	Unavailable	D4 EPS
101	D4 EPS #1 Acid Wash Kettle	K-4275	Brown Boiler	No model number	D4 EPS
101	D4 EPS #1 Bird Centrifuge	M-4290	Bird Machinery	No model number	D4 EPS
101	D4 EPS #1 Fluidized Dryer	H-4301	Unavailable	Unavailable	D4 EPS
101	D4 EPS #1 Gala Dryer	H-4300	Unavailable	Unavailable	D4 EPS
101	D4 EPS #2 Acid Wash Kettle	K-4276	Brown Boiler	No model number	D4 EPS
101	D4 EPS #2 Dryer Check Bin #1420	T-4242	Unavailable	Unavailable	D4 EPS
101	D4 EPS #2 Dryer Check Bin #1421	T-4243	Unavailable	Unavailable	D4 EPS
101	D4 EPS #2 Fluidized Dryer	H-4225	Unavailable	Unavailable	D4 EPS
101	D4 EPS #2 Gala Dryer	H-4223	Gala	403-BF	D4 EPS
101	D4 EPS #3 Acid Wash Kettle	K-4201	Brown Boiler	No model number	D4 EPS
101	D4 EPS #4 Acid Wash Kettle	K-4202	Brown Boiler	No model number	D4 EPS
101	D4 EPS 4B10 and 4B11 System Backup	M-4005/M-4251	Kirk & Blum (4B10); Airecon (4B11)	#12-"C7" (4B10) ; Size 12 Design C-7 (4B11)	D4 EPS
101	D4 EPS A Line 1 Feeder	T-4353	Unavailable	Unavailable	D4 EPS
101	D4 EPS B Line 2 Feeder	T-4353	Unavailable	Unavailable	D4 EPS
101	D4 EPS Cyclopentane Tank	T-3323	Richmond Engineering Co.	No model number	D4 EPS
101	D4 EPS Flame Retardant Mixing Tank	T-4101	Unavailable	Unavailable	D4 EPS
101	D4 EPS Fugitive Equipment Leak Sources	N/A	N/A	N/A	D3 EPS
101	D4 EPS Hi-Vac System	N/A	Unavailable	Unavailable	D3 EPS
101	D4 EPS Isopentane Tank	T-3375	Industrial Metal Products	No model number	D4 EPS
101	D4 EPS Line 1 Packaging Bin 1412	T-4340	Unavailable	Unavailable	D4 EPS
101	D4 EPS Line 1 Undersized Bin 1413	T-4338	Unavailable	Unavailable	D4 EPS
101	D4 EPS Line 2 Packaging Bin 1422	T-4281	Unavailable	Unavailable	D4 EPS
101	D4 EPS Isopentane Tank	T-1300	Richmond Engineering Co.	No model number	D4 EPS
101	D4 EPS Pneumatic Transfer Cyclone for 4B10 Airvey System	M-4005	Kirk & Blum	#12-"C7"	D4 EPS
101	D4 EPS Pneumatic Transfer Cyclone for 4B11 Airvey System	M-4251	Airecon	Size 12 Design C-7	D4 EPS
101	D4 EPS Pneumatic Transfer Cyclones for 4B3 Airvey System	M-4210/M-4235	Kirk & Blum	Special #14-C-7 /C-7	D4 EPS
101	D4 EPS Pneumatic Transfer Cyclones for 4B4 Airvey System	M-4183/M-4187/M-4190	Kirk & Blum	C-7 / #14-C-7/ Special # 14-C-7	D4 EPS

Table A-5
Source Inventory
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TV Major Source Group	Source Name/Description	Source No.	Make ^(a)	Model ^(a)	Location/Process
101	D4 EPS Reactor #401	R-4001	Brighton Corp	No model number	D4 EPS
101	D4 EPS Reactor #402	R-4002	Brighton Corp	No model number	D4 EPS
101	D4 EPS Reactor Feed Bin 4F1	T-4003	Unavailable	Unavailable	D4 EPS
101	D4 EPS Reactor Feed Bin 4F2	T-4004	Unavailable	Unavailable	D4 EPS
101	D4 EPS Silo #41 for Reactor Bead Bin 4F1	T-4220	Tectank	No model number	D4 EPS
101	D4 EPS Silo #42 for Reactor Bead Bin 4F1	T-4221	Tectank	No model number	D4 EPS
101	D4 EPS Silo #43 for Reactor Bead Bin 4F2	T-4151	Tectank	No model number	D4 EPS
101	D4 EPS Silo #44 for Reactor Bead Bin 4F2	T-4152	Tectank	No model number	D4 EPS
101	D4 EPS Silo #45 for Reactor Bead Bin 4F2	T-4153	Tectank	No model number	D4 EPS
101	D4 EPS Sump Building Exhaust Fan	Sump		N/A	D4 EPS
101	Hydrogen Chloride Tank	T-3031	Raven Industries	No model number	D3 EPS
101	Pentane Emission Reduction System - PERS (DFTO)	G-4626	Smith Engr. Co.	Type: DFTO	D3 & D4 EPS
101	Pentane Emission Reduction system - PERS (RTO/RCO Oxidizer)	G-4625	Smith Engr. Co.	Type: RTO	D3 & D4 EPS
101	Pentane railcar loading and unloading (cyclopentane)	N/A	N/A	N/A	D3 EPS
101	Pentane railcar loading and unloading (normal)- D3 & D4 EPS	N/A	N/A	N/A	D3 EPS
101	Pentane railcar loading and/or unloading - (isopentane) - D4 EPS - (previously named D3 railcar unloading - D4 EPS in RACT II)	N/A	N/A	N/A	D3 EPS
201	Arcel 330 Airvey Cyclone	M-2334	Unavailable	Unavailable	ARCEL
201	Arcel 380 Airvey System Pneumatic Cyclone	M-2021	Kirk & Blum	No model number	ARCEL
201	Arcel Carter Day Dryer	H-2022	Carter Day	No model number	ARCEL
201	Arcel Carter Day Dryer Maxi Surge Bin	T-2015	Unavailable	Unavailable	ARCEL
201	ARCEL Cooling Tower	W-2840	Marley	NC8309J-2BS	ARCEL
201	ARCEL Hold Bin Tank 200	R-2200	Pfaudler	No model number	ARCEL
201	ARCEL Hold Tank	T-2200	Pfaudler	No model number	ARCEL
201	Arcel Isopentane Storage Tank	T-2530	Brown Boiler	Serial # 16719	ARCEL
201	Arcel Reactor 1 (199)	R-2199	Central Fabricators	Serial # R360-0874	ARCEL
201	Arcel Reactor 2 (201)	R-2201	Pfaudler	No model number	ARCEL
201	Arcel Reactor Beads Feed Bin 441	T-2441	Unavailable	Unavailable	ARCEL
201	Catalytic Oxidizer (CATOX)	G-2501	Pro-Environmental, Inc	PE1	ARCEL
201	Fugitive Equipment Leak Sources	N/A	N/A	N/A	PES and ARCEL
201	n-Pentane Storage Tank	T-2529	Buffalo Tank	No model number	PES
201	PES 370 Airvey System Pneumatic Cyclone (Line 1 to R202 ,R203, R204)	M-2M20	Kirk & Blum	No model number	PES
201	PES 370 Airvey System Pneumatic Cyclone (Line 1 to R205)	M-2275	Unavailable	Unavailable	PES
201	PES 370 Airvey System Pneumatic Cyclone to 439 bin (Line 2)	M-2071	Kirk & Blum	Size 8	PES
201	PES Acid Wash Kettle 210 (Line 1 and Line 2)	K-2210	Vincent's	Serial # A62466-2	PES
201	Railcar Unloading	N/A	N/A	N/A	EPS
201	Package Bin Exhaust	T-2781	Paragon Fabricators	Serial # 1626-V-1	ARCEL
201	Package Vent Exhaust	N/A	N/A	N/A	PES
201	PES 370 Airvey System Pneumatic Cyclone (Line 1 to 440 bin)	M-2351	Unavailable	Unavailable	PES
201	PES Acid Wash Kettle 210	K-2210	Vincent's	Serial # A62466-2	PES
201	PES Acid Wash Kettle 211	K-2211	BI-CON	MC-4 24"	PES
201	PES Additive Feed Tank - Line 1	T-2254	Paragon Fabricators	Serial # 1615-V-1	PES
201	PES Additive Mix Tank - Line 2	T-2113	Central Fabricators	Serial # M-45	PES
201	PES Additive MIX Tank (Line 1)	T-2036	Brown Boiler	No model number	PES
201	PES Butyl Acrylate Storage Tank	T-2116	Withrup	No model number	PES
201	PES Catalyst Feed Tank - Line 2	T-2253	Central Fabricators, Inc.	No model number	PES
201	PES Dewatering Dryer - Line 1	H-2249	Carter Day	D532, Style OKV1-X	PES
201	PES Dewatering Dryer - Line 2	H-2248	Carter Day	D532	PES
201	PES Gala Dryer	H-2042	Gala	303 BF	PES

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TV Major Source Group	Source Name/Description	Source No.	Make ^(a)	Model ^(a)	Location/Process
201	PES Monomer Feed Tank - Line 1 and 2	T-2260	Central Fabricators	Serial # L-12	PES
201	PES Monomer Mix Tank - Line 1	T-2040	Central Fabricators	Serial # M-38	PES
201	PES Monomer MIX tank (Line 2)	T-2033	Brown Boiler	No model number	PES
201	PES QC Packaging Bin	T-2706	Unavailable	Unavailable	PES
201	PES Reactor 204	R-2204	Brighton Corp	Serial # PC7000	PES
201	PES Reactor 206 (Line 2)	R-2206	Nooter Corp	948125 - Serial # 948125 -1	PES
201	PES Reactor 207 (Line 2)	R-2207	Nooter Corp	948125 - Serial # 948125-4	PES
201	PES Reactor 208 (Line 2)	R-2208	Nooter Corp	948125 - Serial # 948125-2	PES
201	PES Reactor 209 (Line 2)	R-2209	Nooter Corp	948125 - Serial # 948125-3	PES
201	PES Reactor R203 (Line 1)	R-2203	Central Fabricators, Inc	Serial # L-21	PES
201	PES Reactor R205 (Line 1)	R-2205	ENERFAB	No model number	PES
201	PES Silo 1	T-2746	CST	D-60-14-196761-00	PES
201	PES Silo 2	T-2747	ENERFAB	No model number	PES
201	PES Silo 3	T-2748	ENERFAB	No model number	PES
201	PES Slurry Hold Tank	T-2247	ENERFAB / WITHERUP	Serial # 17417	PES
201	Sea Bulk Loading Filter Receiver	F-2908	Dustex	4238-5-5-111G	N/A
201	Waste Water Sump	Waste Water Sump	N/A	N/A	PES/ARCEL
301	Containment Structure (incidents only)	N/A	N/A	N/A	D3 EPS
301	D3 Cooling Tower	U-3169	Marley Cooling Tower	No model number	D3 Dylene
301	D4 EPS Pneumatic Transfer Cyclone for 4B1 Airvey System	M-4061	Kirk & Blum	No model number	D3 Dylene
301	D4 EPS Pneumatic Transfer Cyclone for 4B2 Airvey System	M-4062	Kirk & Blum	No model number	D3 Dylene
301	Dylene #1 Processing String - #1 Fluidized Bed Dryer System	H-3407	General American Trans. Corp	No model number	D3 Dylene
301	Dylene #1 Processing String - #1 Slurry Kettle	T-3415	ACME Process Equipment Co.	No model number	D3 Dylene
301	Dylene #1 Processing String - #2 Slurry Kettle	T-3417	ACME Process Equipment Co.	No model number	D3 Dylene
301	Dylene #2 Processing String - #1 Hold Tank	T-3433	Richmond Engineering Co.	No model number	D3 Dylene
301	Dylene #2 Processing String - #2 Fluidized Bed Dryer System	H-3440	General American Trans. Corp	No model number	D3 Dylene
301	Dylene #3 Processing String - #3 Fluidized Bed Dryer System	H-3458	General American Trans. Corp	Unit - 1172	D3 Dylene
301	Dylene #3 Processing String - #4 Hold Tank	T-3499	Richmond Engineering Co.	No model number	D3 Dylene
301	Dylene 270 Airvey System F1 Bin	T-3540	A.O. Smith Engr Strg Prod Co.	No model number	D3 Dylene
301	Dylene 270 Airvey System F2 Bin	T-3993	A.O. Smith / Peabody Tectank	Serial # 92612	D3 Dylene
301	Dylene 270 Airvey System Pneumatic Cyclone	M-3538	FLO-TRONICS	150	D3 Dylene
301	Dylene 504 Airvey System Filter Receiver	F-3502	Spencer	No model number	D3 Dylene
301	Dylene 720 Airvey System Pneumatic Cyclone	M-3519	FLO-TRONICS	150	D3 Dylene
301	Dylene 720 Airvey System Railcar Filter Receiver	M-3582	FLO-TRONICS	150	D3 Dylene
301	Dylene Airvey 280 System	M-3530	FLO-TRONICS	250	D3 Dylene
301	Dylene Airvey 503 System	M-3534/M-3535	FLO-TRONICS / Kirk & Blum	150 (FLO-TRONICS) / #10 DES. 7 (Kirk & Blum)	D3 Dylene
301	Dylene B2 Airvey System	M-3588	FLO-TRONICS	250	D3 Dylene
301	Dylene B3 Airvey System	M-3585	FLO-TRONICS	250	D3 Dylene
301	Dylene B3 Airvey System Pneumatic Cyclone B3	M-3583	Unavailable	Unavailable	D3 Dylene
301	Dylene B3/B4 Airvey System Pneumatic Cyclone B4	M-3594	Unavailable	Unavailable	D3 Dylene
301	Dylene Bin 1200	T-3600	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bin 1201	T-3595	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bin 1203	T-3668	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bin 1204	T-3667	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bin 1205	T-3666	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bin 1206	T-3669	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bin 1213	T-3663	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bin 1215	T-3665	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bin 1216	T-3662	Butler Manufacturing Co.	No model number	D3 Dylene
301	Dylene Bulk Lime Storage Silo	T-3005	Imperial Calumet/Young Ind.	70-35-12X43-0 HTGH	D3 Dylene
301	Dylene Bulk Lime Weigh Hopper	T-3010	Young Industries Inc.	70-35-6X16-2 High	D3 Dylene
301	Dylene General Fugitive Equipment Leak Sources	N/A	N/A	N/A	D3 EPS

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Source Inventory
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TV Major Source Group	Source Name/Description	Source No.	Make ^(a)	Model ^(a)	Location/Process
301	Dylene HAP Fugitive Equipment Leak Sources	N/A	N/A	N/A	D3 EPS
301	Dylene Phosphoric Acid Tank	T-3380	Manufacture: Heil Process Equipmetn Co.	No model number	D3 Dylene
301	Dylene Railcar Loader	M-3582	FLO-TRONICS	150	D3 Dylene
301	Dylene Reactor 301	R-3301	Brighton Corp	Serial # C-2493-5	D3 Dylene
301	Dylene Reactor 302	R-3302	RV Industries	Serial # 5861	D3 Dylene
301	Dylene Reactor 303	R-3303	Brighton Corp	Serial # C-2493-2	D3 Dylene
301	Dylene Reactor 304	R-3304	Brighton Corp	Serial # C-2493-3	D3 Dylene
301	Dylene Reactor 305	R-3305	Brighton Corp	Serial #'s: Manuf: C-1146 / PA : 297603	D3 Dylene
301	Dylene Reactor 306	R-3306	Brighton Corp	Serial #'s: Manuf: C-2318-1 / PA : 297695	D3 Dylene
301	Dylene Reactor 307 (Swing)	R-3307	Brighton Corp	Serial #'s: Manuf: C-2317-2 / PA : 297696	D3 EPS/D3 Dylene
301	Dylene Reactor 308 (Swing)	R-3308	Brighton Corp	Serial #'s: Manuf: C-2317 / PA : 297697	D3 EPS/D3 Dylene
301	Dylene Reactor 309 (Swing)	R-3309	Brighton Corp	Serial # C-2494	D3 EPS/D3 Dylene
301	Dylene Reactor 310 (Swing)	R-3310	Brighton Corp	Serial #'s: Manuf: C-1182 / PA : 297644	D3 EPS/D3 Dylene
301	Dylene Reactor 311	R-3311	Brighton Corp	Serial # C-2493-4	D3 Dylene
301	Dylene Reactor 312	R-3312	Brighton Corp	Serial # C-2493-1	D3 Dylene
301	Dylene Screening Lines A/B Airvey System Cyclone A	M-3605	FLO-TRONICS	150	D3 Dylene
301	Dylene Screening Lines A/B Airvey System Cyclone B	M-3611	FLO-TRONICS	150	D3 Dylene
301	Dylene Screening Lines C/D Airvey System Cyclone C	M-3620	FLO-TRONICS	150	D3 Dylene
301	Dylene Screening Lines C/D Airvey System Cyclone D	M-3617	FLO-TRONICS	100	D3 Dylene
301	Dylene Truck Loading Pneumatic Cyclone	M-3577	Unavailable	Unavailable	D3 Dylene
301	East Reactor Day Tank	T-3398	Brown Boiler	No model number	D3 Dylene
301	Styrene Emissions Reduction (SERS) Control Stack	N/A	N/A	N/A	D3 EPS
301	TCP Tank	R-3313	Chattanooga & Tank Co	No model number	D3 Dylene
301	Wastewater	N/A	N/A	N/A	D3 EPS
301	West Reactor Day Tank	T-3393	Richmond Engineering Co.	No model number	D3 Dylene
601	D3 Dylene Refeed Bin 522 Vent	T-3862	Unavailable	Unavailable	D3 Dylene
601	D3 Dylene Refeed Bin 523 Vent	T-3865	Unavailable	Unavailable	D3 Dylene
601	D3 Extrusion 501 Cyclone for the Pneumatic Conveying System	M-3770	Spencer	No model number	D3 Extrusion
601	D3 Extrusion Line 3 & 4 Pellet Refeed Transfer Cyclones	M-3860/M-3863	Spencer	No model number	D3 Extrusion
601	D3 Extrusion Line 3 Carter Day Dry (AK-7819 / Line 3 sweco screener	H-3894/S3893	Unavailable	Unavailable	D3 Extrusion
601	D3 Extrusion Line 3 Mixer Feed Chute	A-3883	Farrel	9FCM	D3 Extrusion
601	D3 Extrusion Line 3 Mixer Feed Chute Collection Hood	A-3883	Farrel	9FCM	D3 Extrusion
601	D3 Extrusion Mixer Diverter Scrap Dumpsters	Scrap Dumpsters	N/A	N/A	D3 Extrusion
601	D3 Extrusion Resin Feed Bin 513 Vent	T-3871	Unavailable	Unavailable	D3 Extrusion
601	D3 Extrusion Resin Feed Bin 514 Vent	T-3911	Unavailable	Unavailable	D3 Extrusion
601	D3 Extrusion Resin Feed Bin 515 Vent	T-3913	Unavailable	Unavailable	D3 Extrusion
601	D3 Extrusion, Packaging, and Blending Miscellaneous Equipment	Multiple Indoor Points	N/A	N/A	D3 Extrusion
701	Field Storage Fugitive Equipment Leak Sources	N/A	N/A	N/A	D3 EPS
701	N-Pentane Storage Sphere	T-0065	PDMS-Desmoines	Serial No: 115 F-550	Field Storage
701	Styrene Barge Unloading	Barge	N/A	N/A	Field Storage
701	Styrene Field Tank 6	T-0055	Chicago B & I	No model number	Field Storage
701	Styrene Field Tank 7	T-0045	Chicago B & I	No model number	Field Storage
701	Styrene Field Tank 8	T-0035	Chicago B & I	No model number	Field Storage
701	Styrene Field Tank 9	T-0025	Chicago B & I	No model number	Field Storage
701	Styrene Truck Loading	Trucks	N/A	N/A	Field Storage

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TV Major Source Group	Source Name/Description	Source No.	Make ^(a)	Model ^(a)	Location/Process
801	Aeration Lagoon	Aeration lagoon	N/A	N/A	General Plant
801	Diesel Off Road Storage Tank	T-0762	Steel Tank Institute	Flame Shield	General Plant
801	Engr & maint. Bldg Furnace	Engr & maint. Bldg Furnace	Carrier	48TCED08A2A6A0A0A0,48TCED12A2A6A0A0A0,48TCEA07A2A6A0A0A0	General Plant
801	Filter Plant HCl Tank	T-6102	Poly Processing	Serial No: V-00-07384	General Plant
801	Fugitive Painting Emissions	Site Painting	N/A	N/A	General Plant
801	Fugitive Road Dust Emissions	Road dust	N/A	N/A	General Plant
801	Gasoline Storage Tank	T-0763	Steel Tank Institute	Flame Shield	General Plant
801	Gasoline Tank used by Paris	T-0850	Steel Tank Institute	Flame Shield	General Plant
801	Heaters	Various Heaters	N/A	N/A	General Plant
801	Lab Hoods (added to inventory list)	Various Lab Hoods	N/A	N/A	General Plant
801	Lime Storage Silo and Slaker	T-0103	Unavailable	Unavailable	General Plant
801	Maintenance Shop Spray Paint Hood	Paint booth	Speedaire Fume Hood	No model number	General Plant
801	North Basin	North basin	N/A	N/A	General Plant
801	Off Road Diesel Tank used by Paris	T-0841	Steel Tank Institute	Flame Shield	General Plant
801	On Road Diesel Tank used by Paris	T-0839	Steel Tank Institute	Flame Shield	General Plant
801	Pilot Plant and Lab. Bldg. Furnace	Pilot Plant and Lab. Bldg. Furnace	Carrier	VDC81H22 & 48TCFD20A2A6A6F0G0	General Plant
801	Process Refrigeration Systems	Multiple	N/A	N/A	General Plant
801	Quiescent Lagoon	Quiescent lagoon	N/A	N/A	General Plant
801	Storeroom Furnace	Storeroom Furnace	Carrier	48KCEA05A2A5A0A0A0	General Plant
801	Technology Bldg. Furnace	Technology Bldg. Furnace	Carrier	No model number	General Plant
801	Waste Storage Pad	Waste pad	N/A	N/A	General Plant
900	Swing Reactors-D3 EPS Production	900	Same as Dylene Reactor 307 (Swing), Dylene Reactor 308 (Swing), Dylene Reactor 309 (Swing), and Dylene Reactor 310 (Swing) listed above	Same as Dylene Reactor 307 (Swing), Dylene Reactor 308 (Swing), Dylene Reactor 309 (Swing), and Dylene Reactor 310 (Swing) listed above	D3
901	17 HP Emergency Generator	901/M-6011	Kohler	7.5RMW81	Fuel Burning Equipment
031	Boiler 1 (11.67 MMBtu/hr)	031	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
032	Boiler 2 (11.67 MMBtu/hr)	032	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
033	Boiler 3 (11.67 MMBtu/hr)	033	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
034	Boiler 4 (11.67 MMBtu/hr)	034	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
035	Boiler 5 (11.67 MMBtu/hr)	035	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
036	Boiler 6 (11.67 MMBtu/hr)	036	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
037	Boiler 7 (11.67 MMBtu/hr)	037	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
038	Boiler 8 (11.67 MMBtu/hr)	038	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
039	Boiler 9 (11.67 MMBtu/hr)	039	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
040	Boiler 10 (11.67 MMBtu/hr)	040	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
041	Boiler 11 (11.67 MMBtu/hr)	041	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment
042	Boiler 12 (11.67 MMBtu/hr)	042	Miura	LXH-300 SGI NG fired package boiler	Fuel Burning Equipment

^(a) Source identification information is consistent with the information provided in TVOP No. 04-00033. Make and model information is provided as available. Sources (i.e. tanks) constructed on site or custom built may not have a make or model number; in these cases the manufacturer name and serial numbers are shown or designated as "Unavailable", if not available at the time of submittal of this notification. Sources containing multiple emissions units or not containing equipment are designated as "N/A" for make and model.

Table A-6
RACT-Specific Permit Conditions [TVOP No. 04-00033, Section D, RACT 2 Sources]
BVPV Styrenics LLC - Monaca, PA

TV Source Sub Groups	Source Name	Emissions/Fuel/Throughput Restriction(s)	Testing Requirement(s)	Monitoring Requirement(s)	Recordkeeping Requirement(s)	Reporting Requirement(s)	Work Practice Requirement(s)
105	RACT 2 - D3 AND D4 EPS EQUIPMENT	Cap: 227 tons VOCs per rolling 12-month period. [Section E, RACT 2 Sources, Condition # 002]	No requirements exist.	The owner/operator shall maintain records of monthly and 12-month rolling VOC emissions. [Section E, RACT 2 Sources, Condition # 005]	The owner/operator shall maintain daily records of operating hours for the following sources: 101-15 D4 EPS #1 Dryer Check Bin #1410 101-16 D4 EPS #1 Dryer Check Bin #1411 101-17 D4 EPS #2 Dryer Check Bin #1420 101-18 D4 EPS #2 Dryer Check Bin #1421 Records shall be maintained for a minimum of five (5) years and be made available to the Department upon request. [Section D, Source ID 105, # 001]	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). 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. [Section B, # 025 (b)] 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. [Section B, # 026 (a)] The permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active 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. All air emissions from the facility should be estimated and reported. [Section B, # 031 (a)] Requirements listed in Table A-7 [Section E, RACT 2 Sources]	The owner/operator shall not operate more than two of four of the following sources at any time: 101-15 D4 EPS #1 Dryer Check Bin #1410 101-16 D4 EPS #1 Dryer Check Bin #1411 101-17 D4 EPS #2 Dryer Check Bin #1420 101-18 D4 EPS #2 Dryer Check Bin #1421 [Section D, Source ID 105, # 002]
205	RACT 2 - D2 PROCESS EQUIPMENT	Cap: 57 tons VOCs per rolling 12-month period. [Section E, RACT 2 Sources, Condition # 002]	No requirements exist.	The owner/operator shall maintain records of monthly and 12-month rolling VOC emissions. [Section E, RACT 2 Sources, Condition # 005]	No requirements exist.		No requirements exist.
305	RACT 2 - D3 DYLENE EQUIPMENT	Cap: 11 tons VOCs per rolling 12-month period. [Section E, RACT 2 Sources, Condition # 002]	No requirements exist.	The owner/operator shall maintain records of monthly and 12-month rolling VOC emissions. [Section E, RACT 2 Sources, Condition # 005]	No requirements exist.		No requirements exist.
605	RACT 2 - D3 EXTRUSION LINE 3	Cap: 7 tons VOCs per rolling 12-month period. [Section E, RACT 2 Sources, Condition # 002]	No requirements exist.	The owner/operator shall maintain records of monthly and 12-month rolling VOC emissions. [Section E, RACT 2 Sources, Condition # 005]	No requirements exist.		No requirements exist.
705	RACT 2 - FIELD STORAGE EQUIPMENT	Cap: 5 tons VOCs per rolling 12-month period. [Section E, RACT 2 Sources, Condition # 002]	No requirements exist.	The owner/operator shall maintain records of monthly and 12-month rolling VOC emissions. [Section E, RACT 2 Sources, Condition # 005]	No requirements exist.		No requirements exist.
805	RACT 2 - GENERAL PLANT SOURCES	The dispensing delivery tank shall remain vapor tight at all times. [Section D, Source ID 805, # 001] Gasoline may not be transferred from a delivery vessel into a stationary gasoline storage tank unless the displaced vapors from the storage tank are transferred to the dispensing delivery tank through a vapor tight return line and unless the receiving tank is equipped with a submerged fill pipe which extends from the filling orifice to within 6 inches of the bottom of the tank. The vapors collected in the dispensing tank shall be disposed of in accordance with 129.59 or 129.60(c). [Section D, Source ID 805, # 002] Cap: 3 tons VOCs per rolling 12-month period. [Section E, RACT 2 Sources, Condition # 002]	No requirements exist.	The owner/operator shall maintain records of monthly and 12-month rolling VOC emissions. [Section E, RACT 2 Sources, Condition # 005]	No requirements exist.		No requirements exist.
905	RACT 2 - FUEL BURNING EQUIPMENT	No requirements exist.	No requirements exist.	No requirements exist.	No requirements exist.	No requirements exist.	No requirements exist.

Table A-7
RACT Permit Conditions [TVOP No. 04-00033, Section E, RACT 2 Sources]
BVPV Styrenics LLC - Monaca, PA

Emissions Restriction(s)	Condition # 001 [25 Pa. Code §127.441] Operating permit terms and conditions. The total facility wide VOC emissions for the RACT 2-affected equipment (i.e. Source IDs 105, 205, 305, 605, 705, and 805) shall not exceed 310 tons in any consecutive 12-month period.
	Condition # 002 In accordance with the Alternative RACT and Compliance Proposal, the RACT 2 VOC emission limits for the facility include: Source ID 105 - 227 tons per rolling 12-month period Source ID 205 - 57 tons per rolling 12-month period Source ID 305 - 11 tons per rolling 12-month period Source ID 605 - 7 tons per rolling 12-month period Source ID 705 - 5 tons per rolling 12-month period Source ID 805 - 3 tons per rolling 12-month period
	Condition # 003 [25 Pa. Code §127.441] Operating permit terms and conditions. In accordance with 25 Pa. Code §129.99(e)(2), RACT for these sources is: 1) Operation of only two of the four D4 EPS Dryer Check Bins below at any one time. As a result, the potential VOC emissions for the Source 105 - RACT 2 D3 AND D4 EPS EQUIPMENT, which these bins fall under, is reduced by 25.82 tons per year of VOC. This reduces the RACT 2 - Source 105 RACT cap from 253 tons of VOC per rolling 12-month period (RACT 1 cap) to 227 tons of VOC per rolling 12 month period (RACT 2 cap). 2) Operation at any time in accordance with good air pollution control practices. 101-15 D4 EPS #1 Dryer Check Bin #1410 101-16 D4 EPS #1 Dryer Check Bin #1411 101-17 D4 EPS #2 Dryer Check Bin #1420 101-18 D4 EPS #2 Dryer Check Bin #1421
Testing Requirement(s)	No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).
Monitoring Requirement(s)	Condition # 004 [25 Pa. Code §127.441] Operating permit terms and conditions. The owner/operator shall utilize a Department approved parametric monitoring plan to accurately determine compliance. Any changes or alterations to the monitoring plan shall obtain prior written approval from the Department.
	Condition # 005 [25 Pa. Code §127.511] Monitoring and related recordkeeping and reporting requirements. The owner/operator shall maintain records of monthly and 12-month rolling VOC emissions for Source IDs 105, 205, 305, 605, 705, and 805.
Recordkeeping Requirement(s)	Condition # 006 [25 Pa. Code §127.511] Monitoring and related recordkeeping and reporting requirements. The owner/operator shall maintain 12-month rolling records in accordance with 25 Pa Code 129.100 to demonstrate compliance with the emission limits established herein.

Table A-7
RACT Permit Conditions [TVOP No. 04-00033, Section E, RACT 2 Sources]
BVPV Styrenics LLC - Monaca, PA

Recordkeeping Requirement(s)	<p>Condition # 007 [25 Pa. Code §129.100] Compliance demonstration and recordkeeping requirements.</p> <p>(a) Except as provided in subsection (c), the owner and operator of an air contamination source subject to a NOx requirement or RACT emission limitation or VOC requirement or RACT emission limitation, or both, listed in § 129.97 (relating to presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule) shall demonstrate compliance with the applicable RACT requirement or RACT emission limitation by performing the following monitoring or testing procedures:</p> <p>(1)-(3) Not applicable.</p> <p>(4) For an air contamination source without a CEMS, monitoring and testing in accordance with a Department-approved emissions source test that meets the requirements of Chapter 139, Subchapter A (relating to sampling and testing methods and procedures). The source test shall be conducted one time in each 5-year calendar period.</p> <p>(b) Except as provided in § 129.97(k) and § 129.99(i) (relating to alternative RACT proposal and petition for alternative compliance schedule), the owner and operator of an air contamination source subject to subsection (a) shall demonstrate compliance with the applicable RACT requirement or RACT emission limitation in accordance with the procedures in subsection (a) not later than:</p> <p>(1) January 1, 2017, for a source subject to § 129.96(a) (relating to applicability).</p> <p>(2) January 1, 2017, or 1 year after the date that the source meets the definition of a major NOx emitting facility or major VOC emitting facility, whichever is later, for a source subject to §129.96(b).</p> <p>(c) An owner or operator of an air contamination source subject to this section, §§ 129.96 and 129.97 and § 129.98 (relating to facility-wide or system-wide NOx emissions averaging plan general requirements) may request a waiver from the requirement to demonstrate compliance with the applicable emission limitation listed in § 129.97 if the following requirements are met:</p> <p>(1) The request for a waiver is submitted, in writing, to the Department not later than:</p> <p>(i) October 24, 2016, for a source subject to § 129.96(a).</p> <p>(ii) October 24, 2016, or 6 months after the date that the source meets the definition of a major NOx emitting facility or major VOC emitting facility, whichever is later, for a source subject to § 129.96(b).</p> <p>(2) The request for a waiver demonstrates that a Department-approved emissions source test was performed in accordance with the requirements of Chapter 139, Subchapter A, on or after:</p> <p>(i) April 23, 2015, for a source subject to § 129.96(a).</p> <p>(ii) April 23, 2015, or within 12 months prior to the date that the source meets the definition of a major NOx emitting facility or major VOC emitting facility, whichever is later, for a source subject to § 129.96(b).</p> <p>(3) The request for a waiver demonstrates to the satisfaction of the Department that the test results show that the source's rate of emissions is in compliance with the source's applicable NOx emission limitation or VOC emission limitation.</p> <p>(4) The Department approves, in writing, the request for a waiver.</p> <p>(d) The owner and operator of an air contamination source subject to this section and §§ 129.96—129.99 shall keep records to demonstrate compliance with §§ 129.96—129.99 in the following manner:</p> <p>(1) The records must include sufficient data and calculations to demonstrate that the requirements of §§ 129.96—129.99 are met.</p> <p>(2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.</p> <p>(e) Not applicable.</p> <p>(f) Beginning with the compliance date specified in § 129.97(a), the owner or operator of an air contamination source claiming that the air contamination source is exempt from the applicable VOC emission rate threshold specified in §129.99(c) and the requirements of § 129.97 based on the air contamination source's potential to emit shall maintain records that demonstrate to the Department or appropriate approved local air pollution control agency that the air contamination source is not subject to the specified emission rate threshold.</p> <p>(g) The owner or operator of a combustion unit subject to § 129.97(b) shall record each adjustment conducted under the procedures in § 129.97(b). This record must contain, at a minimum:</p> <p>(1) The date of the tuning procedure.</p> <p>(2) The name of the service company and the technician performing the procedure.</p> <p>(3) The final operating rate or load.</p> <p>(4) The final NOx and CO emission rates.</p> <p>(5) The final excess oxygen rate.</p> <p>(6) Other information required by the applicable operating permit.</p> <p>(h) Not applicable.</p> <p>(i) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.</p>
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Table A-7
RACT Permit Conditions [TVOP No. 04-00033, Section E, RACT 2 Sources]
BVPV Styrenics LLC - Monaca, PA

<p align="center">Reporting Requirement(s)</p>	<p>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). 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. [Section B, # 025 (b)]</p> <p>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:</p> <ol style="list-style-type: none"> (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. [Section B, # 026 (a)] <p>The permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active 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. All air emissions from the facility should be estimated and reported. [Section B, # 031 (a)]</p> <p>Requirements listed in Table A-7 [Section E, RACT 2 Sources]</p>
<p align="center">Work Practice Requirement(s)</p>	<p>Condition # 008 [25 Pa. Code §129.97] Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule. VOC RACT 2 conditions for sources subject to 25 Pa. Code §129.97(c)(2):</p> <p>a) In accordance with 25 Pa. Code §129.97(c)(2), beginning on January 1, 2017, the permittee shall operate and maintain the following sources in accordance with manufacturer specifications and with good operating practices to minimize VOC emissions:</p> <ol style="list-style-type: none"> 1. Source 101, Equipment ID 101-47, Pentane railcar unloading - (cyclopentane) 2. Source 301, Equipment ID 301-19, Pentane railcar unloading - D4 EPS 3. Source 601, Equipment ID 601-01, D3 Extrusion Line 3 Mixer Feed Chute 4. Source 601, Equipment ID 601-02, D3 Extrusion Line 3 Mixer Feed Chute Collection Hood 5. Source 701, Equipment ID 701-02, Styrene Field Tank 6 6. Source 701, Equipment ID 701-03, Styrene Field Tank 7 7. Source 701, Equipment ID 701-04, Styrene Field Tank 8 8. Source 701, Equipment ID 701-05, Styrene Field Tank 9 9. Source 701, Equipment ID 701-07, Field Storage Fugitive Equipment Leak Sources 10. Source 801, Equipment ID 801-14, Fugitive Painting Emissions 11. Source 801, Equipment ID 801-19, Lab Hoods <p>Condition # 009 [25 Pa. Code §129.97] Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule. VOC RACT 2 conditions for sources subject to 25 Pa. Code §129.97(c)(3):</p> <p>a) In accordance with 25 Pa. Code §129.97(c)(3), beginning on January 1, 2017, the permittee shall operate and maintain the following sources in accordance with manufacturer specifications and with good operating practices to minimize VOC emissions:</p> <ol style="list-style-type: none"> 1. Source 801, Equipment ID 801-06, Storeroom Furnace 2. Source 801, Equipment ID 801-07, Technology Bldg. Furnace 3. Source 801, Equipment ID 801-08, Dylark Office Bldg. Furnace 4. Source 801, Equipment ID 801-09, Engr. & Maint. Bldg. Furnace 5. Source 801, Equipment ID 801-10, Pilot Plant and Lab Bldg. Furnace 6. Source 031, Equipment ID 031, Boiler 1 (11.67 MMBtu/hr) 7. Source 032, Equipment ID 032, Boiler 2 (11.67 MMBtu/hr) 8. Source 033, Equipment ID 033, Boiler 3 (11.67 MMBtu/hr) 9. Source 034, Equipment ID 034, Boiler 4 (11.67 MMBtu/hr) 10. Source 035, Equipment ID 035, Boiler 5 (11.67 MMBtu/hr) 11. Source 036, Equipment ID 036, Boiler 6 (11.67 MMBtu/hr) 12. Source 037, Equipment ID 037, Boiler 7 (11.67 MMBtu/hr) 13. Source 038, Equipment ID 038, Boiler 8 (11.67 MMBtu/hr) 14. Source 039, Equipment ID 039, Boiler 9 (11.67 MMBtu/hr) 15. Source 040, Equipment ID 040, Boiler 10 (11.67 MMBtu/hr) 16. Source 041, Equipment ID 041, Boiler 11 (11.67 MMBtu/hr) 17. Source 042, Equipment ID 042, Boiler 12 (11.67 MMBtu/hr) <p>Condition # 010 [25 Pa. Code §129.97] Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule. VOC RACT 2 conditions for sources subject to 25 Pa. Code §129.97(c)(5):</p> <p>a) In accordance with 25 Pa. Code §129.97(c)(5), beginning on January 1, 2017, the permittee shall operate and maintain the following sources in accordance with manufacturer specifications and with good operating practices to minimize VOC emissions:</p> <ol style="list-style-type: none"> 1. Source 901, Equipment ID 901-01, 17 HP Emergency Generator

Table A-7
RACT Permit Conditions [TVOP No. 04-00033, Section E, RACT 2 Sources]
BVPV Styrenics LLC - Monaca, PA

<p>Work Practice Requirement(s)</p>	<p>Condition # 011 [25 Pa. Code §129.99] Alternative RACT proposal and petition for alternative compliance schedule. VOC RACT 2 conditions for sources subject to 25 Pa. Code §129.99(e)(2):</p> <p>a) In accordance with 25 Pa. Code §129.99(e)(2), the Department approves the permittee's alternative RACT proposal for the following sources which have the potential to emit equal to or greater than 2.7 tpy of VOC. RACT for these sources is the use of existing Control Device ID C111 -Thermal Oxidizer (RCO/RTO) G-4625 as the primary control device with Control Device ID C112 - Back-up Direct Fired Thermal Oxidizer (DFTO) as the secondary backup control device. These emission control devices comprise the Pentane Emissions Reduction System (PERS) which reduces VOC emissions from Source 101 controlled emission units with a destruction efficiency at or greater than 97% pursuant to Section D, Source Level Requirements, Source ID 110, Condition #003 of TVOP-04-00033:</p> <ul style="list-style-type: none"> 101-01 D3 EPS #3 Hold Tank 101-02 D3 EPS Dryer #4 101-03 D3 EPS Packaging Net Weigh Hopper 101-04 D3 EPS Packaging Net Weigh 101-09 D3 EPS #4 Acid Wash Kettle 101-10 D3 EPS #3 Acid Wash Kettle 101-11 D3 EPS No. 4 Bird Centrifuge 101-25 D3 EPS Pneumatic Transfer Cyclone for 4B10 Airvey System 101-26 D3 EPS Pneumatic Transfer Cyclone for 4B11 Airvey System 101-27 D3 EPS 4B10 and 4B11 System Backup 101-28 D3 EPS "A" Packaging Line Net Weigher Hopper 101-29 D3 EPS "B" Packaging Line Net Weigher Hopper 101-30 D3 EPS #1 Acid Wash Kettle 101-31 D3 EPS #2 Acid Wash Kettle 101-32 D3 EPS #3 Acid Wash Kettle 101-33 D3 EPS #4 Acid Wash Kettle 101-34 D3 EPS Reactor #401 101-35 D3 EPS Reactor #402 101-36 D3 EPS #1 Bird Centrifuge 101-37 D3 EPS #1 Gala Dryer 101-38 D3 EPS #1 Fluidized Dryer 101-39 D3 EPS #2 Gala Dryer 101-40 D3 EPS #2 Fluidized Dryer 101-44 Pentane Emission Reduction System - PERS [RTO/RCO Oxidizer] 101-45 Pentane Emission Reduction System - PERS [DFTO]
	<p>Condition # 012 [25 Pa. Code §129.99] Alternative RACT proposal and petition for alternative compliance schedule.</p> <p>VOC RACT 2 conditions for sources subject to 25 Pa. Code §129.99(e)(2):</p> <p>In accordance with 25 Pa. Code §129.99(e)(2), the Department approves the permittee's alternative RACT proposal for the following sources which have the potential to emit equal to or greater than 2.7 tpy of VOC. RACT for these sources is the use of existing Control Device ID C230 - D2 Catalytic Oxidizer (CATOX). These emission units comprise Source ID 230 - D2 Equipment controlled by CATOX. Process exhaust from the Source ID 201 controlled emission units are captured and routed to a CATOX which destroys pentane emissions. The CATOX reduces VOC emissions from Source ID 201 controlled emission units with a destruction efficiency at or greater than 98% pursuant to Section D, Source Level Requirements, Source ID 230, Condition #001 of TVOP-04-00033:</p> <ul style="list-style-type: none"> 201-04 ARCEL Reactor 2 (201) 201-07 ARCEL Reactor 1 (199) 201-08 Package Bin Exhaust 201-10 ARCEL 380 Airvey System Pneumatic Cyclone 201-22 Catalytic Oxidizer (CATOX)

Table A-7
RACT Permit Conditions [TVOP No. 04-00033, Section E, RACT 2 Sources]
BVPV Styrenics LLC - Monaca, PA

Work Practice Requirement(s)	<p>Condition # 013 [25 Pa. Code §129.99] Alternative RACT proposal and petition for alternative compliance schedule. VOC RACT 2 conditions for sources subject to 25 Pa. Code §129.99(e)(2): In accordance with 25 Pa. Code §129.99(e)(2), the Department approves the permittee's alternative RACT proposal for the following sources which have the potential to emit equal to or greater than 2.7 tpy of VOC. RACT for these sources is the use of existing Control Device ID C315 - SERS (12 Unit Reflux Condenser System). These emission units comprise Source ID 315 - Sources Controlled by Styrene Emissions Reduction System (SERS). The SERS condenser system reduces VOC emissions from the Source ID 301 controlled emissions units with a control efficiency of approximately 89%: 301-01 Dylene Reactor 301 301-02 Dylene Reactor 302 301-03 Dylene Reactor 303 301-04 Dylene Reactor 304 301-05 Dylene Reactor 305 301-06 Dylene Reactor 306 101/301-07 Dylene Reactor 307 101/301-08 Dylene Reactor 308 101/301-09 Dylene Reactor 309 101/301-10 Dylene Reactor 310 301-11 Dylene Reactor 311 301-12 Dylene Reactor 312 301-17 Styrene Emissions Reduction (SERS) Control Stack</p>
	<p>Condition # 014 [25 Pa. Code §129.99] Alternative RACT proposal and petition for alternative compliance schedule. In accordance with 25 Pa. Code §129.99(e)(2), the Department approves the permittee's alternative RACT proposal for the following sources which have the potential to emit equal to or greater than 2.7 tpy of VOC. RACT for these sources is the operation in accordance with the Best Management Practices submitted to PADEP, or as updated and kept on file, and keep records of maintenance performed at applicable emissions units. 101-12 D3 EPS Sump 201-23 Waste Water Sump 301-16 Wastewater 801-01 North Basin 801-02 Aeration Lagoon 801-03 Quiescent Lagoon</p>
	<p>Condition # 015 [25 Pa. Code §129.99] Alternative RACT proposal and petition for alternative compliance schedule. In accordance with 25 Pa. Code §129.99(e)(2), the Department approves the permittee's alternative RACT proposal for the following sources which have the potential to emit equal to or greater than 2.7 tpy of VOC. RACT for these sources is the operation in accordance with the Best Management Practices submitted to PADEP, or as updated and kept on file, and keep records of maintenance performed at applicable emissions units. 101-46 D3 Railcar Unloading 201-24 D2 Railcar Unloading</p>
	<p>Condition # 016 [25 Pa. Code §129.99] Alternative RACT proposal and petition for alternative compliance schedule. In accordance with 25 Pa. Code §129.99(e)(2), the Department approves the permittee's alternative RACT proposal for the following sources which have the potential to emit equal to or greater than 2.7 tpy of VOC. RACT for these sources is the operation in accordance with the Best Management Practices submitted to PADEP, or as updated and kept on file, and keep records of maintenance performed at applicable emissions units. 201-11 ARCEL Carter Day Dryer 201-12 ARCEL Carter Day Dryer Maxi Surge Bin</p>
	<p>Condition # 017 [25 Pa. Code §129.99] Alternative RACT proposal and petition for alternative compliance schedule. In accordance with 25 Pa. Code §129.99(e)(2), the Department approves the permittee's alternative RACT 2 proposal for Source Group 101 which includes uncontrolled (uncaptured) sources under Source ID 135. These sources have a potential to emit equal to or greater than 2.7 tpy of VOC. RACT 2 includes the reduction in VOC generated from the four D4 EPS Dryer Check Bins (marked with * below) by operating only two of the four bins at any one time and operation of Source Group 101 sources in accordance with the Best Management Practices submitted to PADEP, or as updated and kept on file, and keep records of maintenance performed at applicable emissions units. This operational restriction will reduce the RACT 2 - D3 AND D4 EPS EQUIPMENT and Facility wide RACT 2 caps by 25.82 tons of VOC based on a rolling 12-month period. 101-05 D3 EPS Airveying Pneumatic Cyclone/Filter Receiver 1265 101-06 D3 EPS Airveying Pneumatic Cyclone/Filter Receiver 1260 101-07 D3 EPS Packaging Bin 1218 101-08 D3 EPS Packaging Bin 1208 *101-15 D4 EPS #1 Dryer Check Bin #1410 *101-16 D4 EPS #1 Dryer Check Bin #1411 *101-17 D4 EPS #2 Dryer Check Bin #1420 *101-18 D4 EPS #2 Dryer Check Bin #1421 101-19 D4 EPS Line 1 Packaging Bin 1412 101-22 D4 EPS Line 2 Packaging Bin 1422</p>

Table A-8
RACT Permit Conditions [TVOP No. 04-00033, Section E, Emissions Trading]
BVPV Styrenics LLC - Monaca, PA

Emissions Restriction(s)	<p>Condition # 001 [25 Pa. Code §127.448] Emissions trading at facilities with Federally enforceable emissions cap.</p> <p>(a) The owner or operator of a facility with a Federally enforceable emissions cap may trade increases and decreases in emissions between sources with Federally enforceable emissions caps at the permitted facility, when the applicable SIP and this article provide for the emissions trades without requiring a permit revision and when the owner or operator of the facility provides 7 days written notice to the Department prior to the proposed change. This subsection is applicable when the permit does not already provide for the emissions trading.</p> <p>(b) The written notification required by subsection (a) shall include information required by the SIP and this article authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each change, changes in emissions that will occur as a result of the change from any source within the facility, the permit requirements with which the source will comply using the emissions trading provisions of the applicable implementation plan and this article and the air contaminants emitted subject to the emissions trade. The notice shall also refer to the provisions with which the source will comply in the applicable implementation plan and this article that provide for the emissions trade.</p> <p>(c) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 127.516 (relating to permit shield) extends to a change made under this section. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the SIP and this article authorizing the emissions trade.</p> <p>(d) If a permit applicant requests it, the Department may issue permits that contain terms and conditions allowing for the trading of emissions increases and decreases in the permitted facility solely for the purpose of complying with Federally enforceable emissions caps that are established in the permit independent of otherwise applicable requirements. The permit applicant shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The Department will not include in the emissions trading provisions sources for which emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with applicable requirements.</p> <p>(1) The facility shall provide 7 days written notice to the Department of the proposed trade.</p> <p>(2) In addition to the information contained in subsection (b), the notice shall also state how the increases and decreases in emissions will comply with the terms and conditions of the permit.</p>
Testing Requirement(s)	N/A
Monitoring Requirement(s)	N/A
Recordkeeping Requirement(s)	<p>Condition # 002 [25 Pa. Code §127.448] Emissions trading at facilities with Federally enforceable emissions cap.</p> <p>This TVOP establishes a Federally enforceable emission cap among the following sources that individually have the following Federally enforceable emission caps:</p> <p>105: RACT 2 - D3 and D4 EPS Equipment Cap: 227.0 tons VOCs per rolling 12-month period.</p> <p>205: RACT 2 - D2 Processes Cap: 57.0 tons VOCs per rolling 12-month period.</p> <p>305: RACT 2 - D3 Dylene Equipment Cap: 11.0 tons VOCs per rolling 12-month period.</p> <p>605: RACT 2 - D3 Extrusion Lines 3 Cap: 7.0 tons VOCs per rolling 12-month period.</p> <p>705: RACT 2 - Field Storage Equipment Cap: 5.0 tons VOCs per rolling 12-month period.</p> <p>805: RACT 2 - General Plant Sources Cap: 3.0 tons VOCs per rolling 12-month period.</p> <p>This TVOP establishes a Federally enforceable emissions cap of 304 tons per rolling 12-month period. This is based on the following: (227+57+11+7+5+3) tons - 6 tons (1 ton per source for flexibility) equals 304.0 tons per rolling 12-month period.</p>
Reporting Requirement(s)	N/A
Work Practice Requirement(s)	N/A

**ATTACHMENT B -
RBLC SEARCH RESULTS**

Table B-1
RBLC Search Results - Polymer and Resin Production
BVPV Styrenics LLC - Monaca, PA

FACILITY NAME	PROCESS NAME	PRIMARY FUEL	THROUGHPUT	THROUGHPUT UNIT	POLLUTANT	CONTROL METHOD DESCRIPTION	EMISSION LIMIT	EMISSION LIMIT UNIT	POLLUTANT COMPLIANCE NOTES
GULF COAST GROWTH VENTURES PROJECT	Waste Water Treatment Plant		0		Volatile Organic Compounds (VOC)	Glycol Plant and the Olefins plant must be covered and the vapor space must be directed to the shared vent system for control. Stormwater drains and wastewater conveyances associated with the polyethylene plants do not require control because they do not have the potential to accept contaminated process water. All vapors from the equalization tanks and the dissolved air flotation basin must also be captured and controlled. The required controls are a catalytic oxidizer and the shared vent system, respectively. The catalytic oxidizer must achieve a minimum destruction efficiency of 99%, to be demonstrated through stack sampling. The level of mixed liquor suspended solids (MLSS) in the biological oxidation treatment unit must be maintained above 2000 mg/L.	0		
GULF COAST GROWTH VENTURES PROJECT	Fixed Roof Tanks		0		Volatile Organic Compounds (VOC)	painted white and employ bottom or submerged fill. Storage tanks with capacities less than 25,000 gallons which store stocks with a VOC vapor pressure of less than 0.50 psia are exempt	0		
GULF COAST GROWTH VENTURES PROJECT	Floating Roof Tanks		0		Volatile Organic Compounds (VOC)	internal floating roof with a welded deck. Floating roof tanks must be designed with a sump whose drain pipe discharges to no more than one diameter above the bottom of the sump, and must be designed with a connection to a control device for use during floating roof landings	0		
GULF COAST GROWTH VENTURES PROJECT	Truck and Railcar Liquid Loading/Unloading Operations		0		Volatile Organic Compounds (VOC)	Low vapor pressure (< 0.50 psia) organic liquids: □ For organic liquids with a low volatility the permit requires that loading be conducted using bottom or submerged fill. Add-on control is not required. □ High vapor pressure (> 0.50 psia) organic liquids □ For high volatility organic liquids (pyrolysis gasoline), the permit requires that the truck or railcar being loaded be certified as vapor tight (following NSPS XX vapor tightness specifications), and that a closed vent system be used to direct all displaced loading emissions to a properly-operated control device. For loading into railcars, vapor tightness can also be demonstrated through a valid DOT certification for pressure-rated vessels.	0		
GULF COAST GROWTH VENTURES PROJECT	Ethylene Plant Pyrolysis Furnace MSS		0		Volatile Organic Compounds (VOC)	decoke effluent be controlled by a cyclone separator and that the exhaust from the cyclone be redirected to the furnace firebox	0		
GULF COAST GROWTH VENTURES PROJECT	Ethylene Plant Process Vents		0		Volatile Organic Compounds (VOC)	multi-point ground flare, an elevated flare, a flare gas recovery unit (which directs recovered flare gas to the boiler fuel gas header), and two thermal oxidizers which operate in parallel	0		
GULF COAST GROWTH VENTURES PROJECT	Ethylene Plant Process Vents MSS		0		Volatile Organic Compounds (VOC)	MPGF	0		
GULF COAST GROWTH VENTURES PROJECT	Ethylene Plant MAPD Area Process Vents		0		Volatile Organic Compounds (VOC)	Depressurization and initial purge are controlled by the shared vent system and plant controls, while the final burn-off steps are uncontrolled	0		
GULF COAST GROWTH VENTURES PROJECT	MEG Plant Process Vents - EO Section		0		Volatile Organic Compounds (VOC)	cycle gas purge vent has a high hydrocarbon content and stable flow rate that makes it suitable for use as fuel gas, and will be used as supplemental fuel for the glycol thermal oxidizer	0		
GULF COAST GROWTH VENTURES PROJECT	MEG Plant Process Vents - EO Recovery and Hydrolysis		0		Volatile Organic Compounds (VOC)	thermal oxidizer	0		
GULF COAST GROWTH VENTURES PROJECT	MEG Plant - Process Vents: Distillation		0		Volatile Organic Compounds (VOC)	thermal oxidizer and an elevated flare	0		
GULF COAST GROWTH VENTURES PROJECT	MEG Plant Process Vents MSS		0		Volatile Organic Compounds (VOC)	minimize time	0		
GULF COAST GROWTH VENTURES PROJECT	LLDPE Plant Process Vents		0		Volatile Organic Compounds (VOC)	Process vents are recycled to the process or routed to the fuel gas header (via the flare gas recovery unit) to recover their heating value. Other process vents are controlled through the shared vent system to flares or thermal oxidizer	0		
GULF COAST GROWTH VENTURES PROJECT	Pellet Handling - Railyard		0		Volatile Organic Compounds (VOC)	Granular PE must be degassed to such an extent that total VOC emissions from the extruded pellets does not exceed 50 lb per million pounds of PE produced.	0		
GULF COAST GROWTH VENTURES PROJECT	Process Turnarounds		0		Volatile Organic Compounds (VOC)	Degassing of process vessels may use the plant flare system or a temporary control device. Process vessels must be degassed to an appropriate control device until the measured VOC concentration in the process vessel is verified to be less than 10,000 ppmv VOC or 10% of the LEL of a representative compound. Process vessels containing no more than 50 lb VOC for which a connection to a control device is not available may be opened to the atmosphere without any prior control.	0		
GULF COAST GROWTH VENTURES PROJECT RAILYARD	Polyethylene Resin Loading		0		Volatile Organic Compounds (VOC)	Residual VOC emissions from PE pellets are controlled through controlled degassing of the resin at the production lines	0		
NHK SEATING OF AMERICA, INC.	SEAT FOAM PRODUCTION LINE		56	SEATS	Volatile Organic Compounds (VOC)	REGENERATIVE THERMAL OXIDIZER	95	% OVERALL CONTROL EF	STATE BACT

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BVPV Styrenics LLC - Monaca, PA

FACILITY NAME	PROCESS NAME	PRIMARY FUEL	THROUGHPUT	THROUGHPUT UNIT	POLLUTANT	CONTROL METHOD DESCRIPTION	EMISSION LIMIT	EMISSION LIMIT UNIT	POLLUTANT COMPLIANCE NOTES
DARAMIC, LLC	OIL EXTRACTION SYSTEMS FOR SUB-MICRO (SM) LINE 3, SUB-MICRO (SM) LINE 4 AND SUB-MICRO (SM) LINE 6		100	MMSQ METER/YR	Volatile Organic Compounds (VOC)	CARBON ADSORPTION SYSTEM	98	PERCENT	<p>Additional Bact Limitations:</p> <p>(A)All Off-Specification Material That Is Removed From Sm Lines 3, 4 And 6 As A Result Of Start-Ups, Wet Folds, Or Web Breaks Shall Be Placed In The Trichloroethylene Recovery System (Smokehouse) Identified As Unit Id # 9.4.</p> <p>(B)The Voc Emissions Occurring As Evaporative Losses From The Oil Extraction Systems For Sm Lines 3, 4, And 6 Storage Tanks (Unit Id #S 11.1 Through 11.6) And The Recovery System (Smokehouse, Unit Id # 9.4) When The Oil Extraction Systems For Sm Lines 3, 4 And 6 Are Not In Operation Shall Be Controlled By The Cas But The Control Efficiency Of 98% Shall Not Apply Due To The Expected Low Voc Inlet Concentration.</p> <p>(C)The Implementation Of A Leak Detection And Repair (Ldar) Program For Equipment Leaks As Follows:</p> <p>(1)The Permittee Shall Develop A Written Ldar Program Requiring Leak Checks Of All Equipment In Trichloroethylene Service.</p> <p>(2)The Ldar Program Shall Include The Following Elements:</p> <p>(A)Written Ldar Program - The Written Ldar Program Shall Specify The Source'S Specific Procedure For Recordkeeping, Certifications, Monitoring And Repair</p> <p>(B)Training - The Training Programs Can Vary According To The Level Of Involvement And Degree Of Responsibility Of Ldar Personnel.</p> <p>(C)Ldar Audits - The Audits Shall Check That The Correct Equipment Is Being Monitored, Ldar Program Procedures Are Being Followed, Leaks Are Being Fixed And The Required Records Are Being Kept.</p> <p>(D)Contractor Accountability - The Ldar Program Shall Describe Oversight Procedures To Increase The Accountability Of Contractors.</p> <p>(E)Internal Leak Definition - The Ldar Program Shall Include The Internal Leak Definition Applicable To Equipment In Tee Service</p> <p>(F)More Frequent Monitoring - To Ensure That Leaks Are Still Being Identified In A Timely Manner And That Previously Unidentified Leaks Are Not Worsening Over Time, Implement A Plan For More Frequent Monitoring For Components That Contribute Most To Equipment Leak Emissions.</p>
FIBER INDUSTRIES LLC	Wastewater Treatment Plant		0		Volatile Organic Compounds (VOC)	Proper operation and maintenance of process and control device (steam stripper) to maintain low VOC concentration entering WWTP.	34.11	TPY	
FIBER INDUSTRIES LLC	Monomer Plants and Polymerization Lines		0		Volatile Organic Compounds (VOC)	Vapor Phase Destruction System consisting of three boilers and 3 process heaters.	4.7	LB/HR	
FIBER INDUSTRIES LLC	Process Vents		0		Volatile Organic Compounds (VOC)	Compliance with 40 CFR 63.1315 and Good Work Practice.	0		
FIBER INDUSTRIES LLC	Storage tanks		0		Volatile Organic Compounds (VOC)	Proper Tank Design, Operation, and Maintenance	0		
FIBER INDUSTRIES LLC	Spinning Lines		0		Volatile Organic Compounds (VOC)	Low-VOC content finishing materials and good work practices. Maintenance of tanks at a constant volume and temperature.	0.0001	LB/LB PROC MAT /LINE	
FIBER INDUSTRIES LLC	Staple Finishing Lines		0		Volatile Organic Compounds (VOC)	Low-VOC content finishing materials and good work practices. Maintenance of tanks at a constant volume and temperature.	0.0001	LB/LB FIB PROD/LINE	
FIBER INDUSTRIES LLC	Die Head Cleaning		0		Volatile Organic Compounds (VOC)	Good Work Practices.	0		
PE-1 & 2 UNITS	Polyethylene Manufacturing Unit		1.22	tons/yr	Volatile Organic Compounds (VOC)	VOC emissions from fugitive sources will be subject to 28LAER Leak Detection and Repair program. VOC emissions from the cooling towers will be monitored monthly by Appendix P or approved equivalent techniques. VOC emissions from Tanks will be controlled by internal floating roof tanks.	0		
PROJECT JUMBO	Storage Tanks		0		Volatile Organic Compounds (VOC)	Emissions from all tank farm tanks will be routed to a caustic scrubber. Scrubber will achieve 95% reduction for acetic acid and ethylene glycol	0.68	LB/H	
PLAQUEMINES PLANT 1	PVC Dryers with Cyclone and wet scrubber (P-31)		815	MM LB/YR	Volatile Organic Compounds (VOC)	Cyclone and Wet Scrubber with compliance with 40 CFR 63 Subpart HHHHHHHH	10.42	LB/H	
PLAQUEMINES PLANT 1	Reactors 2		815	MM LB/YR	Volatile Organic Compounds (VOC)	Comply with 40 CFR 63 Subpart HHHHHHHH	0.314	LB/MM LB	Units are in LB/MM LB of PVC
PLAQUEMINES PLANT 1	PVC Unit Fugitives		0		Volatile Organic Compounds (VOC)	Comply with 40 CFR 63 Subpart H	0.263	LB/H	
SHINTECH PLAQUEMINES PLANT 1	Scrubber C		815	mm lb/yr	Volatile Organic Compounds (VOC)	Wet scrubber	10.42	LB/HR	Comply with 40 CFR 63 Subpart HHHHHHHH.
SHINTECH PLAQUEMINES PLANT 1	PVC Unit Fugitive Emissions 2		0		Volatile Organic Compounds (VOC)	Comply with 40 CFR 63 Subpart H.	0.243	LB/HR	
POINT COMFORT PLANT	MSS Activities		0		Volatile Organic Compounds (VOC)	To control VOC with a vapor pressure of 0.5 psia or greater at 95 degrees F, vapors will be routed to the incinerator/scrubber system until the equipment or storage tank VOC has a concentration of 10,000 ppmv or less.	10000	PPMV	
FAGERDALA PACKAGING INC. (INDIANA)	POLYETHYLENE SHEET FOAM EXTRUDER LINE (SFE-01)		684	LB/H RESIN	Volatile Organic Compounds (VOC)	REGENERATIVE THERMAL OXIDIZER	98	% OVERALL CONTROL	STATE BACT
FAGERDALA PACKAGING INC. (INDIANA)	POLYETHYLENE SHEET FOAM EXTRUDER LINE		684	LB/H RESIN	Volatile Organic Compounds (VOC)	REGENERATIVE THERMAL OXIDIZER (RTO) WITH PERMANENT TOTAL ENCLOSURE (PTE)	366.61	TONS	EMISSION LIMIT 1: INPUT OF BLOWING AGENT (ISOBUTANE)☐ STATE BACT
WESTLAKE FACILITY	M-Line Production Area Flare (FL061) (Z2, EQT 19)		0		Volatile Organic Compounds (VOC)	Good combustion practices	8882.92	LB/H	Annual VOC emissions from the Cogeneration Plant Flare (449, EQT 326); the M-Line Production Area Flare (Z2, EQT 19); and the Plant 5 Flare (Z1, EQT 138) (not addressed in the PSD permit) are limited to 465.93 TPY (GRP 12).
WESTLAKE FACILITY	Cogeneration Plant Flare (449, EQT 326)		0		Volatile Organic Compounds (VOC)	Good combustion practices	165.75	LB/H	Annual VOC emissions from the Cogeneration Plant Flare (449, EQT 326); the M-Line Production Area Flare (Z2, EQT 19); and the Plant 5 Flare (Z1, EQT 138) (not addressed in the PSD permit) are limited to 465.93 TPY (GRP 12).
WESTLAKE FACILITY	Bulk Storage Vents (RLP 5, 9, 10, & 11)		1200	ACFM	Volatile Organic Compounds (VOC)	Good design and operating practices	0.01	LB/H	Annual VOC emissions from these vents, along with VOC emissions from a number of other vents not addressed in the PSD permit, are capped at 6.91 TPY (GRP 15).
WESTLAKE FACILITY	Facility Fugitive Emissions (FUG 4)		0		Volatile Organic Compounds (VOC)	Leak detection and repair (LDAR): LAC 33:III.2122	0		40 CFR 60 Subpart DDD (referencing Subpart VV) is also applicable, but LAC 33:III.2122 is the overall most stringent program.
LAKE CHARLES CHEMICAL COMPLEX LDPE UNIT	LLPDE/LDPE Multi-Point Ground Flare (EQT 640)		0		Volatile Organic Compounds (VOC)	Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as pilot gas.	305.08	LB/HR	BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987.☐ ☐ BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's start-up, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as pilot gas.
LAKE CHARLES CHEMICAL COMPLEX LDPE UNIT	LDPE Fugitives (FUG 13)		0		Volatile Organic Compounds (VOC)	Leak Detection and Repair (LDAR): 40 CFR 60 Subpart VVa	17.44	TPY	

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LAKE CHARLES CHEMICAL COMPLEX LDPE UNIT	LDPE Thermal Oxidizer (EQT 648)		122	MM BTU/HR	Volatile Organic Compounds (VOC)	Compliance with the applicable provisions of 40 CFR 63 Subpart SS.	11.76	LB/HR	BACT is determined to be compliance with the applicable provisions of Subpart SS, including, but not limited to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature monitoring requirements of 40 CFR 63.988.
LAKE CHARLES CHEMICAL COMPLEX LDPE UNIT	Bin B208 Vent (EQT 667)		0		Volatile Organic Compounds (VOC)		0.04	LB/HR	
FG LA COMPLEX	ET1 Spent Caustic Oxidation Unit Process Vent		0		Volatile Organic Compounds (VOC)	Routing process vent through a closed vent system to vapor combustors.	0		
FG LA COMPLEX	ET2 Spent Caustic Oxidation Unit Vent		0		Volatile Organic Compounds (VOC)	Routing process vent through a closed vent system to vapor combustors.	0		
FG LA COMPLEX	Caustic Area Carbon Canister Vents		0		Volatile Organic Compounds (VOC)	Routing process vents to carbon canisters.	0.01	T/YR	
FG LA COMPLEX	HDPE2 Low Polymer Tank Truck Loading		4861689	gal/yr	Volatile Organic Compounds (VOC)	Routing through a closed vent system to a thermal oxidizer or flare.	0		
FG LA COMPLEX	HDPE2 Oilgomer Tank Truck Loading		486209	gal/yr	Volatile Organic Compounds (VOC)	Routing through a closed vent system to a thermal oxidizer or flare.	0		
FG LA COMPLEX	PP Tank Truck Loading		24000	gal/h	Volatile Organic Compounds (VOC)	Routing through a closed vent system to a vapor combustor.	0		
FG LA COMPLEX	LOG Uncontrolled Barge Dock Loading (Heavy Oil)		264151	gal/h	Volatile Organic Compounds (VOC)	Routing through a closed vent system to a vapor combustor.	0		
FG LA COMPLEX	LOG Barge Loading (Pyrolysis Gasoline)		0		Volatile Organic Compounds (VOC)	Routing through a closed vent system to a vapor combustor.	0		
FG LA COMPLEX	LOG Railcar Loading		63396	gal/h	Volatile Organic Compounds (VOC)	Compliance with all applicable provisions of 40 CFR 63 Subpart YY and routing through a closed vent system to a flare.	0		BACT with loading spent wash oil and/or ethylene glycol is compliance with all applicable provisions of 40 CFR 63 Subpart G.
FG LA COMPLEX	LOG Tank Truck Loading		31698	gal/h	Volatile Organic Compounds (VOC)	Compliance with all applicable provisions of 40 CFR 63 Subpart YY and routing through a closed vent system to a vapor combustor.	0		BACT with loading spent wash oil and/or ethylene glycol is compliance with all applicable provisions of 40 CFR 63 Subpart G.
FG LA COMPLEX	LOG Tanker Dock Loading		660377	gal/h	Volatile Organic Compounds (VOC)	Submerged loading.	0		
FG LA COMPLEX	LOG Uncaptured Tank Truck Loading (Heavy Oil)		0		Volatile Organic Compounds (VOC)	Good operating practices.	0		
FG LA COMPLEX	LOG Railcar and Barge Dock Loading (Ethylene Glycol)		0		Volatile Organic Compounds (VOC)	Compliance with all applicable provisions of 40 CFR 63 Subpart G.	0		
FG LA COMPLEX	LOG Railcar Loading (Pyrolysis/Heavy Oil)		0		Volatile Organic Compounds (VOC)	Routing through a closed vent system to a vapor combustor or flare.	0		
FG LA COMPLEX	LDPE Compressor Used Oil Storage and Loading		0		Volatile Organic Compounds (VOC)	Good operating practices.	0.01	T/YR	
FG LA COMPLEX	LDPE Spent Lube Oil and Wax Loading		0		Volatile Organic Compounds (VOC)		0		
FG LA COMPLEX	LDPE Wax and Column Heavy Ends Loading		0		Volatile Organic Compounds (VOC)		0		
FG LA COMPLEX	Wastewater Treatment System		0		Volatile Organic Compounds (VOC)	Good design and venting the emissions to a control device in the primary treatment system enters the biological treatment unit.	0		
FG LA COMPLEX	Control Devices: Flares, Vapor Combustors, and Thermal Oxidizers		0		Volatile Organic Compounds (VOC)	Combination of minimizing the quantity of waste gas and supplemental fuel and good designs and combustion practices.	0		
FG LA COMPLEX	Ethylene Decoking Drums		8000	lb/h	Volatile Organic Compounds (VOC)	Operation of the pyrolysis furnaces to minimize coke buildup and minimize the frequency of required decoking.	0		
FG LA COMPLEX	ET1 Distillation Units		0		Volatile Organic Compounds (VOC)	Routing process vent through a closed vent system to flare.	0		
FG LA COMPLEX	ET2 Distillation Units		0		Volatile Organic Compounds (VOC)	Routing process vent through a closed vent system to flare.	0		
FG LA COMPLEX	PR Distillation Units and Reactors		0		Volatile Organic Compounds (VOC)	Routing distillation units and reactor vents through a closed vent system to flare.	0		
FG LA COMPLEX	LDPE Compressor, Reactor, Separators, and Extruder		0		Volatile Organic Compounds (VOC)	Routing process vent through a closed vent system to thermal oxidizers and or flare.	0		
FG LA COMPLEX	HDPE1, HDPE2, PP, LDPE, LLDPE Downstream Pellet Handling		0		Volatile Organic Compounds (VOC)	Limit the VOC content of the individual vent streams to no more than 0.10 percent by weight.	0.1	% BY WEIGHT	Determine VOC concentrations (and volumetric flow) via the procedures set forth in 40 CFR 60.564(d).
FG LA COMPLEX	PP Catalyst Prep, Polymerization Reactors, Polypropylene Recovery, Extruder		0		Volatile Organic Compounds (VOC)	Routing process vent through a closed vent system to thermal oxidizer and flare.	0		
FG LA COMPLEX	EG1 Glycol Dehydrator, Columns, Reactors, EO Absorber, and EO Stripper		0		Volatile Organic Compounds (VOC)	Routing process vent through a closed vent system to thermal oxidizer and flare.	0		
FG LA COMPLEX	EG2 Glycol Dehydrator, Reactors, Columns, EO Adsorber, and EO Stripper		0		Volatile Organic Compounds (VOC)	Routing process vent through a closed vent system to thermal oxidizer and flare.	0		
FG LA COMPLEX	LDPE Pellet Dryer Vent Filter		0		Volatile Organic Compounds (VOC)	Compliance with 40 CFR 63 Subpart FFFF.	0		
FG LA COMPLEX	ET1 and ET2 MAPD Regeneration Vents		0		Volatile Organic Compounds (VOC)		0		No additional controls due to low potential VOC emissions.
FG LA COMPLEX	UT1 Boiler Natural Gas Vents		0		Volatile Organic Compounds (VOC)		0		No additional controls due to low potential VOC emissions.
FG LA COMPLEX	UT2 Turbine, Duct Burner, and Boiler Natural Gas Vents		0		Volatile Organic Compounds (VOC)		0		No additional controls due to low potential VOC emissions.
FG LA COMPLEX	UT2 Cogeneration and Steam Turbine Lube Oil Vents		0		Volatile Organic Compounds (VOC)		0		No additional controls due to low potential VOC emissions.
FG LA COMPLEX	ET1, ET2, and PR Pressure Storage Tanks		0		Volatile Organic Compounds (VOC)	Maintain working pressure sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere.	0		
FG LA COMPLEX	HDPE1 Hexane, Low Polymer, and Oilgomer Storage Tanks		0		Volatile Organic Compounds (VOC)	Routing storage vessels through a closed vent system to thermal oxidizers.	0		
FG LA COMPLEX	HDPE2 Hexane, Low Polymer, and Oilgomer Storage Tanks		0		Volatile Organic Compounds (VOC)	Routing storage tank through closed vent system to thermal oxidizers.	0		
FG LA COMPLEX	PP Hexane Storage Tank		0		Volatile Organic Compounds (VOC)	Routing through a closed vent system to a thermal oxidizer or flare.	0		
FG LA COMPLEX	LOG Hexane Storage Tank		0		Volatile Organic Compounds (VOC)	Routing through a closed vent system to a thermal oxidizer.	0		
FG LA COMPLEX	PR HC, Spent Caustic, and Wash Oil Storage Tanks		0		Volatile Organic Compounds (VOC)	Routing through a closed vent system to a vapor combustor.	0		
FG LA COMPLEX	Pyrolysis Gasoline and Hexane Storage Tanks		0		Volatile Organic Compounds (VOC)	Equip with internal floating roof.	0		
FG LA COMPLEX	DEG, EG, PEG, MEG, and Diesel Storage Tanks		0		Volatile Organic Compounds (VOC)	Storage vessels equipped with fixed roofs.	0		
FG LA COMPLEX	ET1 Tank Truck Loading		185100	bb/yr	Volatile Organic Compounds (VOC)	Routing through a closed vent system to a vapor combustor.	0		

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FG LA COMPLEX	ET2 Tank Truck Loading		185100	bb/yr	Volatile Organic Compounds (VOC)	Routing through a closed vent system to a vapor combustor.	0		
FG LA COMPLEX	HDPE1 Low Polymer Tank Truck Loading		0		Volatile Organic Compounds (VOC)	Routing through a closed vent system to a thermal oxidizer or flare.	0		
FG LA COMPLEX	HDPE1 Oligomer Tank Truck Loading		486209	gal/yr	Volatile Organic Compounds (VOC)	Routing through a closed vent system to a thermal oxidizer or flare.	0		
PTTGCA PETROCHEMICAL COMPLEX	Ethylene Manufacturing Unit (P801)		0		Volatile Organic Compounds (VOC)	high pressure (HP) flare achieving a destruction efficiency of 98% for VOC emissions and thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions. See notes.	0		(a)use of closed vent systems controlled with high pressure (HP) flare (emission unit P003) achieving a destruction efficiency of 98% for VOC emissions from the following: <input type="checkbox"/> (i)startup/shutdown/maintenance/upsets; <input type="checkbox"/> <input type="checkbox"/> (ii)spent caustic degassing drum; <input type="checkbox"/> <input type="checkbox"/> (iii)spent caustic drain drum; and <input type="checkbox"/> <input type="checkbox"/> (iv)pressure relief valve (PRV) leaks/releases. (b)use of thermal oxidizer (TO, emission units P001 and P002) achieving a destruction efficiency of 99.5% for VOC emissions from the following: <input type="checkbox"/> (i)quench water drain drum; <input type="checkbox"/> <input type="checkbox"/> (ii)wet air oxidation unit; <input type="checkbox"/> <input type="checkbox"/> (iii)dimethyl disulphide (DMDS) tank; and <input type="checkbox"/> <input type="checkbox"/> (iv)wash oil tank; <input type="checkbox"/> (c)tail gas from the hydrogenation section shall be used as fuel gas for firing in process cracking furnace(s); (d)implementation of a facility specific program reducing fugitive component equipment leaks for applicable component equipment in the ethylene manufacturing unit; <input type="checkbox"/> (e)implementation of a program to minimize flaring.
PTTGCA PETROCHEMICAL COMPLEX	High-Density Polyethylene Manufacturing Unit #1 (P802)		0		Volatile Organic Compounds (VOC)	Use of closed vent system controlled with high pressure (HP) flare achieving a destruction efficiency of 98% for VOC emissions, use of thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions, implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line and implementation of a program to minimize flaring.	0.0054	LB/MMBTU	For combustion emissions associated with the jackets of two catalyst activator furnaces: (i)0.0054 lb/MMBtu; <input type="checkbox"/> (ii)0.03 lb/hr (for each individual furnace); and <input type="checkbox"/> (iii)0.25 ton per rolling 12-month period for two activator furnaces combined. <input type="checkbox"/> <input type="checkbox"/> For HDPE manufacturing process for VOC emissions other than the catalyst activation furnace combustion emissions: <input type="checkbox"/> i.use of closed vent system controlled with high pressure (HP) flare achieving a destruction efficiency of 98% for VOC emissions from the following: <input type="checkbox"/> (a)intermediate flash slurry sampler; <input type="checkbox"/> <input type="checkbox"/> (b)LSR lights condenser; <input type="checkbox"/> <input type="checkbox"/> (c)heavies column; and <input type="checkbox"/> <input type="checkbox"/> (d)pressure relief valve (PRV) leaks/releases; <input type="checkbox"/> ii.use of thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions from the following: <input type="checkbox"/> <input type="checkbox"/> (a)LPSR condensate separator; and <input type="checkbox"/> <input type="checkbox"/> (b)powder conveying package vent; <input type="checkbox"/> iii.residual VOC in the polyethylene resin exiting the extruder shall be less than 80 ppmv; <input type="checkbox"/> iv.The combined VOC emissions for all HDPE manufacturing process vents without VOC control (e.g. not vented to flare or TO) shall not exceed 28.00 tons per rolling 12-month period; <input type="checkbox"/> v.implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line (see C.12.b)(2)b. and c.); and <input type="checkbox"/> vi.implementation of a program to minimize flaring.
PTTGCA PETROCHEMICAL COMPLEX	High-Density Polyethylene Manufacturing Unit #2 (P803)		0		Volatile Organic Compounds (VOC)	Use of closed vent system controlled with high pressure (HP) flare achieving a destruction efficiency of 98% for VOC emissions, use of thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions, implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line and implementation of a program to minimize flaring.	0.0054	LB/MMBTU	For combustion emissions associated with the jackets of two catalyst activator furnaces: (i)0.0054 lb/MMBtu; <input type="checkbox"/> (ii)0.03 lb/hr (for each individual furnace); and <input type="checkbox"/> (iii)0.25 ton per rolling 12-month period for two activator furnaces combined. <input type="checkbox"/> <input type="checkbox"/> For HDPE manufacturing process for VOC emissions other than the catalyst activation furnace combustion emissions: <input type="checkbox"/> i.use of closed vent system controlled with high pressure (HP) flare achieving a destruction efficiency of 98% for VOC emissions from the following: <input type="checkbox"/> (a)intermediate flash slurry sampler; <input type="checkbox"/> <input type="checkbox"/> (b)LSR lights condenser; <input type="checkbox"/> <input type="checkbox"/> (c)heavies column; and <input type="checkbox"/> <input type="checkbox"/> (d)pressure relief valve (PRV) leaks/releases; <input type="checkbox"/> ii.use of thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions from the following: <input type="checkbox"/> <input type="checkbox"/> (a)LPSR condensate separator; and <input type="checkbox"/> <input type="checkbox"/> (b)powder conveying package vent; <input type="checkbox"/> iii.residual VOC in the polyethylene resin exiting the extruder shall be less than 80 ppmv; <input type="checkbox"/> iv.The combined VOC emissions for all HDPE manufacturing process vents without VOC control (e.g. not vented to flare or TO) shall not exceed 28.00 tons per rolling 12-month period; <input type="checkbox"/> v.implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line (see C.12.b)(2)b. and c.); and <input type="checkbox"/> vi.implementation of a program to minimize flaring.
PTTGCA PETROCHEMICAL COMPLEX	Linear Low/High-Density Polyethylene Manufacturing Unit #3 (P804)		0		Volatile Organic Compounds (VOC)	Thermal oxidizer with a destruction efficiency of 99.5% from analyzer vents, degassing column vents, ethylene purification, low product purge bin vent filter, and high pressure accumulator vent. <input type="checkbox"/> Closed vent system controlled with flare (high pressure (HP) and/or low pressure (LP)) with a destruction efficiency of 98% from butene dryer regen vent, hexene dryer regen vent, ICA dryer regen vent, ethylene deoxo regen vent, ethylene dryers regen vent, ethylene systems shutdown, non-emergency reactor vents, and product purge bin vent filter. <input type="checkbox"/> Pressure safety valve (PSV) leaks/releases from raw materials supply pressure PSVs, purification PSVs, reaction PSVs, resin degassing PSVs, and vent recovery PSVs. <input type="checkbox"/> Implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line. <input type="checkbox"/> Implementation of a program to minimize flaring.	80	PPM	Residual VOC in the polyethylene resin exiting the granular resin surge hopper shall be less than 80 ppmv. <input type="checkbox"/> <input type="checkbox"/> The combined VOC emissions for all LLDPE/HDPE manufacturing process vents without VOC control (e.g. not vented to flare or TO) shall not exceed 36.00 tons per rolling 12-month period.

Table B-1
RBLC Search Results - Polymer and Resin Production
BVPV Styrenics LLC - Monaca, PA

FACILITY NAME	PROCESS NAME	PRIMARY FUEL	THROUGHPUT	THROUGHPUT UNIT	POLLUTANT	CONTROL METHOD DESCRIPTION	EMISSION LIMIT	EMISSION LIMIT UNIT	POLLUTANT COMPLIANCE NOTES
PTTGCA PETROCHEMICAL COMPLEX	Linear Low/High-Density Polyethylene Manufacturing Unit #4 (P805)		0		Volatile Organic Compounds (VOC)	Thermal oxidizer with a destruction efficiency of 99.5% from analyzer vents, degassing column vents, ethylene purification, low product purge bin vent filter, and high pressure accumulator vent. □ Closed vent system controlled with flare (high pressure (HP) and/or low pressure (LP)) with a destruction efficiency of 98% from butene dryer regen vent, hexene dryer regen vent, ICA dryer regen vent, ethylene deoxo regen vent, ethylene dryers regen vent, ethylene systems shutdown, non-emergency reactor vents, and product purge bin vent filter. □ Pressure safety valve (PSV) leaks/releases from raw materials supply pressure PSVs, purification PSVs, reaction PSVs, resin degassing PSVs, and vent recovery PSVs. □ Implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line. □ Implementation of a program to minimize flaring.	80	PPM	Residual VOC in the polyethylene resin exiting the granular resin surge hopper shall be less than 80 ppmv. □ □ The combined VOC emissions for all LLDPE/HDPE manufacturing process vents without VOC control (e.g. not vented to flare or TO) shall not exceed 36.00 tons per rolling 12-month period.
PTTGCA PETROCHEMICAL COMPLEX	Wastewater Collection and Treatment (P806)		0		Volatile Organic Compounds (VOC)	i. Use an enhanced biodegradation unit to maintain the annual benzene quantity from facility waste at less than 10 megagrams (MG; 11 tons) by combining waste streams with greater than 10 ppmw benzene with waste streams with less than 10 ppmw benzene to form a combined waste stream with a benzene concentration less than 10 ppmw; □ ii. Route emissions from wastewater generated in the ethylene manufacturing process to a thermal oxidizer designed to achieve >99.5% destruction efficiency for volatile organic compounds (VOC); □ iii. Cover and route emissions from the process wastewater equalization tank (T-6503), the waste oil drum (T-6502), the oily wastewater storage tank (T-6501) and the wet air oxidation unit to a thermal oxidizer designed to achieve >99.5% destruction efficiency for VOC; □ iv. Emissions from wastewater generated in the high-density polyethylene units must comply with the applicable requirements of 40 CFR Part 63, Subpart FFFF.	0.01	LB/H	
PTTGCA PETROCHEMICAL COMPLEX	Light and Heavy Pygas Railcar Loading (J001)		0		Volatile Organic Compounds (VOC)	Thermal oxidizer (TO) achieving a destruction efficiency of >99.5%. □ □ The TO controlling heavy and light pygas railcar loading operations is permitted as a separate and individual emissions unit (emissions unit P001 or P002). For efficient permitting structure, the applicable operational restrictions, monitoring, record keeping, reporting, and testing associated with TO control are contained within the requirements of emissions unit P001 and P002. □ □ A separate emissions unit (P807) associated with fugitive leaks of VOC, HAP*, VHAP/Benzene*, and GHGs* from all component equipment at the facility subject to the leak control and repair regulations above has been established. For efficient permitting structure, the applicable requirements (limitations, operational restrictions, monitoring, record keeping, reporting, and testing) associated with equipment leak control and repair for VOC, HAP*, VHAP/Benzene*, and GHGs* are contained within the requirements of emissions unit P807.	0		The TO controlling heavy and light pygas railcar loading operations is permitted as a separate and individual emissions unit (emissions unit P001 or P002). For efficient permitting structure, the applicable operational restrictions, monitoring, record keeping, reporting, and testing associated with TO control are contained within the requirements of emissions unit P001 and P002. □ □ A separate emissions unit (P807) associated with fugitive leaks of VOC, HAP*, VHAP/Benzene*, and GHGs* from all component equipment at the facility subject to the leak control and repair regulations above has been established. For efficient permitting structure, the applicable requirements (limitations, operational restrictions, monitoring, record keeping, reporting, and testing) associated with equipment leak control and repair for VOC, HAP*, VHAP/Benzene*, and GHGs* are contained within the requirements of emissions unit P807.
LOW DENSITY POLYETHYLENE (LDPE) PLANT	Low Density Polyethylene Production		0		Volatile Organic Compounds (VOC)	Process vents (upstream of the extruder) will be flared or recycled to process for control of VOC. No control is proposed for process vents at or downstream of the extruder (meets Tier 1 BACT for emissions in the range of 155 lb VOC/MMlb product). □ □ The pellet degassing silos are routed to a flare or Regenerative Thermal Oxidizer for control of VOC emissions. The Flare will meet 40CFR60.18 requirements and will provide 98 wt.% DRE. □ □ Fixed roof storage tanks are less than 25,000 gallon capacity, in service for materials of less than 0.5 psia, painted white and aluminum, located out of direct sunlight and either re-filled off-site or by submerged fill on-site. □ □ Fugitive emissions are minimized by a modified 28 VHP Leak Detection and Repair program, using 500 ppm leak definition. □ □ VOC emission from loading are controlled by submerged fill for materials of vapor pressure <0.5 psia. For materials with VP>0.5 psia from the Vinylacetate column, a (OL3 Flare) will be used for control of VOC emissions.	0		
HIGH DENSITY POLYETHYLENE II PLANT	Maintenance, Startup and Shutdown (MSS)		0		Volatile Organic Compounds (VOC)	MSS emissions from the Attachment C MSS activities may be routed to the flare until the concentration of VOC in the equipment goes down to 10,000 ppm or reaches 10% of LEL. After that, equipment is opened to atmosphere. Flare will achieve 98% DRE for MSS VOC vented to it. □ □ Low emitting activities are not controlled	10000	PPM	
LINEAR LOW DENSITY POLYETHYLENE PLANT	MSS (plant turnarounds and routine maintenance)		0		Volatile Organic Compounds (VOC)	best operational practices, vent to flares	0		
LINEAR LOW DENSITY POLYETHYLENE PLANT	Maintenance, Startup and Shutdown (MSS)		0		Volatile Organic Compounds (VOC)	Equipments are vented to a flare (98% DRE) until VOC conc. remaining in the equipments goes down to 10,000 ppm. After that, equipments are opened to atmosphere to do maintenance and repair. If LEL meters are used, equipments vented to a flare until VOC concentration reaches down to 10% LEL in the vent gases to the Flare.	10000	PPMV	

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BVPV Styrenics LLC - Monaca, PA

FACILITY NAME	PROCESS NAME	PRIMARY FUEL	THROUGHPUT	THROUGHPUT UNIT	POLLUTANT	CONTROL METHOD DESCRIPTION	EMISSION LIMIT	EMISSION LIMIT UNIT	POLLUTANT COMPLIANCE NOTES
OLEFINS PLANT	Maintenance, Startup and Shutdown (MSS)		0		Volatile Organic Compounds (VOC)	Degassing emissions from the equipment will be routed to one of the Plant Flare meeting 40CFR60.18 requirements until VOC concentration remaining in the equipment goes down to 10,000 ppm or 10% of LEL (lower explosive limit). After that equipments are opened to atmosphere to do repair and maintenance.	10000	PPMV	
POLYETHYLENE 7 FACILITY	WASTEWATER LOADING RACK		0		Volatile Organic Compounds (VOC)	Tank trucks pressure rated greater than 15 psig and loading operations routed to flare for control of emissions	0		
POLYETHYLENE 7 FACILITY	Low Pressure HDPE and LLDPE solution phase plant		0		Volatile Organic Compounds (VOC)	Process vents upstream of pellet dryer controlled; dryer vents uncontrolled and emissions added to residual VOC emissions; residual VOC head space testing after dryer and at product loadout.	39.3	LB/MMLB	
POLYETHYLENE 7 FACILITY	Storage tanks content vapor pressure less than 0.5 psia		0		Volatile Organic Compounds (VOC)	FLARE	0		
POLYETHYLENE 7 FACILITY	Storage tanks content vapor pressure greater than or equal to 0.5 psia		0		Volatile Organic Compounds (VOC)	IFR AND FLARE	0		
POLYETHYLENE 7 FACILITY	PROCESS VENTS		0		Volatile Organic Compounds (VOC)	FLARE	0		
POLYETHYLENE 7 FACILITY	FLARE		0		Volatile Organic Compounds (VOC)	GOOD COMBUSTION PRACTICES	0		
EQUISTAR CHEMICALS LA PORTE COMPLEX	Process Vents (EPN: LBFLARE)		312	GAL/TANK/DAY	Volatile Organic Compounds (VOC)	Flare - 99% DRE for all VOC up to three carbons and 98% DRE for all other VOCs	0		
EQUISTAR CHEMICALS LA PORTE COMPLEX	MSS Vessel Clearing to Atmosphere		0		Volatile Organic Compounds (VOC)	Best practices. Purging/clearing with nitrogen to boiler or flare control, then venting of VOC at a concentration of no more than 10,000 ppmv.	0		
FORMOSA POINT COMFORT PLANT	PROCESS VENTS (PE3-02A, PE3-02B, and PE3-07, PE3-08A, PE3-08B)		0		Volatile Organic Compounds (VOC)		0		
FORMOSA POINT COMFORT PLANT	PROCES VENTS		0		Volatile Organic Compounds (VOC)		0		
FORMOSA POINT COMFORT PLANT	Polyethylene 3 (PE3) Unit		0		Volatile Organic Compounds (VOC)	Flare and Thermal Oxidizers	0		
FORMOSA POINT COMFORT PLANT	SITE WIDE EQUIPMENT MSS		0		Volatile Organic Compounds (VOC)	Temporary Flare for MSS Emissions.	0		