



**BUREAU OF AIR MANAGEMENT
TITLE V OPERATING PERMIT**

DRAFT

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-33 of the Regulations of Connecticut State Agencies (RCSA) and pursuant to the Code of Federal Regulations (CFR), Title 40, Part 70.

Title V Permit Number	189-0237-TV
Client/Sequence/Town/Premises Numbers	8840/1/189/27
Date Issued	
Expiration Date	

Corporation:

Roehm America LLC

Premises Location:

528 South Cherry Street, Wallingford, CT 06492

Name of Responsible Official and Title:

David A. Gmyrek, Plant Manager

All the following attached pages, 2 through 52, are hereby incorporated by reference into this Title V permit.

Katherine S. Dykes
Commissioner

Date

TABLE OF CONTENTS

DRAFT
PAGE

List of Abbreviations/Acronyms	4
Section I. Premises Information/Description	
A. Premises Information.....	5
B. Premises Description.	5
Section II. Emissions Units Information	
A. Emissions Units Description - Table II.A.....	7
B. Grouped Emissions Units Description - Table II.B	28
C. Operating Scenario Identification - Table II.C	28
Section III. Applicable Requirements and Compliance Demonstration	
A. Grouped Emissions Unit 1	29
B. Emissions Unit I50	38
C. Emissions Unit K08.....	39
D. Premises-Wide General Requirements	42
Section IV. Compliance Schedule.....	44
Section V. State Enforceable Terms and Conditions	45
Section VI. Title V Requirements	
A. Submittals to the Commissioner & Administrator.....	46
B. Certifications [RCSA §22a-174-33(b)].....	46
C. Signatory Responsibility [RCSA §22a-174-2a(a)]	46
D. Additional Information [RCSA §§22a-174-33(j)(1)(X), -33(h)(2)].....	47
E. Monitoring Reports [RCSA §22a-174-33(o)(1)]	47
F. Premises Records [RCSA §22a-174-33(o)(2)]	48
G. Progress Reports [RCSA §22a-174-33(q)(1)].....	48
H. Compliance Certifications [RCSA §22a-174-33(q)(2)].....	49
I. Permit Deviation Notifications [RCSA §22a-174-33(p)]	49
J. Permit Renewal [RCSA §22a-174-33(j)(1)(B)].....	49
K. Operate in Compliance [RCSA §22a-174-33(j)(1)(C)]	49
L. Compliance with Permit [RCSA §22a-174-33(j)(1)(G)]	49
M. Inspection to Determine Compliance [RCSA §22a-174-33(j)(1)(M)].....	50
N. Permit Availability.....	50
O. Severability Clause [RCSA §22a-174-33(j)(1)(R)]	50
P. Need to Halt or Reduce Activity [RCSA §22a-174-33(j)(1)(T)]	50
Q. Permit Requirements [RCSA §22a-174-33(j)(1)(V)]	50
R. Property Rights [RCSA §22a-174-33(j)(1)(W)]	50
S. Alternative Operating Scenario Records [RCSA §22a-174-33(o)(3)].....	50
T. Operational Flexibility and Off-Permit Changes [RCSA §22a-174-33(r)(2)]	51
U. Information for Notification [RCSA §22a-174-33(r)(2)(A)]	51
V. Transfers [RCSA §22a-174-2a(g)]	51
W. Revocation [RCSA §22a-174-2a(h)]	51
X. Reopening for Cause [RCSA §22a-174-33(s)]	52
Y. Credible Evidence.....	52

All conditions in Sections III, IV, and VI of this Title V permit are enforceable by both the Administrator and the commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in Section III of this Title V permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in Sections III, IV, and VI of this Title V permit in accordance with the Clean Air Act, as amended.

LIST OF ABBREVIATIONS/ACRONYMS

DRAFT

<i>Abbreviation/Acronym</i>	<i>Description</i>
°C	Degree Celsius
°F	Degree Fahrenheit
AOS	Alternative Operating Scenario
AST	Aboveground Storage Tank
Bhp	Brake Horse Power
Bldg	Building
CDX	Central Data Exchange
CEDRI	Compliance and Emissions Data Reporting Interface
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CMS	Continuous Monitoring System
CPMS	Continuous Parameter Monitoring System
DEEP	Department of Energy and Environmental Protection
EU	Emissions Unit
EPA	Environmental Protection Agency
gal	Gallon
GEU	Grouped Emissions Unit
HAP	Hazardous Air Pollutant
hr	Hour
ITT	Intent to Test
KOH	Potassium Hydroxide
lb	Pound
LDAR	Leak Detection and Repair
MACT	Maximum Achievable Control Technology
MCPU	Miscellaneous Organic Chemical Manufacturing Process Units
MMA	Methyl Methacrylate
MMBtu	Million British Thermal Units
mmHg	Millimeters of Mercury
MON	Miscellaneous Organic Chemical Manufacturing NESHAP
NERC	North American Electric Reliability Corporation
NESHAP	National Emissions Standard for Hazardous Air Pollutants
POD	Point of Determination
ppmv	Parts per million by volume
RCSA	Regulations of Connecticut State Agencies
RICE	Reciprocating Internal Combustion Engine
SIC	Standard Industrial Classification Code
SOS	Standard Operating Scenario
SSM	Startup, Shutdown, and Malfunction
SSMP	Startup, Shutdown, and Malfunction Plan
TOC	Total Organic Compounds
UST	Underground Storage Tank
VOC	Volatile Organic Compound
yr	Year

Section I: Premises Information/Description

A. PREMISES INFORMATION

Nature of Business: Manufacturer of Acrylic Based Thermoplastic Molding Compounds
Primary SIC: 2821
Facility Mailing Address: 528 South Cherry Street, Wallingford, CT 06492
Telephone Number: (203) 303-3500

DRAFT

B. PREMISES DESCRIPTION

Roehm America LLC (Roehm) is a research-based chemical company, which develops and manufactures proprietary products and technology. Roehm currently leases eight acres of the 250 acre Allnex USA, Inc. site in Wallingford, Connecticut.

Roehm manufactures acrylic-based thermoplastic molding compounds. The thermoplastics operations, which began in 1956, are classified under the Standard Industrial Classification Code (SIC) 2821. A variety of everyday products are manufactured using Roehm's thermoplastic material, including household appliances, vacuums/floor cleaners, electronic housings, towel dispensers and food packaging for such items as plastic tubs for margarine and blister packs for crackers and cookies. In addition, a very high-grade material is used in the medical field to produce various devices for transfer and purification of blood, and disposable medical diagnostic devices such as cassettes and cuvettes.

Roehm's thermoplastic operations consist of the following processes:

- Raw material storage in tanks/vessels
- Monomer preparation
- Polymer production
- Grafted rubber preparation
- Solvent recovery operations
- Dye preparation
- Post color operations

Common chemical process equipment includes blend tanks, feed tanks, reactors, distillation units, centrifuges, condensers, decanters and extruders. The bulk of emissions from the thermoplastic operations are vented to a carbon adsorber system for control of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). These units are subject to the Miscellaneous Organic Chemical Manufacturing Maximum Achievable Control Technology (MACT) (40 CFR Part 63 Subpart FFFF).

As part of 40 CFR Part 63 Subpart FFFF, Roehm selected to operate under the equipment leak requirements of 40 CFR Part 63 Subpart H pursuant to 40 CFR §63.2480(a). Separately Roehm is subject to 40 CFR Part 264 Subpart BB (Standards for Hazardous Waste Treatment, Storage and Disposal Facilities-Air Emission Standards for Equipment Leaks). Equipment operating in compliance with 40 CFR Part 63 Subpart H are in compliance with 40 CFR Part 264 Subpart BB pursuant to 40 CFR §63.160(c).

Some of the storage tanks at this premises meet the applicability requirements of 40 CFR Part 60 Subpart Kb, but because they are being operated in compliance with 40 CFR Part 63 Subpart FFFF they are in compliance with 40 CFR Part 60 Subpart Kb pursuant to 40 CFR §63.2535(c).

Section I: Premises Information/Description

DRAFT

Roehm has one tank (Emission Unit (EU)-A06) that is subject to 40 CFR Part 63 Subpart FFFF and 40 CFR 264 Subpart CC (Standards for Hazardous Waste Treatment, Storage and Disposal Facilities-Air Emission Standards for Tanks, Surface Impoundments and Containers). Pursuant to 40 CFR §63.2535(b)(1), Roehm has elected to comply with the monitoring, recordkeeping, and reporting requirements in 40 CFR Part 264, except that Subpart FFFF compliance reports must contain the requirements in 40 CFR §63.2520(e).

The facility operates one natural gas fired emergency generator subject to RCSA §§22a-174-3b, -22f, the Reciprocating Internal Combustion Engine (RICE) MACT (40 CFR Part 63 Subpart ZZZZ), and Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (40 CFR Part 60 Subpart JJJJ).

Roehm's potential emissions exceeds the major source threshold for the following pollutants: VOC and single HAP (Toluene).

Roehm is a Title V source located in a severe ozone non-attainment area defined in RCSA §22a-174-1(106).

Roehm is subject to the following:

40 CFR Part 63 Subpart FFFF	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
40 CFR Part 63 Subpart ZZZZ	National Emission Standards for Reciprocating Internal Combustion Engines
40 CFR Part 60 Subpart JJJJ	National Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Section II: Emissions Units Information

A. EMISSIONS UNITS DESCRIPTION

DRAFT

Emissions units are set forth in Table II.A. It is not intended to incorporate by reference these Regulations into this Title V permit.

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
EU-A01	Tank 110-101A: Polybutadiene Latex Emulsion (AST) Installation Year: 1975 Maximum Rated Capacity: 40,000 gal Location: Tank Farm	Submerged Fill Pipe	None
EU-A02	Tank 110-101B: Polybutadiene Latex Emulsion (AST) Installation Year: 1975 Maximum Rated Capacity: 40,000 gal Location: Tank Farm	Submerged Fill Pipe	None
EU-A04	Tank 950: Methyl Methacrylate (AST) Installation Year: 2024 Maximum Rated Capacity: 61,016 gal Location: Tank Farm	Vapor Balanced 2-Stage Carbon Adsorption System	40 CFR Part 63 Subpart FFFF
EU-A05	Tank 951: Acrylonitrile (AST) Installation Year: 2024 Maximum Rated Capacity: 45,000 gal Location: Tank Farm	Vapor Balanced 2-Stage Carbon Adsorption System	40 CFR Part 63 Subpart FFFF
EU-A06	Tank 952: Waste Toluene (AST) Installation Year: 2024 Maximum Rated Capacity: 22,489 gal Location: Tank Farm	Vapor Balanced 2-Stage Carbon Adsorption System	40 CFR Part 63 Subpart FFFF (Wastewater tank that complies with overlap provisions in 40 CFR 264 per 40 CFR 63.2535(b)(1))
EU-A07	Tank 953: Distilled Toluene CY (UST) Installation Year: 1996 Maximum Rated Capacity: 15,000 gal Location: Tank Farm	Carbon Canister	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
EU-A08	Tank 210: Recovered Toluene CY (AST) Installation Year: 2016 Maximum Rated Capacity: 530 gal Location: Bldg. 10A	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-A09	Tank 956: Styrene (UST) Installation Year: 1996 Maximum Rated Capacity: 20,000 gal Location: Tank Farm	Vapor Balanced Carbon Canister	40 CFR Part 63 Subpart FFFF
EU-A10	Tank 957: Recovered Toluene XT (UST) Installation Year: 1996 Maximum Rated Capacity: 20,000 gal Location: Tank Farm	Carbon Canister	40 CFR Part 63 Subpart FFFF
EU-A11	Tank 958: Toluene Virgin (UST) Installation Year: 1996 Maximum Rated Capacity: 15,000 gal Location: Tank Farm	Vapor Balanced Carbon Canister	40 CFR Part 63 Subpart FFFF
EU-A12	Tank 959: Distilled XT Toluene (UST) Installation Year: 1996 Maximum Rated Capacity: 24,000 gal Location: Tank Farm	Carbon Canister	40 CFR Part 63 Subpart FFFF
EU-A13	Tank 960: Ethyl Acrylate (UST) Installation Year: 1996 Maximum Rated Capacity: 15,000 gal Location: Tank Farm	Vapor Balanced Carbon Canister	40 CFR Part 63 Subpart FFFF
EU-B01	BR-2 MMP Mix Tank Installation Year: 1986 Maximum Rated Capacity: 50 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B02	BR201 Blend Tank Installation Year: 1955-2000 Maximum Rated Capacity: 7,600 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-B03	BR202 Blend Tank	Carbon Adsorber	Part of the MON

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Installation Year: 1955-2000 Maximum Rated Capacity: 7,600 gal Location: Bldg. 10		MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B04	BR207 Blend Tank Installation Year: 1955-2000 Maximum Rated Capacity: 4,000 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B05	BR208 Blend Tank Installation Year: 1973 Maximum Rated Capacity: 4,000 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B06	BR209 Cyrolite Dye Prep Tank Installation Year: 1970-2000 Maximum Rated Capacity: 120 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B07	BR501 Blend Tank Installation Year: 1970-2000 Maximum Rated Capacity: 7,000 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-B08V	RE 502 Blend Tank (Vent) Installation Year: 1975 Maximum Rated Capacity: 8,800 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-B08P	RE 502 Blend Tank (Purge) Installation Year: 1975 Maximum Rated Capacity: 8,800 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-B09	Maleic Anhydride Dump Station Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Scrubber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B10	BR513 Blend Tank	Carbon Adsorber	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Installation Year: 1975 Maximum Rated Capacity: 4,000 gal Location: Bldg. 10		
EU-B11	PBD Preparation-TA-1240 Distribution Tank Installation Year: 1983 Maximum Rated Capacity: 700 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B12	PBD Preparation-Grind Filling/Grind Cooling/Grind Heating/Grind Emptying Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B13	BR2200 Blend Tank Installation Year: 1964 Maximum Rated Capacity: 1,200 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-B14	BR 2205 Antioxidant Tank Installation Year: 1955-2000 Maximum Rated Capacity: 1,400 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B15	TA2201 Belly Tank Installation Year: 1970-2000 Maximum Rated Capacity: 10,000 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-B16	BR2206 XT Dye Solution Tank Installation Year: 1955-2000 Maximum Rated Capacity: 1,400 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B17	TA2206 XT Dye Prep Tank Installation Year: 1984 Maximum Rated Capacity: 60 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
EU-B18	BR2209 Emulsion Tank Installation Year: 1955-2000 Maximum Rated Capacity: 325 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B19	TA2209 Emulsion Tank Installation Year: 1955-2000 Maximum Rated Capacity: 900 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B20	TA2210A BHT Solution Prep Tank Installation Year: 1996 Maximum Rated Capacity: 50 gal Location: Bldg. 10	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B21	TA2210 BHT Solution Prep Tank Installation Year: 1996 Maximum Rated Capacity: 250 gal Location: Bldg. 10	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B22	TA2211 DDM Day Tank Installation Year: 1988 Maximum Rated Capacity: 75 gal Location: Bldg. 10	None (non-HAP)	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-B23	TA2212 DDM Weigh Tank Installation Year: 1970-2000 Maximum Rated Capacity: 20 gal Location: Bldg. 10	None (non-HAP)	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-C01	RE100 Prebody Reactor Installation Year: 1955 Maximum Rated Capacity: 3,400 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C02	RE300 Prebody Reactor Installation Year: 1957 Maximum Rated Capacity: 3,400 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

DRAFT

Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
EU-C03	RE400 Prebody Reactor Installation Year: 1957 Maximum Rated Capacity: 3,400 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C04	RE102B Tower Reactor Installation Year: 1955-2000 Maximum Rated Capacity: 2,600 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C05	Vertical Blender VB-102 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C06	Extruder EX-102 Rear Vent Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C07	Extruder EX-102 Zone 1 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C08	Extruder EX-102 Zone 2 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C09	Extruder EX-102 Vent Die Hood Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C10	RE302B Tower Reactor Installation Year: 1957 Maximum Rated Capacity: 2,600 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C11	Vertical Blender VB-302	Carbon Adsorber	40 CFR Part 63

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10		Subpart FFFF
EU-C12	Extruder EX-302 Die Hood Vent Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C13	Extruder EX-302 Zone 1 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C14	Extruder EX-302 Zone 2 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C15	Extruder EX-302 Zone 3 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C16	Extruder EX-302 Rear Vent Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C17	RE-402B Tower Reactor Installation Year: 1955-2000 Maximum Rated Capacity: 2,600 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C18	Vertical Blender VB-402 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C19	Extruder EX-402 Rear Vent Installation Year: 1955-2000	Carbon Adsorber	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Maximum Rated Capacity: No Data Location: Bldg. 10		
EU-C20	Extruder EX-402 Zone 1 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C21	Extruder EX-402 Zone 2 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C22	Extruder EX-402 Die Hood Vent Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C23	CO100 XT Still Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C24	CO210 Cyrolite Still Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C25	CF1260 Centrifuge Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C26	VP B5270 Discharge Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-C27	Post Color Extruder (1007) Installation Year: 1970-2000 Maximum Rated Capacity: No Data	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Location: Bldg. 10A		apply.
EU-C28	Post Color Extruder (1008) Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D01	BR3 MMP Hold Tank Installation Year: 1986 Maximum Rated Capacity: 22 gal Location: Bldg. 10	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D02	BD102 Latex Bin Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D03	BR 201A Hold Tank Installation Year: 1984 Maximum Rated Capacity: 6,225 gal Location: Bldg. 10	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D04	BR 209A Cyrolite Dye Hold Tank Installation Year: 1970-2000 Maximum Rated Capacity: 40 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D05	BD 302 Latex Bin Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D06	BD402 Latex Bin Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D07	BR501A Hold Tank Installation Year: 1979 Maximum Rated Capacity: 3,260 gal	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Location: Bldg. 10		apply.
EU-D08	BR 513A Hold Tank Installation Year: 1995 Maximum Rated Capacity: 3,000 gal Location: Bldg. 10	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D09	BR516 Acrylite Recovered Toluene Hold Tank Installation Year: 1970-2000 Maximum Rated Capacity: 10,000 gal Location: Bldg. 10	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D10	T-1250 Feed Hopper Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D11	TA2206 XT Dye Hold Tank (AST) Installation Year: 1984 Maximum Rated Capacity: 60 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D12	TA2210A BHT Solution Hold Tank Installation Year: 1970-2000 Maximum Rated Capacity: 50 gal Location: Bldg. 10	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D13	TA2220 LP Solution Hold Tank Installation Year: 1988 Maximum Rated Capacity: 75 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-D14	Dye Drum DR-HW55 Installation Year: 1970-2000 Maximum Rated Capacity: 55 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-E01	Waste Toluene Loading Installation Year: 1970-2000 Maximum Rated Capacity: 100 gpm	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

DRAFT

Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Location: Bldg. 10		apply.
EU-E02	MMA Transloading – Out of Service Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-F01	Latex Centrifuge/Latex Dewater Wastewater Discharge Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	40 CFR Part 63 Subpart FFFF
EU-F02	CY Still Bottoms Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	40 CFR Part 63 Subpart FFFF
EU-F03	XT Still Bottoms Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	40 CFR Part 63 Subpart FFFF
EU-F04	Extruder Vacuum Zone Condenser Headers Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	40 CFR Part 63 Subpart FFFF
EU-F05	Tower 102B Reactor Residual Water Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	40 CFR Part 63 Subpart FFFF
EU-F06	Tower 302B Reactor Residual Water Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	40 CFR Part 63 Subpart FFFF
EU-F07	Tower 402B Reactor Residual Water Installation Year: 1955-2000 Maximum Rated Capacity: No Data	None	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Location: Bldg. 10		
EU-F08	VP214 Discharge Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	40 CFR Part 63 Subpart FFFF
EU-F09	VP100-2 (TA 100-30) Discharge Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	40 CFR Part 63 Subpart FFFF
EU-F10	DE-301 Decanter Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-F11	DE-502 Decanter Installation Year: 1955-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-F12	DE-603 Discharge Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10A	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-F13	DE-703 Decanter Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-F14	DE-707 Decanter Installation Year: 1985 Maximum Rated Capacity: 575 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-F15	DE-708 Decanter Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal	Carbon Adsorber	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Location: Bldg. 10		
EU-F16	Extruder Sluice Discharges (EX-102/302/402) Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-F17	Pattie Water Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-F18	Post Color Sluice Discharges (TA-1007/TA-1008) Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-F19	Maleic Anhydride Scrubber Discharge (FL-502-4) Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-G01	Decant Tank (DE-214) Installation Year: 2000 Maximum Rated Capacity: 50 gal Location: Bldg. 10	Carbon Adsorber	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-G02	Decant Tank (DE-602) Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-G03	Still Bottoms Receiver (TA-100-4) Installation Year: 2020 Maximum Rated Capacity: 320 gal Location: Bldg. 10A	Fixed Roof	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-G04	Decant Tank (DE-702)	Carbon Adsorber	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10		
EU-H01	Decant Tank (DE-707) Installation Year: 1985 Maximum Rated Capacity: 575 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-H02	Accumulation Tank (TA140-204) Installation Year: 1975 Maximum Rated Capacity: 70 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-H03	Decant Tank (DE-301) Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-H04	Decant Tank (TA-800) Installation Year: 1970-2000 Maximum Rated Capacity: 1,500 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-H05	Decant Tank (TA-802) Installation Year: 1970-2000 Maximum Rated Capacity: 1,500 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-H06	Decant Tank (DE-700) Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-H07	Decant Tank (DE-703) Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-H08	Decant Tank (DE-708) Installation Year: 1970-2000	Carbon Adsorber	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Maximum Rated Capacity: 300 gal Location: Bldg. 10		
EU-H09	Decant Tank (DE-502) Installation Year: 1983 Maximum Rated Capacity: 300 gal Location: Bldg. 10	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-H10	Decant Tank (DE-603) Installation Year: 1970-2000 Maximum Rated Capacity: 300 gal Location: Bldg. 10A	Carbon Adsorber	40 CFR Part 63 Subpart FFFF
EU-H11	Tank (TA-6046-1) Installation Year: 1970-2000 Maximum Rated Capacity: 50 gal Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-H12	Decant Tank (DE-211) Installation Year: 2000 Maximum Rated Capacity: 70 gal Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I01	CN 100 RN100 Prebody Reactor Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I02	HE 105 RN100 Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I03	CN 300 RN300 Prebody Reactor Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I04	HE 305 RN300 Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Location: Bldg. 10		apply.
EU-I05	CN 400 RN400 Prebody Reactor Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I06	HE405 RN400 Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I07	CN108 RE102B Tower Reactor Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I08	HE 103 RE102B Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I09	CN 308 RE302 Tower Reactor Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I10	HE 303 RE302B Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I11	CN 408 RE402B Tower Reactor Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I12	HE 403 RE402B Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
EU-I13	HE 106 VB102 Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I14	HE 306 VB302 Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I15	HE 406 VB402 Heater Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I16	CN 102 Extruder 102 Zone 1 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I17	CN 701 Extruder 102 Zone 2 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I18	CN 302 Extruder 302 Zone 1 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I19	CN 705 Extruder 302 Zone 2 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I20	CN 702 Extruder 302 Zone 3 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

DRAFT

Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
EU-I21	CN 402 Extruder 402 Zone 1 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I22	CN 703 Extruder 402 Zone 2 Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I23	HE 701 102 Vacuum Pump Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I24	HE 702 302 Vacuum Pump Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I25	HE 703 402 Vacuum Pump Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I26	HE 100-30 XT Vacuum Pump Cooler Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I27	HE 214 CY Vacuum Pump Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I28	CN 211 CY Still Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I29	CY Still Product Cooler (HE213)	None	Part of the MON MCPU but no control

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A		requirements in 40 CFR 63 Subpart FFFF apply.
EU-I30	Ammonia Refrigeration System (CN1200) Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I31	CN 6046-1 Toluene Recovery Unit Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I32	CN 6046-2 Toluene Recovery Unit Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I33	CN 100-6 XT Still Cooler Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I34	CN 100-3 XT Still Reboiler Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I35	HE 212 CY Still Reboiler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I36	HE 36 EX102 Lube Oil Cooler Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I37	HE 37 EX 102 Zone Oil Cooler Installation Year: 1955-2000	None	Part of the MON MCPU but no control requirements in 40

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Maximum Rated Capacity: No Data Location: Bldg. 10		CFR 63 Subpart FFFF apply.
EU-I38	HE-302 EX302 Lube Oil Cooler Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I39	HE 304 EX302 Zone Oil Cooler Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I40	HE-402 EX402 Lube Oil Cooler Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I41	HE 404 EX404 Zone Oil Cooler Installation Year: 1955-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I42	HE 102 Sluice Water Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I43	HE 302 Sluice Water Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I44	HE 402 Sluice Water Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I45	HE 1007 Sluice Water Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Regulation Number
	Location: Bldg. 10A		apply.
EU-I46	HE 1008 Sluice Water Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I47	HE 211 Cy Still Feed Evaporator Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I48	HE 1007RED EX-1007 Lube Oil Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I49	HE 1008RED EX-1008 Lube Oil Cooler Installation Year: 1970-2000 Maximum Rated Capacity: No Data Location: Bldg. 10A	None	Part of the MON MCPU but no control requirements in 40 CFR 63 Subpart FFFF apply.
EU-I50	Cold Cleaning Unit Installation Year: 10/2013 Maximum Rated Capacity: 110 gal Location: Bldg. 27	None	RCSA §§22a-174-20(j) and -20(l)(3)
EU-K08	GENERAC SG500 Natural Gas Fired Emergency Generator Installation Year: 08/2025 Maximum Rated Capacity: 500 kW Location: Bldg. 22	None	RCSA §22a-174-3b(e) RCSA §22a-174-22f 40 CFR Part 63 Subpart ZZZZ 40 CFR Part 60 Subpart JJJJ

Section II: Emissions Units Information

B. GROUPED EMISSIONS UNITS' DESCRIPTION

DRAFT

Grouped emissions units are set forth in Table II.B.

TABLE II.B: GROUPED EMISSIONS UNITS DESCRIPTION		
Grouped Emissions Unit	Emissions Unit	Description
GEU-01	EU-A01 through EU-I49	Miscellaneous Organic Chemical Manufacturing Equipment

C. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following Standard Operating Scenarios (SOS) and Alternative Operating Scenarios (AOS) without notifying the commissioner, provided that such operations are explicitly provided for and described in Table II.C. There are no Alternate Operating Scenarios for the premises.

TABLE II.C: OPERATING SCENARIO IDENTIFICATION	
Emissions Units Associated with the Scenario	Description of Scenario
GEU-01	Miscellaneous Organic Chemical Manufacturing Equipment
EU-I50	Cold Cleaning Unit
EU-K08	Operates on natural gas

Section III: Applicable Requirements and Compliance Demonstration

The following contains summaries of applicable regulations and compliance demonstration for each identified Emissions Unit, regulated by this Title V permit.

DRAFT

A. GEU-01: Miscellaneous Organic Chemical Manufacturing Equipment
Subject to: 40 CFR Part 63 Subpart FFFF

Emissions units EU-A01 through EU-I49 as described in Table II.A of this Title V permit have been identified as being part of GEU-01 as of the date of issuance of this Title V permit (Application No. 202412384).

Any other emissions unit that is identified as part of GEU-01 in the list created in Section III.D.24 of this Title V permit shall also be subject to the requirements below, as applicable.

1. Organic HAPs

a. Limitation or Restriction

- i. *Group 1 Continuous Process Vents (as defined in 40 CFR §63.2550):* The Permittee shall reduce emissions of total organic HAP by $\geq 98\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or Total Organic Compounds (TOC) by venting emissions through a closed-vent system to any combination of control devices (except a flare). [40 CFR §63.2455(a); 40 CFR Part 63 Subpart FFFF Table 1, Condition No. 1.a.i]
- ii. *Group 1 Batch Process Vents (as defined in 40 CFR §63.2550):* The Permittee shall reduce uncontrolled organic HAP emissions from one or more batch process vents within the process by venting *through* one or more closed-vent systems to any combination of control devices (excluding a flare) that reduce organic HAP to an outlet concentration ≤ 20 ppmv as TOC or total organic HAP. [40 CFR §63.2460(a); 40 CFR Part 63 Subpart FFFF Table 2, Condition No. 1.c]
- iii. For all other batch process vents within the process, the Permittee shall reduce collective organic HAP emissions by $\geq 98\%$ by weight by venting emissions from a sufficient number of the vents through one or more closed-vent systems to any combination of control devices (except a flare). [40 CFR §63.2460(a); 40 CFR Part 63 Subpart FFFF Table 2, Condition No. 1.c]
- iv. When organic HAP emissions from different emission types (e.g., continuous process vents, batch process vents, storage tanks, transfer operations, and waste management units) are combined, the Permittee must either: [40 CFR §63.2450(c)]
 - (A) Comply with the applicable requirements of 40 CFR §63.2450(c)(1) for each kind of organic HAP emissions in the stream (e.g., the requirements of Table 1 for continuous process vents and the requirements of Table 4 for emissions from storage tanks); or [40 CFR §63.2450(c)(1)]
 - (B) Determine the applicable requirements based on the hierarchy presented in 40 CFR §63.2450(c)(2)(i) through (vi). For a combined stream, the applicable requirements are specified in the highest-listed paragraph in the hierarchy that applies to any of the individual streams that make up the combined stream. [40 CFR §63.2450(c)(2)]
 - (1) The requirements of 40 CFR Part 63 Subpart FFFF Table 2 and 40 CFR §63.2460 for Group 1 batch process vents, including applicable monitoring, recordkeeping, and reporting.
[40 CFR §63.2450(c)(2)(i), 40 CFR Part 63 Subpart FFFF Table 2, Condition No. 1.c]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- v. *Group 1 Storage Tanks (as defined in 40 CFR §63.2550)*: The Permittee shall implement vapor balancing in accordance with 40 CFR §63.1253(f) (40 CFR Part 63 Subpart GGG), except as specified in 40 CFR §§63.2470(e)(1) through (3).
[40 CFR §63.2470(e)]
- vi. For all other Group 1 storage tanks, the Permittee shall reduce uncontrolled organic HAP emissions of total organic HAP by $\geq 95\%$ by weight or to an outlet concentration ≤ 20 ppmv as organic HAP or TOC by venting emissions through a closed vent system to any combination of control devices (excluding a flare).
[40 CFR §63.2470(a); 40 CFR Part 63 Subpart FFFF, Table 4, Condition No. 1.b.ii]
- vii. If the Permittee reduces organic HAP emissions by venting emissions through a closed-vent system to an adsorber(s) that cannot be regenerated or a regenerative adsorber(s) that is regenerated offsite, then the Permittee must install a system of two or more adsorber units in series and comply with the requirements specified in 40 CFR §§63.2450(e)(7)(i) through (iii).
[40 CFR §63.2450(e)(7)]
- viii. The emission limits in Table 4 to Subpart FFFF for control devices used to control emissions from storage tanks do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of each control device, during which the control device does not meet the emission limit specified in Table 4 to Subpart FFFF, must not exceed 240 hours per year (hr/yr). The Permittee may submit an application to the administrator requesting an extension of this time limit to a total of 360 hr/yr. The application must explain why the extension is needed, it must indicate that no material will be added to the storage tank between the time the 240-hr limit is exceeded and the control device is again operational, and it must be submitted at least 60 days before the 240-hr limit will be exceeded. [40 CFR 63.2470(d)]
- ix. *Tank Emptying and Degassing*: For each storage tank subject to Item 1 of Table 4 to Subpart FFFF, the Permittee must comply with 40 CFR §§63. 63.2470(f)(1) through (4) during storage tank shutdown operations (i.e., emptying and degassing of a storage tank) until the vapor space concentration in the storage tank is less than 10 percent of the LEL. The Permittee must determine the concentration using process instrumentation or portable measurement devices and follow procedures for calibration and maintenance according to manufacturer's specifications.
[40 CFR 63.2470(f)]
- x. *Maintenance Vents*: The Permittee may designate a process vent as a maintenance vent if the vent is only used as a result of startup, shutdown, maintenance, or inspection of equipment where equipment is emptied, depressurized, degassed, or placed into service. The Permittee must comply with the applicable requirements in 40 CFR §63.2450(v)(1) through (3) for each maintenance vent. Any vent designated as a maintenance vent is only subject to the maintenance vent provisions in 40 CFR §63.2450(v) and the associated recordkeeping and reporting requirements in 40 CFR §§63.2525(p) and 63.2520(e)(14), respectively. The Permittee does not need to designate a maintenance vent as a Group 1 or Group 2 process vent nor identify maintenance vents in a notification of compliance status report. [40 CFR §63.2450(v)]
- xi. *Bypass Lines*: The use of a bypass line at any time on a closed vent system to divert emissions subject to the requirements in Tables 1 through 7 to 40 CFR 63 Subpart FFFF to the atmosphere or to a control device not meeting the requirements specified in Tables 1 through 7 to 40 CFR 63 Subpart FFFF is an emissions standards deviation. The Permittee must also comply with the requirements specified in paragraphs 40 CFR §§2450(e)(6)(i) through (v) of this section, as applicable. [40 CFR §63.2450(e)(6)]

Section III: Applicable Requirements and Compliance Demonstration

- xii. The Permittee must comply with the requirements specified in 40 CFR §§63.2480(e)(1) and (2) for pressure relief devices, such as relief valves or rupture disks, in organic HAP gas or vapor service instead of the pressure relief device requirements of 40 CFR §§63.1030, 63.105, or 63.111. Except as specified in 40 CFR §§63.2480(e)(4) and (5), the Permittee must also comply with the requirements specified in 40 CFR §§63.2480(e)(3), (6), (7), and (8) for all pressure relief devices in organic HAP service. [40 CFR 63.2450(t); 40 CFR 63.2480(e)]
- xiii. *Equipment Leaks*: The Permittee shall comply with the requirements of 40 CFR Part 63 Subpart H and the requirements referenced therein, except as specified in 40 CFR §§63.2480(b) and (d). [40 CFR §63.2480(a); 40 CFR Part 63 Subpart FFFF, Table 6, Condition No. 1.b]
- ix. *Process Wastewater*: The Permittee shall comply with the requirements in 40 CFR §§63.132 through 63.148 (40 CFR Part 63 Subpart G) and the requirements referenced therein, except as specified in 40 CFR §63.2485. [40 CFR §63.2485(a); 40 CFR Part 63 Subpart FFFF, Table 7, Condition No. 1]
- xv. *Maintenance Wastewater*: The Permittee shall comply with the requirements in 40 CFR §63.105 (40 CFR Part 63 Subpart F) and the requirements referenced therein, except as specified in 40 CFR §63.2485. [40 CFR §63.2485(a); 40 CFR Part 63 Subpart FFFF, Table 7, Condition No. 2]
- xvi. *Liquid Streams in an Open System within a Miscellaneous Organic Chemical Manufacturing Process Units (MCPU)*: The Permittee shall comply with the requirements in 40 CFR §63.149 (40 CFR Part 63 Subpart G) and the requirements referenced therein, except as specified in 40 CFR §63.2485. [40 CFR §63.2485(a); 40 CFR Part 63 Subpart FFFF, Table 7, Condition No. 3]
- xvii. The Permittee shall comply with the applicable General Provisions requirements according to 40 CFR Part 63 Subpart FFFF, Table 12. [40 CFR §63.2540; 40 CFR Part 63 Subpart FFFF, Table 12]

b. Monitoring Requirements

- i. The Permittee shall meet the closed vent system and carbon adsorber control device requirements of 40 CFR §63.982(c) and the requirements referenced therein, except when complying with Section III.A.1.a.vii through Section III.A.1.a.ix of this Title V permit. [40 CFR §63.2450(e)(1)]
- ii. The Permittee shall meet the following control requirements for non-regenerative adsorber(s) or regenerative adsorber(s) that are regenerated offsite: [40 CFR §63.2450(e)(7)]
- (A) Conduct an initial performance test or design evaluation of the adsorber and establish the breakthrough limit and adsorber bed life. [40 CFR §63.2450(e)(7)(i)]
- (B) Monitor the HAP or total organic compound (TOC) concentration through a sample port at the outlet of the first adsorber bed in series using either a portable analyzer, in accordance with Method 21 of 40 CFR part 60, appendix A-7, using methane, propane, isobutylene, or the primary HAP being controlled as the calibration gas or Method 25A of 40 CFR part 60, appendix A-7, using methane, propane, or the primary HAP being controlled as the calibration gas. [40 CFR §63.2450(e)(7)(ii)]
- (C) Replace the first adsorber in series immediately when breakthrough, as defined in 40 CFR §63.2550(i), is detected between the first and second adsorber. The original second adsorber (or a fresh canister) will become the new first adsorber and a fresh adsorber will become the second adsorber. For purposes of 40 CFR §63.2450(e)(7)(iii)(A), “immediately” means

Section III: Applicable Requirements and Compliance Demonstration

within 8 hours of the detection of a breakthrough for adsorbers of 55 gallons or less, and within 24 hours of the detection of a breakthrough for adsorbers greater than 55 gallons. Monitor at the outlet of the first adsorber within 3 days of replacement to confirm it is performing properly. [40 CFR §63.2450(e)(7)(iii)(A)]

DRAFT

- (D) Based on the adsorber bed life established according to 40 CFR §63.2450(e)(7)(i) and the date the adsorbent was last replaced, conduct monitoring to detect breakthrough at least monthly if the adsorbent has more than 2 months of life remaining, at least weekly if the adsorbent has between 2 months and 2 weeks of life remaining, and at least daily if the adsorbent has 2 weeks or less of life remaining. [40 CFR §63.2450(e)(7)(iii)(B)]
- iii. The following performance tests requirements apply instead of or in addition to the requirements specified in 40 CFR Part 63 Subpart SS:
 - (A) The Permittee shall conduct gas molecular weight analysis using Method 3, 3A, or 3B in 40 CFR Part 60 Appendix A. [40 CFR §63.2450(g)(1)]
 - (B) The Permittee shall measure moisture content of the stack gas using Method 4 in 40 CFR Part 60 Appendix A. [40 CFR §63.2450(g)(2)]
 - (C) The Permittee may use Method 320 of 40 CFR Part 60 Appendix A as an alternative to using Method 18, Method 25/25A, or Method 26/26A to comply with any of the emission limits specified in Section III.A.1.a of this Title V permit. When using Method 320, the Permittee shall follow the analyte spiking procedures of section 13 of Method 320, unless the Permittee demonstrates that the complete spiking procedure has been conducted at a similar source. [40 CFR §63.2450(g)(4)]
- iv. The Permittee shall record the results of each calibration check and all maintenance performed on the Continuous Parameter Monitoring System (CPMS). Such records shall include the date and time of completion of calibration and preventative maintenance of the CPMS in addition to the requirements for CPMS in 40 CFR Part 63 Subpart SS. When 40 CFR Part 63 Subpart SS uses the term “a range” or “operating range” of a monitored parameter, it means an “operating limit” for a monitored parameter for the purposes of 40 CFR Part 63 Subpart FFFF. [40 CFR §§63.2450(k)(1) and (2); 40 CFR §63.998(c)(1)(ii)(A)]
- v. The Permittee shall ensure that the exclusion of monitoring data collected during periods of startup, shutdown and malfunction from daily averages, as referenced in 40 CFR §§63.152(f)(7)(ii) through (iv) and 40 CFR §§63.998(b)(2)(iii) and (b)(6)(i)(A), do not apply for purposes of compliance with 40 CFR Part 63 Subpart FFFF. [40 CFR §63.2450(l)]
- c. *Record Keeping Requirements*
 - i. The Permittee shall make and keep each applicable record required by 40 CFR Part 63 Subpart A and in referenced subparts F, G, H, SS, UU, WW and GGG of 40 CFR Part 63 and 40 CFR Part 65 Subpart F. [40 CFR §63.2525(a)]
 - ii. The Permittee shall make and keep records of each operating scenario as specified below: [40 CFR §63.2525(b)]
 - (A) A description of the process and the type of process equipment used. [40 CFR §63.2525(b)(1)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (B) An identification of related process vents, including their associated emission episodes; wastewater Point of Determination (POD); storage tanks; and transfer racks. [40 CFR §63.2525(b)(2)]
 - (C) The applicable control requirements of 40 CFR Part 63 Subpart FFFF, including the level of required control, and for vents, the level of control for each vent. [40 CFR §63.2525(b)(3)]
 - (D) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. [40 CFR §63.2525(b)(4)]
 - (E) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process. [40 CFR §63.2525(b)(5)]
 - (F) The applicable monitoring requirements of 40 CFR Part 63 Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process. [40 CFR §63.2525(b)(6)]
 - (G) Calculations and engineering analyses required to demonstrate compliance. [40 CFR §63.2525(b)(7)]
- iii. The Permittee shall make and keep a schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect. [40 CFR §63.2525(c)]
 - iv. The Permittee shall make and keep the following records for Group 1 Batch Process Vents (as defined in 40 CFR §63.2550) from batch process vents in compliance with a percent reduction limit in Section III.A.1.a.ii and iii of this Title V permit if some of the vents are controlled to less than the percent reduction requirement: [40 CFR §63.2525(d)]
 - (A) Records of whether each batch operated was considered a standard batch; [40 CFR §63.2525(d)(1)]
 - (B) The estimated uncontrolled and controlled emissions for each batch that is considered to be a nonstandard batch. [40 CFR §63.2525(d)(2)]
 - v. The Permittee shall make and keep records of the results of each CPMS calibration check, and the maintenance performed, as specified in 40 CFR §63.2450(k)(1). [40 CFR §63.2525(g)]
 - vi. For each nonregenerative adsorber and regenerative adsorber that is regenerated offsite subject to the requirements in 40 CFR §63.2450(e)(7), the Permittee must keep the applicable records specified in 40 CFR §63.2525(o)(1) through (3). [40 CFR §63.2525(o)]
 - vii. For each maintenance vent opening subject to the requirements in 40 CFR §63.2450(v), the Permittee must keep the applicable records specified in 40 CFR §63.2525(p). [40 CFR §63.2525(p)]
 - viii. The Permittee shall make and keep records sufficient to show compliance with the applicable General Provisions requirement of 40 CFR Part 63 Subpart FFFF, Table 12. [RCSA §22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

d. Reporting Requirements

DRAFT

- i. When 40 CFR §63.2455 through 40 CFR §63.2490 reference other subparts in 40 CFR Part 63 that use the term “periodic report,” it means “compliance report” for the purposes of 40 CFR Part 63 Subpart FFFF. The compliance report shall include the information specified in 40 CFR §63.2520(e), as well as the information in specified in referenced subparts. [40 CFR §63.2450(m)(1)]
- ii. When there are conflicts between 40 CFR Part 63 Subpart FFFF and referenced subparts for the due dates of reports required by 40 CFR Part 63 Subpart FFFF, reports shall be submitted according to the due dates presented in 40 CFR Part 63 Subpart FFFF. [40 CFR §63.2450(m)(2)]
- iii. Excused excursions, as defined in 40 CFR 63 Subparts G and SS, are not allowed. [40 CFR §63.2450(m)(3)]
- iv. In addition to the reporting required in Section VI of this Title V permit, the Permittee shall submit semi-annual compliance reports in accordance with the dates in Section VI.E of this Title V permit which contain the following information: [40 CFR §63.2520(e)]:
 - (A) Company name and address. [40 CFR §63.2520(e)(1)]
 - (B) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report. If the report is submitted via CEDRI, the certifier's electronic signature during the submission process replaces the requirement in §63.2520(e)(2). [40 CFR §63.2520(e)(2)]
 - (C) Date of report and beginning and ending dates of the reporting period. The Permittee is no longer required to provide the date of report when the report is submitted via CEDRI. [40 CFR §63.2520(e)(3)]
 - (D) The compliance report shall contain the following information on deviations, as defined in 40 CFR §63.2550: [40 CFR §63.2520(e)(5)]
 - (1) If there are no deviations from any emission limit, operating limit or work practice standard specified in 40 CFR Part 63 Subpart FFFF, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period. [40 CFR §63.2520(e)(5)(i)]
 - (2) For each deviation from an emission limit, operating limit, and work practice standard that occurs where a Continuous Monitoring System (CMS) is not used to comply with the emission limit or work practice standard, the compliance report shall include the following information. This includes periods of SSM. [40 CFR §63.2520(e)(5)(ii)]
 - (a) The total operating time in hours of the affected source during the reporting period. [40 CFR §63.2520(e)(5)(ii)(A)]
 - (b) Operating logs of processes with batch vents from batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks. [40 CFR §63.2520(e)(5)(ii)(C)]
 - (c) Report information for each deviation to meet an applicable standard. For each

Section III: Applicable Requirements and Compliance Demonstration

instance, report the start date, start time, and duration in hours of each deviation. For each deviation, the report must include a list of the affected sources or equipment, an estimate of the quantity in pounds of each regulated pollutant emitted over any emission limit, a description of the method used to estimate the emissions, the cause of the deviation (including unknown cause, if applicable), as applicable, and the corrective action taken. [40 CFR §63.2520(e)(5)(ii)(D)]

- (3) For each deviation from an emission limit or operating limit that occurs when CMS is being used to comply with an emission limit, the compliance report shall include the following information. This includes periods of SSM. [40 CFR §63.2520(e)(5)(iii)]
- (a) The start date, start time, and duration in hours that each CMS was inoperative, except for zero (low-level) and high-level checks. [40 CFR §63.2520(e)(5)(iii)(A)]
 - (b) The start date, start time, and duration in hours that each continuous emission monitoring system was out-of-control, and a description of the corrective actions taken. [40 CFR §63.2520(e)(5)(iii)(B)]
 - (c) The total duration in hours of all deviations for each CMS during the reporting period, the total operating time in hours of the affected source during the reporting period, and the total duration as a percent of the total operating time of the affected source during that reporting period. [40 CFR §63.2520(e)(5)(iii)(D)]
 - (d) A summary of the total duration in hours of CMS downtime for each CMS during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the affected source during that reporting period. [40 CFR §63.2520(e)(5)(iii)(F)]
 - (e) An identification of each HAP that is known to be in the emission stream. [40 CFR §63.2520(e)(5)(iii)(G)]
 - (f) A brief description of the process units. [40 CFR §63.2520(e)(5)(iii)(H)]
 - (g) The monitoring equipment manufacturer(s) and model number(s) and the pollutant or parameter monitored. [40 CFR §63.2520(e)(5)(iii)(I)]
 - (h) The date of the latest CMS certification or audit. [40 CFR §63.2520(e)(5)(iii)(J)]
 - (i) Operating logs of processes with batch vents from batch operations for each day(s) during which the deviation occurred. [40 CFR §63.2520(e)(5)(iii)(K)]
 - (j) The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred. [40 CFR §63.2520(e)(5)(iii)(L)]
 - (k) Report the number of deviations to meet an applicable standard. For each instance, report the start date, start time and duration in hours of each deviation.

Section III: Applicable Requirements and Compliance Demonstration

For each deviation, the report must include a list of the affected sources or equipment, an estimate of the quantity in pounds of each regulated pollutant emitted over any emission limit, a description of the method used to estimate the emissions, and the cause of the deviation (including unknown cause, if applicable), as applicable, and the corrective action taken.
[40 CFR §63.2520(e)(5)(iii)(M)]

- (I) Report a breakdown of the total duration in hours of the deviations during the reporting period into those that are due control equipment problems, process problems, other known causes, and other unknown causes.
[40 CFR §63.2520(e)(5)(iii)(N)]
- (4) If it was documented in the notification of compliance status report that an MCPU has Group 2 batch process vents (as defined in 40 CFR §63.2550) because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by 40 CFR §63.2525(e) that exceeds an applicable HAP usage or emissions threshold. [40 CFR §63.2520(e)(5)(iv)]
- (E) Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, the Permittee shall report the information specified in 40 CFR §63.2525(b) and provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario. [40 CFR §63.2520(e)(7)]
- (F) Applicable records and information for periodic reports as specified in referenced subparts F, G, H, SS, UU, WW, and GGG of 40 CFR Part 63 and 40 CFR Part 65 Subpart F.
[40 CFR §63.2520(e)(9)]
- (G) Except as specified in 40 CFR §63.2520(e)(10)(ii), whenever the Permittee makes a process change, or change any of the information submitted in the notification of compliance status report or a previous compliance report that is not within the scope of an existing operating scenario, the Permittee shall document the change in the compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification shall include all of the following information: [40 CFR §63.2520(e)(10)(i)]
 - (1) A description of the process change. [40 CFR §63.2520(e)(10)(i)(A)]
 - (2) Revisions to any of the information reported in the original notification of compliance status report as required by 40 CFR §63.2520(d). [40 CFR §63.2520(e)(10)(i)(B)]
 - (3) Information required by the notification of compliance status report under 40 CFR §63.2520(d) for changes involving the addition of processes or equipment at the affected source. [40 CFR §63.2520(e)(10)(i)(C)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (H) The Permittee shall submit a report 60 days before the scheduled implementation date of any of the following: [40 CFR §63.2520(e)(10)(ii)]
- (1) Any change to the information contained in the precompliance report.
[40 CFR §63.2520(e)(10)(ii)(A)]
 - (2) A change in the status of a control device from small to large.
[40 CFR §63.2520(e)(10)(ii)(B)]
 - (3) A change from Group 2 to Group 1 (as they are defined in 40 CFR §63.2550) for any emission point except for batch process vents that meet the conditions specified in 40 CFR §63.2460(b)(6)(i). [40 CFR §63.2520(e)(10)(ii)(C)]
- (I) For bypass lines subject to the requirements in 40 CFR §63.2450(e)(6), the compliance report must include the start date, start time, duration in hours, estimate of the volume of gas in standard cubic feet, the concentration of organic HAP in the gas in parts per million by volume and the resulting mass emissions of organic HAP in pounds that bypass a control device. For periods when the flow indicator is not operating, report the start date, start time, and duration in hours. [40 CFR §63.2520(e)(12)]
- (J) For each nonregenerative adsorber and regenerative adsorber that is regenerated offsite subject to the requirements in 40 CFR §63.2450(e)(7), the Permittee must report the date of each instance when breakthrough, as defined in 40 CFR §63.2550(i), is detected between the first and second adsorber and the adsorber is not replaced according to 40 CFR §63.2450(e)(7)(iii)(A). [40 CFR §63.2520(e)(13)]
- (K) For any maintenance vent release exceeding the applicable limits in 40 CFR §63.2450(v)(1), the compliance report must include the information specified in 40 CFR §63.2450(e)(14)(i) through (iv). For the purposes of this reporting requirement, if the Permittee complies with 40 CFR §63.2450(v)(1)(iv) then the Permittee must report each venting event conducted under those provisions and include an explanation for each event as to why utilization of this alternative was required. [40 CFR §63.2520(e)(14)]
- (L) Compliance reports for pressure relief devices subject to the requirements 40 CFR §63.2480(e) must include the information specified in 40 CFR §§63.2520(e)(15)(i) through (iii). [40 CFR §63.2520(e)(15)]
- (M) For each heat exchange system subject to 40 CFR §§63.2490(d) or (e), the reporting requirements of 40 CFR §63.104(f)(2) no longer apply; instead, the compliance report must include the information specified in 40 CFR §§63.2520(e)(16)(i) through (v). [40 CFR §63.2520(e)(16)]
- v. A change to any elements in Section III.A.1.c.ii of this Title V permit not previously reported, except for Section III.A.1.c.ii.(E) of this Title V permit, constitutes a new operating scenario. [40 CFR §63.2525(b)(8)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

B. EU-I50 (Cold Cleaning Unit)

Subject to: RCSA §§22a-174-20(j) and -20(l)(3)

1. VOC

a. Limitation or Restriction

- i. The Permittee shall not, during any one day, dispose of more than one and one-half gallons (5.7 liters) of any VOC or of any material containing more than one and one-half gallons (5.7 liters) of any VOC by any means which will permit the evaporation of such solvent into the atmosphere. [RCSA §22a-174-20(j)]
- ii. The Permittee shall use only solvent that has a vapor pressure less than or equal to 1.0 mmHg at 20°C. [RCSA §22a-174-20(l)(3)(K)]

b. Monitoring Requirements

- i. The Permittee shall use the following work practices: [RCSA §22a-174-20(l)(3)]
 - (A) Equip the cleaning device with a cover that is easily operated with one hand; [RCSA §22a-174-20(l)(3)(A)]
 - (B) Equip the cleaning device with an internal rack or equipment for draining cleaned parts so that parts are enclosed under the cover while draining. Such drainage rack or equipment may be external for applications where an internal type cannot fit into the cleaning system; [RCSA §22a-174-20(l)(3)(B)]
 - (C) Collect and store waste solvent in closed containers. Closed containers used for storing waste solvent may contain a device that allows pressure relief but does not allow liquid solvent to drain from the container; [RCSA §22a-174-20(l)(3)(C)]
 - (D) Close the cover if parts are not being handled in the cleaner for two minutes or more, or if the device is not in use; [RCSA §22a-174-20(l)(3)(D)]
 - (E) Drain the cleaned parts for at least 15 seconds or until dripping ceases, whichever is longer; [RCSA §22a-174-20(l)(3)(E)]
 - (F) Minimize the drafts across the top of each cold cleaning unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters per minute, as measured between one and two meters upwind, at the same elevation as the tank lip; [RCSA §22a-174-20(l)(3)(G)]
 - (G) Do not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired. Any leaked solvent or solvent spilled during transfer shall be cleaned immediately, and the wipe rags or other sorbent material used to clean the spilled or leaked solvent shall be immediately stored in covered containers for disposal or recycling; [RCSA §22a-174-20(l)(3)(H)]
 - (H) Provide a permanent, conspicuous label on or posted near each unit summarizing the applicable operating requirements and; [RCSA §22a-174-20(l)(3)(I)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (I) Shall not clean sponges, fabric, wood, leather, paper and other absorbent material in a cold cleaning machine. [RCSA §22a-174-20(l)(3)(L)]

c. Record Keeping Requirements

- i. The Permittee shall make and keep records of the following for a minimum of five years after such record is made: [RCSA §22a-174-20(l)(3)(J)]
 - (A) The type of solvent used, including a description of the solvent and the solvent name; [RCSA §22a-174-20(l)(3)(J)(i)]
 - (B) The vapor pressure of the solvent in mmHg measured at 20°C (68°F); [RCSA §22a-174-20(l)(3)(J)(ii)]
 - (C) The percent VOC content by weight; and [RCSA §22a-174-20(l)(3)(J)(iii)]
 - (D) The amount of solvent added to each unit on a monthly basis. [RCSA §22a-174-20(l)(3)(J)(iv)]
- ii. The Permittee shall make and keep daily records of the volume and type of VOC disposed and means of disposal. [RCSA 22a-174-33(j)(1)(K)(ii)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

C. EU-K08 (GENERAC SG500 Natural Gas Fired Emergency Generator)

Subject to: §§22a-174-3b(e) and -22f, 40 CFR 60 Subpart JJJJ and 40 CFR Part 63 Subpart ZZZZ
RICE MACT Designation: Emergency, New SI, >500 Bhp, Constructed after 12/19/02

1. Hours of Operation

a. Limitation or Restriction

The generator shall not be operated except during periods of testing and scheduled maintenance or during an emergency and operation shall not exceed 300 hours during any 12 month rolling aggregate. [RCSA §22a-174-3b(e)(2)(A)] [STATE ONLY REQUIREMENT]

b. Monitoring Requirements

The Permittee shall monitor the hours of operation of the emergency generator using log entries of the hours run each day. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall make and maintain records of the hours of operation for each month and each 12 month rolling aggregate. [RCSA §22a-174-3b(e)(4)] [STATE ONLY REQUIREMENT]

d. Reporting Requirements

Section III: Applicable Requirements and Compliance Demonstration

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

DRAFT

2. Operation and Maintenance

a. Limitation or Restriction

- i. The Permittee shall properly maintain equipment and operate such engine in accordance with RCSA §22a-174-3b(e). [RCSA §22a-174-3b(e)(1)] [STATE ONLY REQUIREMENT]
- ii. The Permittee shall not operate the emergency engine for routine, scheduled testing or maintenance on any day for which the commissioner has forecast that ozone levels will be "moderate to unhealthy for sensitive groups" or greater. If, subsequent to the initial forecast of "moderate to unhealthy for sensitive groups" or greater, the forecast is revised to "moderate" or lower, the Permittee is no longer prohibited from operating the engine for routine, scheduled testing or maintenance for the remainder of that day. The Permittee may rely on an ozone forecast of "moderate" or lower obtained after 3 p.m. on the preceding day. Subsequent changes to the ozone forecast after 3 p.m. that forecast ozone levels of "moderate to unhealthy for sensitive groups" or greater shall not obligate the Permittee to refrain from operation of the emergency engine at the facility on the following day. The commissioner may exempt, by permit or order, the Permittee of an emergency engine from RCSA §22a-174-22f(d) if such emergency engine is unattended and the testing is automated and cannot be modified from a remote location. [RCSA §22a-174-22f(d)(2)]

b. Monitoring Requirements

Record keeping specified in Section III.C.2.c of this Title V permit shall be sufficient to meet Monitoring Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

- i. The Permittee shall make and keep the following records:
[RCSA §22a-174-22f(g)(3)(B) and (C)]
 - (A) The date and work performed for repairs, replacement of parts and other maintenance; and
 - (B) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22f.

d. Reporting Requirements

- i. The Permittee shall submit an Initial Notification pursuant to 40 CFR 63.6645(f). The notification should include the information in 40 CFR §63.9(b)(2)(i) through (v), and a statement that the stationary RICE has no additional requirements in accordance with 40 CFR §63.6590(b) and explain the basis of the exclusion. [40 CFR §63.6645(f)]
- ii. The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

3. 40 CFR Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

a. Limitation or Restriction

- i. The Permittee shall comply with the following emission standards:
[40 CFR §60.4233(d) and 40 CFR Part 60 Subpart JJJJ Table 1]

(A) NO_x: 10 g/HP-hr

(B) CO: 387 g/HP-hr

- ii. The Permittee shall operate and maintain the engine to achieve the emission standards as required in 40 CFR §60.4233 over the entire life of the engine. [40 CFR §60.4234]
- iii. The Permittee shall operate the emergency engine in accordance with 40 CFR 60.4243(d)(1) –(3).
[40 CFR 60.4243(d)]

b. Monitoring Requirements

Record keeping specified in Section III.C.3.c of this Title V permit shall be sufficient to meet Monitoring Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

- i. The Permittee shall comply with all record keeping requirements of the General Provisions in 40 CFR §§60.1 through 60.19, inclusive, as specified in 40 CFR Part 60 Subpart JJJJ, Table 3.
[40 CFR §60.4246]
- ii. The Permittee shall keep records of maintenance conducted on each engine. [40 CFR §60.4245(a)(2)]
- iii. The Permittee shall keep records of all notifications submitted to comply with 40 CFR Part 60 Subpart JJJJ and all documentation supporting any notification. [40 CFR §60.4245(a)(1)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such date specified by the commissioner whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

D. PREMISES-WIDE GENERAL REQUIREMENTS

1. **Annual Emission Statements:** The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4a(b)(1).
2. **Emission Testing:** The Permittee shall comply with the procedures for sampling, emission testing, sample analysis, and reporting as set forth in RCSA §22a-174-5.
3. **Emergency Episode Procedures:** The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
4. **Reporting of Malfunctioning Control Equipment:** The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.
5. **Prohibition of Air Pollution:** The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
6. **Public Availability of Information:** The public availability of information shall apply, as set forth in RCSA §22a-174-10.
7. **Prohibition Against Concealment/Circumvention:** The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
8. **Violations and Enforcement:** The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
9. **Variances:** The Permittee may apply to the commissioner for a variance from one or more of the provisions of these regulations as set forth in RCSA §22a-174-13.
10. **No Defense to Nuisance Claim:** The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
11. **Severability:** The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
12. **Responsibility to Comply:** The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
13. **Particulate Emissions:** The Permittee shall comply with the standards for control of particulate matter and visible emissions as set forth in RCSA §22a-174-18.
14. **Fuel Sulfur Content:** The Permittee shall not use No. 2 heating oil that exceeds fifteen parts per million of sulfur by weight as set forth in CGS §16a-21a(a)(2)(B).
15. **Sulfur Compound Emissions:** The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §§22a-174-19, 22a-174-19a and 22a-174-19b, as applicable.
16. **Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
17. **Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide

Section III: Applicable Requirements and Compliance Demonstration

emissions as set forth in RCSA §§22a-174-22f.

DRAFT

18. **Ambient Air Quality:** The Permittee shall not cause or contribute to a violation of an ambient air quality standard as set forth in RCSA §22a-174-24(b).
19. **Open Burning:** The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
20. **Asbestos:** Should the premises, as defined in 40 CFR §61.145, become subject to the national emission standard for asbestos regulations in 40 CFR Part 61 Subpart M when conducting any renovation or demolition at this premises, then the Permittee shall submit proper notification as described in 40 CFR §61.145(b) and shall comply with all other applicable requirements of 40 CFR Part 61 Subpart M.
21. **Emission Fees:** The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).
22. **Chemical Accident Prevention Provisions:** The Permittee shall comply with all the applicable requirements of 40 CFR Part 68 Subpart G.
23. **Protection of Stratospheric Ozone:** The Permittee shall comply with all applicable requirements of 40 CFR Part 82 Subpart F.
24. **Miscellaneous Organic Chemical Manufacturing Equipment Identification:**
 - a. The Permittee shall create a list of every emissions unit at the premises included in the miscellaneous organic chemical manufacturing affected source (GEU-1) within 30 days of the issuance of this Title V permit (Application No. 202412384). Such list shall include the following information:
[RCSA §22a-174-33(j)(1)(K)]
 - i. Assigned Emission Unit Number (EU);
 - ii. Unit type and description (make and model);
 - iii. Installation date and/or applicable manufacture date;
 - iv. DEEP license number, if applicable;
 - v. Capacity in gallons or gallons per minute;
 - vi. Control requirements in 40 CFR 63 Subpart FFFF, if applicable;
 - vii. Installation location; and
 - viii. The date the list was created.
 - b. The Permittee shall create a record of every emissions unit at the premises included in the miscellaneous organic chemical manufacturing affected source (GEU-1) on a monthly basis; updating the information in the list required by Section III.D.24.a of this Title V permit, or the most recent such record required by Section III.D.24.b of this Title V permit. The Permittee shall make such record within 30 days of the end of the previous month. [RCSA §22a-174-33(j)(1)(K)]
 - c. The Permittee shall comply with Section III.A of this Title V permit for each emissions unit identified as part of GEU-1 in the list created under Section III.D.24.a or b of this Title V permit.
[RCSA §22a-174-33(j)(1)(K)]

Section IV: Compliance Schedule

DRAFT

TABLE IV: COMPLIANCE SCHEDULE				
Emissions Unit	Applicable Regulations	Steps Required for Achieving Compliance (Milestones)	Date by which Each Step is to be Completed	Dates for Monitoring, Record Keeping, and Reporting
	RCSA §22a-174-20(ee)	The Permittee shall submit a minor modification to Permit No. 187-0237-TV, in accordance with RCSA Section 22a-174-2a(e), to incorporate any future Consent Order that may be issued under RCSA §22a-174-20(ee).	Not more than 120 days after issuance of Consent Order.	n/a

Section V: State Enforceable Terms and Conditions

Only the Commissioner of the Department of Energy and Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

DRAFT

SECTION V: STATE ENFORCEABLE TERMS AND CONDITIONS

- A. This Title V permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Energy and Environmental Protection or any federal, local or other state agency. Nothing in this Title V permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Nothing in this Title V permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, investigate air pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.
- C. Additional Emissions Units
 - 1. The Permittee shall make and submit a written record, at the commissioner's request, within 30 days of receipt of notice from the commissioner, or by such other date specified by the commissioner, of each additional emissions unit or group of similar or identical emissions units at the premises.
 - 2. Such record of additional emissions units shall include each emissions unit, or group of emissions units, at the premises which is not listed in Section II.A of this Title V permit, unless the emissions unit, or group of emissions units, is:
 - a. an insignificant emissions unit as defined in RCSA §22a-174-33; or
 - b. an emissions unit or activity listed in *White Paper for Streamlined Development of Part 70 Permit Applications, Attachment A* (EPA guidance memorandum dated July 10, 1995).
 - 3. For each emissions unit, or group of emissions units, on such record, the record shall include, as available:
 - a. Description, including make and model;
 - b. Year of construction/installation or if a group, range of years of construction/installation;
 - c. Maximum throughput or capacity; and
 - d. Fuel type, if applicable.
- D. Odors: The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor that constitutes a nuisance beyond the property boundary of the premises as set forth in RCSA §22a-174-23.
- E. Hazardous Air Pollutants (HAPs): The Permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA §22a-174-29.

Section VI: Title V Requirements

The Administrator of the United States Environmental Protection Agency and the Commissioner of the Department of Energy and Environmental Protection have the authority to enforce the terms and conditions contained in this section.

DRAFT

SECTION VI: TITLE V REQUIREMENTS

A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

The date of submission to the commissioner of any document required by this Title V permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this Title V permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this Title V permit, the word "day" means calendar day. Any document or action which is required by this Title V permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

Any document required to be submitted to the commissioner under this Title V permit shall, unless otherwise specified in writing by the commissioner, be directed to: Compliance Analysis and Coordination Unit, Bureau of Air Management, Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the Environmental Protection Agency shall be submitted per the procedure required by the applicable requirement or otherwise in a computer-readable format and addressed to: Director, Enforcement and Compliance Assurance Division, U.S. EPA Region I, 5 Post Office Square, Suite 100 (Mailcode: 04-02), Boston, Massachusetts 02109-3912, Attn: Air Compliance Clerk.

B. CERTIFICATIONS [RCSA §22a-174-33(b)]

In accordance with RCSA §22a-174-33(b), any report or other document required by this Title V permit and any other information submitted to the commissioner or Administrator shall be signed by an individual described in RCSA §22a-174-2a(a), or by a duly authorized representative of such individual. Any individual signing any document pursuant to RCSA §22a-174-33(b) shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in RCSA §22a-174-2a(a)(4):

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute."

C. SIGNATORY RESPONSIBILITY [RCSA §22a-174-2a(a)]

For purposes of signing any Title V-related application, document, report or certification required by RCSA §22a-174-33, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to RCSA §22a-174-33 and either:

Section VI: Title V Requirements

DRAFT

1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding 25 million dollars in second quarter 1980 dollars; or
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:
 - i. Such written authorization specifically authorizes a named individual, or a named position, having responsibility for the overall operation of the Title V premises or activity,
 - ii. Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
 - iii. If a duly authorized representative is a named individual in an authorization submitted under subclause ii. of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause ii. of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

D. ADDITIONAL INFORMATION [RCSA §22a-174-33(j)(1)(X), RCSA §22a-174-33(h)(2)]

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending this Title V permit or to determine compliance with this Title V permit.

In addition, the Permittee shall submit information to address any requirements that become applicable to the subject source and shall submit correct, complete, and sufficient information within 15 days of the applicant's becoming aware of any incorrect, incomplete, or insufficient submittal, during the pendency of the application, or any time thereafter, with an explanation for such deficiency and a certification pursuant to RCSA §22a-174-2a(a)(5).

E. MONITORING REPORTS [RCSA §22a-174-33(o)(1)]

A Permittee, required to perform monitoring pursuant this Title V permit, shall submit to the commissioner, on forms prescribed by the commissioner, written monitoring reports on March 1 and September 1 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this Title V permit, which has occurred since the date of the last monitoring report; and
3. Each deviation caused by a failure of the monitoring system to provide reliable data.

Section VI: Title V Requirements

DRAFT

F. PREMISES RECORDS [RCSA §22a-174-33(o)(2)]

Unless otherwise required by this Title V permit, the Permittee shall make and keep records of all required monitoring data and supporting information for at least five years from the date such data and information were obtained. The Permittee shall make such records available for inspection at the site of the subject source, and shall submit such records to the commissioner upon request. The following information, in addition to required monitoring data, shall be recorded for each permitted source:

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;
6. The analytical techniques or methods used for such analyses;
7. The results of such analyses;
8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

G. PROGRESS REPORTS [RCSA §22a-174-33(q)(1)]

The Permittee shall, on March 1 and September 1 of each year, or on a more frequent schedule if specified in this Title V permit, submit to the commissioner a progress report on forms prescribed by the commissioner, and certified in accordance with RCSA §22a-174-2a(a)(5). Such report shall describe the Permittee's progress in achieving compliance under the compliance plan schedule contained in this Title V permit. Such progress report shall:

1. Identify those obligations under the compliance plan schedule in this Title V permit which the Permittee has met, and the dates on which they were met; and
2. Identify those obligations under the compliance plan schedule in this Title V permit which the Permittee has not timely met, explain why they were not timely met, describe all measures taken or to be taken to meet them and identify the date by which the Permittee expects to meet them.

Any progress report prepared and submitted pursuant to RCSA §22a-174-33(q)(1) shall be simultaneously submitted by the Permittee to the Administrator.

Section VI: Title V Requirements

DRAFT

H. COMPLIANCE CERTIFICATIONS [RCSA §22a-174-33(q)(2)]

The Permittee shall, on March 1 of each year, or on a more frequent schedule if specified in this Title V permit, submit to the commissioner a written compliance certification certified in accordance with RCSA §22a-174-2a(a)(5) and which includes the information identified in 40 CFR §§70.6(c)(5)(iii)(A) to (C), inclusive.

Any compliance certification prepared and submitted pursuant to RCSA §22a-174-33(q)(2) shall be simultaneously submitted by the Permittee to the Administrator.

I. PERMIT DEVIATION NOTIFICATIONS [RCSA §22a-174-33(p)]

Notwithstanding Section VI.E of this Title V permit, the Permittee shall notify the commissioner in writing, on forms prescribed by the commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than 24 hours after such deviation commenced; and
2. For any other regulated air pollutant, no later than ten days after such deviation commenced.

J. PERMIT RENEWAL [RCSA §22a-174-33(j)(1)(B)]

All of the terms and conditions of this Title V permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with RCSA §§22a-174-33(g), -33(h), and -33(i).

K. OPERATE IN COMPLIANCE [RCSA §22a-174-33(j)(1)(C)]

The Permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this Title V permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

L. COMPLIANCE WITH PERMIT [RCSA §22a-174-33(j)(1)(G)]

This Title V permit shall not be deemed to:

1. Preclude the creation or use of emission reduction credits or allowances or the trading thereof in accordance with RCSA §§22a-174-33(j)(1)(I) and -33(j)(1)(P), provided that the commissioner's prior written approval of the creation, use, or trading is obtained;
2. Authorize emissions of an air pollutant so as to exceed levels prohibited pursuant to 40 CFR Part 72;
3. Authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or
4. Impose limits on emissions from items or activities specified in RCSA §§22a-174-33(g)(3)(A) and -33(g)(3)(B) unless imposition of such limits is required by an applicable requirement.

Section VI: Title V Requirements

DRAFT

M. INSPECTION TO DETERMINE COMPLIANCE [RCSA §22a-174-33(j)(1)(D)]

The commissioner may, for the purpose of determining compliance with this Title V permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under such permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this Title V permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

N. PERMIT AVAILABILITY

The Permittee shall have available at the facility at all times a copy of this Title V permit.

O. SEVERABILITY CLAUSE [RCSA §22a-174-33(j)(1)(R)]

The provisions of this Title V permit are severable. If any provision of this Title V permit or the application of any provision of this Title V permit to any circumstance is held invalid, the remainder of this Title V permit and the application of such provision to other circumstances shall not be affected.

P. NEED TO HALT OR REDUCE ACTIVITY [RCSA §22a-174-33(j)(1)(T)]

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Title V permit.

Q. PERMIT REQUIREMENTS [RCSA §22a-174-33(j)(1)(V)]

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the Permittee's obligation to comply with this Title V permit.

R. PROPERTY RIGHTS [RCSA §22a-174-33(j)(1)(W)]

This Title V permit does not convey any property rights or any exclusive privileges. This Title V permit is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby, including CGS §4-181a(b) and RCSA §22a-3a-5(b). This Title V permit shall neither create nor affect any rights of persons who are not parties to this Title V permit.

S. ALTERNATIVE OPERATING SCENARIO RECORDS [RCSA §22a-174-33(o)(3)]

The Permittee shall, contemporaneously with making a change authorized by this Title V permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

Section VI: Title V Requirements

DRAFT

T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES [RCSA §22a-174-33(r)(2)]

The Permittee may engage in any action allowed by the Administrator in accordance with 40 CFR §§70.4(b)(12)(i) to (iii)(B), inclusive, and 40 CFR §§70.4(b)(14)(i) to (iv), inclusive, without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor permit modification or revision provided such action does not:

1. Constitute a modification under 40 CFR Part 60, 61 or 63;
2. Exceed emissions allowable under the subject permit;
3. Constitute an action which would subject the Permittee to any standard or other requirement pursuant to 40 CFR Parts 72 to 78, inclusive; or
4. Constitute a non-minor permit modification pursuant to RCSA §22a-174-2a(d)(4).

At least seven days before initiating an action specified in RCSA §22a-174-33(r)(2)(A), the Permittee shall notify the Administrator and the commissioner in writing of such intended action.

U. INFORMATION FOR NOTIFICATION [RCSA §22a-174-33(r)(2)(A)]

Written notification required under RCSA §22a-174-33(r)(2)(A) shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The Permittee shall thereafter maintain a copy of such notice with the Title V permit. The commissioner and the Permittee shall each attach a copy of such notice to their copy of the Title V permit.

V. TRANSFERS [RCSA §22a-174-2a(g)]

No person other than the Permittee shall act or refrain from acting under the authority of this Title V permit unless such permit has been transferred to another person in accordance with RCSA §22a-174-2a(g).

The proposed transferor and transferee of a permit shall submit to the commissioner a request for a permit transfer on a form provided by the commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS §22a-60.

W. REVOCATION [RCSA §22a-174-2a(h)]

The commissioner may revoke this Title V permit on his own initiative or on the request of the Permittee or any other person, in accordance with CGS §4-182(c), RCSA §22a-3a-5(d), and any other applicable law. Any such request shall be in writing and contain facts and reasons supporting the request. The Permittee requesting revocation of this Title V permit shall state the requested date of revocation and provide evidence satisfactory to the commissioner that the subject source is no longer a Title V source.

Pursuant to the Clean Air Act, the Administrator has the power to revoke this Title V permit. Pursuant to the Clean Air Act, the Administrator also has the power to reissue this Title V permit if the Administrator has determined that the commissioner failed to act in a timely manner on a permit renewal application.

Section VI: Title V Requirements

This Title V permit may be modified, revoked, reopened, reissued, or suspended by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(r), CGS §22a-174c, or RCSA §22a-174-33a-5(d).

DRAFT

X. REOPENING FOR CAUSE [RCSA §22a-174-33(s)]

This Title V permit may be reopened by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(s).

Y. CREDIBLE EVIDENCE

Notwithstanding any other provision of this Title V permit, for the purpose of determining compliance or establishing whether a Permittee has violated or is in violation of any permit condition, nothing in this Title V permit shall preclude the use, including the exclusive use, of any credible evidence or information.

Print for Compliance Certification or Enforcement

DRAFT

Click the button below to generate the appropriate checklist. Be aware that this macro does not work unless you have access to the DEEP D-Drive.

This macro takes anywhere from 2-5 minutes to run. Your computer will look like it is locked up but it is working. Unfortunately the new DEEP virtual computer system makes this process even slower. Please be patient.

Print Enforcement Checklist

Print Compliance Certification