AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY

TITLE V OPERATING PERMIT

Permit No.: 129-97-TV

Plant ID: 0082

Effective Date: 28 February 2002

Expiration Date: 28 February 2007

UTM Northing: 4230.7

UTM Easting: 602.6

SIC: 2821

NAICS: 325211

AFS: 00082

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

Noveon, Inc.
4200 Bells Lane
Louisville, Kentucky 40211

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Responsible Official: Roger K. LaCosse

Applicant for Permit: Noveon, Inc.

Title of Responsible Official: Facility Director

Date Application Received: 21 February 1997

Date Application Administratively Complete: 17 April 1997

Date Public Notice Given: 28 January 2001

Reviewing Engineer (68)

Jesse M Goldsmith
Air Pollution Control Officer

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Abbreviations and Acronyms

AC - Additional Condition
AFS - AIRS Facility Subsystem
AIRS - Aerometric Information Retrieval System
APCD - Air Pollution Control District
ASL - Adjusted Significant Level
atm - Atmosphere
BACT - Best Available Control Technology
Btu - British Thermal Unit
°C - Degrees Centigrade
CAAA - Clean Air Act Amendments (15 November 1990)
CEMS - Continuous Emission Monitoring System
cf - Cubic foot
DOE - District Only Enforceable
°F - Degrees Fahrenheit
FTO - Flameless Thermal Oxidizer
gal - Gallon
HAP - Hazardous Air Pollutant
Hg - Mercury
hr - hour
l - Liter
lbs - Pounds
m - Meter
MACT - Maximum Achievable Control Technology
mg - Milligram
mm - Millimeter
MM - Million
MOCS - Management of Change System
NAICS - North American Industry Classification System
NO_x - Nitrogen oxides
NSPS - New Source Performance Standards
NSR - New Source Review
PM - Particulate Matter
PM_{10} - Particulate matter less than 10 microns
PMP - Preventive Maintenance Plan
ppm - Parts per million
PSD - Prevention of Significant Deterioration
psia - Pounds per square inch absolute
RACT - Reasonably Available Control Technology
RVCM - Residual Vinyl Chloride Monomer
SIC - Standard Industrial Classification
SIP - State Implementation Plan
SO_2 - Sulfur dioxide
TAL - Threshold Ambient Limit
TAP - Toxic Air Pollutant

tpy - Tons per year
UTM - Universal Transverse Mercator
VCM - Vinyl Chloride Monomer
VOC - Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)

2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

   US EPA - Region IV
   Air Enforcement Branch
   Atlanta Federal Center
   61 Forsyth Street
   Atlanta, GA 30303-8960

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:

   a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.

   b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.

4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

i. An emergency occurred and that the owner or operator can identify the cause of the emergency.

ii. The permitted facility was at the time being properly operated.

iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)

7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.

8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

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

b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

a. Enter the premises to inspect any emissions-related activity or records required in this permit.

b. Have access to and copy records required by this permit.

c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.

d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.
(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner

or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)

16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.

17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.

18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.

19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.

20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.

21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)

22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.

23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

    a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.

    b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.

    c. Knowingly making any false statement in any permit application.

    d. Noncompliance with Regulation 1.07, section 4.2; or

    e. Noncompliance with KRS Chapter 77.

25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.

26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.

27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.

28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.

29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.

30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.

31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.

32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.

34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

    a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

    Air Pollution Control District of Jefferson County
    850 Barret Ave
    Louisville, KY 40204-1745

    b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

    US EPA - Region IV
    APTMD - 12th floor
    Atlanta Federal Center
    61 Forsyth Street
    Atlanta, GA 30303-3104

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	**Title**
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	**Title**
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for *Existing Affected Facilities*)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for *New Affected Facilities*)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	**Title**
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

U-RES Emission Unit Description: Resin - Chlorination of a resin slurry which is then dried to produce a chlorinated resin.

U-RES Applicable Regulations

Federally Enforceable Regulations		
Number	**Subject**	**Sections**
40 CFR 68	Chemical Accident Prevention Provisions.	Subparts A, B, and D through H
5.15	Chemical Accident Prevention Provisions	1
6.09	Standards of Performance for Existing Process Operations	1 through 3; and 5
7.08	Standards of Performance for New Process Operations	1 through 3

District Only Enforceable Regulations		
Number	**Subject**	**Sections**
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U-RES Emission Points								
ID ("E-RES-" Prefix)	**Description**	**Applicable Regulation(s)††**	**Pollutant/ Standard**	**Allowable Emission/ Equipment Standard**	**Compliance Monitoring†**	**Control Device**		**Stack ID ("S-RES-" Prefix)**
						ID ("C-RES-" Prefix)	**Type**	
TK-4N	Silo 4, TK-4N	7.08, sec 3.1.2	PM	24.4 lbs/hr	ONE, PMP	SED-4N	Fabric filter	SED-4N
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-6F	Silo 6, TK-6F	6.09, sec 3.2	PM	15.8 lbs/hr	ONE, PMP	SED-2F	Fabric filter	SED-2F
		6.09, sec 3.1	Opacity	< 20%	MON			

U-RES Emission Points

ID ("E-RES-" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device ID ("C-RES-" Prefix)	Control Device Type	Stack ID ("S-RES-" Prefix)
SED-1F	Process Collector SED-1F	7.08, sec 3.1.2	PM	5.38 lbs/hr (total) and < 20% (each) (SED-1F and TK-2F)	ONE	N/A	N/A	SED-1F
		7.08, sec 3.1.1	Opacity		MON			
TK-2F	Tank TK-2F	7.08, sec 3.1.2	PM		ONE, PMP	SED-2C	Fabric filter	SED-2C
		7.08, sec 3.1.1	Opacity		MON			
CLST-1	Chlorine Railcar Unloading Station, CLST-1	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
CLST-2	Chlorine Railcar Unloading Station, CLST-2	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
CLST-3	Chlorine Railcar Unloading Station, CLST-3	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
CLST-4	Chlorine Railcar Unloading Station, CLST-4	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
TK-14D	Tank TK-14D	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
TK-4	Tank TK-4	5.11, secs 1 and 6	TAP(s)	RACT	MOCS, PMP	SCRBR*	Scrubber	SCRBR*
TK-5	Tank TK-5	5.11, secs 1 and 6	TAP(s)	RACT	MOCS, PMP	SCRBR*	Scrubber	SCRBR*
TK-6	Tank TK-6	5.11, secs 1 and 6	TAP(s)	RACT	MOCS, PMP	SCRBR*	Scrubber	SCRBR*
SED-17C	Process Collector SED-17C	7.08, sec 3.1.2	PM	4.5 lbs/hr (total) and < 20% (each) (SED-17C and TK-15C)	ONE	N/A	N/A	SED-17C
		7.08, sec 3.1.1	Opacity		MON			
TK-15C	Silo 15, TK-15C	7.08, sec 3.1.2	PM		ONE, PMP	SED-15C	Fabric filter	SED-15C
		7.08, sec 3.1.1	Opacity		MON			
SED-5C	Process Collector SED-5C	7.08, sec 3.1.2	PM	1.2 lbs/hr (total) and < 20% (each) (SED-5C and TK-12C or TK-13C)	ONE	N/A	N/A	SED-5C
		7.08, sec 3.1.1	Opacity		MON			
TK-12C	Tank TK-12C	7.08, sec 3.1.2	PM		ONE	N/A	N/A	TK-12C
		7.08, sec 3.1.1	Opacity		MON			
TK-13C	Tank TK-13C	7.08, sec 3.1.2	PM		ONE	N/A	N/A	TK-13C
		7.08, sec 3.1.1	Opacity		MON			
B4FUG	Building 4 Fugitives	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RXCLMTR	Reactor Chlorine Meters	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR

U-RES Emission Points								
ID ("E-RES-" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-RES-" Prefix)
						ID ("C-RES-" Prefix)	Type	
RE-3D	Reactor RE-3D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RE-4D	Reactor RE-4D	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RE-5D	Reactor RE-5D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RE-6D	Reactor RE-6D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RE-7D	Reactor RE-7D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RE-8D	Reactor RE-8D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
TK-1E	Tank TK-1E	N/A	HAP †††	N/A	N/A	SCRBR or N/A	Scrubber	SCRBR or Fugitive
TK-2E	Tank TK-2E	N/A	HAP †††	N/A	N/A	SCRBR or N/A	Scrubber	SCRBR or Fugitive
TK-3E	Tank TK-3E	N/A	HAP †††	N/A	N/A	SCRBR or N/A	Scrubber	SCRBR or Fugitive
TK-1F	Tank TK-1F	N/A	HAP †††	N/A	N/A	N/A and SCRBR**	N/A and Scrubber	TK-1F and SCRBR**
SED-1J2	Process Collector SED-1J2	7.08, sec 3.1.2	PM	0.45 lbs/hr	ONE	N/A	N/A	BL-1J2
		7.08, sec 3.1.1	Opacity	< 20%	MON			
DR-1J	Dryer DR-1J	7.08, sec 3.1.2	PM	2.5 lbs/hr	ONE, PMP	SED-1J1, 2J1, and 1J4	Dual parallel cyclone and Wet scrubber	SED-1J4
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-16C	Process Collector SED-16C	7.08, sec 3.1.2	PM	2.0 lbs/hr	ONE	N/A	N/A	SED-16C
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-9C	Silo 9, TK-9C	6.09, sec 3.2	PM	15.8 lbs/hr	ONE, PMP	SED-9C	Fabric filter	SED-9C
		6.09, sec 3.1	Opacity	< 20%	MON			
TK-10C	Silo 10, TK-10C	6.09, sec 3.2	PM	15.8 lbs/hr	ONE, PMP	SED-10C	Fabric filter	SED-10C
		6.09, sec 3.1	Opacity	< 20%	MON			
SED-3C	Process Collector SED-3C	7.08, sec 3.1.2	PM	1.2 lbs/hr and < 20% (SED-3C and TK-2C or TK-7C)	ONE	N/A	N/A	SED-3C
		7.08, sec 3.1.1	Opacity		MON			
SED-4C	Process Collector SED-4C	7.08, sec 3.1.2	PM	1.2 lbs/hr and < 20% (SED-4C and TK-2C or TK-7C)	ONE	N/A	N/A	SED-4C
		7.08, sec 3.1.1	Opacity		MON			

U-RES Emission Points								
ID ("E-RES-" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-RES-" Prefix)
						ID ("C-RES-" Prefix)	Type	
TK-2C	Tank TK-2C	7.08, sec 3.1.2	PM	1.2 lbs/hr and < 20% (TK-2C and SED-3C or SED-4C)	ONE	N/A	N/A	TK-2C
		7.08, sec 3.1.1	Opacity		MON			
TK-7C	Tank TK-7C	7.08, sec 3.1.2	PM	1.2 lbs/hr and < 20% (TK-7C and SED-3C or SED-4C)	ONE	N/A	N/A	TK-7C
		7.08, sec 3.1.1	Opacity		MON			
RE-9D	Reactor RE-9D	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RE-10D	Reactor RE-10D	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RE-11D	Reactor RE-11D	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
RE-12D	Reactor RE-12D	5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP	SCRBR	Scrubber	SCRBR
TK-7E	Tank TK-7E	N/A	HAP †††	N/A	N/A	SCRBR or N/A	Scrubber or N/A	SCRBR or TK-7E
TK-8E	Tank TK-8E	N/A	HAP †††	N/A	N/A	SCRBR or N/A	Scrubber or N/A	SCRBR or TK-8E
TK-9E	Tank TK-9E	N/A	HAP †††	N/A	N/A	SCRBR or N/A	Scrubber	SCRBR or TK-8E
CL-2E	Stripper CL-2E (Condenser TK-11E optional)***	N/A	HAP †††	N/A	N/A	N/A	N/A	CL-2E
TK-10E	Tank TK-10E	N/A	HAP †††	N/A	N/A	SCRBR or N/A	Scrubber or N/A	SCRBR or TK-10E
SED-12J	Process Collector SED-12J	7.08, sec 3.1.2	PM	0.45 lbs/hr	ONE	N/A	N/A	BL-1J2
		7.08, sec 3.1.1	Opacity	< 20%	MON			
DR-2J	Dryer DR-2J	7.08, sec 3.1.2	PM	1.15 lbs/hr	ONE, PMP	SED-13J, 14J, and 15J	Dual parallel cyclone and Wet scrubber	SED-18J
		7.08, sec 3.1.1	Opacity	< 20%	MON			
BAGR-1J	Bagger BAGR-1J	7.08, sec 3.1.2	PM	4.12 lbs/hr	ONE, PMP	SED-8J	Fabric filter	SED-8J
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-1A	Silo 1A, TK-1A	6.09, sec 3.2	PM	4 lbs/hr (total) and < 20% (each) (TK-1A and TK-6A)	ONE, PMP	SED-3J3	Fabric filter	SED-3J3
		6.09, sec 3.1	Opacity		MON			
TK-6A	Silo 6A, TK-6A	6.09, sec 3.2	PM		ONE, PMP	SED-2J3	Fabric filter	SED-2J3
		6.09, sec 3.1	Opacity		MON			

U-RES Emission Points								
ID ("E-RES-" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-RES-" Prefix)
						ID ("C-RES-" Prefix)	Type	
TK-16J	Silo 16J, TK-16J	7.08, sec 3.1.2	PM	3.29 lbs/hr (total) and < 20% (each) (TK-16J and TK-17J)	ONE, PMP	SED-16J	Fabric filter	SED-16J
		7.08, sec 3.1.1	Opacity		MON			
TK-17J	Silo 17J, TK-17J	7.08, sec 3.1.2	PM		ONE, PMP	SED-17J	Fabric filter	SED-17J
		7.08, sec 3.1.1	Opacity		MON			
TK-1J	Silo 1 (OTT), TK-1J	7.08, sec 3.1.2	PM	3.2 lbs/hr	ONE, PMP	SED-9J	Fabric filter	SED-9J
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-2J	Silo 2 (OTT), TK-2J	7.08, sec 3.1.2	PM	3.2 lbs/hr	ONE, PMP	SED-19J	Fabric filter	SED-19J
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-2R	Silo 2A, TK-2R	6.09, sec 3.2	PM	4.5 lbs/hr (total) and < 20% (each) (TK-2R and TK-3R)	ONE, PMP	SED-2R	Fabric filter	SED-2R
		6.09, sec 3.1	Opacity		MON			
TK-3R	Silo 3A, TK-3R	6.09, sec 3.2	PM		ONE, PMP	SED-3R	Fabric filter	SED-3R
		6.09, sec 3.1	Opacity		MON			
TK-7J	Silo 7A, TK-7J	6.09, sec 3.2	PM	2.25 lbs/hr	ONE, PMP	SED-10J	Fabric filter	SED-10J
		6.09, sec 3.1	Opacity	< 20%	MON			
HPR-1J3	Hopper HPR-1J3	7.08, sec 3.1.2	PM	8.15 lbs/hr (total) and < 20% (each) (HPR-1J3, TK-8J, TK-9J, TK-13J, and TK-14J)	ONE, PMP	SED-1J	Fabric filter	SED-1J
		7.08, sec 3.1.1	Opacity		MON			
TK-8J	Silo 8A, TK-8J	6.09, sec 3.2	PM		ONE, PMP	SED-4J3	Fabric filter	SED-4J3
		6.09, sec 3.1	Opacity		MON			
TK-9J	Silo 9A, TK- 9J	6.09, sec 3.2	PM		ONE, PMP	SED-5J3	Fabric filter	SED-5J3
		6.09, sec 3.1	Opacity		MON			
TK-13J	Silo 13, TK-13J	6.09, sec 3.2	PM		ONE, PMP	SED-6J3	Fabric filter	SED-6J3
		6.09, sec 3.1	Opacity		MON			
TK-14J	Silo 14, TK-14J	6.09, sec 3.2	PM		ONE, PMP	SED-7J3	Fabric filter	SED-7J3
		6.09, sec 3.1	Opacity		MON			
SED-1W2	B-29 Central Vacuum System Process Collector	7.08, sec 3.1.2	PM	2.1 lbs/hr	ONE	N/A	N/A	SED-1W2
		7.08, sec 3.1.1	Opacity	< 20%	MON			

* Closed pressure vessel; however, fugitive header and storage tank vent are controlled by scrubber system, SCRBR.

** Tank vents to atmosphere (through stack); fugitive leaks are controlled by scrubber system, SCRBR.

*** Optional equipment to minimize the appearance of the steam discharge from Stripper CL-2E. Emissions are accounted for post-stripper, pre-condenser. Condenser is not a control device.

†Compliance Monitoring Reference Codes: **MOCS** - Management of Change System, See Additional Conditions; **MON** - Periodic monitoring required, See Additional Conditions; **ONE** - One-time demonstration that limit cannot be exceeded; **PMP** - Preventive Maintenance Program, See Additional Conditions and Appendix B.

†† Regulations 5.11 and 5.12 are District only enforceable.

††† Only hydrochloric acid, an unregulated HAP, is emitted in trace quantities from this Emission Point.

U-RES Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)

   a. PM: See U-RES Emission Points Table.

   b. Opacity: See U-RES Emission Points Table.

   c. TAPs: See U-RES Emission Points Table.

   d. Control devices: the owner or operator shall maintain and operate all required control devices as identified in the U-RES Emission Point Table.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

   a. PM: Where controls are required for compliance with the PM emission standard, as indicated in the U-RES Emission Points Table, a visible emissions survey shall be conducted as specified in Additional Condition 2.b.i and a Preventive Maintenance Program (PMP) shall be implemented, as prescribed in Appendix B.

      i. Perform or cause to be performed preventive maintenance on pollution control equipment according to the PMP; and

      ii. Maintain records of the PMP and preventive maintenance performed.

      iii. If non-compliance occurs, the PMP shall be modified to adequately address the deficiency.

      iv. Stack testing shall be performed on representative equipment once during the initial permit term at five locations approved by the District, each representing one of the five emission factors, to verify the control efficiencies and emission factors used in the one-time compliance demonstrations for PM. Said testing shall be conducted per the specifications of 40 CFR 60, Appendix A, Methods 1 through 5.

   b. Opacity:

      i. For each PM Emission Point subject to Regulation 6.09 (section 3.1) or 7.08 (section 3.1.1) and having a required control device, not cause or permit the discharge of emissions greater than or equal to 20% opacity:

         1) The owner or operator shall conduct a daily one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Point (stack) identified in the U-RES Emission Points Table. No more than four Emission Points shall be observed simultaneously.

         2) For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a

weekly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.

3) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.b.i.1.

ii. For each PM Emission Point subject to Regulation 6.09 (section 3.1) or 7.08 (section 3.1.1) and *not* having a required control device, not cause or permit the discharge of emissions greater than or equal to 20% opacity:

1) The owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Point (stack) identified in the U-RES Emission Points Table. No more than four Emission Points shall be observed simultaneously.

2) For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.

3) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.b.ii.1.

c. TAPs:

i. Comply with Regulation 5.11 as follows:

1) Maintain a MOCS, as approved by the District, to evaluate and document modifications, as defined in Regulation 5.12.

2) If a control device is required for compliance with Regulation 5.11, maintain a PMP as described in Additional Condition 2.c.iii, below.

3) Exempt from Regulation 5.11 any specific pollutant(s) governed by a MACT Standard that is or becomes applicable.

ii. Comply with Regulation 5.12 as follows:

1) Conduct a compliance or ASL determination for each Regulation 5.12 pollutant or emission source, and for each modification, as defined in Regulation 5.12.

2) Submit, if required, a BACT demonstration for each Regulation 5.12 TAP emission to the District.

3) Maintain a MOCS, as approved by the District, to evaluate and document modifications, as defined in Regulation 5.12.

4) If a control device is required for compliance with Regulation 5.12, maintain a PMP as described in Additional Condition 2.c.iii, below.

5) Exempt from Regulation 5.12 any specific pollutant(s) governed by a MACT Standard that is or becomes applicable.

iii. Implement a PMP for the control devices required for compliance with Regulation 5.11 or 5.12 as prescribed in Appendix B. The owner or operator shall:

1) Perform or cause to be performed preventive maintenance on control devices according to the PMP; and

2) Maintain records of the PMP and preventive maintenance performed.

3) If a non-compliance occurs, the PMP shall be modified to adequately address the deficiency.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM: See Additional Condition 2.a.

b. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; whether visible emissions were observed; and any corrective action taken. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

c. TAPs: The owner or operator shall maintain records as indicated in the MOCS, making these available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report semi-annually to the District the following:

   a. PM:

      i. Emission Unit ID number;

      ii. The beginning and ending date of the reporting period;

      iii. Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions (or a negative declaration if none); and

      iv. Reason for excess emissions whether process upset, control device malfunction, other known causes, or unknown causes.

   b. Opacity

      i. Emission Unit ID number and Stack ID number;

      ii. The beginning and ending date of the reporting period;

      iii. The date, time, and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

      iv. The date, time and results of each Method 9 or Method 22 conducted (or a negative declaration, if none); and

      v. Description of any corrective action taken pursuant to Additional Conditions 2.b.i.3 and 2.b.ii.3.

   c. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for the PMP:

      i. Emission Point ID number;

      ii. The beginning and ending date of the reporting period; and

      iii. A summary report of the preventive maintenance performed and any corrective actions taken.

5. **Raw Materials Use Flexibility:** Subject to the standards and requirements outlined in this section including the monitoring, record keeping, and reporting requirements, the owner or operator shall be able to use any raw materials containing VOCs, HAPs, TAPs, or PM in the U-RES Emission Unit. The flexibility allowed under this provision does not affect the owner or operator's obligation to comply with the New Source Review requirements found at Regulations 2.04 and 2.05, the Standards of Performance for Emitting Toxic Air Pollutants

found at Regulations 5.11 and 5.12, any applicable NESHAP standard, Title V Modifications, or any other requirement determined to be applicable to this Emission Unit.

U-RES Comments/Explanations:

Additional Condition 2.c is for demonstrating compliance with Regulations 5.11 and 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

U-CMP Emission Unit Description: Compounding - Compounding of resin into powders or pellets.

U-CMP Applicable Regulations

Federally Enforceable Regulations		
Number	**Subject**	**Sections**
7.08	Standards of Performance for New Process Operations	1 through 3
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1 through 5; 7 and 8
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	2.1

District Only Enforceable Regulations		
Number	**Subject**	**Sections**
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
SED-10R	Resin Unloading Process Collector SED-10R	7.08, sec 3.1.2	PM	5.5 lbs/hr	MON	N/A	N/A	SED-10R
		7.08, sec 3.1.1	Opacity	< 20%	MON			
B31WS	B-31 Weigh Station	7.08, sec 3.1.2	PM	0.01 lbs/hr	ONE, PMP	SED-3D	Fabric filter	SED-3D
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
B3WS	B-3 Weigh Station	7.08, sec 3.1.2	PM	0.01 lbs/hr	ONE, PMP	SED-4D	Fabric filter	SED-4D
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP			
TK-1S	Storage Tank TK-1S	7.12, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	Fugitive
TK-2S	Storage Tank TK-2S	7.12, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	Fugitive
SED-1D	B-31 Central Vacuum Cleaning System Process Cyclone Collector SED-1D	7.08, sec 3.1.2	PM	0.2 lbs/hr	ONE, PMP	SED-2D	Fabric filter	BL-1D and BL-2D
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP			
DB-1M-1	No. 1 Resin Day Bin DB-1M-1	7.08, sec 3.1.2	PM	1.5 lbs/hr	ONE, PMP	SED-1M-1	Fabric filter	SED-1M-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
DB-2M-1	No. 2 Resin Day Bin DB-2M-1	7.08, sec 3.1.2	PM	1.5 lbs/hr	ONE, PMP	SED-4M-1	Fabric filter	SED-4M-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
HPR-5M-1	Hopper HPR-5M-1	Included with MI-1M-1				SED-3M-1	Fabric filter	SED-3M-1
MI-1M-1	Mixer MI-1M-1	7.25, sec 2.1	VOC	See Comment 1	ONE	N/A	N/A	SED-3M-1 and Fugitive
		7.08, sec 3.1.2	PM	1.5 lbs/hr	ONE, PMP	SED-3M-1	Fabric filter	
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP			
SED-2M-1	Rework Hopper-Loader HPR-1/ SED-2M-1	7.08, sec 3.1.2	PM	0.3 lbs/hr	ONE	N/A	N/A	CM-1M-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
BS-1B-1	Blend Silo BS-1B-1	7.08, sec 3.1.2	PM	1.5 lbs/hr	ONE, PMP	SED-1B-1	Fabric filter	SED-1B-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
BS-2B-1	Blend Silo BS-2B-1	7.08, sec 3.1.2	PM	1.5 lbs/hr	ONE, PMP	SED-2B-1	Fabric filter	SED-2B-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
BS-3B-1	Blend Silo BS-3B-1	7.08, sec 3.1.2	PM	1.5 lbs/hr	ONE, PMP	SED-3B-1	Fabric filter	SED-3B-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device ID ("C-CMP-" Prefix)	Control Device Type	Stack ID ("S-CMP-"Prefix)
BS-4B-1	Blend Silo BS-4B-1	7.08, sec 3.1.2	PM	1.5 lbs/hr	ONE, PMP	SED-4B-1	Fabric filter	SED-4B-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
BS-5B-1	Blend Silo BS-5B-1	7.08, sec 3.1.2	PM	1.5 lbs/hr	ONE, PMP	SED-5B-1	Fabric filter	SED-5B-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
BS-6B-1	Blend Silo BS-6B-1	7.08, sec 3.1.2	PM	2.5 lbs/hr	ONE, PMP	SED-6B-1	Fabric filter	SED-6B-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
HPR-2P-1	Hopper HPR-2P-1	7.08, sec 3.1.2	PM	0.5 lbs/hr	ONE, PMP	SED-2P-1	Fabric filter	SED-2P-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
HPR-1P-1	Hopper HPR-1P-1	7.08, sec 3.1.2	PM	0.5 lbs/hr	ONE, PMP	SED-1P-1	Fabric filter	SED-1P-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
HPR-1L	Bulk Loading Hopper HPR-1L	7.08, sec 3.1.2	PM	0.5 lbs/hr	ONE, PMP	SED-1L-1	Fabric filter	SED-1L-1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
LS-1L-1	Railcar Loading Station LS-1L-1	Included with BS-2B-1				SED-2B-1	Fabric filter	SED-2B-1
LS-2L-1	Railcar Loading Station LS-2L-1	Included with BS-3B-1				SED-3B-1	Fabric filter	SED-3B-1
LS-3L-1	Railcar Loading Station LS-3L-1	Included with BS-4B-1				SED-4B-1	Fabric filter	SED-4B-1
LS-4L-1	Railcar Loading Station LS-4L-1	Included with BS-5B-1				SED-5B-1	Fabric filter	SED-5B-1
LS-5L-1	Railcar Loading Station LS-5L-1	Included with BS-6B-1				SED-6B-1	Fabric filter	SED-6B-1
DB-1M-2	No. 1 Resin Day Bin DB-1M-2	7.08, sec 3.1.2	PM	0.88 lbs/hr	ONE, PMP	SED-1M-2	Fabric filter	SED-1M-2
		7.08, sec 3.1.1	Opacity	< 20%	MON			
DB-2M-2	No. 2 Resin Day Bin DB-2M-2	7.08, sec 3.1.2	PM	0.88 lbs/hr	ONE, PMP	SED-2M-2	Fabric filter	SED-2M-2
		7.08, sec 3.1.1	Opacity	< 20%	MON			
MI-1M-2	Mixer MI-1M-2	7.25, sec 2.1	VOC	See Comment 1	ONE	N/A	N/A	SED-3M-2 and Fugitive
		7.08, sec 3.1.2	PM	0.5 lbs/hr	ONE, PMP	SED-3M-2	Fabric filter	
		7.08, sec 3.1.1	Opacity	< 20%	MON			
HPR-3M-2	Hopper HPR-3M-2	Included with MI-1M-2				SED-3M-2	Fabric filter	SED-3M-2
FE-14FM-2	Hopper/Feeder FE-14FM-2	Included with SED-1D				SED-2D	Fabric filter	BL-1D and BL-2D

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
CLR-1C-2	Cooler CLR-1C-2	7.08, sec 3.1.2	PM	0.5 lbs/hr	ONE, PMP	SED-3C-2	Fabric filter	SED-3C-2
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS, PMP			
HPR-1C-2	Hopper HPR-1C-2	Included with CLR-1C-2				SED-3C-2	Fabric filter	SED-3C-2
SED-1FE-2	Rework Hopper-Loader HPR-1/SED-1FE-2	7.08, sec 3.1.2	PM	0.25 lbs/hr	ONE	N/A	N/A	CM-1FE-2
		7.08, sec 3.1.1	Opacity	< 20%	MON			
EXT-3E-2	Extruder EXT-3E-2	5.12, secs 1 and 5	TAP(s)	TAL	MOCS	N/A	N/A	BL-1E-2
SED-5EC-2	Conveying Process Cyclone SED-5EC-2	7.08, sec 3.1.2	PM	0.25 lbs/hr	ONE	N/A	N/A	SED-5EC-2
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
EXT-2E-2	Extruder EXT-2E-2	5.12, secs 1 and 5	TAP(s)	TAL	MOCS	N/A	N/A	BL-1E-2
SED-2EC-2	Conveying Process Cyclone SED-2EC-2	7.08, sec 3.1.2	PM	0.25 lbs/hr	ONE	N/A	N/A	SED-2EC-2
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
EXT-1E-2	Extruder EXT-1E-2	5.12, secs 1 and 5	TAP(s)	TAL	MOCS	N/A	N/A	BL-1E-2
SED-1EC-2	Conveying Process Cyclone SED-1EC-2	7.08, sec 3.1.2	PM	0.25 lbs/hr	ONE	N/A	N/A	SED-1EC-2
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
CLR-2EC-2	Cooler CLR-2EC-2	7.08, sec 3.1.2	PM	0.25 lbs/hr	ONE, PMP	SED-4EC-2	Cyclone	SED-4EC-2
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
CLR-1EC-2	Cooler CLR-1EC-2	7.08, sec 3.1.2	PM	0.25 lbs/hr	ONE, PMP	SED-3EC-2	Cyclone	SED-3EC-2
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
SED-1L-2	Pellet Railcar Loading Process Cyclone SED-1L-2	7.08, sec 3.1.2	PM	0.25 lbs/hr	ONE	N/A	N/A	SED-1L-2
		7.08, sec 3.1.1	Opacity	< 20%	NONE			

†Compliance Monitoring Reference Codes: **MOCS** - Management of Change System, See Additional Conditions; **MON** - Parametric monitoring required, See Additional Conditions; **ONE** - One-time demonstration that limit cannot be exceeded; **PMP** - Preventive Maintenance Program, See Additional Conditions and Appendix B; **NONE** - No Compliance Monitoring is required.

†† Regulations 5.11 and 5.12 are District only enforceable.

U-CMP Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)

   a. PM: See U-CMP Emission Points Table.

   b. Opacity: See U-CMP Emission Points Table.

   c. TAPs: See U-CMP Emission Points Table.

   d. Control devices: the owner or operator shall maintain and operate all required control devices as identified in the U-CMP Emission Point Table.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

   a. PM:

      i. For PM Emission Point E-CMP-SED-10R, subject to Regulation 7.08 (section 3.1.2), monitor compliance with the allowable hourly PM emission rate by calculating and recording daily an average hourly emission rate using the following formula:

$$PM = A \times B \times (1 - C)$$

      Where:

      A = Material throughput (expressed in lbs/hr);
      B = Load factor (the amount of material the collector "sees"; expressed as a decimal); and
      C = Control efficiency (expressed as a decimal).

      ii. Where controls are required for compliance with the PM emission standard, as indicated in the U-CMP Emission Points Table, a visible emissions survey shall be conducted as specified in Additional Condition 2.b.i and a Preventive Maintenance Program (PMP) shall be implemented, as prescribed in Appendix B.

         1) Perform or cause to be performed preventive maintenance on pollution control equipment according to the PMP; and

         2) Maintain records of the PMP and preventive maintenance performed.

         3) If non-compliance occurs, the PMP shall be modified to adequately address the deficiency.

      iii. Stack testing shall be performed on representative equipment once during the initial permit term at five locations approved by the District, each representing one of the five emission factors, to verify the control efficiencies and emission factors used in

the one-time compliance demonstrations for PM. Said testing shall be conducted per the specifications of 40 CFR 60, Appendix A, Methods 1 through 5.

b. Opacity:

i. For each PM Emission Point subject to Regulation 7.08 (section 3.1.1) and having a required control device, not cause or permit the discharge of emissions greater than or equal to 20% opacity:

1) The owner or operator shall conduct a daily one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Point (stack) identified in the U-CMP Emission Points Table. No more than four Emission Points shall be observed simultaneously.

2) For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a weekly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.

3) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.b.i.1.

ii. For each PM Emission Point subject to Regulation 6.09 (section 3.1) or 7.08 (section 3.1.1) and *not* having a required control device, not cause or permit the discharge of emissions greater than or equal to 20% opacity:

1) The owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Point (stack) identified in the U-RES Emission Points Table. No more than four Emission Points shall be observed simultaneously.

2) For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.

3) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the

visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.b.ii.1.

c. TAPs:

i. Comply with Regulation 5.12 as follows:

1) Conduct a compliance or ASL determination for each Regulation 5.12 pollutant or emission source, and for each modification, as defined in Regulation 5.12.

2) Submit, if required, a BACT demonstration for each Regulation 5.12 TAP emission to the District.

3) Maintain a MOCS, as approved by the District, to evaluate and document modifications, as defined in Regulation 5.12.

4) If a control device is required for compliance with Regulation 5.12, maintain a PMP as described in Additional Condition 2.c.ii, below.

5) Exempt from Regulation 5.12 any specific pollutant(s) governed by a MACT Standard that is or becomes applicable.

ii. Implement a PMP for the control devices required for compliance with Regulation 5.12 as prescribed in Appendix B.

1) Perform or cause to be performed preventive maintenance on control devices according to the PMP; and

2) Maintain records of the PMP and preventive maintenance performed.

3) If a non-compliance occurs, the PMP shall be modified to adequately address the deficiency.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM: See Additional Condition 2.a. Additionally, for Emission Point E-CMP-SED-10R the owner or operator shall keep daily records of the following to support the calculations required in Additional Condition 2.a.i:

i. Amount of materials processed in tons (or pounds) per day; and

ii. Hours of operation.

b. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; whether visible emissions were observed; and any corrective action taken. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

c. TAPs: The owner or operator shall maintain records as indicated in the MOCS, making these available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report semi-annually to the District the following:

a. PM - Hourly Emission Limits:

i. Emission Unit ID number;

ii. The beginning and ending date of the reporting period;

iii. Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions (or a negative declaration if none); and

iv. Reason for excess emissions whether process upset, control device malfunction, other known causes, or unknown causes

b. Opacity

i. Emission Unit ID number and Stack ID number;

ii. The beginning and ending date of the reporting period;

iii. The date, time, and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

iv. The date, time and results of each Method 9 or Method 22 conducted (or a negative declaration, if none); and

v. Description of any corrective action taken pursuant to Additional Conditions 2.b.i.3 and 2.b.ii.3.

c. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for the PMP:

i. Emission Point ID number;

ii. The beginning and ending date of the reporting period; and

iii. A summary report of the preventive maintenance performed and any corrective actions taken.

5. **Raw Materials Use Flexibility:** Subject to the standards and requirements outlined in this section including the monitoring, record keeping, and reporting requirements, the owner or operator shall be able to use any raw materials containing VOCs, HAPs, TAPs, or PM in the U-CMP Emission Unit. The flexibility allowed under this provision does not affect the owner or operator's obligation to comply with the New Source Review requirements found at Regulation 2.04 and 2.05, the Standards of Performance for Emitting Toxic Air Pollutants found at Regulations 5.11 and 5.12, any applicable NESHAP standard, Title V Modifications, or any other requirement determined to be applicable to this Emission Unit.

U-CMP Comments/Explanations:

1. Noveon has demonstrated its potential, source-wide, VOC emissions are less than five tons per year for facilities (i.e., Emission Points) subject to Regulation 7.25 (section 2.1). Since this demonstration is based on uncontrolled VOC emissions, no monitoring, record keeping, or reporting are required.

2. District Only Enforceable Condition 2.c is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

3. Uncontrolled PM Emission Points handling *only* pellets (monitoring indicated as "NONE") are not required to monitor opacity.

U-LTX Emission Unit Description: Latex - Polymerization of various monomers, including vinyl chloride monomer (VCM), into product.

U-LTX Applicable Regulations

Federally Enforceable Regulations		
Number	**Subject**	**Sections**
40 CFR 61	Subpart A, General Provisions	61.01 through 61.19
	Subpart F, National Emission Standard for Vinyl Chloride	61.60, 61.61; and 61.64 through 61.71
	Subpart V, National Emission Standard for Equipment Leaks (Fugitive Emission Sources)	61.240 through 61.245
40 CFR 68	Chemical Accident Prevention Provisions	Subparts A, B; and D through H
5.15	Chemical Accident Prevention Provisions	1
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5; and 7
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1 through 5; 7 and 8
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	2.1

District Only Enforceable Regulations		
Number	**Subject**	**Sections**
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference (40 CFR 61 Subparts A, F, and V)	1.1, 1.6, 1.19; and 3 through 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
TFRU	Monomer Railcar Unloading	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	N/A	N/A	Fugitive
TK-301	Tank TK-301	5.11, secs 1 and 6	TAP(s)	ASL	MOCS	N/A	N/A	TK-301
TK-302	Tank TK-302	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-302
TK-303	Tank TK-303	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-303
TK-304	Tank TK-304	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-304
TK-305	Tank TK-305	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-305
TK-306	Tank TK-306	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-306
TK-307	Tank TK-307	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-307
TK-308	Tank TK-308	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-308
TK-309	Tank TK-309	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-309
TK-310	Tank TK-310	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-310
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS			
TK-311	Tank TK-311	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-311
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS			
TK-312	Tank TK-312	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-312
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS			
TK-313	Tank TK-313	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-313
SEB121TU	Truck Unloading Station (SE Corner B-121)	5.11, secs 1 and 6	TAP(s)	TAL	MOCS	N/A	N/A	Fugitive
PH1TK	No. 1 pH Scale Tank (pH 1)	5.12, secs 1 and 5	TAP(s)	TAL	MOCS	N/A	N/A	PH1TK
MON1TK	Monomer 1 Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	MON1TK
MON2TK	Monomer 2 Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	MON2TK
MON3TK	Monomer 3 Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	MON3TK
PLY-7*	Polymerizer PLY-7	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(c); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
PLY-19*	Polymerizer PLY-19	7.12, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	121VS and Fugitive
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS			
PLY-22*	Polymerizer PLY-22	7.12, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	121VS and Fugitive
		5.11, secs 1 and 6	TAP(s)	RACT	MOCS			
PLY-20*	Polymerizer PLY-20	7.12, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	121VS and Fugitive
		5.12, secs 1 and 5	TAP(s)	TAL	MOCS			
PLY-24*	Polymerizer PLY-24	7.12, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	121VS and Fugitive
		5.11, secs 1 and 6	TAP(s)	TAL	MOCS			
PLY-13*	Polymerizer PLY-13	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive
		5.11, secs 1 and 6	TAP(s)	TAL	MOCS			
PLY-15*	Polymerizer PLY-15	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive
		5.11, secs 1 and 6	TAP(s)	TAL	MOCS			
PLY-3*	Polymerizer PLY-3	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive and PLY-3
		5.12, secs 1 and 5	TAP(s)	TAL and BACT	MOCS			
PLY-9*	Polymerizer PLY-9	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive and PLY-9
		5.12, secs 1 and 5	TAP(s)	TAL and BACT	MOCS			
PLY-10*	Polymerizer PLY-10	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive and PLY-10
		5.12, secs 1 and 5	TAP(s)	TAL and BACT	MOCS			
PLY-11*	Polymerizer PLY-11	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive and PLY-11
		5.12, secs 1 and 5	TAP(s)	TAL and BACT	MOCS			
PLY-21*	Polymerizer PLY-21	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive and PLY-21
		5.11, secs 1 and 6	TAP(s)	TAL	MOCS			
PLY-23*	Polymerizer PLY-23	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive and PLY-23
		5.11, secs 1 and 6	TAP(s)	TAL	MOCS			
GLS-18TK1	GLS-18 Tank in Sope Room (No. 1 Tank is East Tank)	6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE	N/A	N/A	Fugitive
		5.11, secs 1 and 6	TAP(s)	TAL	MOCS			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
GLS-18TK2	GLS-18 Tank in Sope Room (No. 2 Tank is West Tank)	6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE	N/A	N/A	Fugitive
		5.11, secs 1 and 6	TAP(s)	TAL	MOCS			
TK-501	Tank TK-501	7.12, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	TK-501
PLY-17*	Polymerizer PLY-17	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	PLY-17/18
PLY-18*	Polymerizer PLY-18	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	PLY-17/18
TK-SOP-1	Tank TK-SOP-1	7.12, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	Fugitive
SCLTK1	No. 1 Scale Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	SCLTK1/2/3/4 /5/6
SCLTK2	No. 2 Scale Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	SCLTK1/2/3/4 /5/6
SCLTK3	No. 3 Scale Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	SCLTK1/2/3/4 /5/6
SCLTK4	No. 4 Scale Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	SCLTK1/2/3/4 /5/6
SCLTK5	No. 5 Scale Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	SCLTK1/2/3/4 /5/6
SCLTK6	No. 6 Scale Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	SCLTK1/2/3/4 /5/6
SCLTK7	No. 7 Scale Tank	6.13, sec 3.3	VOC	Submerged Fill	NONE	N/A	N/A	121VS
SCLTK8	No. 8 Scale Tank	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	SCLTK8
		6.13, sec 3.3	VOC	Submerged Fill	NONE			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
TK-100	TK-100 Misc. Monomer Feed Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or TK-100
		40 CFR 61.64(c); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
		7.25, sec 2.1	VOC	See Comment 2	ONE			
		5.12, secs 1 and 5	TAP(s)	BACT	MOCS			
MI-1D/2D/ 3D/4D/5D	Mixers MI-1D/2D/ 3D/4D/5D (5D is a common spare)	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(c); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
PLY-25	Polymerizer PLY-25	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-26	Polymerizer PLY-26	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
PLY-27	Polymerizer PLY-27	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-28	Polymerizer PLY-28	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-29	Polymerizer PLY-29	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
PLY-30	Polymerizer PLY-30	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-31	Polymerizer PLY-31	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-32	Polymerizer PLY-32	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
PLY-37	Polymerizer PLY-37	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-38	Polymerizer PLY-38	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-39	Polymerizer PLY-39	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
PLY-40	Polymerizer PLY-40	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-45	Polymerizer PLY-45	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-46	Polymerizer PLY-46	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
PLY-47	Polymerizer PLY-47	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
PLY-48	Polymerizer PLY-48	40 CFR 61.64(a)(1)	VCM	10 ppm (3-hr avg)	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**; or N/A	Recovery System, FTO, and Scrubber**; or N/A	TK-SCR-1** or 121VS
		40 CFR 61.64(a)(2) or 40 CFR 61.64(f)(1)(ii)	VCM	0.00002 lb VCM per lb product (dry solids basis); or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON			
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
		5.11, secs 1 and 6	TAP(s)	RACT or TAL and RACT	MOCS			
STR-6	STR-6 No. 6 Latex Product Stripper	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
FKOTK-6	No. 6 Stripper Foam Knock-Out Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
STR-7	STR-7 No. 7 Latex Product Stripper	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
FKOTK-7	No. 7 Stripper Foam Knock-Out Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
STR-8	STR-8 No. 8 Latex Product Stripper	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
FKOTK-8	No. 8 Stripper Foam Knock-Out Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
STR-9	STR-9 No. 9 Latex Product Stripper	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
FKOTK-9	No. 9 Stripper Foam Knock-Out Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
STR-10	STR-10 No. 10 Latex Product Stripper	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
FKOTK-10	No. 10 Stripper Foam Knock-Out Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(b); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
PLY-33	Plastic Autoclave PLY-33	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
PLY-34	Plastic Autoclave PLY-34	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
PLY-35	Plastic Autoclave PLY-35	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
PLY-36	Plastic Autoclave PLY-36	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
#5BRPTK	No. 5 Burp Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(c); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
#5FKOTK	No. 5 Burp Tank Foam Knock-Out Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.64(c); 61.65(b)(6)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
TK-13C	TK-13C Wastewater Accumulator Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.65(b)(9)(i)	VCM	10 ppm by weight	REG, MON			
		40 CFR 61.65(b)(9)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
PLY-5*	Polymerizer PLY-5	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	PLY-5
STR-2	No. 2 Wastewater Stripper	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.65(b)(9)(i)	VCM	10 ppm by weight	REG, MON			
		40 CFR 61.65(b)(9)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
FKOTK-2	No. 2 Wastewater Stripper Foam Knock-Out Tank	40 CFR 61.65(b)(6)(i)	VCM	Larger of 2% of equipment's vol. or 25 gals, at STP	REG, MON	RCVRY, TK-FTO-1, and TK-SCR-1**	Recovery System, FTO, and Scrubber**	TK-SCR-1**
		40 CFR 61.65(b)(9)(i)	VCM	10 ppm by weight	REG, MON			
		40 CFR 61.65(b)(9)(ii)	VCM	10 ppm (3-hr avg)	REG, MON			
18TK	No. 18 Tank	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
19TK	No. 19 Tank	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
20TK	No. 20 Tank	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
8TK	No. 8 Tank	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	8TK and Fugitive
		7.25, sec 2.1	VOC	See Comment 2	ONE			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
9TK	No. 9 Tank	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	9TK and Fugitive
		7.25, sec 2.1	VOC	See Comment 2	ONE			
10TK	Latex Storage Tank TK-10	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
11TK	Latex Storage Tank TK-11	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
12TK	Latex Storage Tank TK-12	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
13TK	Latex Storage Tank TK-13	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
14TK	Latex Storage Tank TK-14	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
15TK	Latex Storage Tank TK-15	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
SPBT	South Poly Blend Tank (SPBT)	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
NPBT	North Poly Blend Tank (NPBT)	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
21TK	B-125 Inside Latex Storage Tank #21	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
22TK	B-125 Inside Latex Storage Tank #22	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
23TK	B-125 Inside Latex Storage Tank #23	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
24TK	B-125 Inside Latex Storage Tank #24	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
TK-125	Latex Storage Tank TK-125	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive
		7.25, sec 2.1	VOC	See Comment 2	ONE			
BLKLDG	3 Latex Truck and 2 Railcar Loading Stations	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive and BLKLDG
		7.25, sec 2.1	VOC	See Comment 2	ONE			

U-LTX Emission Points								
ID ("E-LTX" Prefix)	Description	Applicable Regulation(s)††	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-LTX-" Prefix)
						ID ("C-LTX-" Prefix)	Type	
DRM-121	B-121 Latex Drumming Line	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive and DRM-121
		6.24, sec 3.3	Non-VCM VOC	450 lbs/hr and 3000 lbs/ day; See Comment 3	ONE			
DRM-116	B-116 Latex Drumming Line	40 CFR 61.64(e)(1)(ii) or 40 CFR 61.64(f)(1)(ii)	VCM	400 ppm daily weighted avg RVCM content; or 0.00042 lb VCM/lb product (dry solids basis)	REG, MON	N/A	N/A	Fugitive and DRM-116
		7.25, sec 2.1	VOC	See Comment 2	ONE			
TK-RED-2	Tank TK-RED-2	5.12, secs 1 and 5	TAP(s)	TAL	MOCS	N/A	N/A	Fugitive or Fugitive and 121VS

* None of the equipment with a designation of PLY-1 through 24 is used for polymerization purposes.

** When the VGA of Oxy Vinyls, LP (OxyVinyls), formerly The Geon Company, is used in lieu of the FTO (Alternative Operating Scenario), Control ID becomes C-LTX-RCVRY and C-LPA-VGA (OxyVinyls); and Stack ID becomes S-LPA-CL-1P (OxyVinyls).

†Compliance Monitoring Reference Codes: **MOCS** - Management of Change System, See Additional Conditions; **MON** - Parametric monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **ONE** - One-time demonstration that limit cannot be exceeded; **PMP** - Preventive Maintenance Program, See Additional Conditions and Appendix B; **REG** - Sufficient Compliance Monitoring in applicable regulation.

†† Regulations 5.11 and 5.12 are District only enforceable.

U-LTX Alternative Operating Scenario:

In lieu of the FTO, Noveon may use the Vent Gas Absorber System (C-LPA-VGA) of Oxy Vinyls, LP (OxyVinyls), as a secondary, and final, control for its Recovery System. When OxyVinyls' VGA is used, neither the FTO nor the Scrubber shall be used, and the only atmospheric discharge shall occur through OxyVinyls' S-LPA-CL-1P. See Additional Condition 8 and Appendix A.

U-LTX Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)

   a. VOC: See U-LTX Emission Points Table. Additionally, the standards for VCM leaks shall apply as prescribed in 40 CFR 61.242-1.

   b. TAPs: See U-LTX Emission Points Table.

   c. Control devices: the owner or operator shall maintain and operate all required control devices as identified in the U-LTX Emission Point Table.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

   a. VOC: See U-LTX Emission Points Table and Additional Conditions 7 and 8. Additionally, VCM monitoring shall be performed pursuant to 40 CFR 61.68 and 40 CFR 61.245.

   b. TAPs:

      i. Comply with Regulation 5.11 as follows:

         1) Maintain a MOCS, as approved by the District, to evaluate and document modifications, as defined in Regulation 5.12.

         2) If a control device is required for compliance with Regulation 5.11, maintain a PMP as described in Additional Condition 2.b.iii, below.

         3) Exempt from Regulation 5.11 any specific pollutant(s) governed by a MACT Standard that is or becomes applicable.

      ii. Comply with Regulation 5.12 as follows:

         1) Conduct a compliance or ASL determination for each Regulation 5.12 pollutant or emission source, and for each modification, as defined in Regulation 5.12.

         2) Submit, if required, a BACT demonstration for each Regulation 5.12 TAP emission to the District.

3) Maintain a MOCS, as approved by the District, to evaluate and document modifications, as defined in Regulation 5.12.

4) If a control device is required for compliance with Regulation 5.12, maintain a PMP as described in Additional Condition 2.b.iii, below.

5) Exempt from Regulation 5.12 any specific pollutant(s) governed by a MACT Standard that is or becomes applicable.

iii. Implement a PMP for the control devices required for compliance with Regulation 5.11 or 5.12 as prescribed in Appendix B. The owner or operator shall:

1) Perform or cause to be performed preventive maintenance on control devices according to the PMP; and

2) Maintain records of the PMP and preventive maintenance performed.

3) If a non-compliance occurs, the PMP shall be modified to adequately address the deficiency.

iv. Monitor the pH of the caustic scrubber (C-LTX-TK-SCR-1) effluent at least daily to confirm proper neutralization of hydrogen chloride/hydrochloric acid emissions from the FTO (C-LTX-TK-FTO-1). Records of this monitoring shall be maintained and be made available for review by the District upon request.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC: See U-LTX Emission Points Table and Additional Condition 8. Additionally, record keeping for VCM monitoring shall be performed pursuant to 40 CFR 61.71 and 40 CFR 61.246.

b. TAPs: The owner or operator shall maintain records as indicated in the MOCS, making these available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report semi-annually to the District the following:

a. VOC: See U-LTX Emission Points Table. Additionally, reporting for VCM monitoring shall be performed pursuant to 40 CFR 61.70 and 40 CFR 61.247.

b. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for the PMP:

i. Emission Point ID number;

ii. The beginning and ending date of the reporting period; and

iii. A summary report of the preventive maintenance performed and any corrective actions taken.

5. The owner or operator may, pursuant to an equivalency granted for 40 CFR 61.70 (c)(2)(i), composite individual batch samples only if the batches are the same grade latex resin; have approximately the same yield and total solids content; and have an expected residual vinyl chloride content of less than 250 ppm. Composite samples shall then be analyzed per EPA Test Method 107, Determination of Vinyl Chloride Content of Polyvinyl Chloride Resin, within 36 hours of taking the first sample. Additionally, the compositing procedure shall be compared with the reference procedure once per month. See Comment 1, below.

6. **Raw Materials Use Flexibility:** Subject to the standards and requirements outlined in this section including the monitoring, record keeping, and reporting requirements, the owner or operator shall be able to use any raw materials containing VOCs, HAPs, TAPs, or PM in the U-LTX Emission Unit. The flexibility allowed under this provision does not affect the owner or operator's obligation to comply with the New Source Review requirements found at Regulation 2.04 and 2.05, the Standards of Performance for Emitting Toxic Air Pollutants found at Regulations 5.11 and 5.12, any applicable NESHAP standard, Title V Modifications, or any other requirement determined to be applicable to this Emission Unit.

7. Pursuant to 40 CFR 61.64 and 61.65, operate a Recovery System, C-LTX-RCVRY, and an FTO, C-LTX-TK-FTO-1, to control vinyl chloride emissions as follows:

a. The FTO shall be controlled by the Scrubber, which shall be the only atmospheric discharge point (via stack S-LTX-TK-SCR-1).

b. The owner or operator shall demonstrate compliance with the 10 ppm emission standard (three-hour average) by:

i. Continuously monitoring the concentration of VCM in the exhaust stream; or

ii. Continuously monitoring the FTO's oxidation chamber temperature to confirm operation at the minimum temperature of 1713 °F at temperature probe TI312A3.

1) If probe TI312A3 malfunctions, then probe TI312A1 may be used until probe TI312A3 resumes proper functioning. While operating under this scenario, the minimum temperature of 1843 °F shall be maintained.

2) If probes TI312A3 and TI312A1 malfunction, then probe TY310 may be used until either the other probes resume proper functioning. While operating under this scenario, the minimum temperature of 1377 °F shall be maintained.

iii. When monitoring the concentration of VCM in the exhaust stream, periods of excess emissions shall be classified as any three-hour period during which the average concentration of VCM exceeds 10 ppm.

iv. When monitoring the FTO's oxidation chamber temperature, periods of excess emissions shall be classified as any three-hour period during which:

1) Pursuant to EPA's equivalency letter of 2 November 1998 and the requirements of 40 CFR 61.70(c)(1), the average oxidation chamber temperature is more than 50 degrees below the oxidation chamber temperature determined during the latest performance test when compliance was demonstrated, as specified in Additional Condition 7.b.ii (*where the temperatures already have been decremented by 50 degrees*); and

2) The average concentration of VCM exceeds 10 ppm.

See Comment 4, below.

8. Pursuant to Regulation 2.16, section 4.1.17.1, maintain a log indicating the date and time of each change in operation made under the above-mentioned Alternative Operating Scenario. These records shall be made available to the District upon request.

U-LTX Comments/Explanations:

1. Noveon (then BFGoodrich) proposed the alternate sampling procedure described in Additional Condition 5, for the Louisville plant only, in a 27 June 1983 letter and modified in a 21 November 1983 letter allowing batch samples to be composited. This procedure was approved 1 December 1983 as an equivalency for 40 CFR 61.70(c)(2)(i).

2. Noveon has demonstrated that its potential, source-wide, VOC emissions are less than five tons per year for facilities (i.e., Emission Points) subject to Regulation 7.25 (section 2.1). Since this demonstration is based on uncontrolled VOC emissions, no monitoring, record keeping, or reporting are required.

3. Noveon has demonstrated that its potential VOC emissions are less than 450 pounds per hour and 3000 pounds per day for each facility (i.e., Emission Point) subject to Regulation 6.24 (section 3.3). Since this demonstration is based on uncontrolled VOC emissions, no monitoring, record keeping, or reporting are required.

4. VCM Control System

   a. On 22 July 1998, the District petitioned EPA, on behalf of Noveon (then BFGoodrich), for an Equivalency to monitor the FTO's oxidation chamber temperature in lieu of the required vinyl chloride monitoring system. This equivalency was granted in EPA's letter of 2 November 1998. The alternate monitoring procedure described in Additional Condition 7.b.ii results from this equivalency.

   b. Note this system is considered BACT for Regulations 5.12 and 7.25.

5. Additional Condition 2.b is for demonstrating compliance with Regulations 5.11 and 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

6. "Polymerizers" PLY-1, PLY-6, and PLY-8, used as closed-pressure, raw material storage vessels, are currently used to store 5.15-regulated substances; otherwise, these would be considered Insignificant Activities.

7. Noveon uses no Class I or II solvents at Emission Points regulated under Regulation 6.24.

U-GAS Emission Unit Description: Unleaded Gasoline Storage

U-GAS Applicable Regulations

Federally Enforceable Regulation		
Number	**Subject**	**Sections**
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)	1 through 6

District Only Enforceable Regulation		
Number	**Subject**	**Sections**
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U-GAS Emission Point								
ID ("E-GAS-" Prefix)	Description	Applicable Regulation(s)	Pollutant	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID ("S-GAS-" Prefix)
						ID ("C-GAS-" Prefix)	Type	
GSTK	Above-Ground Unleaded Gasoline Storage Tank (APCDJC Station Identification: 1957)	7.15, sec 3	VOC	Stage I vapor recovery system	NONE	N/A	N/A	GSTK

†Compliance Monitoring Reference Code: NONE - No Compliance Monitoring is required.

U-GAS Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)

   Storage tanks shall be equipped with the following:

   a. A submerged fill pipe;

   b. If the gasoline storage tank is equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank;

   c. Vent line restrictions on the affected facility; and

   d. Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. The cross-sectional area of the vapor return hose and any other vapor return passages in the circuit connecting the vapor space in the service station tank to that of the truck tank must be at least 50% of the liquid fill hose cross-sectional area for each tank and free of flow restrictions to achieve acceptable recovery. The vapor balance equipment must be maintained according to the manufacturer's specifications. The type, size and design of the vapor balance system are subject to the approval of the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

   There are no monitoring requirements.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

   There are no record keeping requirements.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

   There are no reporting requirements.

Solvent Metal Cleaning Equipment

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Number	**Subject**	**Sections**
7.18	Standards of Performance for New Solvent Metal Cleaning Equipment	1 through 4

Solvent Metal Cleaning Equipment Emission Points								
ID	**Description**	**Applicable Regulation(s)**	**Pollutant/ Standard**	**Allowable Emission/ Equipment Standard**	**Compliance Monitoring†**	**Control Device**		**Stack ID**
						ID	**Type**	
N/A	Various Solvent Metal Cleaning Equipment	7.18, sec 4	VOC	See AC 1.	MON	N/A	N/A	N/A

†Compliance Monitoring Reference Code: **MON** - Periodic monitoring required, See ACs.

Additional Conditions:

1. **Standards** (Regulation 7.18, Sections 3 and 4)

   a. The cleaner shall be equipped with a cover. If the VOC volatility is greater than 15 mm Hg measured at 100°F or if the VOC is agitated or heated, then the cover shall be designed so that it can be easily operated with one hand.

   b. The cleaner shall be equipped with a drainage facility such that VOC that drains off parts removed from the cleaner will return to the cleaner. If the VOC volatility is greater than 32 mm Hg measured at 100°F, then the drainage facility shall be internal so that parts are enclosed under the cover while draining. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system.

   c. A permanent, conspicuous label summarizing the operating requirements in Additional Condition 1.f shall be installed on or near the cleaner.

   d. If used, the VOC spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing.

   e. If the VOC volatility is greater than 32 mm Hg measured at 100°F or if the VOC is heated above 120°F, then one of the following control devices shall be used:

      i. Freeboard that gives a freeboard ratio equal to or greater than 0.7;

      ii. Water cover (VOC must be insoluble in and heavier than water); or

      iii. Other systems of equivalent control, such as a refrigerated chiller or carbon absorption.

   f. Operating Requirements

      i. Do not dispose of waste VOC or transfer it to another party in a manner that more than 20% by weight of the waste VOC can evaporate into the atmosphere. Store waste VOC only in covered containers.

      ii. Close degreaser cover whenever not handling a part in the cleaner.

      iii. Drain cleaned parts until dripping ceases (15 seconds is usually necessary).

      iv. Do not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F).

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

   VOC: The owner or operator shall conduct weekly inspections to verify ongoing compliance with the control and operational requirements specified in Additional Condition 1.

3. **Record Keeping**

VOC: The owner or operator shall maintain records that include the following for each purchase:

a. The name and address of the solvent supplier;

b. The date of the purchase;

c. The type of the solvent; and

d. The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

e. Additionally, the owner or operator shall maintain records of the results of the inspection requirement specified in Additional Condition 2.

4. **Reporting**

VOC: There are no reporting requirements.

Source-wide TAP Emissions Limits		
TAP	Regulation	Allowable Emissions (lbs/hr)
Acetone	5.11/5.12	2376.50
Acrylic acid	5.11/5.12	40.05
Ammonia	5.11/5.12	24.03
Chlorine	5.12	6.85
Hydrogen chloride	5.11/5.12	3.76
Methacrylic acid	5.12	93.46
Styrene	5.11	287.05
Vinyl acetate	5.11	40.05

The above emission limits are for Regulations 5.11 and 5.12 only and are District only enforceable. Additional emission limits for the same pollutants are imposed by other regulations, and the more stringent limit applies.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-permit Documents

Document	Date
MOCS, Version 1	7 June 2000
RMP	28 February 2001*

Alternative Operating Scenario

Description	Emission Unit
Oxy Vinyls, LP provides alternate VCM control	U-LTX

Source-wide HAP Speciation			
HAP	CAS No.	HAP	CAS No.
Acrylamide	79-06-1	Formaldehyde	50-00-0
Acrylic Acid	79-10-7	Hydrochloric Acid	7647-01-0
Acrylonitrile	107-13-1	Methyl Methacrylate	80-62-6
Antimony Compounds	N/A	Polycyclic Organic Matter (POM)	N/A
Cadmium Compounds	N/A	Styrene	100-42-5
Chlorine	7782-50-5	Vinyl Acetate	108-05-4
Chromium Compounds	N/A	Vinyl Chloride	75-01-4
Ethyl Acrylate	140-88-5	Vinylidene Chloride	75-35-4
Bis(2-Ethylhexly)phthalate (DEHP)	117-81-7		

Note: HAPs cited in the table above are those currently known to be used at this plant.

*Note, the original RMP for this source was submitted by The BFGoodrich Company on 18 June 1999, meeting the required RMP submittal date of 21 June 1999.

Insignificant Activities		
Description	**Quantity**	**Basis**
Emergency Relief Vents or Ventilating Systems not otherwise regulated.	Various	Regulation 2.02, section 2.3.10
Indoor PM Collectors Venting Indoors	Various	Regulation 2.02, section 2.3.21
Internal Combustion Engines, Fixed or Mobile	Various	Regulation 2.02, section 2.2
Brazing, Soldering, or Welding Equipment	Various	Regulation 2.02, section 2.3.4
Woodworking, Except Conveying, Hogging, or Burning Wood/Sawdust	Various	Regulation 2.02, section 2.3.5
Lab Ventilating and Exhausting Systems, Non-radioactive Materials	Various	Regulation 2.02, section 2.3.11
Blast Cleaning, Abrasives in Water	Various	Regulation 2.02, section 2.3.13
Soil or Groundwater Contamination Remediation, Passive or Total Removal	As needed	Regulation 2.02, section 2.3.20
Emergency Generators and associated propane tanks	Various	USEPA White Papers. (Uses propane as fuel.)
Miscellaneous Drums and Totes	Various	No known underlying applicable requirement.
Miscellaneous Tote Bin Station(s)	Various	No known regulated emissions to the atmosphere.
Pressurized Storage Vessels (VOC and non-regulated/non-VOC materials)	Various	Regulation 2.02, section 2.3.26 (VOC) or no known underlying applicable requirement (non-regulated/non-VOC)
Settling Pits	Various	No known underlying applicable requirement.
Cooling Towers	Various	No known underlying applicable requirement. No Cr-based additives.
VOC Storage Vessels ≤ 250 gallons	Various	Regulation 2.02, section 2.3.24
Bulk Unloading and Loading	Various	No known regulated emissions to the atmosphere. (For loading/unloading involving particulate materials, negligible PM may be discharged to the ground when loading/unloading hoses are disconnected.)
Miscellaneous PM Containers/Equipment	Various	No known regulated emissions to the atmosphere.

1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

2. Activities identified in Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.

   a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a < 20% opacity limit for facilities not otherwise regulated.

   b. No periodic monitoring shall be required for facilities designated as insignificant activities.

Appendix A: Alternative Operating Scenario/Reciprocal Control Procedure

Procedure: This procedure deals with venting from OxyVinyls (LPA) to the FTO as well as from Noveon to the OxyVinyls VGA system. Please note that the Protocol Steps are exactly the same regardless of the flow.

Protocol Steps

Approval: The Ventor (the one venting) must contact the Recipient (the one receiving the vent gas) for approval before opening any valves to vent. Once approval is granted through the supervisors, the venting may occur.

Communication: The Ventor must contact the Recipient every shift (8 hours) to confirm the venting activity is occurring.

Closure: Once the venting has stopped, the Ventor must confirm with the Recipient that all flow has ceased and the valving has been secured for non-venting activity.

When venting from OxyVinyls to the FTO:

See the Supervisor for approval prior to opening up the vent line from LPA to the FTO. Monitor the system to insure that there aren't any upsets to the system. Contact the Process Engineer if there are any questions or problems.

When Venting from Noveon to the OxyVinyls VGA system:

See the Supervisor for approval prior to opening up the vent line from Latex to the VGA system. Contact the Process Engineer if there are any questions or problems. Inspect the line(s) to the LPA to insure that there are no breaks in the line. Monitor the system to insure that there aren't any upsets to the system.

Appendix B: Preventive Maintenance Program

Procedure for Title V Control Device Preventative Maintenance

1. A preventative maintenance work order is set up in the computerized work order system for each applicable Title V control device in the plant. This includes most bag houses, cyclones, and wet scrubbers.

2. All new installations of applicable control devices will be entered into the computerized work order system with the appropriate inspection frequency.

   a. The manufacturing department will determine the inspection frequency based on good engineering practices.

   b. The person responsible for the new installation is also responsible for ensuring the appropriate party enters the new equipment into the Preventative Maintenance Program.

3. The preventative maintenance work orders are generated at the beginning of each month. The equipment is tagged for inspection and then scheduled for a shutdown. It is the responsibility of the production maintenance coordinator to ensure each inspection is completed.

4. Equipment and inspection frequencies are listed in the table, below.

5. For each applicable bag house, the following items will be performed during each inspection:

   a. The integrity of the unit will be visually inspected for excessive wear or damage.

   b. The filter media will be visually inspected for excessive wear or damage. They will be replaced as necessary.

   c. The cages will be inspected for damage and replaced as necessary.

   d. The unit's pulse air will be inspected. This includes inspecting and replacing the solenoids and diaphragms as necessary.

6. For each applicable cyclone, visually inspect the vessel integrity.

7. For each applicable wet scrubber, the following items will be performed during each inspection:

   a. Visual inspection of the vessel integrity.

   b. Inspect the pumps and repair as necessary.

   c. Inspect spray ring and nozzles, cleaning as necessary.

8. For the chlorine scrubber, the following items will be performed during the inspection:

   a. Quarterly: Visual inspection of scrubber recirculation pump. This includes checking the oil pressure, flush piping, seals, coupling guard condition, and base and overall pump integrity.

   b. Semi-annually:

      i) Inspection item in 8.a., above, plus;

      ii) Visual inspection of the condenser, knock out bottle, and the venturis. This includes checking the overall condition of the tank for any wear or corrosion, as well as checking the condition of the flanges, bolts, insulation, paint, and base support.

   c. Three-Year Turnaround:

      i) Inspection items 8.b., above, plus;

      ii) Calibration check of the hi-level indicators in each caustic storage tank.

      iii) Calibration check of the level indicator and temperature transmitter in the 50% caustic storage tank.

      iv) Inspect and repair as necessary air operators on the eductor VSPs and control valves.

      v) Calibration check of the eductor flow meters.

      vi) Inspect and repair as necessary the reactor and scrubber emergency vent VSPs.

      vii) Outside inspection contractor to complete tank wall thickness inspection.

Computerized Record Keeping

The completion date for the inspection of each control device will be recorded electronically. Specific details of each inspection will be noted only by exception or unusual finding. Any unusual inspection findings will be documented and addressed on a case-by-case basis.

Noveon Preventive Maintenance Program (PMP)				
Equipment Number (Title V Info.)	**Description**	**Task Name**	**Frequency**	**Source**
Compounding Area (U-CMP, unless otherwise noted)				
48-SED-3C-2	Cooler 1C-2 Dust Collector	Insp. Dust Collector	QTR	CLR-1C-2 HPR-1C-2
48-SED-3EC-2	Pellet Cooler 1EC-2 Cyclone	Insp. Cycl.	QTR	CLR-1EC-2
48-SED-4EC-2	Pellet Cooler 2EC-2 Cyclone	Insp. Cycl.	QTR	CLR-2EC-2
48-SED-1M-2	No. 1 Resin Day Bin Dust Collector	Insp. Dust Collector	AN	DB-1M-2
48-SED-2M-2	No. 2 Resin Day Bin Dust Collector	Insp. Dust Collector	AN	DB-2M-2
48-SED-3M-2	Mixer 1M-2 Dust Collector	Insp. Dust Collector	QTR	MI-1M-2 HPR-3M-2
48-SED-2R(U-RES)	Silo 2A Dust Collector	Insp. Dust Collector	2 YR	TK-2R
48-SED-3R(U-RES)	Silo 3A Dust Collector	Insp. Dust Collector	2 YR	TK-3R
49-SED-1B-1	Blend Silo 1B Dust Collector	Insp. Dust Collector	AN	BS-1B-1
49-SED-2B-1	Blend Silo 2B Dust Collector	Insp. Dust Collector	AN	BS-2B-1 LS-1L-1
49-SED-3B-1	Blend Silo 3B Dust Collector	Insp. Dust Collector	AN	BS-3B-1 LS-2L-1
49-SED-4B-1	Blend Silo 4B Dust Collector	Insp. Dust Collector	AN	BS-4B-1 LS-3L-1
49-SED-5B-1	Blend Silo 5B Dust Collector	Insp. Dust Collector	AN	BS-5B-1 LS-4L-1
49-SED-6B-1	Blend Silo 6B Dust Collector	Insp. Dust Collector	AN	BS-6B-1 LS-5L-1
49-SED-2D	B-31 Central Vacuum Cleaning System Collector	Insp. Dust Collector	AN	SED-1D FE-14FM-2
49-SED-1L-1	Bulk Loading Hopper Dust Collector	Insp. Dust Collector	2 YR	HPR-1L
49-SED-1M-1	No. 1 Resin Day Bin Dust Collector	Insp. Dust Collector	AN	DB-1M-1
49-SED-3M-1	Mixer 1M-1 Dust Collector	Insp. Dust Collector	QTR	MI-1M-1 HPR-5M-1

QTR - Quarterly
SA - Semi-annually
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2 YR - Every second year
3 YR - Every third year

Noveon Preventive Maintenance Program (PMP)				
Equipment Number (Title V Info.)	**Description**	**Task Name**	**Frequency**	**Source**
49-SED-4M-1	No. 2 Resin Day Bin Dust Collector	Insp. Dust Collector	AN	DB-2M-1
49-SED-1P-1	Hopper 1P-1 Dust Collector	Insp. Dust Collector	AN	HPR-1P-1
49-SED-2P-1	Hopper 2P-1 Dust Collector	Insp. Dust Collector	AN	HPR-2P-1
48-SED-3D	B-31 Weigh Station Collector	Insp. Dust Collector	2 YR	B-31WS
49-SED-4D	B-3 Weigh Station Collector	Insp. Dust Collector	2 YR	B-3WS
Resin Area (U-RES)				
63-C2-SED-2 (SED-2C)	Dump Station Dust Collector	Insp. Dust Collector	AN	TK-2F
63-C2-SED-9 (SED-9C)	Silo Dust Collector	Insp. Dust Collector	2 YR	TK-9C
63-C2-SED-10 (SED-10C)	Silo Dust Collector	Insp. Dust Collector	2 YR	TK-10C
63-C8-SED-15(SED-15C)	Silo Dust Collector	Insp. Dust Collector	2 YR	TK-15C
63-F1-SED-2(SED-2F)	Soda Ash Silo Dust Collector	Insp. Dust Collector	AN	TK-6F
63-J1-SED-1(SED-1J1)	Dryer Separator - A-line	Insp. Cycl.	QTR	DR-1J
63-J1-SED-2(SED-2J1)	Dryer Separator - A-line	Insp. Cycl.	QTR	DR-1J
63-J3-SED-1(SED-1J)	B-31 Hopper Dust Collector	Insp. Dust Collector	2 YR	HPR-1J3
63-J3-SED-8(SED-8J)	Bagger Dust Collector	Insp. Dust Collector	2 YR	BAGR-1J
63-J3-SED-2(SED-2J3)	Silo Dust Collector	Insp. Dust Collector	AN	TK-6A
63-J3-SED-3(SED-3J3)	Silo Dust Collector	Insp. Dust Collector	AN	TK-1A
63-J3-SED-4(SED-4J3)	Silo Dust Collector	Insp. Dust Collector	AN	TK-8J
63-J3-SED-5(SED-5J3)	Silo Dust Collector	Insp. Dust Collector	AN	TK-9J

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Noveon Preventive Maintenance Program (PMP)				
Equipment Number (Title V Info.)	**Description**	**Task Name**	**Frequency**	**Source**
63-J3-SED-6(SED-6J3)	Silo Dust Collector	Insp. Dust Collector	AN	TK-13J
63-J3-SED-7(SED-7J3)	Silo Dust Collector	Insp. Dust Collector	AN	TK-14J
63-J4-SED-1(SED-1J4)	Dryer Wet Scrubber - A-line	Insp. Wet Scrubber	QTR	DR-1J
63-J11-SED-13(SED-13J)	Dryer Separator - B-line	Insp. Cycl.	QTR	DR-2J
63-J11-SED-14(SED-14J)	Dryer Separator - B-line	Insp. Cycl.	QTR	DR-2J
63-J12-SED-15(SED-15J)	Dryer Wet Scrubber - B-line	Insp. Wet Scrubber	QTR	DR-2J
63-J13-SED-16(SED-16J)	Day Silo Dust Collector	Insp. Dust Collector	AN	TK-16J
63-J13-SED-17(SED-17J)	Day Silo Dust Collector	Insp. Dust Collector	AN	TK-17J
SED-9J	No. 1 Over-the-Track Silo Dust Collector	Insp. Dust Collector	2 YR	TK-1J
SED-19J	No. 2 Over-the-Track Silo Dust Collector	Insp. Dust Collector	2 YR	TK-2J
63-N-SED-4(SED-4N)	Silo Dust Collector	Insp. Dust Collector	AN	TK-4N
63-D19-SCRUBBER-1 (SCRBR)	Chlorine Scrubber	Insp. Pump Insp. Tank PSM Ck. PSM Insp	QTR SA 3 YR 3 YR	Various
SED-10J	Silo Dust Collector	Insp. Dust Collector	AN	TK-7J

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