

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
11 September 2013

Title V Statement of Basis

Company: Zeon Chemicals L.P.

Plant Location: 4100 Bells Lane, Louisville, Kentucky 40211

Date Application Received: 29 June 2006 **Date Admin Complete:** 28 August 2006

Date of Draft Permit: 20 July 2013 **Date of Proposed Permit:** 20 July 2013

District Engineer: Stewart McCollam **Permit No:** 151-97-TV (R3)

Plant ID: 0283 **SIC Code:** 3639 **NAICS:** 325212 **AFS:** 00283

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}).

Application Type/Permit Activity:

Initial Issuance

Permit Revision

Administrative

Minor

Significant

Permit Renewal

Compliance Summary:

Compliance certification signed

Source is out of compliance

Compliance schedule included

Source is operating in compliance

I. Source Information**1. Product/Process Description:**

The source manufactures Synthetic Rubber Latex, Resins, and Pellets. Products consist of Nitrile Butadiene Rubber (NBR), Styrene Acrylonitrile Resin (SAN), and Polyacrylate Elastomers. (ACM)

2. Process Description:

Source operates several production lines within Emission Unit U-ZN consisting of:

(A) *Elastomer product process unit (EPPU)* used to process raw materials and to manufacture an elastomer product. This collection of equipment includes unit operations; recovery operations equipment; process vents; storage vessels, as determined in §63.480(g); equipment that is identified in §63.149; and the equipment that is subject to the equipment leak provisions as specified in §63.502.

(B) *Thermoplastic product process unit (TPPU)* used to process raw materials and to manufacture a thermoplastic product as its primary product. This collection of equipment includes unit operations; recovery operations equipment, process vents; equipment identified in §63.149; storage vessels, as determined in §63.1310(g); and the equipment that is subject to the equipment leak provisions as specified in §63.1331.

(C) *Chemical manufacturing process unit (CMPU)* consisting of equipment assembled and connected by pipes or ducts to process raw materials and to manufacture an intended product. CMPU includes reactors and their associated product separators and recovery devices; distillation units and their associated distillate receivers and recovery devices; associated unit operations; associated recovery devices; and any feed, intermediate and product storage vessels, product transfer racks, and connected ducts and piping. A chemical manufacturing process unit includes pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and control devices or systems.

(D) *Miscellaneous organic chemical manufacturing process unit (MCPU)* which collectively functions to produce a product or isolated intermediate that are materials described in §63.2435(b). The MCPU includes reaction, recovery, separation, purification, or other activity, operation, manufacture, or treatment which are used to produce a product or isolated intermediate.

(F) The following table outlines what HAP-containing raw material is predominantly associated with each MACT standard applicable to Emission Points listed in Emission Unit U-ZN.

MACT Standard	HAP-Containing Raw Material Monomer(s) Predominantly Associated with MACT Standard for MACT Assignment Purposes
40 CFR Part 63 Subpart U	Acrylonitrile and 1,3-Butadiene
40 CFR Part 63 Subpart JJJ	Styrene
40 CFR Part 63 Subpart FFFF	Ethyl Acrylate

3. Site Determination:

There are no other facilities that are contiguous or adjacent and under common control.

4. Emission Unit Summary:

Emission Unit	Equipment Description
U-ZN	Manufactures synthetic rubber latex, resins, and pellets utilizing various unit operations including blending/mixing, reacting, recovery, and drying of synthetic rubber products.

5. Permit Revisions

Revision No.	Issue Date	Public Notice Date	Type	Attachment No. / Page No.	Description
N/A	4/5/01	12/10/00	Initial	Entire Permit	Initial Permit Issuance
R1	03/15/02	N/A	Admin	U-ZN	Administrative changes made in response to Zeon's official request for Administrative changes dated January 14, 2001; and other company letters dated December 21, 2001 and March 7, 2002.

Revision No.	Issue Date	Public Notice Date	Type	Attachment No. / Page No.	Description
R2	11/12/02	N/A	Admin	U-ZN	The conditions from 40 CFR Part 63 Subparts U and JJJ were added to the permit instead of being referenced
R3	09/11/13	07/20/13	Renewal	Entire Permit	Scheduled Permit Renewal; Change of Responsible Official; Incorporation of Construction Permits – Equipment and Insignificant Activities updated

6. Fugitive Sources:

Fugitive emissions of VOCs and HAPs from Emission Points subject to 40 CFR Part 63 Subpart H *National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks*.

7. Plantwide Emission Summary:

Pollutant	Actual Emissions (TPY) 2011 Data	Major Source Status (based on PTE)
CO	1.14	No
NO _x	1.36	No
SO ₂	0.01	No
PM	2.25	No
PM ₁₀	0.55	No
VOC	17.49	Yes
GHG (CO _{2e})	N/A	No

Pollutant	Actual Emissions (TPY) 2011 Data	Major Source Status (based on PTE)
Single HAP > 1 TPY		
1,3 Butadiene	0.51	Yes
Acrylonitrile	2.44	Yes
Ethyl Acrylate	5.11	Yes
Styrene	0.50	Yes
Total HAPs	8.564	Yes

8. Applicable Requirements:

PSD NSPS SIP MACT
 NSR NESHAPS District-Origin Other

9. MACT Requirements:

40 CFR Part 63 Subpart H National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks

40 CFR Part 63 Subpart U National Emission Standards for Hazardous Air Pollutants: Group I Polymers and Resins

40 CFR Part 63 Subpart JJJ National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins

40 CFR Part 63 Subpart EEEE National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)

40 CFR Part 63 Subpart FFFF National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing

40 CFR Part 63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

10. Referenced Federal Regulations in Permit:

40 CFR Part 63 Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
40 CFR Part 63 Subpart U	National Emission Standards for Hazardous Air Pollutants: Group I Polymers and Resins
40 CFR Part 63 Subpart JJJ	National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins
40 CFR Part 63 Subpart EEEE	National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)
40 CFR Part 63 Subpart FFFF	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
40 CFR Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

II. Regulatory Analysis**1. Acid Rain Requirements:**

The source is not subject to the Acid Rain Program.

2. Stratospheric Ozone Protection Requirements:

Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

3. Prevention of Accidental Releases 112(r):

The source does manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount. The required Risk Management Plan was submitted on June 08, 2009.

4. 40 CFR Part 64 Applicability Determination:

Source is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*.

5. Basis of Regulation Applicability**a. Plant-wide**

Zeon is a major source for Single HAP and Total HAPs. Regulation 2.16 - *Title V Operating Permits* establishes requirements for major sources.

b. STAR Program:

- i. Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. Zeon submitted their Category 1 and Category 2 TAC Environmental Acceptability Demonstration to the District on December 29, 2006, May 15, 2009 and additional updated information August 20, 2010.
- ii. Based on Tier 4 air dispersion modeling using AERMOD, the carcinogenic risk, R_c , for each Category 1 and Category 2 TAC emissions from a single P/PE are below 1.0 for non-industrial property and below 10.0 for industrial property with the fuel oil usage limits and utilizing the monomer recovery system (control device) for all front-end batch process vents. The carcinogenic risk for all Category 1 and Category 2 TACs for all processes are below 7.5 for non-industrial property and below 75.0 for industrial property.

The Industrial/Roadway cumulative risk for New or Modified Sources was 16.1, which is below the EA goal of 38. The Non-Industrial/Non-roadway(Residential) cumulative risk for new or modified sources is 2.44 which is below the EA goal of 3.8. The source has demonstrated environmental acceptability for TAC emissions for all new and modified P/PE.

Since the maximum off-site Risk meets the more stringent non-industrial R_c of less than 1.0 for individual process equipment and less than 7.5 for the plant-wide cumulative risk, the source has demonstrated compliance with the EA Goals for each TAC.

iii. STAR Risk Analyses Results:

TAC	Rc (All P/PE) (Residential / Non-Industrial)	HQ (All P/PE) (Residential / Non-Industrial)	Rc (All P/PE) Industrial/ Roadway	HQ (All P/PE) Industrial/ Roadway
1,3 Butadiene	1.39	0.02	23.26	0.24
Acrylonitrile	4.04	0.03	18.46	0.07
Ethyl Acrylate	N/A	0.48	N/A	2.44
Butyl Acrylate	N/A	0.07	N/A	0.11
Styrene	0.01	0.00	0.05	0.00
Diesel Particulate	0.72	0.0005	4.2	0.003
Total	6.16	0.60	45.97	2.89

- iv. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or thermal oxidizer, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas.

c. Applicable Regulations

Regulation	Title	Type
1.05	Compliance with Emission Standards and Maintenance Requirements	SIP
2.16	Title V Operating Permits	SIP
5.00	Standards for Toxic Air Contaminants and Hazardous air Pollutants, Definitions	Local
5.01	General Provisions	Local
5.02	Adoption and Incorporation by Reference of National Emissions Standards for Hazardous Air Pollutants	Local
5.14	Hazardous Air Pollutants and Source Categories	Local
5.15	Chemical Accident Prevention Provisions	Local
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	Local
5.21	Environmental Acceptability for Toxic Air Contaminants	Local
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	Local
5.23	Categories of Toxic Air Contaminants	Local
6.18	Solvent Metal Cleaning Equipment	SIP

Regulation	Title	Type
6.24	Standard of Performance for Existing Sources Using Organic Materials	SIP
6.43	Volatile Organic Compound Emission Reduction Requirements	SIP
7.02	Adoption of Federal New Source Performance Standards	SIP
7.08	Standards of Performance for New Process Operations	SIP
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	SIP
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	SIP
40 CFR 60 Subpart A	General Provisions	Federal
40 CFR Part 63 Subpart A	General Provisions	Federal
40 CFR Part 63 Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	Federal
40 CFR Part 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	Federal
40 CFR Part 63 Subpart JJJ	National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins	Federal
40 CFR Part 63 Subpart EEEE	National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)	Federal
40 CFR Part 63 Subpart FFFF	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing	Federal
40 CFR Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Federal
40 CFR 68	Chemical Accident Prevention Provisions	Federal
40 CFR 82	Protection of Stratospheric Ozone	Federal

d. Basis for Applicability

Regulation	Basis for Applicability
1.05	All sources emitting VOCs in quantities equal to or greater than 100 tons per year and all Control Technique Guidance (CTG) sources emitting VOCs in quantities of 25 tons or more per year or some lesser applicability amount as defined in the specific CTG regulation shall maintain daily records and calculations that demonstrate daily compliance with the VOC emission standards defined in the applicable portions of Regulation 6 or 7.

Regulation	Basis for Applicability
2.16	Title V source
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.15	Chemical Accident Prevention Provisions
5.21	Establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants.
6.18	Applies to each cold cleaners, open top vapor degreasers, and conveyorized degreasers that use volatile organic compounds (VOCs) to remove soluble impurities from metal surfaces.
6.24	Any affected facility using any organic materials which was in being prior to June 13, 1979.
6.43	This regulation applies to each stationary source identified in this regulation. Zeon is identified by regulation.
7.02	Adoption of Federal New Source Performance Standards
7.08	This regulation applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.
7.12	This regulation applies to each affected facility which means each storage vessel for volatile organic compounds that commences construction or modification on or after April 19, 1972, and has a storage capacity greater than 250 gallons.
7.25	Affected facility constructed after June 13, 1979 for VOC. The core winders use an adhesive which contains VOC, therefore is subject to Regulation 7.25.
40 CFR 60 Subpart A	General Provisions
40 CFR Part 63 Subpart A	These standards regulate specific categories of stationary sources that emit (or have the potential to emit) one or more hazardous air pollutants.
40 CFR Part 63 Subpart H	Applies to facilities with Organic Hazardous Air Pollutants for Equipment Leaks
40 CFR Part 63 Subpart U	Applies to facilities with one or more elastomer product process units (EPPU) and associated equipment
40 CFR Part 63 Subpart JJJ	Applies to facilities with one or more thermoplastic product process units (TPPU) and associated equipment
40 CFR Part 63 Subpart EEEE	This subpart establishes national emission limitations, operating limits, and work practice standards for organic hazardous air pollutants (HAP) emitted from organic liquids distribution (OLD) (non-gasoline) operations at major sources of HAP emissions.
40 CFR Part 63 Subpart FFFF	Source subject to subpart if you own or operate miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source of hazardous air pollutants (HAP) emissions as defined in section 112(a) of the Clean Air Act (CAA).
40 CFR Part 63 Subpart ZZZZ	Applies to facilities with Stationary Reciprocating Internal Combustion Engines
40 CFR 68	Chemical Accident Prevention Provisions
40 CFR 82	Protection of Stratospheric Ozone

e. **Emission Unit U-ZN -**

i. Equipment:

Emission Point ID	Emission Point Description	Applicable Regulations
E-TKF-OLD	OLD MACT Transfer Racks	40 CFR Part 63 SUBPART EEEE
E-TKF-100RCU	Monomer Railcar Unloading	6.24
		6.43 section 20
E-TKF-100TU	Monomer Truck Unloading	6.24
		6.43 section 20
E-TKF-TK-101	Storage Tank TK-101	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-102	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-103	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-104	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-105	Storage Tank	5.21
		6.13
		6.43 section 20
		40 CFR Part 63 SUBPART JJJJ
E-TKF-TK-106	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-TKF-TK-107	Storage Tank	5.21
		6.13
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF

Emission Point ID	Emission Point Description	Applicable Regulations
E-TKF-TK-108	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-TKF-TK-109	Storage Tank	6.43 section 20
		7.12
		40 CFR Part 63 SUBPART FFFF
E-TKF-400U	Bulk Material Unloading	6.24
		6.43 section 20
E-TKF-TK-401	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-402	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-403	Storage Tank	6.43 section 20
		7.12
		40 CFR Part 63 SUBPART U
E-TKF-TK-404	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-405	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-406	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-407	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-408	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-TKF-TK-409	Storage Tank	6.43 section 20
		7.12
		40 CFR Part 63 SUBPART U
E-TKF-TK-410	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-TKF-TK-411	Storage Tank	6.43 section 20
		7.12
		40 CFR Part 63 SUBPART U
E-TKF-TK-412	Storage Tank	6.43 section 20
		7.12
		40 CFR Part 63 SUBPART U
E-PLY-PAMU	Monomer Unloading	6.43 section 20
		7.25 section 3.2
E-PLY-TK-307N	Storage Tank	5.21
		6.43 section 20
		7.12
		40 CFR Part 63 SUBPART U
E-PLY-TK-304	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-TK-305	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-TK-306	Storage Tank	6.13
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-TK-150	Storage Tank	6.43 section 20
		7.12
		40 CFR Part 63 SUBPART EEEE

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-TK-152	Storage Tank	6.43 section 20
		7.12
		40 CFR Part 63 SUBPART EEEEE
E-PLY-SPT-1	No. 1 Soap Tank	6.24
		6.43 section 20
E-PLY-SPT-2	No. 2 Soap Tank	6.24
		6.43 section 20
E-PLY-SPT-3	No.3 Soap Tank	6.24
		6.43 section 20
E-PLY-SPT-4	No. 4 Soap Tank	6.24
		6.43 section 20
E-PLY-SPT-5	No. 5 Soap Tank	6.24
		6.43 section 20
E-PLY-SPT-6	No. 6 Soap Tank	6.24
		6.43 section 20
E-PLY-SPT-7	No. 7 Soap Tank	6.24
		6.43 section 20
E-PLY-SPT-8	No. 8 Soap Tank	6.24
		6.43 section 20
E-PLY-TK-14G	Tank TK-14G	6.43 section 20
		7.25
E-PLY-TK-15G	Tank TK-15G	6.43 section 20
		7.25
E-PLY-TK-16G	Tank TK-16G	6.43 section 20
		7.25
E-PLY-TK-26	Tank TK-26	6.24
		6.43 section 20
E-PLY-MTK-101	Tank TK-101	6.24
		6.43 section 20
E-PLY-MTK-102	Tank TK-102	6.24
		6.43 section 20
E-PLY-TK-113	Tank TK-113	6.24
		6.43 section 20

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-PLY-1	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-2	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-3	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-4	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-5	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-6	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-7	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-8	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-PLY-9	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-10	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-11	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-12	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-13	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-14	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-15	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-16	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-PLY-17	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-18	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-19	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-20	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-21	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-22	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-23	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-24	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-PLY-25	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-26	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-27	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-28	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-29	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-30	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-31	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART JJJ
E-PLY-PLY-32	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-PLY-33	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-34	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-35	Polymerizer	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-PLY-36	Polymerizer	
		5.21
		6.24
		6.43 section 20 40 CFR Part 63 SUBPART U
E-PLY-BDTTK-1	Blowdown Tank BDTTK-1	
		5.21
		6.24
		6.43 section 20 40 CFR Part 63 SUBPART U
E-PLY-BDTTK-2	Blowdown Tank BDTTK-2	
		5.21
		6.24
		6.43 section 20 40 CFR Part 63 SUBPART U
E-PLY-BDTTK-3	Blowdown Tank BDTTK-3	
		5.21
		6.24
		6.43 section 20 40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-BDTTK-4	Blowdown Tank BDTTK-4	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-5	Blowdown Tank BDTTK-5	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-6	Blowdown Tank BDTTK-6	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-7	Blowdown Tank BDTTK-7	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-10	Blowdown Tank BDTTK-10	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-11	Blowdown Tank BDTTK-11	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-12	Blowdown Tank BDTTK-12	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-14	Blowdown Tank BDTTK-14	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-BDTTK-15	Blowdown Tank BDTTK-15	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-16	Blowdown Tank BDTTK-16	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-17	Blowdown Tank BDTTK-17	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BDTTK-18	Blowdown Tank BDTTK-18	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-TK-103C	Tank TK-103C	6.43 section 20
		7.25
		40 CFR Part 63 SUBPART FFFF
E-PLY-TK-101	Pre-Mix Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-TK-102	Pre-Mix Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-PLY-37	Polymerizer	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART FFFF

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-PLY-38	Polymerizer	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART FFFF
E-PLY-CN-101/2/VP	2 Barometric Condensers/ Separators (CN-101 & CN-102) and Vacuum Pump	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-BLTTK-13	Blend Tank	6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-BLTTK-14	Blend Tank	6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-BLTTK-15	Blend Tank	6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-BLTTK-16	Blend Tank	6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-BLTTK-17	Blend Tank	6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-BLTTK-18	Blend Tank	6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
E-PLY-BLTTK-19	Blend Tank	6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-BLTTK-20	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-21	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-22	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-23	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-24	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-25	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-26	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-27	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-BLTTK-28	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-29	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-30	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-31	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-32	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-33	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-34	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-35	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-BLTTK-36	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-37	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-38	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-BLTTK-39	Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-NBLT	North Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-SBLT	South Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PLY-S/WTK-HL-65	Tank S/WTK-HL-65	6.24
		6.43 section 20
E-PLU-MUTK-HL-191A	Tank MUTK-HL-191A	6.24
		6.43 section 20
E-PLY-S/WTK-HL-191B	Tank S/WTK-HL-191B	6.43 section 20
		7.25
E-PLY-MRSSTK	Monomer Recovery System (MRS) Solvent Tank	6.43 section 20
		7.12

Emission Point ID	Emission Point Description	Applicable Regulations
E-PLY-STAR	STAR Program PLY Fugitive Emissions	5.21
E-PCO-TK-4	East Coagulation & Wash Tank TK-4	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PCO-TK-5	West Coagulation & Wash Tank TK-4	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PCO-TK-7	East Settling Tank TK-7	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PCO-TK-8	West Settling Tank TK-8	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PCO-TK-9	Feed Tank TK-9	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-PCO-CN-1	Process Condenser	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-SDR-1BLT	No. 1 Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-SDR-2BLT	No. 2 Blend Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART JJJ
E-SDR-EBLT	East Blend Tank EBLT	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART JJJ
E-SDR-WBLT	West Blend Tank WBLT	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART JJJ
E-SDR-1SD	No.1 Spray Dryer	5.21
		6.09
		6.09
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-SDR-1SDHPR-1	No.1 Spray Dryer Product Hopper HPR-1	6.09
		6.09
E-SDR-1SDSCR-5	No. 1 Spray Dryer Packaging Station	7.08
		7.08
E-SDR-1SDHPR-4	No.1 Spray Dryer Packaging Hopper HPR-4	7.08
		7.08
E-SDR-1SDPKG	No. 1 Spray Dryer Packaging Station	7.08
		7.08
E-SDR-2SD	No.2 Spray Dryer	5.21
		6.09
		6.09
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
		40 CFR Part 63 SUBPART JJJ

Emission Point ID	Emission Point Description	Applicable Regulations
E-SDR-2SDCYC	No.2 Spray Dryer Process Cyclone Separator	See applicable regulation(s) and standards for E-SDR-2SD (Included with E-SDR-2SD)
E-SDR-2SDHPR-1	No. 2 Spray Dryer Packaging Feed Hopper HPR-1	7.08
E-SDR-2SDRP	No. 2 Spray Dryer Regular Packaging Station	See applicable regulation(s) and standards for E-SDR-2SD (Regulation 6.09 only) (Included with E-SDR-2SD)
E-SDR-2SDSEP-1	No. 2 Spray Dryer Bulk Packaging Process Separator SEP-1	7.08
E-SDR-2SDBPE	No.2 Spray Dryer Bulk Packaging Station (East)	See Applicable Regulation(s) and Standards for E-SDR-2SDSEP-1 (Included with E-SDR-2SDSEP-1)
E-SDR-2SDBPW	No.2 Spray Dryer Bulk Packaging Station (West)	See Applicable Regulation(s) and Standards for E-SDR-2SDSEP-1 (Included with E-SDR-2SDSEP-1)
E-DRY-CAGTK-106	Tank CAGTK-106	6.43 section 20
E-DRY-CAGTK-103	Tank CAGTK-103	7.25
E-DRY-FTK-202	Latex Feed Tank	6.43 section 20
E-DRY-FTK-203	Latex Feed Tank	40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-DRY-FTK-204	Latex Feed Tank	6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-DRY-FTK-205	Coagulation Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART U
E-DRY-NTK-15H	Coagulation Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U
E-DRY-NSCR-1	Screen SCR-1	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U
E-DRY-NTK-16H	Serum Tank TK-16H	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U
E-DRY-NTK-17H	Leach Tank TK-17H	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-DRY-NSCR-2	Screen SCR-2	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U
E-DRY-NTK-18H	Wash Water Tank	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U
E-DRY-NPRS-1	De-Watering Machine PRS-1	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U
E-DRY-NGR-1H	Wet Grinder GR-1H	5.21
		6.24
		6.43 section 20
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U
E-DRY-NDR	Dryer	5.21
		6.24
		6.43 section 20
		7.08
		7.08
		40 CFR Part 63 SUBPART FFFF
		40 CFR Part 63 SUBPART U
E-DRY-NCC	Crumb Cooler	7.08
		7.08
E-DRY-NFE-2	Dusting AgentProcess Filter	7.08
E-DRY-NCP	Crumb Packaging	7.08

Emission Point ID	Emission Point Description	Applicable Regulations
E-DRY-PSTK-301	Coagulation Tank	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSSCR-301A	Screen SCR-301A	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSTK-306	Serum Tank TK-306	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSTK-302	Hold-Up(Wash) Tank TK-302	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSSCR-302A	Screen SCR-302A	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSTK-303A	Extraction Tank TK-303A	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSSCR-302B	Screen SCR-302B	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSTK-303B	Washing Tank	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U

Emission Point ID	Emission Point Description	Applicable Regulations
E-DRY-PSSCR-303	Screen SCR-303	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSTK-304	Recycle Water Tank TK-304	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSSCR-304	Screen SCR-304	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSPRS-300	De-Watering Machine PRS-300	5.21
		6.43 section 20
		7.25
		40 CFR Part 63 SUBPART U
E-DRY-PSDR	Dryer	5.21
		6.43 section 20
		7.08
		7.08
		7.25
		40 CFR Part 63 SUBPART U
E-PEL-SEP-1	Crumb Conveying Process Cyclone	7.08
		7.08
E-PEL-PEL-1	Pelletizer PEL-1	6.43 section 20
E-PEL-TK-2	Pelletizer Water Recirculation Tank	6.43 section 20
		7.25
E-PEL-SEP-2	Process Pellet Separator/Dryer	6.43 section 20
		7.08
		7.08
		7.25
		5.21

Emission Point ID	Emission Point Description	Applicable Regulations
E-PEL-CV-2	Dryer/Cooler CV-2	7.08
		7.08
E-PEL-SEP-3	Semi-Bulk Packaging Process Cyclone	7.08
		7.08
E-PEL-SEP-4	Box Packaging Process Cyclone	7.08
		7.08
E-MSD-LDAR	Leak Detection and Repair (LDAR) Components	40 CFR Part 63 SUBPART U, JJJ, and FFFF
E-MSD-PRTWSH	Maintenance Parts Washers	6.18
E-MSD-EMGEN001	Emergency Diesel Generator & Internal 785-gal Diesel Fuel Tank	5.21
		7.08
		40 CFR Part 63 SUBPART ZZZZ

ii. Standards/Operationg Limits

(1) VOC

(a) Regulation 6.13

This regulation applies to each storage vessel for volatile organic compounds that was in being or had a construction permit issued by the District before September 1, 1976, was not subject to Regulation 7.12, and that has a storage capacity greater than 250 gallons. Any source that is ever subject to this regulation will always be subject to it unless the source changes its process to one not covered by this regulation.

(b) Regulation 6.18

This regulation applies to cold cleaners, open top vapor degreasers, and conveyORIZED degreasers that use volatile organic compounds (VOCs) to remove soluble impurities from metal surfaces. The owner or operator of an affected facility shall install, maintain, and operate the control equipment and observe at all times the operating and material requirements that apply to the type of solvent metal cleaning equipment as specified in Sections 4, 5, and 6.

(c) Regulation 6.24

This regulation applies to any affected facility using any organic materials which was in being or had a construction permit issued by the District prior to the effective date of this regulation except when a specific regulation exists for the source.

The owner or operator subject to this regulation shall discharge into the atmosphere more than 15 pounds of organic materials in any one day, or more than three pounds in any one hour, from any existing affected facility in which any Class I solvent is used unless said discharge has been reduced by at least 85% by weight.

(d) Regulation 6.43

Each stationary source identified in this regulation shall comply with the emission, equipment, and operational requirements shown for that stationary source.

All stationary sources identified in this regulation shall maintain records and demonstrate compliance with the requirements according to the provisions of this regulation and Regulation 1.05 *Compliance with Emission Standards and Maintenance Requirements* regardless of the stationary source size categories in Regulation 1.05.

Specific requirements in this regulation do not invalidate the applicability of the requirements of Regulation 1.05 except those that are redundant and clearly addressed in Regulation 6.43, in which case the requirements of Regulation 6.43 shall take precedence.

(e) Regulation 7.12

This regulation applies to each affected facility which means each storage vessel for volatile organic compounds that commences construction or modification on or after April 19, 1972, and has a storage capacity greater than 250 gallons. Any source that is ever subject to this regulation will always be subject to it unless the source changes its process to one not covered by this regulation.

(f) Regulation 7.25

Regulation 7.25, section 3 establishes VOC standards for the affected facilities not elsewhere regulated in Regulation 7 as to emissions of VOCs and which commenced after the effective date of this regulation. Sources previously under Regulation 7.24 are subject to this regulation.

The source is required to utilize best available control technology (BACT) and has specific equipment VOC emissions standards based on source submitted BACT analyses.

For emission points which have not had a BACT analysis performed, the source has a plantwide allowable limit of 5 TPY VOC.

(2) PM

(a) Regulation 6.09

This regulation applies to each process operation that is the affected facility not otherwise regulated by any other portion of Regulation 6 and that was in existence or had a construction permit issued by the District on or before September 1, 1976

No owner or operator subject to this regulation shall cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is in excess of the quantity specified in Table 1 of Regulation 6.09.

(b) Regulation 7.08

This regulation applies to each process operation that is the affected facility not otherwise regulated

by other regulations of Regulation 7 and that commenced construction after September 1, 1976.

No owner or operator shall cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gases that may contain particulate matter that is in excess of the quantity in Table 1 of Regulation 7.08.

(3) Opacity

(a) Regulation 6.09

Regulation 6.09, section 3.1.1 establishes an opacity standard of less than 20%.

(b) Regulation 7.08

Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

(4) TAC

(a) Regulations 5.00, 5.01, 5.21, and 5.23

Pursuant to Regulations 5.00, 5.01, 5.21 and 5.23 TAC emissions shall not exceed environmentally acceptable levels whether specifically established by modeling or derived from default de minimis levels provided by the District.

(5) NO_x

(a) Regulation 7.08

In accordance with Regulation 7.08, section 4.1, no owner or operator shall cause to be discharged into the atmosphere from any affected facility or from any air pollution control equipment installed on any affected facility any NO fumes in excess of 300 ppm by volume expressed as NO₂.

The District has determined that diesel engine

generator sets used solely for emergency or backup service are not subject to Regulation 7.08, Section 4

(6) Unit Operation

(a) Regulation 1.09

No person shall permit or cause the emission of air pollutants which exceed the requirements of the District regulations or which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

(b) Regulation 2.03

Permits issued shall be subject to the terms and conditions set forth and embodied in the permit as the District may deem necessary to insure compliance with its standards. Such terms and conditions may include maintenance and availability of records relating to operations which may cause or contribute to air pollution including periodic sampling of the affected facilities.

Limits established in Permit 183-07-C where incorporated in to TV permit.

(7) Regulated Substance

(a) Regulation 5.15

Owner or operator shall operator shall comply with the Risk Management Plan for the handling of acrylonitrile; ammonia (anhydrous); and 1,3-butadiene, submitted to EPA on June 8, 2009.

iii. Monitoring and Record Keeping

(1) VOC

(a) Regulation 6.13.

Regulation 6.13 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2

establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term.

(b) Regulation 6.18

Regulation 6.18 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

(c) Regulation 6.24

Regulation 6.24 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term.

(d) Regulation 6.43

Regulation 6.43 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term.

(e) Regulation 7.12

Regulation 7.12 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

(f) Regulation 7.25

Regulation 7.25 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term.

(2) PM

(a) Regulation 6.09

Regulation 6.09 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

(b) Regulation 7.08

Regulation 7.08 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

(3) Opacity

(a) Regulation 6.09

Regulation 6.09 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

(b) Regulation 7.08

Regulation 7.08 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

(4) TAC

(a) Regulations 5.00, 5.01, 5.21, and 5.23

The source is required to maintain records of all periods when a TAC process was operating while an associated control device was not operating to assure ongoing compliance with Regulations 5.00, 5.01, 5.21, and 5.23.

(5) NO_x

(a) Regulation 7.08

Regulation 7.08 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

(6) Unit Operation

(a) Regulation 1.09

Regulation 1.09 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

(b) Regulation 2.03

Regulation 2.03 does not require any specific monitoring or record keeping requirements. However, Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 establishes requirements for sufficient monitoring and record keeping to assure ongoing compliance with the term

iv. Reporting

(1) VOC

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

(2) PM

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

(3) Opacity

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

(4) TAC

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

(5) NO_x

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

(6) Unit Operation

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

v. Source Testing

(1) Required Performance Testing for U-ZN

(a) Control Device C-SDR-1SD and C-SDR-2SD

Per regulation 1.04, section 2.1, The District, for cause, may require the owner or operator of any affected facility to sample emissions in accordance with EPA test method procedures. Alternate procedures may be used in special circumstances upon advance approval by the District. All tests shall be made under the direction of persons qualified by training and experience in the field of air pollution control.

(b) Control Devices C-PLY-MRV-TO and C-PLY-TCO

Per regulation 1.04, section 2.1, The District, for cause, may require the owner or operator of any affected facility to sample emissions in accordance with EPA test method procedures. Alternate procedures may be used in special circumstances upon advance approval by the District. All tests shall be made under the direction of persons qualified by training and experience in the field of air pollution control.

(c) Control Device C-SDR-2SDRTO

Per regulation 1.04, section 2.1, The District, for cause, may require the owner or operator of any affected facility to sample emissions in accordance with EPA test method procedures. Alternate procedures may be used in special circumstances upon advance approval by the District. All tests shall be made under the direction of persons qualified by training and experience in the field of air pollution control.

(2) Performance Testing Results

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

vi. Appendix A: 40 CFR Part 63 Subpart U

(1) 40 CFR Part 63 Subpart U (Non-LDAR) Standards

(a) Storage Vessels

- (i) E-TKF-TK-101, E-TKF-TK-102, E-TKF-TK-103, E-TKF-TK-104, E-TKF-TK-105, E-TKF-TK-106, E-TKF-TK-107 and E-TKF-TK-108:

each of which has a capacity greater than or equal to 75 m³ (19,815 gallons) but less than 151 m³ (39,894.2 gallons), the maximum true vapor pressure of the total organic HAP at storage temperature is less than 13.1 kPa (98.24 mm Hg), therefore each emission point is a Group 2 Storage Vessel.

- (ii) E-TKF-TK-109:

which has a capacity less than 75 m³ (19,815 gallons) but greater than or equal to 38 m³ (10,039.6 gallons), and may therefore store any total organic HAP at any maximum true vapor pressure at storage temperature, is a Group 2 Storage Vessel

- (iii) E-TKF-404 and E-TKF-TK-410

each of which has a capacity greater than or equal to 75 m³ (19,815 gallons) but less than 151 m³ (39,894.2 gallons), the maximum true vapor pressure of the total organic HAP at storage temperature is less than 13.1 kPa (98.24 mm Hg), and each is therefore a Group 2 Storage Vessel.

- (iv) E-TKF-TK-401, E-TKF-TK-402, E-TKF-TK-403, E-TKF-TK-405, E-TKF-TK-406, E-TKF-TK-407, E-TKF-TK-408 and E-TKF-TK-412:

each of which has a capacity less than 75 m³ (19,815 gallons) but greater than or equal to 38 m³ (10,039.6 gallons), and may therefore store any total organic HAP at any maximum true vapor pressure at storage temperature is a Group 2 Storage Vessel.

(b) Group 2 Batch Front-End Process Vents

Emission Points E-PLY-PLY-1, E-PLY-PLY-2, E-PLY-PLY-3, E-PLY-PLY-4, E-PLY-PLY-5, E-PLY-PLY-6, E-PLY-PLY-7, E-PLY-PLY-8, E-PLY-PLY-9, E-PLY-PLY-10, E-PLY-PLY-11, E-PLY-PLY-12, E-PLY-PLY-13, E-PLY-PLY-14, E-PLY-PLY-15, E-PLY-PLY-16, E-PLY-PLY-17, E-PLY-PLY-18, E-PLY-PLY-19, E-PLY-PLY-20, E-PLY-PLY-21, E-PLY-PLY-22, E-PLY-PLY-23, E-PLY-PLY-24, E-PLY-PLY-25, E-PLY-PLY-26, E-PLY-PLY-27, E-PLY-PLY-28, E-PLY-PLY-29, E-PLY-PLY-30, E-PLY-PLY-32, E-PLY-PLY-33, E-PLY-PLY-34, E-PLY-PLY-35, E-PLY-PLY-36, E-PLY-BDTTK-1, E-PLY-BDTTK-2, E-PLY-BDTTK-3, E-PLY-BDTTK-4, E-PLY-BDTTK-5, E-PLY-BDTTK-6, E-PLY-BDTTK-7, E-PLY-BDTTK-10, E-PLY-BDTTK-11, E-PLY-BDTTK-12, E-PLY-BDTTK-14, E-PLY-BDTTK-15, E-PLY-BDTTK-16, E-PLY-BDTTK-17 and E-PLY-BDTTK-18 were determined to be Group 2 Batch Front-End Process vents

- (i) A batch front-end process vent with annual emissions of TOC or organic HAP less than 11,800 kg/yr is considered a Group 2 batch front-end process vent and the owner or operator of that batch front-end process vent

shall comply with the requirements in §63.487(f) or §63.487(g).

- (ii) The owner or operator of that batch front-end process vent is not required to comply with the provisions in §63.488(e) - §63.488(g)
- (c) Back-End Process Operations with Organic Hap Emission Limitation.

Emission Points E-PLY-BLTTK-20,
 E-PLY-BLTTK-21, E-PLY-BLTTK-22,
 E-PLY-BLTTK-23, E-PLY-BLTTK-24,
 E-PLY-BLTTK-25, E-PLY-BLTTK-26,
 E-PLY-BLTTK-31, E-PLY-BLTTK-32,
 E-PLY-BLTTK-33, E-PLY-BLTTK-34,
 E-PLY-BLTTK-35, E-PLY-BLTTK-36,
 E-PLY-BLTTK-37, E-PLY-BLTTK-38,
 E-PLY-BLTTK-39, E-PLY-NBLT, E-PLY-SBLT,
 E-PCO-TK-4, E-PCO-TK-5, E-PCO-TK-7,
 E-PCO-TK-8, E-PCO-TK-9, E-PCO-TK-11
 (included with E-PCO-CN-1), E-PCO-CN-1,
 E-SDR-1BLT, E-SDR-1SD, E-DRY-PSTK-301,
 E-DRY-PSSCR-301A, E-DRY-PSTK-306,
 E-DRY-PSTK-302, E-DRY-PSSCR-302A,
 E-DRY-PSTK-303A, E-DRY-PSSCR-302B,
 E-DRY-PSTK-303B, E-DRY-PSSCR-303,
 E-DRY-PSTK-304, E-DRY-PSSCR-304,
 E-DRY-PSPRS-300, E-DRY-PSDR:

- (i) Each Emission Point above meets the criteria for *Back-end Process Operations* refers to the unit operations in an EPPU following the stripping operations. Back-end process operations include, but are not limited to, filtering, coagulation, blending, concentration, drying, separating, and other finishing operations, as well as latex and crumb storage. Back-end does not include storage and loading of finished product or emission points that are regulated under §§ 63.484, 63.501, or 63.502 of this subpart.
- (ii) Source has a HAP emission limitation of 0.000315 Mg organic HAP emissions per Mg of NBR produced (0.63 lb HAP/Ton NBR produced) for any consecutive 12-month period based on calculation methodology

listed in §63.494(a)(4)(iv). Production of NBR rubber for calendar year 2009 was used to determine HAP emission limitation for Back-end processes.

- (d) Back-End Process Operations with Organic Hap Emission Limitation with flexible operation.

Emission Points E-DRY-FTK-202, E-DRY-FTK-203, E-DRY-FTK-204, E-DRY-NTK-15H, E-DRY-NSCR-1, E-DRY-NTK-16H, E-DRY-NTK-17H, E-DRY-NSCR-2, E-DRY-NTK-18H, E-DRY-NPRS-1, E-DRY-NGR-1H and E-DRY-NDR, when processing nitrile butadiene rubber

- (i) Each Emission Point above meets the criteria for *Back-end Process Operations* refers to the unit operations in an EPPU following the stripping operations. Back-end process operations include, but are not limited to, filtering, coagulation, blending, concentration, drying, separating, and other finishing operations, as well as latex and crumb storage. Back-end does not include storage and loading of finished product or emission points that are regulated under §§ 63.484, 63.501, or 63.502 of this subpart
- (ii) Each Emission point can process intermediates/products subject to both 40 CFR Part 63 Subpart U or 40 CFR Part 63 Subpart FFFF; therefore, emission points must meet the requirements of each subpart depending on material being processed. When processing NBR rubber, Emission Points subject to Hap Emission Limitation as determined in §63.494(a)(4)(iv).
- (iii) Source has a HAP emission limitation of 0.000315 Mg organic HAP emissions per Mg of NBR produced (0.694 lb HAP/Ton NBR produced) for any consecutive 12-month period based on calculation methodology listed in §63.494(a)(4)(iv). Production of NBR rubber for calendar year 2009 was used to determine HAP emission limitation for Back-end processes.

- (e) For 40 CFR Part 63 Subpart U Process Wastewater (as defined in 40 CFR Part 63.482)

All 40 CFR Part 63 Subpart U process wastewater streams have been determined to be Group 2 process wastewater. There are no applicable non-LDAR standards for Group 2 process wastewater.

- (2) 40 CFR Part 63 Subpart U (Non-LDAR) Record Keeping and Monitoring

- (a) The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart U

- (b) For compliance with LDAR components of 40 CFR Part 63 Subpart U, the source has elected to comply subpart U LDAR standards by following 40 CFR Part 63 Subpart H requirements.

- (3) 40 CFR Part 63 Subpart U (Non-LDAR) Reporting

- (a) The source is required to comply with applicable reporting requirements of 40 CFR Part 63 Subpart U.

vii. Appendix B: 40 CFR Part 63 Subpart JJJ

- (1) 40 CFR Part 63 Subpart JJJ (Non-LDAR) Standards

- (a) Group 2 Storage Vessels

- (i) Emission Points E-TKF-TK-101, E-TKF-TK-102, E-TKF-TK-103, E-TKF-TK-104, E-TKF-TK-105, E-TKF-TK-106, E-TKF-TK-107, E-TKF-TK-108 and E-TKF-TK-109 defined as Storage Vessels per 40 CFR Part 63.1312 are Emission points subject to 40 CFR Part 63 subpart JJJ because they are thermoplastic product process units (TPPU) and associated equipment that is manufacturing the same primary product, and equipment is located at a plant site that is a major source

- (ii) For each Group 2 storage vessel that is not part of an emissions average as described in §63.150 of this subpart, the owner or operator shall comply with the recordkeeping requirement in §63.123(a) of this subpart and

is not required to comply with any other provisions in §§63.119 through 63.123 of this subpart for Group 2 Storage vessels.

(b) Group 2 Batch Process Vents

- (i) Emission Points E-PLY-PLY-31, E-SDR-2BLT, E-SDR-EBLT and E-SDR-WBLT are classified as Group 2 Batch process vents as specified in §63.1323(b) at the location specified in §63.1323(a)(2).
- (ii) Source choose to determine the group status of batch process vent based on annualized production of the single highest-HAP recipe, as defined in §63.1323(a)(1)(iii), considering all products produced or processed in the batch unit operation. The annualized production of the highest-HAP recipe shall be based exclusively on the production of the single highest-HAP recipe of all products produced or processed in the batch unit operation for a 12 month period. The production level used may be the actual production rate. It is not necessary to assume a maximum production rate
- (iii) Owners or operators of all Group 2 batch process vents shall comply with the applicable reference control technology requirements in §63.1322. Source chose to comply with §63.1322(h) which satisfys requirements listed in §63.1322(g).

(c) Group 2 Process Wastewater

- (i) Process wastewater has been determined to be Group 2 per 40 CFR 63.132(a)(3) as referenced by 40 CFR 63.1330(b) with the differences noted in 40 CFR 63.1330(b)(1) through (b)(22)

(d) Start-up, shutdown, malfunction, or non-operation requirements:

- (i) The emission limitations of 40 CFR Part 63 Subpart JJJ and the emission limitations referred to in 40 CFR Part 63 Subpart JJJ

shall not apply during periods of start-up, shutdown, or malfunction, except as provided in 40 CFR 63.1310(j)(3) and (j)(4)

- (2) 40 CFR Part 63 Subpart JJJ (Non-LDAR) Record Keeping and Monitoring
 - (a) There are no monitoring or record keeping requirements Group 2 Storage Vessels because the only raw material currently stored in a subpart JJJ storage vessel, that is predominantly associated with SAN production, is styrene monomer. Per 40 CFR 63.1314(d), the provisions of 40 CFR Part 63 Subpart JJJ do not apply to storage vessels containing styrene at existing affected sources. Zeon is classified as an existing affected source for the purposes of 40 CFR Part 63 Subpart JJJ
 - (b) For Group 2 batch process vents, source chose to comply with the recordkeeping provisions in §§63.1326(a)(1) through (3), 63.1326(a)(9), and 63.1326(a)(4) through (6), as applicable, as required by § 63.1326.
 - (c) For Group 2 Process Wastewater source shall keep the records required by 40 CFR 63.1330(b) with the differences noted in 40 CFR 63.1330(b)(1) through (b)(22) as appropriate
 - (d) For start-up, shutdown, malfunction, or non-operation requirements, the record keeping provisions of 40 CFR 63.1310(i) are applicable to source
- (3) 40 CFR Part 63 Subpart U (Non-LDAR) Reporting
 - (a) The source is required to report information for Group 2 batch process vents, process wastewater, Start-up, shutdown, malfunction, or non-operation requirements as specified in:
 - (i) 40 CFR 63.1335(e)(6)(i)
 - (ii) 40 CFR 63.1335(e)(6)(ii)
 - (iii) 40 CFR 63.1335(e)(6)(iii)
 - (iv) 40 CFR 63.1335(e)(6)(iii)(D)
 - (v) 40 CFR 63.1335(e)(6)(vi)

(vi) 40 CFR 63.1335(e)(6)(vii)

(vii) 40 CFR 63.1335(e)(7)

(viii) 40 CFR 63.1335(e)(1)

viii. Appendix C: 40 CFR Part 63 Subpart EEEE

(1) 40 CFR Part 63 Subpart EEEE (Non-LDAR) Standards

- (a) Storage tanks and transfer racks subject another NESHAP at existing source

Per 40 CFR 63.2338(c)(1), storage tanks and transfer racks subject to another NESHAP are not subject to 40 CFR 63 Subpart EEEE

- (b) Transfer Racks only loading organic liquids

Emission Point E-TKF-OLD has no applicable non-LDAR requirements because it is a transfer rack that that has a *total annual facility-level organic liquid loading volume* below the throughput level required for control requirements or work practice standards. *Total annual facility-level organic liquid loading volume* is less than 800,000 gallons. Table 2 of 40 CFR Part 63 Subpart EEEE per transfer rack emission limit requirements listed in 40 CFR 63.2346(b) and 40 CFR 63.2346(b)(1).

- (c) Storage Tank storing Organic liquids:

Emission Points E-PLY-TK-150 and E-PLY-TK-152, when each storage tank is storing organic liquids, as defined in 40 CFR 63.2406, have no non-LDAR requirements in subpart EEEE because Emission Points

Per 40 CFR 63.2406, *total actual annual facility-level organic liquid loading volume* means the total facility-level actual volume of organic liquid loaded for transport within or out of the facility through transfer racks that are part of the affected source into transport vehicles, based on a 3-year rolling average, calculated annually. For existing affected sources, each 3-year rolling average is based on actual facility-level loading volume during each calendar year (January 1 through

December 31) in the 3-year period. For calendar year 2004 only (the first year of the initial 3-year rolling average), if an owner or operator of an affected source does not have actual loading volume data for the time period from January 1, 2004, through February 2, 2004 (the time period prior to the effective date of the OLD NESHAP), the owner or operator shall compute a facility-level loading volume for this time period as follows: At the end of the 2004 calendar year, the owner or operator shall calculate a daily average facility-level loading volume (based on the actual loading volume for February 3, 2004, through December 31, 2004) and use that daily average to estimate the facility-level loading volume for the period of time from January 1, 2004, through February 2, 2004. The owner or operator shall then sum the estimated facility-level loading volume from January 1, 2004, through February 2, 2004, and the actual facility-level loading volume from February 3, 2004, through December 31, 2004, to calculate the annual facility-level loading volume for calendar year 2004.

(2) 40 CFR Part 63 Subpart EEEE (Non-LDAR) Record Keeping and Monitoring

- (a) Storage tanks and transfer racks subject another NESHAP at existing source:

No applicable record keeping or monitoring.

- (b) Transfer Racks only loading organic liquids:

40 CFR 63.2343 establishes the recordkeeping requirements for emission sources identified in 40 CFR 63.2338 that do not require control under 40 CFR Part 63 Subpart EEEE (*i.e.*, under 40 CFR 63.2346(a) through (e)). Such emission sources are not subject to any other recordkeeping sections in 40 CFR Part 63 Subpart EEEE, including 40 CFR 63.2350(c), except as indicated in 40 CFR 63.2343(a) through (d). (40 CFR 63.2343 as referenced by 40 CFR 63.2390(a))

- (c) Storage Tank storing Organic liquids

For each storage tank subject to 40 CFR Part 63

Subpart EEEE having a capacity of less than 18.9 cubic meters (5,000 gallons) and for each transfer rack subject to 40 CFR Part 63 Subpart EEEE that only unloads organic liquids (*i.e.*, no organic liquids are loaded at any of the transfer racks), you must keep documentation that verifies that each storage tank and transfer rack identified in 40 CFR 63.2343(a) is not required to be controlled.

(3) 40 CFR Part 63 Subpart EEEE (Non-LDAR) Reporting

(a) Storage tanks and transfer racks subject another NESHAP at existing source

For each transfer rack subject to 40 CFR Part 63 Subpart EEEE that loads organic liquids but is not subject to control based on the criteria specified in Table 2 to 40 CFR Part 63 Subpart EEEE, items 7 through 10, you must comply with the reporting requirements specified in 40 CFR 63.2343(c)(2) Transfer Racks only loading organic liquids

(b) Storage Tank storing Organic liquids

(i) If required, your subsequent Compliance Reports must contain the information in 40 CFR 63.2386(c)(1), (2), (3) and, as applicable, in 40 CFR 63.2386(d)(3) and (4).

(ii) As applicable, a listing of any storage tank that became subject to controls based on the criteria for control specified in Table 2 to 40 CFR Part 63 Subpart EEEE, items 1 through 6, since the filing of the last Compliance Report. (40 CFR 63.2386(d)(3)(i))

ix. Appendix D: 40 CFR Part 63 Subpart FFFF

(1) 40 CFR Part 63 Subpart FFFF (Non-LDAR) Standards

For the purposes of 40 CFR Part 63 Subpart FFFF, *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing*, commonly known as the **MON MACT**, Zeon is an **existing** Miscellaneous Organic Chemical Manufacturing Process Unit (MCPU) affected source. Zeon has emission points subject to the MON MACT including batch process vents, storage tanks and wastewater stream as defined in 40 CFR

63.2550.

Emission Unit U-ZN is subject to the requirements of 40 CFR Part 63 Subpart FFFF because source operates a Miscellaneous Organic Chemical Manufacturing Process Unit (MCPU), as defined in 40 CFR 63.2550, and the MCPU is not an affected source or part of an affected source under another 40 CFR Part 63 Subpart, except for process vents from batch operations within a Chemical Manufacturing Process Unit (CMPU), as identified in 40 CFR 63.100(j)(4). (40 CFR 63.2435(a) and (b)(3))

(a) Storage Tanks (as defined in 40 CFR 63.2550)

(i) Emission Points E-TKF-TK-101, E-TKF-TK-102, E-TKF-TK-103, E-TKF-TK-104, E-TKF-TK-105, E-TKF-TK-106, E-TKF-TK-107, E-TKF-TK-108, E-TKF-TK-109, E-PLY-BLTTK-13, E-PLY-BLTTK-14, E-PLY-BLTTK-15, E-PLY-BLTTK-16, E-PLY-BLTTK-17, E-PLY-BLTTK-18, E-PLY-BLTTK-19, E-PLY-BLTTK-27, E-PLY-BLTTK-28, E-PLY-BLTTK-29, E-PLY-BLTTK-30, E-DRY-TK-202, E-DRY-TK-203, and E-DRY-TK-204:

(A) E-TKF-TK-101, E-TKF-TK-102, E-TKF-TK-103, E-TKF-TK-104, E-TKF-TK-105, E-TKF-TK-106, E-TKF-TK-107, E-TKF-TK-108, or E-TKF-TK-109 are defined as a Group 2 Storage Tanks per 40 CFR 63.2550 when storing organic HAP-containing raw materials predominantly associated with the MCPU.

(B) E-PLY-BLTTK-13, E-PLY-BLTTK-14, E-PLY-BLTTK-15, E-PLY-BLTTK-16, E-PLY-BLTTK-17, E-PLY-BLTTK-18, E-PLY-BLTTK-19, E-PLY-BLTTK-27, E-PLY-BLTTK-28, E-PLY-BLTTK-29 and E-PLY-BLTTK-30 are Group 2 Storage Tanks.

- (C) E-DRY-TK-202, E-DRY-TK-203, and E-DRY-TK-204 are Group 2 Storage Tanks when storing organic HAP-containing raw materials predominantly associated with MCPU, as defined in 40 CFR 63.2550
- (ii) Group 2 Storage tanks have no applicable non-LDAR standards contained in 40 CFR Part 63 Subpart FFFF. (40 CFR 63.2550 (Definitions of Group 1 Storage Tank and Group 2 Storage Tank) and 40 CFR 63.2470 (References Table 4 to 40 CFR Part 63 Subpart FFFF))
- (b) Batch Process Vents (as defined in 40 CFR 63.2550)
 - (i) Emission Points E-PLY-TK-101, E-PLY-TK-102, E-PLY-PLY-37 or E-PLY-PLY-38, and E-PLY-CN-101/2/VP are Group 2 Batch Process Vents because the collective uncontrolled organic HAP emissions from all of the batch process vents is less than 10,000 lb/year.

There are no applicable non-LDAR standards under 40 CFR Part 63 Subpart FFFF for Group 2 Batch Process Vents. (40 CFR 63.2550 (Definition of Group 2 Batch Process Vent) and Table 2 to 40 CFR Part 63 Subpart FFFF as referenced by 40 CFR 63.2460(a))

- (ii) Per the MON MACT definition of *batch process vent* found in 40 CFR 63.2550, the following Zeon vents are not considered batch process vents for the purposes of 40 CFR Part 63 Subpart FFFF: Vents on Storage Tanks (when storing organic HAP-containing raw materials predominantly associated with a MCPU, as defined in 40 CFR 63.2550) E-TKF-TK-101, E-TKF-TK-102, E-TKF-TK-103, E-TKF-TK-104, E-TKF-TK-105, E-TKF-TK-106, E-TKF-TK-107, E-TKF-TK-108, E-TKF-TK-109, E-DRY-TK-202, E-DRY-TK-203, and E-DRY-

TK-204; Vents on Storage Tanks E-PLY-BLTTK-13, E-PLY-BLTTK-14, E-PLY-BLTTK-15, E-PLY-BLTTK-16, E-PLY-BLTTK-17, E-PLY-BLTTK-18, E-PLY-BLTTK-19, E-PLY-BLTTK-27, E-PLY-BLTTK-28, E-PLY-BLTTK-29 and E-PLY-BLTTK-30; Vent on E-PLY-TK-103C (Part of MCPU but contains no organic HAP); and Vents from E-DRY-NTK-15H, E-DRY-NSCR-1, E-DRY-NTK-16H, E-DRY-NTK-17H, E-DRY-NSCR-2, E-DRY-NTK-18H, E-DRY-NPRS-1, E-DRY-NGR-1H and E-DRY-NDR (Emission streams from emission episodes that are undiluted and uncontrolled containing less than 50 ppmv HAP are not part of any batch process vent). There are thus no non-LDAR standards, and no non-LDAR monitoring and recordkeeping, and no reporting, requirements for these vents under 40 CFR Part 63 Subpart FFFF

(c) 40 CFR Part 63 Subpart FFFF wastewater (as defined in 40 CFR 63.2550)

(i) Zeon has no liquid streams in open systems within its MCPU as defined in 40 CFR 63.149, as referenced by Table 7 to 40 CFR Part 63 Subpart FFFF and with the exceptions noted in 40 CFR 63.2485(l), and Zeon is thus not subject to the applicable requirements of 40 CFR 63.2485 for such liquid streams.

There are no applicable non-LDAR standards for Group 2 process wastewater. (40 CFR 63.132(a)(3) as referenced by 40 CFR 63.2485(a) and Table 7 to 40 CFR Part 63 Subpart FFFF, except as specified in 40 CFR 63.2485(b) through (o))

(ii) Zeon's Polymerizer Nos. 37 and 38 each have both MON MACT Group 2 process wastewater (resulting from routine cleaning operations occurring as part of the batch operations) and maintenance wastewater (resulting from cleaning operations related to maintenance activities). Note, per the

definition of *Maintenance wastewater* in 40 CFR 63.2550, wastewater from routine cleaning operations occurring as part of batch operations is not considered maintenance wastewater. The wastewater Point of Determination, or POD, for both the process and maintenance wastewaters, is E-PLY-PLY-37 and E-PLY-PLY-38

(A) All 40 CFR Part 63 Subpart FFFF process wastewater streams (Wastewater Point of Determination (POD) E-PLY-PLY-37 and E-PLY-PLY-38) have been determined to be Group 2 process wastewater

(B) There are no applicable non-LDAR standards for maintenance wastewater. (40 CFR 63.105 as referenced by 40 CFR 63.2485(a) and Table 7 to 40 CFR Part 63 Subpart FFFF, except as specified in 40 CFR 63.2485(b) through (o))

(d) Emission Limits and work practice standards

Source must be in compliance with the emission limits and work practice standards in Tables 1 through 7 to 40 CFR Part 63 Subpart FFFF at all times, except during periods of startup, shutdown, and malfunction (SSM), and you must meet the requirements specified in 40 CFR 63.2455 through 40 CFR 63.2490 (or the alternative means of compliance in 40 CFR 63.2495, 40 CFR 63.2500, or 40 CFR 63.2505), except as specified in 40 CFR 63.2450(b) through (s). (40 CFR 63.2450(a))

Per 40 CFR 63.2525(j) and Table 12 to 40 CFR Part 63 Subpart FFFF, the Start-Up, Shutdown and Malfunction Plan (SSMP) requirements of 40 CFR 63.6(e)(3) apply, except Group 2 emission points are not required to be included unless those emission points are used in an emissions average. For equipment leaks, the SSMP requirement is limited to control devices and is optional for other equipment. Zeon does not use emissions averaging; all of Zeon's

emission points are Group 2; and there are no required control devices for equipment leaks. Therefore, Zeon's MON MACT SSMP is required, per 40 CFR 63.105(d), to include the procedures described in 40 CFR 63.105(b) and (c), and a record of the information required by 40 CFR 63.105(b) and (c) is to be maintained as part of the SSMP per 40 CFR 63.105(e)

(2) 40 CFR Part 63 Subpart FFFF (Non-LDAR) Monitoring and Recordkeeping

(a) Storage Tanks

The owner or operator must keep the records specified in 40 CFR 63.2525(a) through (k), as applicable. (40 CFR 63.2525)

(b) Batch Process Vents

The information specified in 40 CFR 63.2525(e)(2), (3) or (4), as applicable, for each process with Group 2 batch process vents or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. No records are required for situations described in paragraph (e)(1) of this section. (40 CFR 63.2525(e))

(c) SSMP Plan

Per 40 CFR 63.2525(j) and Table 12 to 40 CFR Part 63 Subpart FFFF, the Start-Up, Shutdown and Malfunction Plan (SSMP) requirements of 40 CFR 63.6(e)(3) apply, except Group 2 emission points are not required to be included unless those emission points are used in an emissions average. For equipment leaks, the SSMP requirement is limited to control devices and is optional for other equipment. Zeon does not use emissions averaging; all of Zeon's emission points are Group 2; and there are no required control devices for equipment leaks. Therefore, Zeon's MON MACT SSMP is required, per 40 CFR 63.105(d), to include the procedures described in 40 CFR 63.105(b) and (c), and a record of the information required by 40 CFR 63.105(b) and (c) is to be maintained as part of the SSMP per 40 CFR 63.105(e).

(d) Wastewater

For each Group 2 process wastewater stream, the owner or operator shall keep in a readily accessible location the records specified in 40 CFR 63.147(b)(8)(i) through (iv). (40 CFR 63.147(b)(8) as referenced by 40 CFR 63.132(a)(3), 40 CFR 63.2485(a) and Table 7 to 40 CFR Part 63 Subpart FFFF, except as specified in 40 CFR 63.2485(b) through (o))

Each owner or operator of a source subject to 40 CFR Part 63 Subpart FFFF shall comply with the requirements of 40 CFR 63.105(b) through (e) for maintenance wastewaters containing those organic HAPs listed in Tables 8 and 9 to 40 CFR Part 63 Subpart FFFF. (40 CFR 63.105(a) as referenced by 40 CFR 63.2485(a) and Table 7 to 40 CFR Part 63 Subpart FFFF, except as specified in 40 CFR 63.2485(b) through (o))

(e) Non-applicable Record Keeping requirements

The following 40 CFR Part 63 Subpart FFFF recordkeeping requirements of 40 CFR 63.2525 are not applicable to Zeon (non-applicability basis):

- (i) 40 CFR 63.2525(b)(3), (4), (5) and (6) for control requirements, control devices and monitoring requirements (Zeon has no MON MACT-required control devices and none of the specified monitoring requirements);
- (ii) 40 CFR 63.2525(c) for a schedule or log of operating scenarios for processes with batch vents from batch operations (Zeon has one MCPU operating scenario, as defined by the highest HAP recipe grade; a new recipe grade is introduced if this highest HAP recipe grade is exceeded, which then becomes the new operating scenario);
- (iii) 40 CFR 63.2525(d) for Group 1 Batch Process Vents (Zeon has no Group 1 Batch Process Vents); 40 CFR 63.2525(e)(1), (2) and (3) (Zeon's MCPU processes HAP; control of Zeon's batch process vents is not required; and the NOCS documented the

collective uncontrolled organic HAP emissions from all of the batch process vents are less than 10,000 lb/yr);

- (iv) 40 CFR 63.2525(g) for continuous parameter monitoring systems, or CPMS (no CPMS is required for Zeon under 40 CFR Part 63 Subpart FFFF);
 - (v) 40 CFR 63.2525(h) for CEMS (no CEMS is required for Zeon under 40 CFR Part 63 Subpart FFFF);
 - (vi) 40 CFR 63.2525(i) for PUG (Process Unit Groups) (Zeon has not elected to develop and comply with the requirements for PUG in accordance with 40 CFR 63.2535(l));
 - (vii) 40 CFR 63.2525(k) for bag leak detectors used for PM HAP emissions monitoring (Zeon has no PM HAP emissions subject to emissions monitoring under 40 CFR Part 63 Subpart FFFF).
- (3) 40 CFR Part 63 Subpart FFFF (Non-LDAR) Reporting
- (a) The owner or operator shall submit a Compliance Report semiannually according to the requirements of 40 CFR 63.2520(b). (Table 11 to 40 CFR Part 63 Subpart FFFF as referenced by 40 CFR 63.2520(b))
- The Compliance Report must contain the information specified in 40 CFR 63.2520(e)(1) through (10)

x. Appendix E: 40 CFR Part 63 Subpart ZZZZ

- (1) 40 CFR Part 63 Subpart ZZZZ Standards (Stationary RICE)

Emission Point E-EMG-GEN-01 is subject to 40 CFR Part 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, because it involves a stationary reciprocating internal combustion engine (RICE) located at a major source of HAP emissions. (The emergency generator is powered by a stationary RICE with a power rating of 757 brake horsepower, and Zeon is a major source of HAP emissions.) The proposed new stationary RICE meets the definition in 40 CFR 63.6675 of an

emergency stationary RICE, which, per 40 CFR 63.6590(b)(1)(i), does not have to meet the requirements of 40 CFR Part 63 Subpart ZZZZ and of 40 CFR Part 63 Subpart A except for the initial notification requirements of 40 CFR 63.6645(d).

- (2) 40 CFR Part 63 Subpart ZZZZ Monitoring and Record Keeping (Stationary RICE)

There are no applicable monitoring or record keeping requirements required by 40 CFR Part 63 Subpart ZZZZ for Emission Point E-EMG-GEN-01.

- (3) 40 CFR Part 63 Subpart ZZZZ Reporting (Stationary RICE)

The initial notification required by 40 CFR 63.6645(d), as referenced by 40 CFR 63.6590(b)(1), must be, per 40 CFR 63.6645(c), submitted not later than 120 days after becoming subject to 40 CFR Part 63 Subpart ZZZZ. Zeon submitted the initial notification required by 40 CFR Part 63 Subpart ZZZZ on 09/18/2008. Pursuant to 40 CFR 63.6645(d), the initial notification included the information in 40 CFR 63.9(b)(2)(i) through (v); a statement the stationary RICE has no additional requirements; and an explanation of the basis of the exclusion (Zeon stated that generator set operates exclusively as an emergency stationary RICE).

xi. Appendix F: 40 CFR Part 63 Subpart H (LDAR)

- (1) 40 CFR Par 63 Subpart H Standards HAP (LDAR)

The source is required to comply with Leak Detection and Repair requirements of 40 CFR Part 63 subpart H. which apply to Zeon's subject equipment component types that are intended to operate in organic hazardous air pollutant service 300 hours or more during the calendar year within a source subject to the provisions of 40 CFR Part 63 Subparts U, JJJ and FFFF (40 CFR 63.63.160(a))

Because the source has LDAR requirements applicable from Emision Points subject to 40 CFR Part 63 subpart U, 40 CFR Part 63 subpart JJJ, 40 CFR Part 63 subpart FFFF, it has chosen to comply with the applicable LDAR requirements of the aforementioned MACTs by complying with the referenced subpart H standrads as established by

- (a) 40 CFR 63.502(a), with the exceptions noted in 40 CFR 63.502(b)-63.502(m), as applicable, for 40 CFR Part 63 Subpart U
 - (b) 40 CFR 63.1331(a), with the differences noted in 40 CFR 63.1331(a)(1)-63.1331(a)(13), as applicable, and the exceptions of 40 CFR 63.1331(b)-63.1331(c), for 40 CFR Part 63 Subpart JJJ
 - (c) As referenced by 40 CFR 63.2480(a) and Table 6 to 40 CFR Part 63 Subpart FFFF, except as specified in 40 CFR 63.2480(b) and 40 CFR 63.2480(d), as applicable, for 40 CFR Part 63 Subpart FFFF
- (2) 40 CFR Part 63 Subpart H Monitoring and Record Keeping HAP (LDAR)

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR Part 63 Subpart H with the following exceptions as noted:

- (a) 40 CFR 63.181(b)(2)(i) and 40 CFR 63.181(g) (Zeon has no closed-vent system and control device used to comply with provisions of 40 CFR Part 63 Subpart H);
- (b) 40 CFR 63.181(b)(2)(iii) (Zeon has no surge control vessels or bottoms receivers); 40 CFR 63.181(b)(9)(i), 40 CFR 63.181(b)(9)(ii) and 40 CFR 63.181(d)(8) (Zeon has not elected at this time to monitor batch process units as provided under 40 CFR 63.178(c)); 40 CFR 63.181(e) (Zeon has not elected at this time to use pressure testing of batch product process equipment as provided under 40 CFR 63.178(b));
- (c) 40 CFR 63.181(f) for pressure relief devices (Zeon has no pressure relief devices in gas/vapor service subject to 40 CFR 63.165(a) and (b) because all subject pressure relief devices are equipped with a rupture disk upstream of the pressure relief device and are exempt
- (d) 63.165(a) and (b) by 40 CFR 63.165(d)(1); All Zeon pressure relief devices in gas/vapor service subject to the requirements of 40 CFR Part 63 Subpart H are equipped with a rupture disk upstream of the

pressure relief device and are exempt from the requirements of 40 CFR 63.165(a) and (b) by 40 CFR 63.165(d)(1), provided the owner or operator complies with the requirements of 40 CFR 63.165(d)(2)40 CFR 63.181(h) (Zeon is not subject at this time to the requirements of either 40 CFR 63.175 or 40 CFR 63.176;

- (e) 40 CFR 63.181(i) (Zeon has no equipment in heavy liquid service); Zeon has no components in heavy liquid service, as that term is defined in 40 CFR 63.161 of 40 CFR Part 63 Subpart H
- (f) 40 CFR 63.181(k) (Zeon has not elected at this time to comply with the optional requirements of 40 CFR 63.179)

(3) 40 CFR Part 63 Subpart H Reprint Requirements

The source is required to comply with reporting requirements of 40 CFR Part 63 Subpart H as specified by 40 CFR 63.182(d). with the exception of the following:

(a) *MACT Standards Applicable to Zeon with No Equipment Leak Provisions Required*

- (i) 40 CFR Part 63 Subpart EEEE (OLD MACT)

The OLD MACT equipment leak requirements of 40 CFR 63.2346(c) only apply to the OLD existing affected source if there is at least one storage tank or transfer rack that meets the applicability criteria for control in Table 2 to 40 CFR Part 63 Subpart EEEE. Zeon's OLD existing affected source does not contain a storage tank or transfer rack that meets this applicability criteria for control, and 40 CFR 63.2346(c) is therefore not applicable to Zeon's OLD affected source

- (ii) 40 CFR Part 63 Subpart ZZZZ (RICE MACT)

40 CFR Part 63 Subpart ZZZZ has no LDAR standards, record keeping, monitoring, or reporting requirements.

- (b) 40 CFR 63.182(d)
 - (i) 40 CFR 63.182(d)(2)(xiv) as it pertains to 40 CFR 63.165(a) and 40 CFR 63.172(f), and 40 CFR 63.182(d)(2)(xvii) (Zeon has no pressure relief devices in gas/vapor service subject to 40 CFR 63.165(a) because all subject pressure relief devices are equipped with a rupture disk upstream of the pressure relief device and are exempt from 40 CFR 63.165(a) by 40 CFR 63.165(d)(1)), and Zeon has no closed-vent systems and control devices subject to 40 CFR 63.172)
 - (ii) 40 CFR 63.182(d)(3) (Zeon has not elected at this time to use pressure testing of batch product process equipment as provided under 40 CFR 63.178(b))

III. Other Requirements

- 1. Temporary Sources:**
The source did not request to operate any temporary facilities.
- 2. Short Term Activities:**
The source did not report any short term activities.
- 3. Emissions Trading: N/A**
- 4. Operational Flexibility:**
The source did not request any operational flexibility for this equipment.
- 5. Compliance History:**

Incident Date(s)	Regulation Violated	Result
11/16/1995	1.13 – Control of Objectionable Odors in the Ambient Air	Settled
11/19/98	1.13 – Control of Objectionable Odors in the Ambient Air	Settled
11/19/01	5.02 – Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	Settled
8/12/2002	2.16 – Title V Operation Permits	Settled
6/19/07	2.16 – Title V Operation Permits	Settled

- 6. Calculation Methodology:**
The emission calculations for the various pieces of equipment are derived from stack test results, AP-42 emission factors, EPA guidance documents, Monomer Recovery System parameter data, mass balances, and engineering judgments.

7. Insignificant Activities:

Source Wide Insignificant Activities		
Activity	Quantity	Regulatory Basis
Indirect Heat Exchangers less than 10 MM BTU/Hr capacity using only natural gas and not combusting waste oil: <ol style="list-style-type: none"> 1. C-PLY-MRV-TO Natural Gas Burner (1.5 MMBTU/Hr) 2. C-PLY-TCO Natural Gas Burner (2.2 MMBTU/Hr) 3. C-SDR-2SDRTO Natural Gas Burner (5.1 MMBTU/Hr) 	3	Regulation 1.02, Appendix A, Section 1.1
Above-Ground Diesel Fuel Storage Tank (Designated as EB126FST); 300 gallons (approximate); for maintenance activities	1	Tank used exclusively for storage of lubricating oils or fuel oils with a vapor pressure of less than 10 mmHg at conditions of 20°C and 760 mmHg. Regulation 1.02, Appendix A, Section 3.9.2
Closed-Loop Refrigerated Ethylene Glycol/Water Cooling System (Including Tank TK-127C)	1	APCD Determination (April 2012)
Cooling Tower (Non-Chromium treated water)	1	40 CFR Part 63 Subpart Q (40 CFR 63.400) not applicable to cooling tower – does not use chromium treated water.
Research & Development (R&D) Activities/Facilities	N/A	Regulation 1.02, Appendix A, Section 3.27
Plant NH ₃ Refrigeration System consisting of but not limited to: <ol style="list-style-type: none"> a) Approximately 1,800 valves b) Approximately 4,200 flanges c) 6 compressors d) 3 heat exchangers e) 3 condensers f) 2 tanks g) 2 pumps h) 1 separator i) 38 sets of cooling coils in polymerizes 	N/A	Regulation 1.06, Section 4.1; Regulation 1.02, Section 1.38.1.2
Miscellaneous drums and totes	< 2,500	Regulation 1.02, Appendix A, Section 2.3.24

Source Wide Insignificant Activities		
Activity	Quantity	Regulatory Basis
Miscellaneous maintenance lubricating oils storage, including 8 compartment storage rack	1	Tanks used exclusively for storage of lubricating oils or fuel oils with a vapor pressure of less than 10 mmHg at conditions of 20°C and 760 mmHg. Regulation 1.02, Appendix A, Section 3.9.2

Tank Farm (TKF) Insignificant Activities		
Activity	Quantity	Regulatory Basis
Butadiene Monomer Railcar Unloading/Loading Stations: Material is unloaded under pressure with a vapor return hose utilized	3	Closed system with no known underlying applicable regulation.
Butadiene Storage Tank TK-1B (Closed Pressure Vessel with bottom fill and vapor recovery)	1	Exempt from provisions of 40 CFR 63 Subpart U by definition of storage vessel (40 CFR 63.482) Regulation 1.02, Appendix A, Section 3.26
Butadiene Storage Tank TK-2B (Closed Pressure Vessel with bottom fill and vapor recovery)	1	Exempt from provisions of 40 CFR 63 Subpart U by definition of storage vessel (40 CFR 63.482) Regulation 1.02, Appendix A, Section 3.26
Butadiene Storage Tank TK-3B (Closed Pressure Vessel with bottom fill and vapor recovery)	1	Exempt from provisions of 40 CFR 63 Subpart U by definition of storage vessel (40 CFR 63.482) Regulation 1.02, Appendix A, Section 3.26

Tank Farm (TKF) Insignificant Activities		
Activity	Quantity	Regulatory Basis
Butadiene Storage Tank TK-4B (Closed Pressure Vessel with bottom fill and vapor recovery)	1	Exempt from provisions of 40 CFR 63 Subpart U by definition of storage vessel (40 CFR 63.482) Regulation 1.02, Appendix A, Section 3.26
300 gallon (approximate) above ground diesel fuel storage tank for firewater back-up pump (Designated as Storage Tank BNTFDST)	1	Regulation 1.02, Appendix A, Section 3.9.2
Emergency Propane generator and 100 gallon (approximate) propane storage tank for chemical additives “refrigerator”	1	EPA White Papers

Polymerization (PLY) Insignificant Activities		
Activity	Quantity	Regulatory Basis
Storage Tank TK-151; 200-gallon capacity (VOC < 250 gallons)	1	Regulation 1.02, Appendix A, Section 2.3.24
Tank TK-103E (A-80 Storage Tank)	1	Part of Operating Scenario required records (40 CFR 63.2525(b)(1)) and MON MACT NOCS (40 CFR 63.2520(d)(2)(iv))
Tank TK-103 (Blend Tank Addition Tank)	1	Part of Operating Scenario required records (40 CFR 63.2525(b)(1)) and MON MACT NOCS (40 CFR 63.2520(d)(2)(iv))
Tank TK-104 (Calibration and Weigh Tank)	1	Part of Operating Scenario required records (40 CFR 63.2525(b)(1)) and MON MACT NOCS (40 CFR 63.2520(d)(2)(iv))

Polymerization (PLY) Insignificant Activities		
Activity	Quantity	Regulatory Basis
Tank TK-106	1	Part of Operating Scenario required records (40 CFR 63.2525(b)(1)) and MON MACT NOCS (40 CFR 63.2520(d)(2)(iv))
Tank TK-107	1	Part of Operating Scenario required records (40 CFR 63.2525(b)(1)) and MON MACT NOCS (40 CFR 63.2520(d)(2)(iv))
Tank TK-18C	1	Part of Operating Scenario required records (40 CFR 63.2525(b)(1)) and MON MACT NOCS (40 CFR 63.2520(d)(2)(iv))
Tank TK-120 (MCF Tank)	1	Part of Operating Scenario required records (40 CFR 63.2525(b)(1)) and MON MACT NOCS (40 CFR 63.2520(d)(2)(iv))
Latex Loading	< 6	Regulation 1.02, Section 1.38.1.2

Pieco (PCO) Insignificant Activities		
Activity	Quantity	Regulatory Basis
Drum Filling Operation	1	Regulation 1.02, Section 1.38.1.2

Spray Drying (SDR) Insignificant Activities		
Activity	Quantity	Regulatory Basis
Optional-Use, Safety, In-line Particulate No. 2 Spray Dryer RTO “Guard” filter (located post-C-SDR-2SDR and pre-C-SDR-2SDRTO; not a TV particulate control device)	1	Permit 358-08-C; Regulation 1.02, Section 1.38.1.2

Drying (DRY) Insignificant Activities		
Activity	Quantity	Regulatory Basis
Brine Storage Tanks TK-413 and TK-414, and Associated Sodium Chloride Truck Unloading	2 Storage Tanks	Regulation 1.02, Section 1.38.1.2

Pelletizing (PEL) Insignificant Activities		
Activity	Quantity	Regulatory Basis
N/A	N/A	N/A

Miscellaneous (MSC) Insignificant Activities		
Activity	Quantity	Regulatory Basis
Internal 785-gallon diesel fuel tank associated with Emergency Diesel Generator EMGEN001 (Title V Emission Point E-MSC-EMGEN001)	1	Tank used exclusively for storage of lubricating oils or fuel oils with a vapor pressure of less than 10 mmHg at conditions of 20°C and 760 mmHg. Regulation 1.02, Appendix A, Section 3.9.2