



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



Permit No.: 82-09-C (R1)

Plant ID: 1912

Effective Date: 0/00/2016

Expiration Date: 0/00/2017

Owner/Source: E.I. du Pont de Nemours and Company
4250 Camp Ground Road
Louisville, Kentucky 40216

is authorized to install the described process equipment by the Louisville Metro Air Pollution Control District. Authorization is based on information provided with the application submitted by the company and in accordance with applicable regulations and the conditions specified herein.

Process equipment description:

Phase Four Expansion of the VF Process (U-6) bringing the total manufacturing capacity of Vinyl Fluoride to 30 million annual pounds. (See Table 1 for a list of equipment and what is controlled by scrubber SB-403)

Applicable Regulation(s): 2.03, 2.04, 2.16, 5.00, 5.01, 5.15, 5.20, 5.21, 5.22, 5.23, 6.24, 7.25,
40 CFR 63 Subpart FFFF

Control reference(s): N/A

Application No. 11197

Application Received: 2/6/2009

Permit Writer: Shannon Hosey

Date of Public Comment 00/00/2016

{Manager1}
Air Pollution Control Officer
{date1}

Table 1: Process Equipment

Unit U6000 Emission Points				
ID	Description	Applicable Regulation(s) ¹	Control Device	Stack ID
CL-405	HF Recycle Distillation Column with Condenser (C-405) and Reboiler (BR-405) 2009	STAR, 5.15, 7.25, 40 CFR 63 Subpart FFFF	Main/Emergency Scrubber (SB-403)	S-14
CL-406	DFE Recycle Distillation Column with Condenser (C-406) and Reboiler (BR-406) 2009			
CL-500	Removal Distillation Column with Process Condenser (C-500) and Reboiler (BR-500) 2003	STAR, 40 CFR 63 Subpart FFFF ²	Main/Emergency Scrubber (SB-403)	S-14
CL-503	Tar Distillation Column with Condenser (C-302) 2003 and Tar Concentrator (TR-302) 1962			
CO-410	VF Reactor Outlet Cooler 2008	STAR, 5.15, 7.25	Main/Emergency Scrubber (SB-403)	S-14
CO-411	VF Crude (Recycle) Cooler 2009			
F-416	Reactor Outlet Filter 2008	STAR, 5.15, 7.25	Main/Emergency Scrubber (SB-403)	S-14
F-419	VF Crude Gas (1 st Stage) Filter 2009			
H-405N	(Process/Process) Heat Exchanger 2008			
H-405S	(Process/Process) Heat Exchanger 2008			
H-406	Salt Heat Exchanger 2008			
RE-301	Recovered HF Process Tank 1993	STAR, 40 CFR 63 Subpart FFFF ¹	Main/Emergency Scrubber (SB-403)	S-14
RE-401	VF Reactor 1964	STAR, 5.15, 6.24, 40 CFR 63 Subpart FFFF	Main/Emergency Scrubber (SB-403)	S-14
RE-402	VF Reactor 2008	STAR, 5.15, 7.25, 40 CFR 63 Subpart FFFF	Main/Emergency Scrubber (SB-403)	S-14
S-402	DFE Vapor Liquid Separator 2008	STAR, 5.15, 7.25	Main/Emergency Scrubber (SB-403)	S-14
T-403	VF Crude Process Tank 2009			
TR-303	Receiver 2009	NA	NA	NA
TR-304	Receiver 2009	NA	NA	NA
TS-401	HF Recycle Process Tank 1961	STAR, 40 CFR 63 Subpart FFFF ¹	Main/Emergency Scrubber (SB-403)	S-14
V-301	Vent Reactor with Condenser 1994 to Vessel with Condenser (C-303) 2006			
V-402	DFR Recycle Vaporizer 2008	STAR, 5.15, 7.25, 40 CFR 63 Subpart FFFF	Main/Emergency Scrubber (SB-403)	S-14

¹ STAR consists of District Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.

² This emission point from Unit U6000 Emission Points' table does not contain VOCs.

Unit U6000 Emission Points				
ID	Description	Applicable Regulation(s) ¹	Control Device	Stack ID
8275CP	VF Crude (1 st Stage) Compressor 2009	STAR, 5.15, 7.25	Main/Emergency Scrubber (SB-403)	S-14

Unit U6001 Emission Points				
ID	Description	Applicable Regulation(s)	Control Device	Stack ID
CL-407	VF Pure Distillation Column with Process Condenser (C-407) and Reboiler (BR-407) 2009	STAR, 5.15, 7.25 40 CFR 63 Subpart FFFF	NA	NA
CO-413 a & b	Shell and Tube Cooler 2009 (VF Trailer Loading)			
F-409	Pure Column Filter 1994			
F-410	Pure Column Filter 1994			
TR-402	VF Product Receiver Tank 1964	STAR, 5.15, 6.24	NA	NA
TR-403	VF Product Receiver Tank 1964	STAR, 5.15, 6.24	NA	NA
TR-404	VF Product Receiver Tank 1964	STAR, 5.15, 6.24	NA	NA
8850CP	VF Loading Compressor 2003	STAR, 5.15, 7.25 40 CFR 63 Subpart FFFF	NA	NA
8880CP	VF Loading Compressor 2009	STAR, 5.15, 7.25 40 CFR 63 Subpart FFFF	NA	NA
AB-400	HF Adsorbers 1962	STAR, 40 CFR 63 Subpart FFFF ³	Main/Emergency Scrubber (SB-403)	S-14
AB-401	HF Adsorbers 1962			

Unit U6002 Emission Point				
ID	Description	Applicable Regulation(s)	Control Device	Stack ID
C-408	VF Sphere Compressor Vent	40 CFR 63 Subpart FFFF	Main/Emergency Scrubber (SB-403)	S-14

Unit U6003 Emission Points				
ID	Description	Applicable Regulation(s)	Control Device	Stack ID
NA	HF Pumps, connections, valves	STAR	NA	NA
NA	VF Pumps, connections, gas valves, liquid valves	STAR	NA	NA

³ This emission point from Unit U6001 Emission Points' table does not contain VOCs.

Construction Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	82-09-C	08/18/2009	-	Initial	Entire Permit	Initial Permit Issuance
R1	82-09-C (R1)	xx/xx/2016	xx/xx/2016	Significant Revision	Entire Permit	Removing the 100 gpm liquor flow limit and the pH range; Updating TAC language

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

- G1. The owner or operator of the affected facility covered by this permit shall notify the District of any process change, equipment change, material change, or change in method or hours of operation. This requirement is applicable to those changes (except equipment changes) that may have the potential for increasing the emission of air contaminants to a level in excess of the applicable limits or standards specified in this permit or District regulations.
- G2. The owner or operator shall obtain new or revised permits from the District in accordance with District Regulation 2.16 for Title V sources, District Regulation 2.17 for FEDOOP sources or District Regulation 2.03 for other sources including:
- a. The company relocates to a different physical address.
 - b. The ownership of the company is changed.
 - c. The name of the company as shown on the permit is changed.
 - d. Permits are nearing expiration or have expired.
- G3. The owner or operator shall submit a timely application for changes according to G2. Timely renewal is not always achievable; therefore, the company is hereby authorized to continue operation in compliance with the latest District permit(s) until the District issues the renewed permit(s).
- G4. The owner or operator shall not be authorized to transfer ownership or responsibility of the permit. The District may transfer permits after appropriate notification (Form AP-100A) has been received and review has been made.
- G5. The owner or operator shall pay the required permit fees within 45 days after issuance of the SOF by the District, unless other arrangements have been proposed and accepted by the District.
- G6. This permit allows operation 8,760 hours per year unless specifically limited elsewhere in this permit.

- G7. The owner or operator shall submit emission inventory reports as required by Regulation 1.06.
- G8. The owner or operator shall timely report abnormal conditions or operational changes, which may cause excess emissions as required by Regulation 1.07.
- G9. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G10. If a change in the Responsible Official (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of the date the RO change occurs.

Specific Conditions

S1. Standards (Regulation 2.03, section 6.1)

a. VOC⁴

- i. For Emission Points S-402, V-402, H-406, H-405N, H-405S, RE-402, F-416, CO-410, F-419, 8275CP, CO-411, CL-405, T-403 and CL-406, the owner or operator shall limit the combined VOC emissions to 3,029 pounds or less per 12 consecutive month period, based on the BACT analysis dated February 2, 2009.⁵ (Regulation 7.25, section 3.1)
- ii. For Emission Points CO-413 a & b, CL-407, F-409, F-410, 8850CP and 8880CP, the owner or operator shall not allow or cause VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners to equal or exceed 5 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1)
- iii. For Emission Points RE-401, TR-402, TR-403, TR-404, the owner or operator shall not discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the discharge has been reduced by at least 85% by weight.⁶ (Regulation 6.24, section 3.3)

b. HAP

- i. The owner or operator shall reduce the collective hydrogen-halide and halogen-HAP emissions by 99 percent by weight, or to an outlet concentration of 20 ppm, by venting through one or more closed-vent systems to any combination of control devices; (40 CFR 63.2465(a) and 40 CFR 63 Subpart FFFF, Table 3.1.a.)
- ii. The owner or operator shall operate the Main/Emergency Scrubber (SB-403) at all times when emissions are vented to it. (40 CFR 63.994(a)(2) as referenced by 40 CFR 63.2465(c))
- iii. The owner or operator shall operate the Main/Emergency Scrubber (SB-403) by continuously monitoring pH with a flow meter capable of

⁴ This construction project increased the production capacity from 17.5 MMlb/yr to 30 MMlb/yr. The VOC increase from Phase 1, 2, and 3 of this project was 9.31 tpy. The VOC increase from Phase 4 of this project was 15.61 tpy. The potential VOC increase for Phase 1 through 4 was 24.92 tpy. Incorporating the revised maximum potential emissions from Emission Point 6001, the potential VOC increase for Phases 1 through 4 is now 27.04 tpy which is below the 40 ton/yr significant level for PSD/Non-Attainment NSR.

⁵ The BACT analysis, required by Regulation 7.25, dated February 2, 2009 demonstrated that there were no controls economically feasible for the potential combined VOC emissions of 1.51 tons per year.

⁶ The source cannot exceed the pound per day or pound per hour limits in Regulation 6.24 for Class III solvents.

providing a continuous record, which shall be located at the scrubber influent. (40 CFR 63.994(c)(1)(ii)).

c. **TAC**⁷

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21)
- ii. For Emission Points vented to the Main/Emergency Scrubber (SB-403), (Regulation 5.21, section 4.7)
 - 1) The owner or operator shall operate the Main/Emergency Scrubber (SB-403) at all times that any of the process equipment is in operation.
 - 2) The Main/Emergency Scrubber (SB-403) shall have a minimum control efficiency of 91.4%.

d. **Chemical Accident Prevention and Risk Management Plan**⁸ (Regulation 5.15 and 40 CFR Part 68, Subpart G)

The owner or operator shall comply with the requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format specified by the District and EPA.⁹

S2. **Monitoring and Record Keeping** (Regulation 2.03, section 6.1)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

- i. The owner or operator shall monitor and keep a record of the following:
 - 1) Each Reactor (RE-402) Fluorination;
 - 2) Each Vent Reactor (V-301) Purge;
 - 3) Each maintenance evacuation of the Acidic Eductor Vent (maintenance) (S-402; V-402; H-406; H-405N & H-405S; CO-410, F-419, 8275CP, CO- 411; CL-405, C-405, BR-405; T-403; CL-406, C-406, BR-406);
 - 4) Each Column (CL-407) Purge.

⁷ The potential uncontrolled Hydrogen Fluoride (Category 2 TAC) emissions are less than the de minimis rate of 7.6 pounds per hour. The potential controlled Hydrogen Fluoride emissions are less than the de minimis rate of 6,720 pounds per year.

⁸ 1,1-Difluoroethane (DFE) is not a VOC, HAP, or TAC. DFE is regulated by Regulation 5.15 (40 CFR 68 Subpart G).

⁹ Risk Management Plan was submitted 09/08/2015.

- ii. For Emission Points S-402, V-402, H-406, H-405N, H-405S, RE-402, F-416, CO-410, F-419, 8275CP, CO-411, CL-405, T-403 and CL-406, the owner or operator shall monthly calculate and record the monthly and 12 consecutive month VOC emissions for each month.
- iii. For Emission Points CO-413 a & b, CL-407, F-409, F-410, 8850CP and 8880CP, the owner or operator shall monthly calculate and record the monthly and 12 consecutive month VOC emissions for each month.

b. **HAP**

The owner or operator shall comply with the following monitoring requirements from 40 CFR 63.994(c) as referenced by 40 CFR 63.2450(e)(3):

- i. A pH monitoring device capable of providing a continuous record shall be installed to monitor the pH of the scrubber effluent. (40 CFR 63.994(c)(1)(i) as referenced by 40 CFR 63.2450(e)(3))
- ii. As an alternative to continuously measuring and recording pH as specified in §63.994(c)(1)(i), owner or operator may elect to continuously monitor and record the caustic strength of the effluent. (40 CFR 63.2450(k)(3))
- iii. A flow meter capable of providing a continuous record shall be located at the scrubber influent for liquid flow. (40 CFR 63.994(c)(1)(ii) as referenced by 40 CFR 63.2450(e)(3))
- iv. Gas stream flow shall be determined using one of the following procedures (40 CFR 63.994(c)(1)(ii) as referenced by 40 CFR 63.2450(e)(3)):
 - 1) The owner or operator may determine gas stream flow using the design blower capacity, with appropriate adjustments for pressure drop. (40 CFR 63.994(c)(1)(ii)(A) as referenced by 40 CFR 63.2450(e)(3))
 - 2) The owner or operator may measure the gas stream flow at the scrubber inlet. (40 CFR 63.994(c)(1)(ii)(B) as referenced by 40 CFR 63.2450(e)(3))
 - 3) The owner or operator may prepare and implement a gas stream flow determination plan that documents an appropriate method that will be used to determine the gas stream flow. The plan shall require determination of gas stream flow by a method that will at least provide a value for either a representative or the highest gas stream flow anticipated in the scrubber during representative operating conditions other than start-ups, shutdowns, or malfunctions. The plan shall include a description of the methodology to be followed and an explanation of how the selected methodology will reliably determine the gas stream flow, and a description of the records that will be maintained to document the determination of gas stream flow. The owner or operator shall maintain the plan as specified in a referencing

- subpart. (40 CFR 63.994(c)(1)(ii)(D) as referenced by 40 CFR 63.2450(e)(3))
- v. Records of the results of each Continuous Parameter Monitoring System (CPMS) calibration check and the maintenance performed, as specified in §63.2450(k)(1), which cites §63.998(c)(1)(ii)(A). (40 CFR 63.2525(g))
- 1) The date and time of completion of calibration and preventive maintenance of the CPMS. (§63.998(c)(1)(ii)(A) as referenced by 40 CFR 63.2450(k)(1))
 - 2) The “as found” and “as left” CPMS readings, whenever an adjustment is made that affects the CPMS reading and a “no adjustment” statement otherwise. (§63.998(c)(1)(ii)(B) as referenced by 40 CFR 63.2450(k)(1))
 - 3) The start time and duration or start and stop times of any periods when the CPMS is inoperative. (§63.998(c)(1)(ii)(C) as referenced by 40 CFR 63.2450(k)(1))
 - 4) Records of the occurrence and duration of each start-up, shutdown, and malfunction of CPMS used to comply with this subpart during which excess emissions occur. (§63.998(c)(1)(ii)(D) as referenced by 40 CFR 63.2450(k)(1))
 - 5) For each start-up, shutdown, and malfunction during which excess emissions as defined in a referencing subpart occur, records whether the procedures specified in the source’s start-up, shutdown, and malfunction plan were followed, and documentation of actions taken that are not consistent with the plan. These records may take the form of a “checklist,” or other form of recordkeeping that confirms conformance with the start-up, shutdown, and malfunction plan for the event. (§63.998(c)(1)(ii)(E) as referenced by 40 CFR 63.2450(k)(1))
 - 6) Records documenting each start-up, shutdown, and malfunction event. (§63.998(c)(1)(ii)(F) as referenced by 40 CFR 63.2450(k)(1))
 - 7) Records of CPMS start-up, shutdown, and malfunction event that specify that there were no excess emissions during the event, as applicable. (§63.998(c)(1)(ii)(G) as referenced by 40 CFR 63.2450(k)(1))
 - 8) Records of the total duration of operating time. §63.998(c)(1)(ii)(H) as referenced by 40 CFR 63.2450(k)(1))
- vi. Records of each operating scenario specified as follows: (40 CFR 63.2525(b))
- 1) A description of the process and the type of process equipment used. (§63.2525(b)(1))

- 2) An identification of related process vents, wastewater point of determination (POD); storage tanks; and transfer racks. (§63.2525(b)(2))
- 3) The applicable control requirements of this subpart, including the level of required control, and for vents, the level of control for each vent. (§63.2525(b)(3))
- 4) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. (§63.2525(b)(4))
- 5) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s). (§63.2525(b)(5))
- 6) The applicable monitoring requirements (S2.c) of this subpart and any parametric level that assures compliance for all emissions routed to the control device or treatment process. (§63.2525(b)(6))
- 7) Calculations and engineering analyses required to demonstrate compliance. (§63.2525(b)(7))
- 8) For reporting purposes, a change to any of these elements not previously reported, except for S3.c.i.5), constitutes a new operating scenario. (§63.2525(b)(8))

c. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally-acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis* at the time of the change.
- iii. Identification of all periods of bypassing the wet scrubber (SB-403) while in operation during a reporting period. The report shall include the following:
 - 1) The date;
 - 2) The duration (including start and stop time) of each bypass event;
 - 3) The total lb/hr emissions of each TAC during each bypass event;
 - 4) Summary information on the cause or reason for each bypass event;
 - 5) Corrective action taken to minimize the extent and duration of each bypass event; and
 - 6) Measures implemented to prevent reoccurrence of the situation that

resulted in bypassing any of the wet scrubbers. If there are no periods of bypassing any of the wet scrubbers during a reporting period, the owner or operator shall submit a negative declaration for the reporting period.

d. **Chemical Accident Prevention and Risk Management Plan (Regulation 5.15 and 40 CFR Part 68, Subpart G)**

The owner or operator shall monitor the processes and keep records required by Regulation 5.15.

S3. **Reporting** (Regulation 2.03, section 6.1)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete”.
- Signature and title of the responsible official of the company.

The compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 st through June 30 th	August 29 th
July 1 st through December 31 st	March 1 st

a. **VOC**

- i. Emission Unit ID number, Stack ID number, and/or Emission Point ID number;
- ii. The beginning and ending date of the reporting period;
- iii. For Emission Points S-402, V-402, H-406, H-405N, H-405S, RE-402, F-416, CO-410, F-419, 8275CP, CO-411, CL-405, T-403 and CL-406, the monthly and 12 consecutive month VOC emissions for each month.
- iv. For Emission Points CO-413 a & b, CL-407, F-409, F-410, 8850CP, and 8880CP, the monthly and 12 consecutive month VOC emissions for each month.

b. **HAP**

- i. Company name and address (§63.2520(e)(1))
- ii. Statement by a responsible official with that official’s name, title, and signature, certifying the accuracy of the content of the report.

- (§63.2520(e)(2))
- iii. Date of report and beginning and ending dates of the reporting period. (§63.2520(e)(3))
 - iv. For each startup, shutdown, or malfunction (SSM) during which excess emissions occur, the compliance report must include records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction. (§63.2520(e)(4))
 - v. The compliance report must contain the information on deviations, as defined in §63.2550, according to the following: (§63.2520(e)(5))
 - 1) If there are no deviations from any emission limit, operation limit or work practice standard specified in this subpart, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period. (§63.2520(e)(5)(i))
 - 2) For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where you are not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in this subpart, you must include the information in the following: (This includes periods of SSM) (§63.2520(e)(5)(ii))
 - (a) The total operating time of the affected source during the reporting period. (§63.2520(e)(5)(ii)(A))
 - (b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. (§63.2520(e)(5)(ii)(B)).
 - vi. Include each new operating scenario which has been operating since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, you must provide verification that the operating conditions for any associated control or treat device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario. (§63.2520(e)(7))
 - vii. Notification of process change. (§63.2520(e)(10))
 - 1) Except as specified in S4.c.vii.2), whenever you make a process change, or change any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating

scenario, you must document the change in your compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the information in paragraphs (a) through (c) of this section. (§63.2520(e)(10)(i))

- (a) A description of the process change. (§63.2520(e)(10)(i)(A))
- (b) Revisions to any of the information reported in the original notification of compliance status report. (§63.2520(e)(10)(i)(B))
- (c) Information required by the notification of compliance status report for changes involving the addition of processes or equipment at the affected source. (§63.2520(e)(10)(i)(C))

2) You must submit a report 60 days before the scheduled implementation date of any of the changes identified in paragraph (a) or (b) of this section. (§63.2520(e)(10)(ii))

- (a) Any change to the information contained in the precompliance report. (§63.2520(e)(10)(ii)(A))
- (b) A change in the status of a control device from small to large. (§63.2520(e)(10)(ii)(B))

c. TAC

- i. For the Main/Emergency Scrubber (SB-403),
 - 1) Emission unit ID number and emission point ID number
 - 2) The beginning and ending date of the reporting period
 - 3) Identification of all periods where the flow rate of water is below the limit.
 - 4) The total lb/hr emissions of each TAC during each bypass event;
 - 5) The monthly bypass hours for each month and the year to date total
 - 6) Description of any corrective action taken for each exceedance
- ii. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- iii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or

meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze.
(Regulation 5.21 sections 4.22 – 4.24)

- iv. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

d. **Chemical Accident Prevention and Risk Management Plan** (Regulation 5.15 and 40 CFR Part 68, Subpart G)

The owner or operator shall comply with the reporting requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA.

S4. **Testing** (Regulation 2.03, section 5.1)¹⁰

The owner or operator shall construct all equipment in such a manner that the following testing requirements can be performed.

a. **TAC/HAP**

- i. The owner or operator shall within 180 days of achieving normal operation perform an EPA Reference Method (26A) for Hydrogen Fluoride within +/- 10% of maximum production of the process equipment on the inlet and outlet of the Main/Emergency Scrubber (SB-403).
- ii. The owner or operator shall within 180 days of achieving normal operation perform a capture efficiency test using EPA guidelines.
- iii. The owner or operator shall submit a written compliance test plan that includes the EPA test methods that will be used for compliance testing, the process operating parameters that will be monitored during the compliance test, and the control device performance indicators (e.g. temperature) that will be monitored during the compliance test. The compliance test plan shall be furnished to the District at least 30 days prior to the actual date of the compliance test.
- iv. The owner or operator shall provide the District at least 10 days prior notice of any compliance test to afford the District the opportunity to have an observer present.
- v. The owner or operator shall furnish the District with a written report of the results of the compliance test within 60 days following the actual date of the compliance test.
- vi. The owner or operator shall provide written notification to the District of the actual date of initial startup. The written notification shall be postmarked within 15 days after the startup date.

¹⁰ Testing was conducted on June 22, 2011.