Louisville Metro Air Pollution Control District
850 Barret Avenue
Louisville, Kentucky 40204-1745

Permit No.: C-0036-1002-15-V Plant ID: 0036

Effective Date: 0/00/2015 Expiration Date: 0/00/2016

Clariant Corporation (Louisville West Plant)
1227 South 12th Street
Louisville, KY 40210

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:

Process 203-W70 which will include five lines associated with catalyst manufacturing and two ovens associated with existing process 203-W23. See Table for Equipment List.

Applicable Regulation(s): 2.03, 2.05, 2.16, 5.00, 5.01, 5.14, 5.20, 5.21, 5.22, 5.23, 7.08, 7.25, 40 CFR 63 Subpart VVVVVV

Control reference(s): N/A

Application No. 70287 & 70286 Application Received: 3/23/2015

Permit Writer: Jenny Rhodes

Date of Public Comment 5/14/2015

{Manager1}
Air Pollution Control Officer
{date1}

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 when:
(See District Regulation 2.16 for Title V sources. See District Regulation 2.17 for FEDOOP sources. See District Regulation 2.03 for other sources.)

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. For minor sources only, the District does not require application for permit renewal. The District automatically commences the process of permit renewal for minor sources upon expiration. 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 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 100A) to the District within 30 calendar days of the date the RO change occurs.

Emission Point	Description	Applicable Regulations	Control ID	Stack ID
Emission Unit 203-W70				
T-203-W70-101	Chilled Mixing Tank	7.08, 7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	DC-203-W22-902	S-203-W22-004
T-203-W70-102	Chilled Mixing Tank			
M-203-W70-101	Netzsch Mill #1	Sealed Equipment	NA	NA
M-203-W70-102	Netzsch Mill #2		NA	NA
TT-203-W70-101	Washcoat Tote, 92 gallons	7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
TT-203-W70-102	Washcoat Tote, 92 gallons		NA	Fugitive
TT-203-W70-103	Washcoat Tote, 92 gallons		NA	Fugitive
TT-203-W70-104	Washcoat Tote, 92 gallons		NA	Fugitive
TT-203-W70-105	Washcoat Tote, 92 gallons		NA	Fugitive
TT-203-W70-106	Washcoat Tote, 92 gallons		NA	Fugitive
TT-203-W70-201	Washcoat Tote, 185 gallons		NA	Fugitive
TT-203-W70-202	Washcoat Tote		NA	Fugitive
DR-203-W70-201	Drying Table		NA	Fugitive
TR-203-W70-201	Trays and Racks		NA	Fugitive
HT-203-W70-201	Oven 7 (2 MM BTU/hr)	7.08, 7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	S-203-W70-001
TT-203-W70-203	Washcoat Bench	7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
CV-203-W70-201	Auto-Dip Conveyor		NA	Fugitive
TT-203-W70-204	Tote, 26 gallons		NA	Fugitive
TT-203-W70-302	Spiker Tote	5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
TB-203-W70-301	Catalyst Table		NA	S-203-W70-002
TR-203-W70-301	Trays and Racks	7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
HT-203-W70-301	Oven 6 (2 MM BTU/hr)	7.08, 7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	ED-203-W23-150 SC-203-W23-550	S-203-W23-005
TT-203-W70-303	Catalyst Bench	7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
DR-203-W70-302	Drying Table		NA	Fugitive
CV-203-W70-301	Auto-Conveyor		NA	S-203-W70-003
VS-203-W70-401	Vibratory Screener	7.08	DC-203-W22-902	S-203-W22-004
TT-203-W70-401	Catalyst Tote, 80 gal	5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
TT-203-W70-402	Pressure Tote, 10 gal	5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive

Emission Point	Description	Applicable Regulations	Control ID	Stack ID
MX-203-W70-401	Mixer	5.00, 5.01, 5.20, 5.21, 5.22, 5.23	ED-203-W23-150 SC-203-W23-550	S-203-W23-005
FD-203-W70-401	Vibratory Feeder	7.08	DC-203-W22-902	S-203-W22-004
TT-203-W70-403	Washcoat Tote, 55 gallons	7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
CF-203-W70-401	Centrifuge		NA	Fugitive
TT-203-W70-404	Catalyst Tote, 20 gal	5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
TT-203-W70-501	DPF Washcoat Tote	7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
DR-203-W70-501A	Vacuum Table		NA	Fugitive
DR-203-W70-501B	Vacuum Table		NA	Fugitive
DR-203-W70-301	Drying Table		NA	Fugitive
TR-203-W70-501	Trays and Racks		NA	Fugitive
HT-203-W70-501	Oven 4 (1 MM BTU/hr)	7.08, 7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	ED-203-W23-150 SC-203-W23-550	S-203-W23-005
TT-203-W70-502	DPF Catalyst Table	5.00, 5.01, 5.20, 5.21, 5.22, 5.23	NA	Fugitive
DR-203-W70-502	Vacuum Dryer		NA	S-203-W70-004
TT-203-W70-701	Nitric Acid Dilution Tote		NA	S-203-W70-006
TS-203-W70-701	Table Saw	7.08	NA	Fugitive
CS-203-W70-701	Ceramic Saw	7.08, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	DC-203-W70-701	S-203-W70-005
Existing Emission Unit 203-W23				
HT-203-W23-534	Box Dryer, Wisconsin Oven (2.5 MM BTU/hr)	7.08, 7.25, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23	ED-203-W23-550 SC-203-W23-550	S-203-W23-005
HT-203-W23-542	Box Dryer, Wisconsin Oven (2.5 MM BTU/hr)			

Control ID	Equipment Description	Control %
ED-203-W23-150	Eductor which will be used prior to existing scrubber SC-203-W23-550 to control Nitric Acid and NOx.	75% NOx & Nitric Acid
SC-203-W23-550	Existing Packed-bed Scrubber with Mesh Pad, Sly, Model 54-72	75% NOx & Nitric Acid
DC-203-W22-902	Existing Baghouse, Mac Equipment Model 3MTF24 Mactiflo	99.489% PM
DC-203-W70-701	Forced Draft Cartridge Dust Collector	95% PM

Specific Conditions

S1. **Standards** (Regulation 2.03, section 6.1)

a. **VOC**

i. The owner or operator shall not allow or cause the plant-wide VOC emissions to equal or exceed 100 tons during any consecutive 12-month period. (Regulations 2.05)[1]

ii. For the equipment subject to Regulation 7.25 (T-203-W70-101, T-203-W70-102, TT-203-W70-101, TT-203-W70-102, TT-203-W70-103, TT-203-W70-104, TT-203-W70-105, TT-203-W70-106, TT-203-W70-201, TT-203-W70-202, DR-203-W70-201, TR-203-W70-201, HT-203-W70-201, TT-203-W70-203, CV-203-W70-201, TT-203-W70-204, TR-203-W70-301, HT-203-W70-301, TT-203-W70-303, DR-203-W70-302, CV-203-W70-301, TT-203-W70-403, CF-203-W70-401, TT-203-W70-501, DR-203-W70-501A , DR-203-W70-501B , DR-203-W70-301, TR-203-W70-501, HT-203-W70-501, HT-203-W23-534, HT-203-W23-542 and all existing equipment subject to Reg. 7.25), the owner or operator shall not allow or cause the plant-wide VOC emissions to exceed 5 tons per consecutive 12-month period, unless modeling or a BACT analysis has been submitted to, and approved by, the District. (Regulation 7.25, section 3)

b. **HAP**

i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 10 tons during any consecutive 12-month period. (Regulation 2.05)

ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 25 tons during any consecutive 12-month period. (Regulation 2.05)

iii. *Management Practices*. The owner or operator shall comply with the following paragraphs. (40 CFR 63 Subpart VVVVVV)

1) Each process vessel must be equipped with a cover or lid that must be closed at all times when it is in metal HAP service, except for manual operations that require access, such as material addition and removal, inspection, sampling and cleaning. This requirement does not apply to process vessels containing only metal HAP that are in a liquid solution or other form that will not result in particulate emissions of metal HAP (e.g., metal HAP that is in ingot, paste, slurry, or moist pellet form or other form). (40 CFR 63.11495(a)(1))

[1] This project is not major for PSD/NSR since the Company has already accepted synthetic minor limits.

2) The owner or operator must conduct inspections of process vessels and equipment for each CMPU in metal HAP service, as specified in the following paragraphs to demonstrate compliance with S1.c.iii.1) and to determine that the process vessels and equipment are sound and free of leaks. (40 CFR 63.11495(a)(3))

(a) Inspections must be conducted at least quarterly. (§63.11495(a)(3)(i))

(b) For these inspections, detection methods incorporating sight, sound, or smell are acceptable. Indications of a leak identified using such methods constitute a leak unless you demonstrate that the indications of a leak are due to a condition other than loss of HAP. If indications of a leak are determined not to be HAP in one quarterly monitoring period, you must still perform the inspection and demonstration in the next quarterly monitoring period. (§63.11495(a)(3)(ii))

(c) Inspections must be conducted while the subject CMPU is operating. (§63.11495(a)(3)(iv))

(d) No inspection is required in a calendar quarter during which the subject CMPU does not operate for the entire calendar quarter and is not in organic HAP service or metal HAP service. If the CMPU operates at all during a calendar quarter, an inspection is required. (§63.11495(a)(3)(v))

3) The owner or operator must repair any leak within 15 calendar days after detection of the leak, or document the reason for any delay of repair. For the purposes of this paragraph, a leak will be considered "repaired" if a condition specified in one of the following paragraphs is met. (40 CFR 63.11495(a)(4))

(a) The visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated, or (§63.11495(a)(4)(i))

(b) No bubbles are observed at potential leak sites during a leak check using soap solution, or (§63.11495(a)(4)(ii))

(c) The system will hold a test pressure. (§63.11495(a)(4)(iii))

4) The owner or operator must keep records of the dates and results of each inspection event, the dates of equipment repairs, and, if applicable, the reasons for any delay in repair. (40 CFR 63.11495(a)(5))

iv. Startup, shutdown, and malfunction (SSM) provisions in subparts that are referenced in 40 CFR 63.11495(a) and (b) do not apply. (40 CFR 63.11495(c))

v. *General duty*. At all times, the owner or operator must operate and maintain any affected CMPU, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the CMPU. (40 CFR 63.11495(d))

vi. *Emissions from metal HAP process vents*. For all metal HAP process vents from each CMPU with collective uncontrolled metal HAP emissions equal to or greater than 400 lb/yr, the owner or operator shall reduce collective uncontrolled emissions of total metal HAP emissions by ≥95 percent by weight by routing emissions from a sufficient number of the metal process vents through a closed-vent system to any combination of control devices, according to the requirements of §63.11496(f)(3). The requirements of this paragraph §63.11495(f) do not apply to metal HAP process vents from CMPU containing only metal HAP that are in a liquid solution or other form that will not result in particulate emissions of metal HAP (e.g., metal HAP that is in ingot, paste, slurry, or moist pellet form or other form). (40 CFR 63.11496(f) and Table 4)

c. **$PM/PM_{10}/PM_{2.5}$**

i. The owner or operator shall not allow or cause the plant-wide $PM/PM_{10}/PM_{2.5}$ emissions to equal or exceed 100 tons during any consecutive 12-month period. (Regulations 2.04 and 2.05)

ii. For each piece of equipment subject to Regulation 7.08, the owner or operator shall not allow or cause PM emissions to exceed 2.34 lb/hr based on actual operating hours in a calendar day.[2] (Regulation 7.08, section 3.1.2)

iii. For emission points T-203-W70-101, T-203-W70-102, and FD-203-W70-401; the owner or operator shall operate the control device DC-203-W70-902 at all times the process is in operation.

d. **Opacity**

The owner or operator shall not allow or cause visible emissions to equal or exceed twenty percent (20%) opacity. (Regulation 7.08, section 3.1.1)

[2] The potential PM emissions from HT-203-W70-201, HT-203-W70-301, VS-203-W70-401, HT-203-W70-501, TS-203-W70-701, CS-203-W70-701 cannot exceed the PM standard uncontrolled. The potential PM emissions from Emission points T-203-W70-101, T-203-W70-102, and FD-203-W70-401 cannot exceed the PM standard controlled.

e. **NOx**

i. The owner or operator shall not allow or cause the plant-wide NOx emissions to equal or exceed 100 tons during any consecutive 12-month period . (Regulations 2.05)

ii. For emission points HT-203-W70-201, HT-203-W70-301, HT-203-W70-501, HT-203-W23-534, HT-203-W23-542; the owner or operator shall not allow or cause the emissions of NO_X to exceed 300 ppm by volume, expressed as NO_2. (Regulation 7.08, section 4)[3]

f. **TAC**

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. The owner or operator shall not allow emissions of nitric acid and triethylamine emissions to exceed *de minimis* levels. (Regulations 5.00 and 5.21)[4]

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. For each VOC emission point, the owner or operator shall monitor and maintain records of the throughput of all VOC containing materials during each calendar month.

ii. The owner or operator shall calculate and record the plant-wide consecutive 12-month VOC emissions for each month in the reporting period.

iii. For the equipment subject to Regulation 7.25 (T-203-W70-101, T-203-W70-102, TT-203-W70-101, TT-203-W70-102, TT-203-W70-103, TT-203-W70-104, TT-203-W70-105, TT-203-W70-106, TT-203-W70-201, TT-203-W70-202, DR-203-W70-201, TR-203-W70-201, HT-203-W70-201, TT-203-W70-203, CV-203-W70-201, TT-203-W70-204, TR-203-W70-301, HT-203-W70-301, TT-203-W70-303, DR-203-W70-302, CV-203-W70-301, TT-203-W70-403, CF-203-W70-401, TT-203-W70-501, DR-203-W70-501A , DR-203-W70-501B , DR-203-W70-301, TR-203-W70-501, HT-203-W70-501, HT-203-W23-534, HT-203-W23-542 and all existing equipment subject to Reg. 7.25), the owner or operator shall

[3] Emission points HT-203-W70-201, HT-203-W70-301, HT-203-W70-501, HT-203-W23-534, and HT-203-W23-542 cannot exceed the 300 ppm NOx Reg. 7.08 standard uncontrolled.

[4] As of the effective date of this permit, the de minimis levels of Nitric Acid are 1.00 lb/8 hr, 1.00 lb/hr (8 hr averaging period) and Triethylamine are 3,360 lb/yr and 3.78 lb/hr (annual averaging period.)

calculate and record the plant-wide consecutive 12-month VOC emissions for each month in the reporting period.

b. **HAP**

i. For each HAP emission point, the owner or operator shall calculate and monthly record the monthly throughput of each HAP-containing raw material and the HAP content.

ii. The owner or operator shall calculate and record the *plant-wide* consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

iii. The owner or operator must determine the sum of metal HAP emissions from all metal HAP process vents within a CMPU subject to 40 CFR 63 Subpart VVVVVV, except you are not required to determine the annual emissions if you control the metal HAP process vents within a CMPU in accordance with Table 4 of Subpart VVVVVV or if you determine your total metal HAP usage in the process unit is less than 400 lb/yr. To determine the mass emission rate you may use process knowledge, engineering assessment, or test data. You must keep records of the emissions calculations. (40 CFR 63.11496(f)(1))[5]

iv. If your current estimate is that total uncontrolled metal HAP emissions from a CMPU subject to this subpart are less than 400 lb/yr, then you must keep records of either the number of batches operated per month (batch vents) or the process operating hours (continuous vents). Also, you must reevaluate your total emissions before you make any process or operational change that affects emissions of metal HAP. If projected emissions increase to 400 lb/yr or more, then you must be in compliance with one of the options for metal HAP process vents in Table 4 of Subpart VVVVVV upon initiating operation under the new operating conditions. You must keep records of all recalculated emissions determinations. (40 CFR 63.11496(f)(2))[5]

v. *Recordkeeping*. The owner or operator must maintain files of all information required by this subpart for at least 5 years following the date of each occurrence according to the requirements in §63.10(b)(1). If you are subject, you must comply with the recordkeeping and reporting requirements of §63.10(b)(2)(iii) and (vi) through (xiv), and the following applicable requirements for each CMPU subject to this Subpart VVVVVV. (40 CFR 63.11501(c)(1))

1) Records of management practice inspections, repairs, and reasons for any delay of repair, as specified in §63.11495(a)(5). (§63.11501(c)(1)(i))

[5] The requirements of paragraph 40 CFR 63.11496(f) do not apply to metal HAP process vents from CMPU containing only metal HAP that are in a liquid solution or other form that will not result in particular emissions of metal HAP (e.g. metal HAP that is in ingot, paste, slurry, or moist pellet form or other form per 40 CFR 63.11496(f).

2) Records of small heat exchange system inspections, demonstrations of indications of leaks that do not constitute leaks, repairs, and reasons for any delay in repair as specified in §63.11495(b). (§63.11501(c)(1)(ii))

3) Records of metal HAP emission calculations as specified in §63.11496(f)(1) and (2). If total uncontrolled metal HAP process vent emissions from a CMPU subject to this subpart are estimated to be less than 400 lb/yr, also keep records of either the number of batches per month or operating hours, as specified in §63.11496(f)(2). (§63.11501(c)(1)(v))

4) Records of the date, time, and duration of each malfunction of operation of process equipment, control devices, recovery devices, or continuous monitoring systems used to comply with this subpart that causes a failure to meet a standard. The record must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions. (§63.11501(c)(1)(vii))

vi. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11495(d), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (§63.11501(c)(1)(viii))

c. **$PM/PM_{10}/PM_{2.5}$**

i. The owner or operator shall calculate and record the plant-wide consecutive 12-month $PM/PM_{10}/PM_{2.5}$ emissions for each month in the reporting period.

ii. The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of DC-203-W22-902 for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

iii. For emission points T-203-W70-101, T-203-W70-102, and FD-203-W70-401; for any period of time when the process was operating and a PM control device DC-203-W22-902 was not operating, the owner or operator shall maintain the following records[11]:

1) The duration of the control device downtime;

2) The process throughput during the control device downtime;

3) The emissions of PM (lb/hr) and $PM/PM_{10}/PM_{2.5}$ (tons); and

4) Summary information on the cause of the event, corrective action taken, and measures implemented to prevent reoccurrence.

d. **Opacity**

i. For each referenced PM emission point, the owner or operator shall conduct a monthly one-minute visible emissions survey during normal process operation of each PM emission point. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is wholly within a building.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation.

iii. The owner or operator shall maintain monthly records of the results of all visible emissions surveys and Method 9 tests performed. The records shall include the date of each survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

e. **NOx**

The owner or operator shall calculate and record the *plant-wide* consecutive 12-month NO_X emissions for each month in the reporting period.

f. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. The owner or operator shall:[6]

1) For HT-203-W70-201 when processing TEAOH products to maintain triethylamine emissions below the lb/yr (annual averaging period) *de minimis* levels:

(a) Limit the hours of operation to 2775 hours per year.

(b) Maintain monthly records of hours of operation.

2) For HT-203-W70-301 when processing TEAOH products to maintain triethylamine emissions below the lb/hr and lb/yr (annual averaging period) *de minimis* levels:

(a) Limit the hours of operation to 898 hours per year; and

(b) Limit production rate of TEAOH products to 369 lb/hr.

[6] The Company requested the following production rates and hours of operation in the construction application dated March 23, 2015.

(c) Maintain daily records of hours of operation

(d) Maintain daily amount of TEAOH products processed.

3) For DR-203-W70-302 when processing Nitric Acid products to maintain nitric acid emissions below the lb/averaging period (8 hours) *de minimis* level:

(a) Limit the hours of operation to 247 hour per month.

(b) Maintain monthly records of hours of operation.

For CV-203-W70-301 when processing Nitric Acid products maintain nitric acid emissions below the lb/averaging period (8 hours) *de minimis* level:

(c) Limit the hours of operation to 555 hour per month.

(d) Maintain monthly records of hours of operation.

4) For HT-203-W70-501 when processing TEAOH products to maintain triethylamine emissions below the lb/yr (annual averaging period) *de minimis* levels:

(a) Limit the hours of operation to 5598 hours per year.

(b) Maintain monthly records of hours of operation.

5) For HT-203-W23-534 when processing TEAOH products to maintain triethylamine emissions below the lb/hr and lb/yr (annual averaging period) *de minimis* levels:

(a) Limit the hours of operation to 898 hours per year; and

(b) Limit production rate of TEAOH products to 369 lb/hr.

(c) Maintain daily records of hours of operation and the daily amount of TEAOH products processed.

6) For HT-203-W23-542 when processing TEAOH products to maintain triethylamine emissions below the lb/hr and lb/yr (annual averaging period) *de minimis* levels:

(a) Limit the hours of operation to 898 hours per year; and

(b) Limit production rate of TEAOH products to 369 lb/hr.

(c) Maintain daily records of hours of operation and the daily amount of TEAOH products processed.

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:

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

a. **VOC**

i. The owner or operator shall report the plant-wide consecutive 12-month emissions of VOCs for each month in the reporting period.

ii. For the equipment subject to Regulation 7.25 (T-203-W70-101, T-203-W70-102, TT-203-W70-101, TT-203-W70-102, TT-203-W70-103, TT-203-W70-104, TT-203-W70-105, TT-203-W70-106, TT-203-W70-201, TT-203-W70-202, DR-203-W70-201, TR-203-W70-201, HT-203-W70-201, TT-203-W70-203, CV-203-W70-201, TT-203-W70-204, TR-203-W70-301, HT-203-W70-301, TT-203-W70-303, DR-203-W70-302, CV-203-W70-301, TT-203-W70-403, CF-203-W70-401, TT-203-W70-501, DR-203-W70-501A , DR-203-W70-501B , DR-203-W70-301, TR-203-W70-501, HT-203-W70-501, HT-203-W23-534, HT-203-W23-542 and all existing equipment subject to Reg. 7.25), the owner or operator shall report the consecutive 12-month emissions of VOCs for each month in the reporting period.

b. **HAP**

i. The owner or operator shall report the consecutive 12-month plant-wide emissions of each individual HAP for each month in the reporting period.

ii. The owner or operator shall report the consecutive 12-month plant-wide emissions of total HAP for each month in the reporting period.

i. *Semiannual Compliance Reports*. The owner or operator must submit semiannual compliance reports that contain the information specified in the following paragraphs, as applicable. Reports are required only for semiannual periods during which you experienced any of the events described in § 63.11501(d)(1) through (8). (40 CFR 63.11501(d))

1) *Deviations*. You must clearly identify any deviation from the requirements of this subpart. (§63.11501(d)(1))

2) *Delay of leak repair*. You must provide the following information for each delay of leak repair beyond 15 days for any process equipment, storage tank, surge control vessel, bottoms receiver, and each delay of leak repair beyond 45 days for any heat exchange system with a cooling water flow rate less than 8,000

gal/min: information on the date the leak was identified, the reason for the delay in repair, and the date the leak was repaired. (§63.11501(d)(3))

3) *Process change*. You must report each process change that affects a compliance determination and submit a new certification of compliance with the applicable requirements in accordance with the procedures specified in §63.11501(b). (§63.11501(d)(4))

4) *Overlapping rule requirements*. Report any changes in the overlapping provisions with which you comply. (§63.11501(d)(6))

5) *Malfunctions*. If a malfunction occurred during the reporting period, the report must include the number of instances of malfunctions that caused emissions in excess of a standard. For each malfunction that caused emissions in excess of a standard, the report must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions. The report must also include a description of actions you took during a malfunction of an affected source to minimize emissions in accordance with §63.11495(d), including actions taken to correct a malfunction. (§63.11501(d)(8))

c. **PM/PM_{10}/$PM_{2.5}$**

i. The owner or operator shall report the plant-wide consecutive 12-month PM/ PM_{10}/$PM_{2.5}$ emissions for each month in the reporting period.

ii. The owner or operator shall report any failure to perform the visual inspection of the structural and mechanical integrity.

iii. For emission points T-203-W70-101, T-203-W70-102, and FD-203-W70-401; identification of all periods when a process was operating and an associated control device DC-203-W22-902 was not operating, including the information in S2.c.iii., or a negative declaration if the control device was operating at all times the process was operating during the reporting period.

d. **Opacity**

i. The date and time of each VE Survey where visible emissions were observed and the results of the Method 9 test performed;

ii. Identification of all periods of exceeding the opacity standard;

iii. Description of any corrective action taken for each exceedance of an opacity standard specified in this permit; and

iv. Any deviation from the requirement to perform or record the results of the required monthly VE surveys or Method 9 tests.

v. If there were no deviations during the report period, report a negative declaration.

e. **NOx**

The owner or operator shall report the plant-wide consecutive 12-month NOx emissions for each month in the reporting period.

f. **TAC**

i. Within 6 months after a change of a raw material, the owner or operator shall submit the re-evaluated EA demonstration to the District.

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. (Regulations 5.00 and 5.21, sections 4.22 – 4.24)

iv. The owner or operator shall report any exceedances of the TAC limits and if no exceedances occurred during the report period, the owner or operator shall report a negative declaration.

Fee Comment

The permit fees are based on the significant permit revision fee for a Title V source ($2542.40). The total permit fees are $2542.40.