



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



Title V Construction Permit

Permit No.: C-0036-0030-19-V

Plant ID: 0036

Effective Date: MM/DD/YYYY

Expiration Date: MM/DD/YYYY

Source: **Clariant Corporation (West)**
1227 South 12th Street
Louisville, KY 40232

Owner: **Clariant Corporation (West)**
1227 South 12th Street
Louisville, KY 40232

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:

Modifying existing Houdry process (250-W55) including rate changes to the original Houdry line, the installation of a silo and dense phase transport system, the addition of control equipment and corrections to previous equipment that were omitted from permit 27755-14-TV(R2).

Public Notice Date: 11/23/2019

Permit writer: Ulalo Chirwa

Air Pollution Control Officer
{date1}

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Construction Permit Revisions and Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
C-0036-1006-17-V	03/16/2017	04/18/2017	Initial	Modifying existing equipment in the Houdry process (250-W55) ¹ .
C-0036-0030-19-V	11/23/2019	xx/xx/2019	Initial	Modifying rates and controls associated with the original Houdry process line installed in 1993; Installation of Salco Silo, Dense Phase Transport System, and a new Bin Vent Filter; Correction made for equipment previously omitted in 27755-14-TV(R2).

Application and Related Documents

Document Handle	Date	Description
70991	08/15/2019	Confidential version of the construction application
70990	08/15/2019	Public version of the construction application
122225	09/24/2019	Clarification regarding the potential emissions of stack tested equipment

¹ This equipment was originally listed on Permit 36445-12-C.

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

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. Any permit shall be considered invalid if timely payment of annual fees is not made. 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.

- G11. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.04	Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)
2.05	Prevention of Significant Deterioration
2.06	Permit Requirements – Other Sources
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

District Only Enforceable Regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.16	Title V Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

Plantwide Requirements

Plantwide Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.04	Construction or Modification of Major Sources In or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)	1 through 5
2.05	Prevention of Significant Deterioration of Air Quality	1, 2
2.16	Title V Operating Permits	1 through 6
7.08	Standards of Performance for New Process Operations	1 through 3
40 CFR 63 Subpart VVVVVV	National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources	63.11495, 63.11501(c)(1), 63.11501(d), and 63.11496(f)(3)

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

Plantwide Specific Conditions

S1. Standards

[Regulation 2.03, section 6.1]

a. HAP

- i. The owner or operator shall not allow or cause the *plantwide* emissions of any single HAP to equal or exceed 10 tons during any consecutive 12-month period. [Regulation 2.16, section 4.1.1]
- ii. The owner or operator shall not allow or cause the *plantwide* total HAP emissions to equal or exceed 25 tons during any consecutive 12-month period. [Regulation 2.16, section 4.1.1]
- 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)]
 - (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 63.11495(f) and Table 4]

b. 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 and 4.1/4.2]

c. NO_x and PM/PM₁₀/PM_{2.5}

The owner or operator shall not allow or cause the *plantwide* emissions of NO_x or PM/PM₁₀/PM_{2.5} to equal or exceed 100 tons during any consecutive 12-month period. [Regulations 2.04 and 2.05]

d. 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] (See Comment 1.)
- ii. If the TAC does not have an established BAC or *de minimis* value, the owner or operator shall calculate and report these values. The form, located in Attachment B, may be used for determining BAC and *de minimis* values.
[Regulation 5.20, Sections 3 and 4]

S2. Monitoring and Record Keeping

[Regulation 2.03, section 6.1]

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

a. HAP

- i. For each HAP emission point, the owner or operator shall calculate and record the monthly throughput of each HAP-containing raw material and the HAP content. HAP content in both base metal form and compound form shall be kept for HAP compounds.
- ii. The owner or operator shall calculate and record the *plantwide* consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

$$HAP_A = \sum_1^x [U_x(1 - C_{Conx})] + \sum_1^z U_z + F$$

Where:

HAP_A	=	Total plantwide emissions of an individual HAP (A)
U_x	=	Uncontrolled HAP emission from each Emission Point (x)
C_{Conx}	=	Control Efficiency of each control device for each Emission Point (x)
U_z	=	Uncontrolled HAP emissions from each uncontrolled Emission Point (z) during bypass events
F	=	Total plantwide fugitive HAP emissions

- 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 63.11495(f)(1)]
- 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 63.11495(f)(2)]
- v. For an existing source subject to the HAP metals emission limits specified in Table 4 of Subpart VVVVVV, the owner or operator must prepare a monitoring plan containing the information in the following paragraphs. The plan must be maintained on-site and be available on request. You must operate and maintain the control device according to a site-specific monitoring plan at all times. You must keep records of monitoring results to demonstrate continuous compliance. [40 CFR 63.11495(f)(3)(i)]
 - (1) A description of the device;
 - (2) Results of a performance test or engineering assessment conducted in accordance with §63.11495(f)(3)(ii) verifying the performance of the device for reducing HAP metals or particulate matter (PM) to the levels required by this subpart;
 - (3) Operation and maintenance plan for the control device (including a preventative maintenance schedule consistent with the manufacturer's instructions for routine and long-term maintenance) and continuous monitoring system (CMS).

- (4) A list of operating parameters that will be monitored to maintain continuous compliance with the applicable emissions limits; and
 - (5) Operating parameter limits based on either monitoring data collected during the performance test or established in the engineering assessment.
- vi. *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)]
 - (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)]
 - (5) 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)]

b. 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 and daylight hours 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 Methods 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.

c. NO_x

- i. The owner or operator shall calculate and record the *plantwide* consecutive 12-month NO_x emissions for each month in the reporting period.

$$NOx = \sum_1^x [U_x(1 - C_{Conx})] + \sum_1^z U_z + F$$

Where:

NO _x	=	Total plantwide emissions of NO _x
U _x	=	Uncontrolled NO _x emission from each Emission Point (x)
C _{Conx}	=	Control Efficiency of each control device for each Emission Point (x)
U _z	=	Uncontrolled NO _x emissions from each uncontrolled Emission Point (z) during bypass events
F	=	Total plantwide fugitive NO _x emissions

d. PM/PM₁₀/PM_{2.5}

- i. For each PM emission point, the owner or operator shall monitor and maintain records of the throughput of each raw material during each calendar month.
- ii. The owner or operator shall calculate and record the *plantwide* consecutive 12-month PM₁₀/PM_{2.5} emissions for each month in the reporting period.

$$PM/PM_{10}/PM_{2.5} = \sum_1^x [U_x(1 - C_{Conx})] + \sum_i^z U_z + F$$

Where:

- PM/PM₁₀/PM_{2.5} = Total plantwide emissions of PM/PM₁₀/PM_{2.5}
- U_x = Uncontrolled PM emission from each Emission Point (x)
- C_{Conx} = Control Efficiency of each control device for each Emission Point (x)
- U_z = Uncontrolled PM/PM₁₀/PM_{2.5} emissions from each uncontrolled Emission Point (z) during bypass events
- F = Total plantwide fugitive PM/PM₁₀/PM_{2.5} emissions

e. TAC

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

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 or a declaration that there were no such deviations. 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. HAP

- i. The owner or operator shall report the consecutive 12-month *plantwide* emissions of each individual HAP for each month in the reporting period.
- ii. The owner or operator shall report the consecutive 12-month *plantwide* emissions of total HAP for each month in the reporting period.
- iii. *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)]²

- (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)]

b. 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.

c. NO_x and PM/PM₁₀/PM_{2.5}

²The initial notification for 40 CFR 63 Subpart VVVVVV was received 6/21/2010.

The owner or operator shall report the *plantwide* consecutive 12-month emissions of all air pollutants for each month in the reporting period.

d. TAC

Any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration.

S4. Testing

[Regulation 2.03, section 6.1]

a. HAP

- i. For an existing source subject to the HAP metals emission limits specified in Table 4 of Subpart VVVVVV, you must comply with the initial compliance and monitoring requirements in §63.11496(f)(3)(i) through (iii). You must keep records of monitoring results to demonstrate continuous compliance. [40 CFR 63.11496(f)(3)]
- ii. You must prepare a monitoring plan containing the information in §63.11496(f)(3)(i)(A) through (E). The plan must be maintained on-site and be available on request. You must operate and maintain the control device according to a site-specific monitoring plan at all times.
[40 CFR 63.11496(f)(3)(i)]
 - (1) A description of the device;
 - (2) Results of a performance test or engineering assessment verifying the performance of the device for reducing HAP metals or particulate matter (PM) to the levels required by this subpart;
 - (3) Operation and maintenance plan for the control device (including a preventative maintenance schedule consistent with the manufacturer's instructions for routine and long-term maintenance) and continuous monitoring system (CMS).
 - (4) A list of operating parameters that will be monitored to maintain continuous compliance with the applicable emissions limits; and
 - (5) Operating parameter limits based on either monitoring data collected during the performance test or established in the engineering assessment.
- iii. You must conduct a performance test or an engineering assessment for each CMPIU subject to a HAP metals emissions limit in Table 4 to 40 CFR 63 Subpart VVVVVV and report the results in your Notification of Compliance Status (NOCS). Each performance test or engineering assessment must be conducted under representative operating conditions, and sampling for each performance test must be conducted at both the inlet and outlet of the control device. Upon request, you shall make available to

the Administrator such records as may be necessary to determine the conditions of performance tests. If you own or operate an existing affected source, you are not required to conduct a performance test if a prior performance test was conducted within the 5 years prior to the effective date using the same methods specified in §63.11496(f)(3)(iii)), and, either no process changes have been made since the test, or, if you can demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process changes.

[40 CFR 63.11496(f)(3)(ii)]

- iv. If you elect to conduct a performance test, it must be conducted according to requirements in §63.11410(j)(1). As an alternative to conducting a performance test using Method 5 or 5D to determine the concentration of PM, you may use Method 29 in 40 CFR 60, appendix A-8 to determine the concentration of HAP metals. You have demonstrated initial compliance if the overall reduction of either HAP metals or total PM is equal to or greater than 95 percent. [40 CFR 63.11496(f)(3)(iii)]

b. Opacity

There are no testing requirements for this emission unit.

c. NO_x and PM/PM₁₀/PM_{2.5}

There are no testing requirements for this emission unit.

d. TAC

There are no testing requirements for this emission unit.

Plantwide Comments

1. Clariant Corp. – Louisville West Plant emits the following TACs subject to the STAR program (Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23): ammonia (NH₃), cobalt and cobalt compounds (Co), chromium^{trivalent} and chromium compounds (Cr(III)), chromium^{hexavalent} and chromium compounds (Cr(VI)), copper and copper compounds (Cu), hydrochloric acid (hydrogen chloride (HCl)), manganese and manganese compounds (Mn), nickel and nickel compounds (Ni), nitric acid (HNO₃), and sulfuric acid (H₂SO₄). The emissions from many emission units are *de minimis* with control devices, resulting in the requirement to operate the control devices to maintain the *de minimis* status of those emission units.

Clariant determined the environmental acceptability for TAC emissions that were not *de minimis*: Co, Cr(VI), Cu, Mn, Ni, and HNO₃. The plantwide R_C of 1.54 for new and modified processes and process equipment is less than the EAG_c of 3.8 for all TACs from new and modified processes and process equipment. The plantwide R_C of 2.49 for new and modified processes and process equipment on industrial property is less than the EAG_c of 38.0 for all TACs from new and modified processes and process equipment. The plantwide R_C of 4.28 for all processes and process equipment is less than the EAG_c of 7.5 for all TACs from all processes and process equipment. The plantwide R_C of 6.20 for all processes and process equipment on industrial property is less than the EAG_c of 75.0 for all TACs from all processes and process equipment.

Clariant submitted an updated EA demonstration on September 16, 2016 with a Tier 4 analysis of nitric acid from Emission Points T-201-W07-500, T-201-W07-501, T-201-W07-505, HT-203-W23-534, HT-203-W23-542, and T-250-W55-102.

The individual hazard quotient (HQ) for copper from Stack S-201-W17-001 (EP DD-201-W11-110) of 1.8055 was greater than the EAC_{NC} of 1.0. The plantwide HQ for copper of 4.75 is greater than the EAC_{NC} of 1.0 for each individual TAC from all processes and process equipment. Pursuant to Regulation 5.21, Section 6.9, Clariant shall demonstrate compliance with the EA goals for copper by September 22, 2014, 36 months after notification by the District that the BAC for copper became more stringent. Clariant submitted a compliance plan on April 8, 2013, to conduct additional modeling on or before September 22, 2014. The additional modeling did not demonstrate environmental acceptability; therefore, Clariant stopped producing high-copper products in EU 201-W11.

The risks for cobalt from EU 201-W11 and EU 201-W12 are greater than the EA goals. Pursuant to Regulation 5.21, Section 6.9, Clariant shall demonstrate compliance with the EA goals for cobalt by December 4, 2016 by removing cobalt-containing products from EU 201-W11 and EU 201-W12, 36 months after notification by the District that the BAC for cobalt became more stringent. Clariant submitted an updated EA demonstration on June 4, 2014. Clariant stopped production of cobalt-containing products from EU 201-W11 per an email dated February 6, 2018; and EU 201-W12 per an email dated August 17, 2015.

The risks for cobalt from EP MX-204-W35-001, FR-204-W36-001, T-204-W36-001, CV-204-W37-001-004, PD-204-W37-001, HT-204-W37-001, H-204-W42-001, HT-204-W42-001, and PD-204-W42-001 are greater than the EA goals. Pursuant to Regulation 5.21, Section 6.9, Clariant shall demonstrate compliance with the EA goals for cobalt by

December 4, 2016 for these emission units, 36 months after notification by the District that the BAC for cobalt became more stringent. Clariant submitted an updated EA demonstration on June 4, 2014. Clariant stopped production of cobalt-containing products from this equipment per emails dated 6/4/2015 and 8/17/2015.

EU	Stack ID	TAC	Risk (EAG_C)		HQ (EAG_{NC})	
			Unadjusted Process	Industrial Process	Unadjusted Process	Industrial Process
			$EAG_C \leq 1.0$	$EAG_C \leq 10.0$	$EAG_{NC} \leq 1.0$	$EAG_{NC} \leq 3.0$
201-W07	S-201-W07-003 (T-201-W07-505)	HNO ₃	--	--	0.48	1.85
	S-201-W07-005 (T-201-W07-501)					
	S-201-W07-001 (T-201-W07-500)					
250-W55	S-250-W55-001 (T-250-W55-102)					
201-W09	S-201-W08-002 (HT-201-W09-001)	Ni	0.094	0.098	0.026	0.027
		Cr(VI)	0.068	0.071	0.0007	0.00074
201-W10	S-201-W10-003 (HT-W10-420, H-201-W10-440/H-201-W10-442, PA-W10-420)	Ni	0.20	--	0.054	--
		Cu	--	--	0.202	--
201-W11	S-201-W17-001 (DD-201-W11-110)	Mn	--	--	0.66	--
201-W12	S-201-W12-002 (SD-W12-230a)	Ni	0.11	--	0.031	--
	S-201-W12-002 (SD-201-W12-230b)	Cu	--	--	0.01	--
	S-201-W12-001 (DD-W12-210/T-201-W12-210)	Cu	--	--	0.258	--
		Ni	0.57	--	0.156	--
203-W23	HT-203-W23-534	HNO ₃	--	--	0.48	1.85
	HT-2013-W23-542	HNO ₃	--	--	0.48	1.85
204-W42	S-204-W42-001 (HT-204-W42-001)	Cu	--	--	0.767	--
		Ni	1.0	1.376	0.077	0.10
212-W45	All	Cu	--	--	0.961	--
		Ni	0.44	1.69	0.033	0.13

EU	Stack ID	TAC	Risk (EAG_C)		HQ (EAG_{NC})	
			Unadjusted Process	Industrial Process	Unadjusted Process	Industrial Process
			$EAG_C \leq 1.0$	$EAG_C \leq 10.0$	$EAG_{NC} \leq 1.0$	$EAG_{NC} \leq 3.0$
220-W53	S-220-W53-003 (DD-220-W53-006, H-220-W53-011, FD-220-W53-005, -007 and -019, BE-220-W53-001, FD-220-W53-020, SL-220-W53-012 and -013, H-220-W53-012, -013 and -016, V-220-W53-002 and -003, CV-220-W53-003 and -005)	Ni	0.46	0.46	0.035	0.035
250-W55	HT-250-W55-701	Cr(VI)	0.106	0.193	0.001	0.002
	FD-250-W55-702		0.106	0.193	0.001	0.002
	FD-250-W55-703		0.106	0.193	0.001	0.002
	H-250-W55-801		0.048	0.133	0.001	0.001
	HT-250-W55-801		0.976	1.783	0.010	0.019
	HT-250-W55-801B as 801 carrier ht tr.		0.229	0.410	0.002	0.004
Plantwide R_C: for new processes:			1.54(≤ 3.8)	2.49(≤ 38.0)	--	--
Plantwide R_C: for all processes:			4.28(≤ 7.5)	6.20 (≤ 75.0)		

- For new or modified process equipment subject to STAR, the risk is below the plantwide environmental acceptability goal of **3.8**. The new or modified process equipment with potential emissions greater than de minimis levels includes: HT-W10-420, H-201-W10-440/H-201-W10-442, and PA-W10-420 (2005) and HT-250-W55-701, FD-250-W55-702, FD-250-W55-703, H-250-W55-801, HT-250-W55-801, and HT-250-W55-801B as 801 carrier heat treater (2019).
- Nitric Acid from emission points that did not show environmental acceptability through Tier 1 or Tier 2 were modeled together using AERMOD (Tier 4).
- For STAR demonstration purposes, only the base metal form of the HAP needs to be recorded and reported.

Emission Unit: 250-W55 and 250-W56

EU 250-W55: Houdry; raw material handling, catalyst forming, heat treating, screening, and packaging. Alumina carrier is formed and heat treated. The formed carrier is dipped in chromic acid solution and further heat treated for final catalyst product.

EU 250-W56: Houdry Screening System; Screening system for catalyst products

250-W55 and 250-W56 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3 and 4
40 CFR 63 Subpart VVVVVV	National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources	63.11495, 63.11501(c)(1), 63.11501(d), and 63.11496(f)(3)

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

250-W55 and 250-W56 Equipment

Emission Point	Description	Construction Date	Applicable Regulations	Control Device	Stack ID
250-W55					
T-250-W55-105 ³	Chromium Makeup Tank, 5639 gal	2019	7.08	ED-250-W55-801 SC-250-W55-801 BMF-250-W55-801	S-251-W55-027
T-250-W55-102	HNO ₃ Storage Tank & Unload, 10,576 gal	2019	STAR	SC-250-W55-401 ⁴ BMF-250-W55-401	S-250-W55-017
V-250-W55-202	Alumina Silo	2019	7.08	BV-250-W55-202 BV-250-W55-203	S-250-W55-009
V-250-W55-204	Dense Phase Transport System				
CV-250-W55-403	Belt Conveyor	2019	STAR	NA	Fugitive
CV-250-W55-404/405	Belt Conveyors, only one operated at a time				
DD-250-W55-301	Drum Dumper	2019	7.08	DC-250-W55-601	S-250-W55-018
DD-250-W55-302	Drum Dumper	2019	7.08, STAR		
FD-250-W55-301	Vibratory Feeder	2019	7.08, STAR	BV-250-W55-303	S-250-W55-011
FD-250-W55-403	L/W Feeder Fines				
GR-250-W55-301	Rework Grinder				
H-250-W55-305	Fines Hopper Rework				
H-250-W55-302	In Use Hopper	2019	7.08	BV-250-W55-302	S-250-W55-010
FD-250-W55-401 ⁵	L/W Feeder Alumina	2019	7.08	DC-250-W55-411	S-250-W55-015
FD-250-W55-402 ⁵	Feeder Hercoflat	2019	7.08		
H-250-W55-303	Hercoflat Hopper	2019	7.08	DC-250-W55-601	S-250-W55-018
H-250-W55-304	Rework Surge Hopper	2019	7.08, STAR		
H-250-W55-402/403	2 Feed Hoppers, only one operated at a time	2019	STAR	NA	Fugitive
MM-250-W55-401/402	2 Mix Mullers, only one operated at a time	2019	7.08, STAR	ED-250-W55-401 SC-250-W55-401 BMF-250-W55-401	S-250-W55-017
HT-250-W55-401	Proctor & Schwartz Belt Dryer, 940,000 BTU/hr				
PE-250-W55-401/402	Pellet Mills, only one operated at a time	2019	STAR	NA	Fugitive
MS-250-W55-401	Material Spreader				
CV-250-W55-401	Screw Conveyor	2019	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-601	S-250-W55-018
CV-250-W55-402	Vibratory Conveyor				

³ Per C-0036-1006-17-V, Clariant no longer uses chromic acid flake in the W55 Houdry process. DD-250-W55-101 is no longer in use and chromium emissions are not generated in T-250-W55-105.

⁴ With this construction permit, the existing tank T-250-W55-102 is being vented to the existing scrubber SC-250-W55-401.

⁵ This equipment has been re-permitted after being inadvertently removed from the permit during permitting of the 2012 expansion equipment.

Emission Point	Description	Construction Date	Applicable Regulations	Control Device	Stack ID
250-W55					
EPD-250-W55-401	401 Emergency Drumout	2019	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-601	S-250-W55-018
DD-250-W55-401	Drum Dumper				
FD-250-W55-406	Vibratory Feeder				
H-250-W55-401	Refeed Surge Hopper				
BE-250-W55-501	Bucket Elevator				
SCV-250-W55-501	Rework Screw Conveyor				
H-250-W55-501	Dehydrator Feed Hopper				
VS-250-W55-501	Vibratory Screener				
BE-250-W55-601	Bucket Elevator				
CV-250-W55-501 ⁶	Vibratory Feeder	2019	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-601	S-250-W55-018
CV-250-W55-601 ⁶	Vibratory Feeder				
EPD-250-W55-501	501 Emergency Drumout	2019	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-601	S-250-W55-018
EPD-250-W55-601	601 Emergency Drumout				
DD-250-W55-501	Drum Dumper				
DD-250-W55-601	Refeed Drum Dumper				
FD-250-W55-501	Vibratory Feeder				
FD-250-W55-601	Vibratory Feeder				
H-250-W55-502	Hopper				
H-250-W55-601	Heat Treater Feed Hopper				
H-250-W55-602	Refeed Surge Hopper				
VS-250-W55-601	Vibratory Screener				
BE-250-W55-701	Bucket Elevator				
HE-250-W55-701	Product Cooler				
HT-250-W55-501	Dehydrator Vessel				
HT-250-W55-601	Heat Treater	2019	7.08	ED-250-W55-601 SC-250-W55-601 V-250-W55-603B ⁷	or S-250-W55-036
EPD-250-W55-801	801 Emergency Drumout	2019	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-901 FIL-250-W55-901	S-250-W55-030
CV-250-W55-801	Metering Conveyor				
FD-250-W55-901	Vibratory Feeder				

⁶ Conveyors (CV-250-W55-501 and CV-250-W55-601) are being replaced with vibratory feeders.

⁷ With this construction permit, the 603B control system is being added as a back-up control to the existing heat treater HT-250-W55-601 to facilitate increased up-time for the 501 and 601 systems.

Emission Point	Description	Construction Date	Applicable Regulations	Control Device	Stack ID
250-W55					
FD-250-W55-702	Vibratory Feeder	2019	7.08, STAR, 40 CFR 63 VVVVVV	ED-250-W55-801 SC-250-W55-801 BMF-250-W55-801	S-250- W55-027
FD-250-W55-703	Vibratory Feeder				
HT-250-W55-701	Wyssmont Dryer				
V-250-W55-703	Impregnator Hopper				
DD-250-W55-701	Drum Dumper	2019	7.08, STAR, 40 CFR 63 VVVVVV	ED-250-W55-901 SC-250-W55-901 ME-250-W55-901	S-250- W55-031
BE-250-W55-801	Bucket Elevator				
H-250-W55-703	Refeed Surge Hopper				
H-250-W55-801	Chrome Heat Treater Feed Hopper	2019	7.08, STAR, 40 CFR 63 VVVVVV	ED-250-W55-901 SC-250-W55-901 ME-250-W55-901	S-250- W55-031
BE-250-W55-901	Bucket Elevator				
HE-250-W55-901	Product Cooler				
V-250-W55-701	Measure Pot	2019	7.08, STAR	DC-250-W55-601	S-250- W55-018
VS-250-W55-701	Vibratory Screen				
VD-250-W55-701 ⁸	Vibratory Feeder	2019	7.08		
HT-250-W55-801	Chrome Heat Treater	2019	7.08, STAR, 40 CFR 63 VVVVVV	SC-250-W55-802 ED-250-W55-802 SC-250-W55-801 BMF-250-W55-801	S-250- W55-027
FD-250-W55-902	Feeder	2019	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W56-959 FIL-250-W56-959	S-250- W56-032
H-250-W55-901	Final Product Surge Hopper				
SS-250-W55-901	Packager				
VS-250-W55-901	Vibratory Screen				
H-250-W55-306	Hopper	2009	7.08, STAR	BV-250-W55-306 DC-250-W55-201	S-250- W55-201
SSU-250-W55-201	Supersack Unloader	2009	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-201	S-250- W55-201
V-250-W55-205	Dense Phase Transfer Pot				
SSU-250-W55-301	Supersack Unloader				
FD-250-W55-407	Batch Feeder				
FD-250-W55-408 ⁹	Batch Feeder				
BE-250-W55-1020	Bucket Elevator	2013	7.08, STAR	DC-250-W55-601	S-250- W55-018
VS-250-W55-1020	Vibratory Screen				
PA-250-W55-1020	Packager				
H-250-W55-1020	Hopper				
DD-250-W55-1015	Drum Dumper	2013	7.08, STAR	DC-250-W55-1028 FIL-250-W55-1028	S-250- W55-034
SSU-250-W55-1016	Supersack unloader	2013	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-1028 FIL-250-W55-1028	S-250- W55-034
SSB-250-W55-1017	Supersack baler				

⁸ VD-250-W55-701 was previously omitted equipment that is located between the product cooler (HE-250-W55-250) and vibratory screener (VS-250-W55-701).

⁹ This construction permit authorizes an increase in production rate for this emission point.

Emission Point	Description	Construction Date	Applicable Regulations	Control Device	Stack ID
250-W55					
CV-250-W55-1015	Conveyor	2013	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-1028 FIL-250-W55-1028	S-250- W55-034
BE-250-W55-801B	Bucket elevator				
FD-250-W55-902B	Feeder				
VS-250-W55-901B	Vibratory screen				
H-250-W55-901B	Final product surge hopper				
SS-250-W55-901B	Supersack filler				
HT-250-W55-801B	Chrome heat treater as 801 carrier heat treater	2013	7.08, STAR, 40 CFR 63 VVVVVV	SC-250-W55-802B ED-250-W55-802B SC-250-W55-801B SC-250-W55-801C BMF-250-W55- 801B or ED-250-W55-601B SC-250-W55-601B V-250-W55-603B	S-250- W55-027 or S-250- W55-036
H-250-W55-801B	Chrome heat treater feed hopper	2013	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W55-1027 FIL-250-W55-1027	S-250- W55-033
H-250-W55-802B	Hopper				
CV-250-W55- 801B	Metering conveyor				
BE-250-W55-901B	Bucket elevator				
FB-250-W55-801B	Firebox, 1.5 MMBtu/hr	2013	7.06	NA	NA
HT-250-W55-701	Wyssmont Dryer	2017	7.08, STAR, 40 CFR 63 VVVVVV	ED-250-W55-801 SC-250-W55-801 BMF-250-W55-801	S-250- W55-027
V-250-W55-220 ¹⁰	Salco Silo	2019	7.08	BV-250-W55-222 BV-250-W55-203	S-250- W55-009
V-250-W55-224 ¹⁰	Dense Phase Transport System				
250-W56					
DD-250-W56-950	Drum Dumper	1994	7.08, STAR, 40 CFR 63 VVVVVV	DC-250-W56-959 FIL-250-W56-959	S-250- W56-032
DD-250-W56-951	Drum Dumper				
H-250-W56-952	Hopper				
H-250-W56-953	Hopper				
CV-250-W56-954	Feed Conveyor				
CV-250-W56-955	Feed Conveyor				
VS-250-W56-956	Vibratory Screener				
SS-250-W56-957	Super Sack Packager				
STAR Regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.					

¹⁰ New process equipment, emissions are controlled by a new Bin Vent Filter (BV-250-W55-222).

250-W55 and 250-W56 Control Devices

Control ID	Description	Stack
ED-250-W55-801	Eductor, Schutte & Koerting, Model 7014 S 14	S-250-W55-017
BMF-250-W55-401	Cartridge Filter (95%), Monsanto, Model 392-035	S-250-W55-017
BMF-250-W55-801	Brinks Mist Eliminator (99%), Monsanto, Model 392-035	S-250-W55-027
BMF-250-W55-801B	Brownian Motion Mist Eliminator (99%) Monsanto Enviro-Chem	S-250-W55-035
BV-250-W55-202	Bin Vent Filter (99.343%), Mikropul, Model 100S-8-20-TC	S-250-W55-009
BV-250-W55-203	Bin Vent Filter (99.343%), Mikropul, Model 100S-8-20-TC	S-250-W55-009
BV-250-W55-302	Bin Vent Filter (99.343%), Mikropul, Model 165-8-30B	S-250-W55-010
BV-250-W55-303	Bin Vent Filter (99.343%), Nol-Tech, Model 600FR-32	S-250-W55-011
BV-250-W55-306	Bin Vent Filter (95%), Libco 8270-K-08	S-250-W55-201
BV-250-W55-222 ¹¹	Bin Vent Filter (99.343%), Mikropul, Model 100S-8-20 TR "B"	S-250-W55-009
DC-250-W55-201	Baghouse (99.786%), Donaldson Torit DFT 3-18	S-250-W55-201
DC-250-W55-411 ¹²	Baghouse (95 % PM), Flex Kleen, Model CDC-2-2-8 III	S-250-W55-015
DC-250-W55-601	Baghouse (99.343%), Mikro-Pulsaire, Model 500-S-20-20-C	S-250-W55-018
DC-250-W55-901	Baghouse (99.786%), Torit, Model DFT 2-8	S-250-W55-030
DC-250-W55-1027	Baghouse (99.786%) Torit Model 2DF8-4 Ultra Web filter	S-250-W55-033
DC-250-W55-1028	Baghouse (99.786%) Torit Model 2DF8-4 Ultra Web filter	S-250-W55-034
DC-250-W56-959	Baghouse (99.786%), Torit, Model DFT 2-8	S-250-W56-032
ED-250-W55-401	Eductor (95% PM, 75%), Schutte & Koerting, Model 7014 S 14	S-250-W55-017
ED-250-W55-601	Eductor (95% PM, 75%), Schutte & Koerting, Model 7014 S 14	S-250-W55-024
ED-250-W55-601B	Eductor (95%) Schutte & Koerting Model 7014 S 14 inch	S-250-W55-036
ED-250-W55-801	Eductor (95% PM, 75%), Schutte & Koerting, Model 7014 S 14	--
ED-250-W55-802	Eductor (95% PM, 75%), Schutte & Koerting, Model 7014 S 14	S-250-W55-027
ED-250-W55-802B	Eductor (95%) Schutte & Koerting Model 7014 S 14 inch	S-250-W55-035
ED-250-W55-901	Eductor (95% PM, 75%), Anderson, Model P-6542-1	S-250-W55-031
FIL-250-W55-901	HEPA filter (99.97%), Donaldson Model Ultra-Lok	S-250-W55-030
FIL-250-W55-1027	HEPA (99.97%)	S-250-W55-033
FIL-250-W55-1028	HEPA (99.97%)	S-250-W55-034
FIL-250-W56-959	HEPA filter (99.97%), Donaldson Model Ultra-Lok	S-250-W56-032
SC-250-W55-401	Impingement Scrubber (95% PM, 75% NO _x) W.W. Sly, Model 330	S-250-W55-017
SC-250-W55-601	Impingement Scrubber (95% PM, 75% NO _x) W.W. Sly, Model 330	S-250-W55-024
SC-250-W55-601B	Impingement Scrubber (95% PM, 75% NO _x) W.W. Sly, Model 330	S-250-W55-036
SC-250-W55-801	Impingement Scrubber (95% PM, 75%) W.W. Sly, Model 330	S-250-W55-031

¹¹ New control equipment, emissions are routed to the existing Bin Vent Filter (BV-250-W55-203).

¹² This equipment has been re-permitted after being inadvertently removed from the permit during permitting of the 2012 expansion equipment.

Control ID	Description	Stack
SC-250-W55-801B	Impingement Scrubber (95% PM, 75% Cr) W.W. Sly, Model 340	S-250-W55-035
SC-250-W55-801C	Scrubber (95% PM, 75% Cr) W.W. Sly, Model to be determined	S-250-W55-035
SC-250-W55-802	Impingement Scrubber (95% PM, 75%) W.W. Sly, Model 330	S-250-W55-027
SC-250-W55-802B	Scrubber (95% PM, 75% Cr) Make to be determined	S-250-W55-035
SC-250-W55-901	Spray Tower (95% PM, 75%), Anderson, Model P-6542-1	S-250-W55-031
ME-250-W55-901	Mist Eliminator, Anderson, Model 1.9 CHEAF Aerosol Collector	S-250-W55-031
V-250-W55-603	Packed Tower Scrubber (95% PM, 75%) Croll Reynolds, Model 48T-24NOX	S-250-W55-024
V-250-W55-603B	Packed Bed Scrubber (95% PM, 75% NO _x) Croll-Reynolds Co., Inc. Model NO _x Absorption-48T-24 NO _x	S-250-W55-036

250-W55 and 250-W56 Specific Conditions

S1. Standards

[Regulation 2.03, section 6.1]

a. Control Device Operation

The owner or operator shall, to the extent practicable, operate and maintain each control device at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice for minimizing emissions.

[Regulations 2.04, 2.05, 5.00 and 5.21, and Regulation 7.08, section 3.1.2, and 40 CFR 63 Subpart VVVVVV]

b. HAP

i. See Plantwide Specific Conditions.

c. Opacity

The owner or operator shall not allow or cause visible emissions to equal or exceed 20% opacity.

[Regulation 7.08, section 3.1.1, 4.1/4.2 and Regulation 7.06, section 4.2]^{13, 14}

d. PM/PM₁₀/PM_{2.5}

i. See Plantwide Specific Conditions.

ii. The owner or operator shall not allow or cause PM emissions to exceed the following emissions limits, based on actual operating hours in a calendar day. [Regulation 7.08, section 3.1.2]¹⁵

¹³ The District has determined that no periodic visible emissions surveys are required for this emission unit.

¹⁴ The District has determined that using a natural gas fired boiler should inherently meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.

¹⁵ The potential controlled hourly PM emissions from EP CV-250-W55-801, 401, 402, 501, 601, 1015, and 801B, FD-250-W55-901, 902, 703, 401, 408, 407, and 902B, EPD-250-W55-801, 401, 501, and 601, VS-250-W55-901, 501, 601, 701, 1020, and 901B, H-250-W55-901, 801, 302, 303, 501, 601, 703, 306, 1020, 801B, 802B, and 901B, SS-250-W55-901 and 901B, HT-250-W55-801, 401, 501, 601, 701, and 801B, HE-250-W55-901, and 701, BE-250-W55-901, 801, 501, 601, 701, 1020, 801B, and 901B, PA-250-W55-1020, VD-250-W55-701, T-250-W55-105, V-250-W55-204 and 224, 703, 701, and 205, DD-250-W55-301, 302, 701, and 1015, MM-W55-401/402, SSU-250-W55-201, 301 and 1016, SSB-W55-1017, and GR-250-W55-301 meet the applicable emission standard in Regulation 7.08 after the first control device. The potential uncontrolled hourly PM emissions from EP V-250-W55-202, V-250-W55-220, H-250-W55-304, FD-250-W55-301, H-250-W55-305, H-250-W55-401, DD-250-W55-401, FD-250-W55-402, FD-250-W55-403, FD-250-W55-406, SCV-250-W55-501, DD-250-W55-501, H-250-W55-502, FD-250-W55-501, FD-250-W55-601, DD-250-W55-601, H-250-W55-602, FD-250-W55-702 meet the applicable emission standard in Regulation 7.08.

EP	Emission Limit (lb/hr)
V-250-W55-202	19.04
V-250-W55-220	18.98
V-250-W55-204, H-250-W55-302	7.48 each
SSU-250-W55-201, V-250-W55-224, V-250-W55-205, H-250-W55-306	5.85 each
HT-250-W55-401	4.60
CV-250-W55-401, MM-W55-401/402	4.38 each
HT-250-W55-701, V-250-W55-703	4.36
CV-250-W55-402, EPD-250-W55-401, VS-250-W55-501, BE-250-W55-501, H-250-W55-501, HT-250-W55-501	4.12 each
FD-250-W55-401, FD-250-W55-408	4.02
BE-250-W55-1020, VS-250-W55-1020, PA-250-W55-1020, H-250-W55-1020	3.81 each
FD-250-W55-703, EPD-250-W55-801, HT-250-W55-801, H-250-W55-801, BE-250-W55-801	3.63 each
DD-250-W55-301, H-250-W55-303	3.55 each
CV-250-W55-1015, BE-250-W55-801B, H-250-W55-801B, HT-250-W55-801B as 801 carrier heat treater, SSU-250-W55-1016, SSB-250-W55-1017	3.44 each
CV-250-W55-801, FD-250-W55-901, VS-250-W55-901, H-250-W55-901, SS-250-W55-901, FD-250-W55-902, HE-250-W55-901, BE-250-W55-901	3.41 each
EPD-250-W55-501, H-250-W55-601, VS-250-W55-601, HT-250-W55-601, BE-250-W55-601, CV-250-W55-501	3.30 each
H-250-W55-802B, CV-250-W55-801B, BE-250-W55-901B, FD-250-W55-902B, VS-250-W55-901B, H-250-W55-901B, SS-250-W55-901B	3.23 each
DD-250-W55-1015, HT-250-W55-801B as 601 carrier ht tr.	3.09
CV-250-W55-601, EPD-250-W55-601, BE-250-W55-701, HE-250-W55-701, V-250-W55-701, VS-250-W55-701, VD-250-W55-701	3.00 each
HE-250-W55-901B	2.58
T-250-W55-105, DD-250-W55-302, H-250-W55-304, FD-250-W55-301, GR-250-W55-301, H-250-W55-305, FD-250-W55-403, DD-250-W55-401, H-250-W55-401, FD-250-W55-406, DD-250-W55-501, H-250-W55-502, SCV-250-W55-501, FD-250-W55-501, FD-250-W55-601, DD-250-W55-601, H-250-W55-602, SSU-250-W55-301, FD-250-W55-407, DD-250-W55-701, H-250-W55-703, FD-250-W55-702, FD-250-W55-402	2.34 each

- iii. For EP FB-250-W55-801B, the owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.116 pounds per million BTU actual total heat input. [Regulation 7.06, section 4.1.3]¹⁶

¹⁶ For EP FB-250-W55-801B, a one-time PM compliance demonstration was performed, using AP-42 emission factors and combusting natural gas, and the PM emission standards from Regulation 7.06 cannot be exceeded.

e. NO_x

- i. See Plantwide Specific Conditions.
- ii. For EP HT-250-W55-501, HT-250-W55-801, HT-250-W55-801B, and FB-250-W55-701, the owner or operator shall not allow or cause the emissions of NO_x to exceed 300 ppmv, expressed as NO₂. [Regulation 6.09, section 4.1]¹⁷

f. SO₂

- i. For EP FB-250-W55-801B, the owner or operator shall not cause to be discharged into the atmosphere any gases which contain sulfur dioxide in excess of 0.97 pounds per million BTU actual total heat input for combustion of gaseous fuels. [Regulation 7.06, section 5.1.1]¹⁸

g. TAC

- i. See Plantwide Specific Conditions.¹⁹ (See Comment 1.)
- ii. The owner or operator shall not allow nitric acid emissions to exceed *de minimis* from T-250-W55-102, DD-250-W55-302, H-250-W55-304, FD-250-W55-301, GR-250-W55-301, H-250-W55-305, FD-250-W55-403, CV-250-W55-401, MM-250-W55-401, MM-250-W55-402, H-250-W55-402, H-250-W55-403, CV-250-W55-404, CV-250-W55-405, PE-250-W55-401, PE-250-W55-402, CV-250-W55-403, MS-250-W55-401, HT-250-W55-401, CV-250-W55-402, EPD-250-W55-401, DD-250-W55-401, H-250-W55-401, FD-250-W55-406, BE-250-W55-501, VS-250-W55-501, SCV-250-W55-501, H-250-W55-501, BE-250-W55-801B, H-250-W55-801B, BE-250-W55-1020, VS-250-W55-1020, PA-250-W55-1020, H-250-W55-1020, DD-250-W55-1015, or CV-250-W55-1015. [Regulation 5.00 and 5.21]
- iii. The owner or operator shall not allow chromium III emissions to exceed *de minimis* from HT-250-W55-801, HT-250-W55-801B as 801 carrier, CV-250-W55-801, H-250-W55-802B, CV-250-W55-802B, BE-250-W55-901B, FD-250-W55-901, BE-250-W55-901, HE-250-W55-901, FD-250-W55-902, FD-250-W55-902B, VS-250-W55-901, H-250-W55-901, SS-250-W55-901, VS-250-W55-901B, H-250-W55-901B, or SS-250-W55-901B. [Regulations 5.00 and 5.21]

¹⁷ The potential controlled NO_x emissions from EP HT-250-W55-501 and HT-250-W55-801B-801 meet the applicable NO_x emission standard in Regulation 7.08.

¹⁸ For EP FB-250-W55-801B, a one-time SO₂ compliance demonstration was performed, using AP-42 emission factors and combusting natural gas, and the PM emission standards from Regulation 7.06 cannot be exceeded.

¹⁹ Clariant no longer uses chromic acid flake in the W55 process. DD-250-W55-101 is no longer in use and chromium emissions are not generated in T-250-W55-105.

- iv. The owner or operator shall not allow chromium VI emissions to exceed *de minimis* from V-250-W55-703, DD-250-W55-701, H-250-W55-703, BE-250-W55-801, EPD-250-W55-801, CV-250-W55-801, FD-250-W55-901, BE-250-W55-901, HE-250-W55-901, FD-250-W55-902, VS-250-W55-901, H-250-W55-901, SS-250-W55-901, SSU-250-W55-1016, SSB-250-W55-1017, CV-250-W55-1015, BE-250-W55-801B, H-250-W55-801B, H-250-W55-802B, CV-250-W55-801B, BE-250-W55-901B, FD-250-W55-902B, VS-250-W55-901B, H-250-W55-901B, SS-250-W55-901B. [Regulations 5.00 and 5.21]
- v. The owner or operator shall not allow copper emissions to exceed *de minimis* from DD-250-W56-950, DD-250-W56-951, H-250-W56-952, H-W56-953, VS-250-W56-956, SS-250-W56-957, CV-250-W56-954, or CV-250-W56-955. [Regulations 5.00 and 5.21]
- vi. For HT-250-W55-701, FD-250-W55-702, and FD-250-W55-703, the owner or operator shall not allow chromium VI emissions from each emission point to exceed 0.24 lb per 12 consecutive month period. [Regulations 5.00 and 5.21]²⁰
- vii. For H-250-W55-801, the owner or operator shall not allow chromium VI emissions to exceed 0.06 lb per 12 consecutive month period. [Regulations 5.00 and 5.21]²¹
- viii. For HT-250-W55-801B, the owner or operator shall not allow chromium VI emissions to exceed 0.52 lb per 12 consecutive month period. [Regulations 5.00 and 5.21]²²
- ix. For HT-250-W55-801, the owner or operator shall not allow chromium VI emissions to exceed 2.25 lb per 12 consecutive month period. [Regulations 5.00 and 5.21]²³
- x. The owner or operator shall not process chromium products in HT-250-W55-801 and HT-250-W55-801B at the same time. [Regulations 5.00 and 5.21]²⁴

²⁰ The emission limit is derived from the 10/19/19 modeled emission rate of 2.75×10^{-5} lb/hr.

²¹ The emission limit is derived from the 10/19/19 modeled emission rate of 6.70×10^{-6} lb/hr.

²² The emission limit is derived from the 12/16/16 modeled emission rate of 5.91×10^{-5} lb/hr.

²³ The emission limit is derived from the 10/19/19 modeled emission rate of 2.57×10^{-4} lb/hr.

²⁴ The company requested this operating restriction in the application received 12/16/16, in order to maintain the total cancer risk below the goal of 1 in million. This limitation does not preclude one dryer from processing non-chromium products while the other dryer is processing chromium products.

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. Control Device Operation

- i. The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of control devices 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.
- ii. The owner or operator shall monitor and record the pressure drop at least once during each operating day to ensure it is maintained within the operating range as shown in the table below.

Control ID	Pressure Drop
BMF-250-W55-401	1.0 – 14 " w.c.
BMF-250-W55-801, BMF-250-W55-801B	≤ 11 " w.c.
BV-250-W55-202, BV-250-W55-203, BV-250-W55-222, BV-250-W55-302, BV-250-W55-303,	0.1 – 5.0 " w.c.
BV-250-W55-306	0.1 – 6.5 " w.c.
DC-250-W55-201	0.1 – 6.5 " w.c.
DC-250-W55-411	0.1 – 6.5 " w.c.
DC-250-W55-601, DC-250-W55-1027, DC-250-W55-1028, FIL-250-W55-1027, FIL-250-W55-1028, SC-250-W55-801C	0.1 – 5.0 " w.c.
DC-250-W55-901, DC-250-W56-959, FIL-250-W55-901, FIL-250-W56-959	0.2 – 6.0 " w.c.
ED-250-W55-401, ED-250-W55-801	-5.0 – 5.0 " w.c.
ED-250-W55-601	≥ 40 psi
ED-250-W55-601B	≥ 40 psi each
ED-250-W55-802B	≥ 35 psi
SC-250-W55-601B	≥ 15 psi
V-250-W55-603B	≥ 5 psi

- iii. The owner or operator shall monitor and maintain records of the inlet water flow/pressure rate at least once during each operating day to ensure it is greater than or equal to the operating ranges as shown in the table below.

Control ID	Inlet
ED-250-W55-401	≥ 40 psi
ED-250-W55-801, ED-250-W55-802 (measured by 801 pressure)	≥ 35 psi
ED-250-W55-901	≥ 15 psi
SC-250-W55-401, SC-250-W55-601	≥ 15 psi each

Control ID	Inlet
SC-250-W55-801, SC-250-W55-801B, SC-250-W55-801C	≥ 5 gpm each
SC-250-W55-802	≥ 35 psi
SC-250-W55-802B	≥ 35 psi
SC-250-W55-901	≥ 10 psi
V-250-W55-603	≥ 5 psi

- iv. For any period of operating outside the established performance indicator range for BMF-250-W55-401, BMF-250-W55-801, BMF-250-W55-801B, BV-250-W55-202, BV-250-W55-203, BV-250-W55-222, BV-250-W55-302, BV-250-W55-303, BV-250-W55-306, DC-250-W55-201, DC-250-W55-411, DC-250-W55-601, DC-250-W55-901, DC-250-W55-1027, DC-250-W55-1028, DC-250-W56-959, ED-250-W55-401, ED-250-W55-601, ED-250-W55-601B, ED-250-W55-801, ED-250-W55-802, ED-250-W55-802B, ED-250-W55-901, FIL-250-W55-901, FIL-250-W55-1027, FIL-250-W55-1028, FIL-250-W56-959, SC-250-W55-401, SC-250-W55-601, SC-250-W55-601B, SC-250-W55-801/ME-250-W55-801, SC-250-W55-801B, SC-250-W55-801C, SC-250-W55-802, SC-250-W55-802B, SC-250-W55-901, V-250-W55-603, and/or V-250-W55-603B, the owner or operator shall maintain the following records:

- (1) The date,
- (2) The observed performance indicator value,
- (3) Corrective action taken to minimize the extent of the excursion, and
- (4) Measures implemented to prevent reoccurrence.

- v. Upon notification to the District, the owner or operator may modify the performance indicator ranges for BV-250-W55-222 once during the life of this operating permit, based on plant operating trends. Records of the operating trends that necessitated a change shall be kept for the life of the control device.

b. HAP

- i. See Plantwide Specific Conditions.

c. Opacity

- i. See Plantwide Specific Conditions

d. PM/PM₁₀/PM_{2.5}

- i. See Plantwide Specific Conditions.
- ii. For any period of time when the process was operating and a PM control device was not operating, the owner or operator shall maintain the following records:

- (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/PM₁₀/PM_{2.5} (tons); and
- (4) Summary information on the cause of the event, corrective action taken, and measures implemented to prevent reoccurrence.

e. NO_x

- i. See Plantwide Specific Conditions
- ii. For any period of time when the process was operating and a NO_x control device was not operating, the owner or operator shall maintain the following records:
 - (1) The duration of the control device downtime;
 - (2) The process throughput during the control device downtime;
 - (3) The emissions of NO_x (ppmv and tons); and
 - (4) Summary information on the cause of the event, corrective action taken, and measures implemented to prevent reoccurrence.

f. SO₂

There are no monitoring or record keeping requirements for this emission unit.

g. TAC

- i. See Plantwide Specific Conditions.
- ii. The owner or operator shall calculate and record the 12 consecutive month chromium VI emissions (lbs) for each month in the report period from FD-250-W55-702, FD-250-W55-703, HT-250-W55-701, H-250-W55-801, HT-250-W55-801, and HT-250-W55-801B each.
- iii. The owner or operator shall monthly record the type of products processed in HT-250-W55-801 and HT-250-W55-801B and make a record that no chromium products were processed at the same time.
- iv. For any period of time when the process was operating and a TAC control device was not operating, the owner or operator shall maintain the following records:
 - (1) The duration of the control device downtime;
 - (2) The process throughput during the control device downtime;
 - (3) The emissions of each TAC (lb/hr and lb/avg. period); and

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

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 or a declaration that there were no such deviations. 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. Control Device Operation

- i. Identification of all periods of operating outside the established performance indicator range for a control device, including the information below, or a negative declaration if there were no excursions during the reporting period.
- (1) The date,
 - (2) The observed performance indicator value,
 - (3) Corrective action taken to minimize the extent of the excursion, and measures implemented to prevent recurrence.

b. HAP

- i. See Plantwide Specific Conditions.

c. Opacity

- i. See Plantwide Specific Conditions

d. PM/PM₁₀/PM_{2.5}

- i. See Plantwide Specific Conditions.

- ii. Identification of all periods when a process was operating and an associated control device was not operating, including the information below, or a negative declaration if the control device was operating at all times the process was operating during the reporting period.
 - (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/PM₁₀/PM_{2.5} (tons); and
 - (4) Summary information on the cause of the event, corrective action taken, and measures implemented to prevent reoccurrence.

- e. **NO_x**
 - i. See Plantwide Specific Conditions.
 - ii. Identification of all periods of bypassing a NO_x control device while an associated NO_x emission point was in operation during a reporting period, including the information below, or a negative declaration if there were no periods of bypassing a control device during the reporting period.
 - (1) The duration of the control device downtime;
 - (2) The process throughput during the control device downtime;
 - (3) The emissions of NO_x (ppmv and tons); and
 - (4) Summary information on the cause of the event, corrective action taken, and measures implemented to prevent reoccurrence.

- f. **SO₂**

There are no reporting requirements for this emission unit.

- g. **TAC**
 - i. See Plantwide Specific Conditions.
 - ii. The owner or operator shall report the 12 consecutive month chromium VI emissions (lbs) for each month in the report period from FD-250-W55-702, FD-250-W55-703, HT-250-W55-701, H-250-W55-801, HT-250-W55-801, and HT-250-W55-801B each.
 - iii. The owner or operator shall report any months when chromium containing products were processed in HT-250-W55-801 and HT-250-W55-801B at the same time and the amount.

- iv. Identification of all periods when a process was operating and a TAC control device was not operating, including the information below, or a negative declaration if the control device was operating at all times the process was operating during the reporting period.
 - (1) The duration of the control device downtime;
 - (2) The process throughput during the control device downtime;
 - (3) The emissions of each TAC (lb/hr and lb/avg. period); and
 - (4) Summary information on the cause of the event, corrective action taken, and measures implemented to prevent recurrence.

S4. Testing

[Regulation 2.03, section 6.1]

a. Control Device Operation

There are no testing requirements for this emission unit.

b. HAP

See Plantwide Specific Conditions.

c. Opacity

There are no testing requirements for this emission unit.

d. PM/PM₁₀/PM_{2.5}

There are no testing requirements for this emission unit.

e. NO_x

There are no testing requirements for this emission unit.

f. SO₂

There are no testing requirements for this emission unit.

g. TAC

There are no testing requirements for this emission unit.

250-W55 and 250-W56 Comments

1. Except where a Tier 3 or Tier 4 analysis is noted in the table below, the potential TAC emissions are below *de minimis* in Regulations 5.00 and 5.21, with the listed levels of control.

EU	Emission Point	Cr(III)	Cr(VI)	Cu	HNO ₃
250-W55	SS-250-W55-901, H-250-W55-802B, CV-250-W55-801B, BE-250-W55-901B, FD-250-W55-902B, VS-250-W55-901B, H-250-W55-901B, SS-250-W55-901B, CV-250-W55-801, FD-250-W55-901, VS-250-W55-901, H-250-W55-901, FD-250-W55-902, HE-250-W55-901, BE-250-W55-901	1 st	2 nd	--	--
	HT-250-W55-701	--	Tier 3	--	--
	FD-250-W55-702	--	Tier 3	--	--
	FD-250-W55-703	--	Tier 3	--	--
	EPD-250-W55-801, BE-250-W55-801, DD-250-W55-701, V-250-W55-703, H-250-W55-703	--	2 nd	--	--
	HT-250-W55-801	2 nd	Tier 3	--	--
	H-250-W55-801	--	Tier 3	--	--
	T-250-W55-102, H-250-W55-304, FD-250-W55-301, H-250-W55-305, FD-250-W55-403, CV-250-W55-401, CV-250-W55-403, CV-250-W55-404/405, PE-250-W55-401/402, MS-250-W55-401, H-250-W55-402/403, DD-250-W55-1015, DD-250-W55-401, H-250-W55-401, FD-250-W55-406, MS-250-W55-401, SCV-250-W55-501	--	--	--	*
	T-250-W55-105	--	--	--	--
	DD-250-W55-302, GR-250-W55-301, MM-250-W55-401/402, CV-250-W55-402, EPD-250-W55-401, VS-250-W55-501, BE-250-W55-501, H-250-W55-501, BE-250-W55-1020, VS-250-W55-1020, H-250-W55-1020, PA-250-W55-1020	--	--	--	1 st
	HT-250-W55-401	--	--	--	2 nd
	SSU-250-W55-1016, SSB-250-W55-1017	--	1 st	--	--
	CV-250-W55-1015, BE-250-W55-801B, H-250-W55-801B		1 st	--	*
	HT-250-W55-801B as 801 carrier	3 rd	Tier 3	--	--
250-W56	DD-250-W56-950, DD-250-W56-951, H-250-W56-952, H-W56-953, VS-250-W56-956, SS-250-W56-957	1 st	2 nd	2 nd	--
	CV-250-W56-954, CV-250-W56-955	1 st	2 nd	1 st	--

*This emission point can meet the *de minimis* value without a control device.

-- This emission point has no emissions of the specified TAC.

For emission points with potential controlled TAC emissions above *de minimis*, the source performed a Tier 3 analysis based on controlled potential emissions, resulting in the following risks and hazard quotients.

Emission Point	TAC	Location	Risk	Status	HQ	Status
HT-250-W55-701	Cr(VI)	industrial	0.193	≤ 10.0	0.002	≤ 3.0
		unadjusted	0.106	≤ 1.0	0.001	≤ 1.0
FD-250-W55-702	Cr(VI)	industrial	0.193	≤ 10.0	0.002	≤ 3.0
		unadjusted	0.106	≤ 1.0	0.001	≤ 1.0
FD-250-W55-703	Cr(VI)	industrial	0.193	≤ 10.0	0.002	≤ 3.0
		unadjusted	0.106	≤ 1.0	0.001	≤ 1.0
HT-250-W55-801	Cr(VI)	industrial	1.783	≤ 10.0	0.019	≤ 3.0
		unadjusted	0.976	≤ 1.0	0.010	≤ 1.0
HT-250-W55-801B	Cr(VI)	industrial	0.410	≤ 10.0	0.004	≤ 3.0
		unadjusted	0.229	≤ 1.0	0.002	≤ 1.0
H-250-W55-801	Cr(VI)	industrial	0.133	≤ 10.0	0.001	≤ 3.0
		unadjusted	0.048	≤ 1.0	0.001	≤ 1.0

2. L/W Alumina Feeder FD-250-W55-401 and the L/W Hercoflat Feeder FD-250-W55-402 were inadvertently removed in permit 27755-14-TV(R2).

Insignificant Activities

Equipment		Quan.	PTE (tpy)	Regulation Basis
FB-250-W55-701	Heater Assembly, Direct Fired (2.257 MMBtu/hr)	1	0.97 tpy NO _x	Reg. 1.02, Section 1.38.1.2.1

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.
- 3) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16 section 4.3.5.3.6.
- 6) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) to be reported on the annual emission inventory.
- 7) The District has determined pursuant to Regulation 2.16 section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.