**Commonwealth of Kentucky**
**Energy and Environment Cabinet**
**Department for Environmental Protection**
**Division for Air Quality**
**300 Sower Boulevard, 2nd Floor**
**Frankfort, Kentucky 40601**
**(502) 564-3999**

**Draft**

# AIR QUALITY PERMIT

**Issued under 401 KAR 52:020**

| | |
|---|---|
| **Permittee Name:** | **Sekisui Specialty Chemicals America, LLC** |
| **Mailing Address:** | **P.O. Box 970, Calvert City, KY 42029** |
| **Source Name:** | **Sekisui Specialty Chemicals America, LLC** |
| **Mailing Address:** | **P.O. Box 970, Calvert City, KY 42029** |
| **Source Location:** | **246 Johnson Riley Road, Calvert City, KY 42029** |
| **Permit:** | **V-25-011** |
| **Agency Interest:** | **37138** |
| **Activity:** | **APE20230001** |
| **Review Type:** | **Title V, Operating** |
| **Source ID:** | **21-157-00055** |
| **Regional Office:** | **Paducah Regional Office**<br>**130 Eagle Nest Drive**<br>**Paducah, KY 42003**<br>**(270) 898-8468** |
| **County:** | **Marshall** |
| **Application Complete Date:** | **February 15, 2025** |
| **Issuance Date:** | |
| **Expiration Date:** | |

**For Michael J. Kennedy, P.E.**
**Director**
**Division for Air Quality**

# TABLE OF CONTENTS


| SECTION | ISSUANCE | PAGE |
|---|---|---|
| A. PERMIT AUTHORIZATION | Renewal | 1 |
| B. EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS | Renewal | 2 |
| Polymerization (POLY) Process Area | | 2 |
| Saponification (SAP) Process Area | | 24 |
| Polyrectification (POLYREC) Area | | 48 |
| WEDCO Area | | 70 |
| Acetic Acid Recovery (AAR) Area | | 77 |
| Flare | | 93 |
| Tank Farm | | 98 |
| Underground Storage Tank | | 127 |
| Loading Area | | 128 |
| Cooling Towers | | 141 |
| Warehouse Fugitives | | 149 |
| EP Group Requirements | | 150 |
| C. INSIGNIFICANT ACTIVITIES | Renewal | 156 |
| D. SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS | Renewal | 157 |
| E. SOURCE CONTROL EQUIPMENT REQUIREMENTS | Renewal | 158 |
| F. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS | Renewal | 159 |
| G. GENERAL PROVISIONS | Renewal | 162 |
| H. ALTERNATE OPERATING SCENARIOS | Renewal | 168 |
| I. COMPLIANCE SCHEDULE | Renewal | 169 |


| Permit | Permit Type | Activity# | Complete Date | Issuance Date | Summary of Action |
|---|---|---|---|---|---|
| V-25-011 | Renewal | APE20230001 | 2/15/2025 | | Renewal Permit |

## SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Energy and Environment Cabinet (Cabinet) hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit was issued under the provisions of Kentucky Revised Statutes (KRS) Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

## POLYMERIZATION (POLY) PROCESS AREA

**Emission Point (EP) Emission Unit (EU)**

| **EP**(Source ID) | **EU** | **Emission Unit/Point Description** |
|---|---|---|
| **F01(11)** | P01-11: | **Description: Polymerization 50 Line Reactors, Stripper and Auxiliary Equipment**<br>**Control Device:** FLARE, BA-5000 (see FLARE Section B, EP F01)<br>Maximum Processing Rate: 79,000 lb/hr<br>Construction Date: 1984, except (P01-11G) installed in 1996 |
| | *P01-11A* | 50 Line Polykettle Preheater, DA-5056<br>(P01 - 11A) product stream to (P01-11B); exhaust to (P01-11C) |
| | *P01-11B* | 50 Line Polykettle 5 (PK5), DC-5051<br>(P01 11B) product stream to (P01-11D); exhaust to (P01-11A) |
| | *P01-11C* | 50 Line PK5 Process Condenser, EA-5053<br>(P01 11C) product stream to (P01-11B); exhaust to FLARE (EP-F01)<br>**Miscellaneous Organic NESHAP (MON) Group 1 Continuous Process Vent** |
| | *P01-11D* | 50 Line Polykettle 6 (PK6), DC-5052<br>(P01-11D) product stream to (P01-11F); exhaust to (P01-11E) |
| | *P01-11E* | 50 Line PK6 Process Condenser, EA-5054<br>(P01-11E) product stream to (P01-11D); exhaust to FLARE (EP-F01)<br>**MON Group 1 Continuous Process Vent** |
| | *P01-11F* | 50 Line Paste Stripper, DA-5051<br>(P01 11F) product stream to Tank Farm; exhaust to (P01 11G) |
| | *P01-11G* | 50 Line Paste Stripper Condenser, EA-5056<br>(P01 11G) product stream to (P01 11H) |
| | *P01-11H* | 50 Line Paste Stripper Accumulator, FA-5052<br>Capacity: 576 gallons<br>(P01 11H) product stream to (P01 11A), (P01 11F) or (R03 10A); exhaust to FLARE (EP F01)<br>**MON Group 1 Continuous Process Vent** |
| **P01** | P01 | **Polymerization 50 Line Reactors, Stripper and Auxiliary Equipment Startups** |
| **F01(12)** | P03-12: | **Description: Polymerization 100 Line Reactors and Auxiliary Equipment**<br>Control Device: FLARE, BA-5000 (see Section B, EP F01)<br>Maximum Processing Rate: 79,000 lbs/hr<br>Construction Date: 1959, except (P03 12C) installed in 1996 |
| | *P03-12A* | 100 Line Polykettle Preheater, DA-5106<br>(P03 - 12A) product stream to (P03-12B); exhaust to (P03-12C) |
| | *P03-12B* | 100 Line Polykettle 1 (PK1), DC-5101<br>(P03-12B) product stream to (P03-12D); exhaust to (P03-12A) |
| | *P03-12C* | 100 Line PK1 Process Condenser, EA-5103<br>(P03-12C) product stream to (P03-12B); exhaust to FLARE (EP-F01)<br>**MON Group 1 Continuous Process Vent** |
| | *P03-12D* | 100 Line Polykettle 2 (PK2), DC-5102<br>(P03-12D) product stream to (P04-13A); exhaust to (P03-12E) |
| | *P03-12E* | 100 Line PK2 Process Condenser, EA-5104<br>(P03-12E) product stream to (P03-12D); exhaust to FLARE (EP F01)<br>**MON Group 1 Continuous Process Vent** |

# SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| | | |
|---|---|---|
| **F01(13)** | P04-13: | **Description: Polymerization 100 Line Paste Stripper and Auxiliary Equipment**<br>Control Device: FLARE, BA-5000 (see Section B, EP-F01)<br>Maximum Processing Rate: 79,000 lbs/hr<br>Construction Date: 1959 |
| | *P04-13A* | 100 Line Paste Stripper, DA-5101<br>(P04-13A) product stream to Tank Farm; exhaust to (P04-13B) |
| | *P04-13B* | 100 Line Paste Stripper Condenser, EA-5106<br>(P04-13B) product stream to (P04-13C) |
| | *P04-13C* | 100 Line Paste Stripper Accumulator, FA-5102<br>Capacity: 576 gallons<br>(P04-13C) product stream to (P03-12A), (P04-13A) or (R03-10A); exhaust to FLARE (EP-F01)<br>**MON Group 1 Continuous Process Vents** |
| **P03** | P03 | **Polymerization 100 Line Reactors, Stripper and Auxiliary Equipment Startups** |
| **F01(14)** | P06-14: | **Description: Polymerization 150 Line Reactors and Auxiliary Equipment**<br>**Control Device:** FLARE, BA-5000 (see Section B, EP-F01)<br>Maximum Processing Rate: 79,000 lbs/hr<br>Construction Date: 1984 |
| | *P06-14A* | 150 Line Polykettle Preheater, DA-5156<br>(P06-14A) product stream to (P06-14B); exhaust to (P06-4C) |
| | *P06-14B* | 150 Line Polykettle 3 (PK3), DC-5151<br>(P06-14B) product stream to (P06-14D); exhaust to (P06-14A) |
| | *P06-14C* | 150 Line PK3 Process Condenser, EA-5153<br>(P06-14C) product stream to (P06-14B); exhaust to FLARE (EP-F01)<br>**MON Group 1 Continuous Process Vent** |
| | *P06-14D* | 150 Line Polykettle 4 (PK4), DC-5152<br>(P06-14D) product stream to (P07-15A); exhaust to (P06-14E) |
| | *P06-14E* | 150 Line PK4 Process Condenser, EA-5154<br>(P06-4E) product stream to (P06-14D); exhaust to FLARE (EP-F01)<br>**MON Group 1 Continuous Process Vent** |
| **F01(15)** | P07-15: | **Description: Polymerization 150 Line Stripper and Auxiliary Equipment**<br>**Control Device:** FLARE, BA-5000 (see Section B, EP-F01)<br>Maximum Processing Rate: 79,000 lbs/hr |
| | *P07-15A* | 150 Line Paste Stripper, DA-5151<br>Construction Date: 1984<br>(P07-15A) product stream to Tank Farm; exhaust to (P07-15B) |
| | *P07-15B* | 150 Line Paste Stripper Condenser, EA-5156<br>Construction Date: 1996<br>(P07-15B) product stream to (P07-15C) |
| | *P07-15C* | 150 Line Paste Stripper Accumulator, FA-5152<br>Capacity: 576 gallons<br>Construction Date: 1959<br>(P07-15C) product stream to (P06-14A), (P07-15A) or (R03-10A); exhaust to FLARE (EP-F01)<br>**MON Group 1 Continuous Process Vent** |
| **P06** | P06 | **Polymerization 150 Line Reactors, Stripper and Auxiliary Equipment Startups** |
| **P02** | P02 | **Description:** 50 Line Catalyst Preparation Tanks (2), FA-5051A/B<br>Capacity: 684 gallons each, storing a solution of 8 weight percent DEHA in methanol<br>Construction Date: 1984<br>Maximum True Vapor Pressure: > 1.24 psia<br>**MON Group 2 Storage Tanks** |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| | | |
|---|---|---|
| **P05** | P05 | **Description: 100 Line Catalyst Preparation Tanks (2)**, FA-5101A/B<br>Capacity: 272 gallons each, storing a solution of 8 weight percent DEHA in methanol<br>Construction Date: 1959<br>Maximum True Vapor Pressure: > 1.28 psia<br>**MON Group 2 Storage Tanks** |
| **P08** | P08 | **Description:** 150 Line Catalyst Preparation Tanks (2), FA-5151A/B<br>Capacity: 272 gallons each, storing a solution of 8 weight percent DEHA in methanol<br>Construction Date: 1959<br>Maximum True Vapor Pressure: > 1.28 psia<br>**MON Group 2 Storage Tanks** |
| **P09** | P09 | **Description:** Phosphoric Acid Tank, FA-5123<br>Capacity: 500 gallons, storing phosphoric acid in methanol<br>Construction Date: 1983<br>Maximum True Vapor Pressure: > 1.28 psia<br>**MON Group 2 Storage Tank** |
| **P10(01)** | P10 01 | **Description:** DEHA Preparation Tank, FA-5118<br>Capacity: 200 gallons<br>Construction Date: 1990<br>Maximum True Vapor Pressure: > 1.64 psia |
| **P10(02)** | P10 02 | **Description:** DEHA Shortstop Charge Pots (2), HA-5063 and HA-5064<br>Capacity: 110 gallons each<br>Construction Date: 1984<br>Maximum True Vapor Pressure: > 1.64 psia |
| **P10(03)** | P10 03 | **Description:** DEHA Shortstop Charge Pots (4), HA-5113, HA-5114, HA-5163 and HA-5164<br>Capacity: 42 gallons each<br>Construction Date: 1959<br>Maximum True Vapor Pressure: > 1.64 psia |
| **P11** | P11 | **Equipment Leaks (Polymerization Process Area Fugitives)**<br>Gas Vapor Valves: 115<br>Light Liquid Valves: 562<br>Light Liquid Pumps: 14<br>Connectors: 2,671<br>Agitators: 7<br>Instrumentation Systems: 140<br>Pressure Relief Devices<br>Gas/Vapor: 5<br>Light Liquid: 9 |

The equipment leak component count for the Polymerization Process Area, listed above, as submitted in the application, reflects an accurate count of the equipment as of the date of issuance of this permit but is not intended to limit the permittee to the exact numbers specified. The permittee may add or remove equipment leak components without a permit revision as long as the components continue to comply with the applicable requirements listed below, and the changes do not: (1) cause a significant increase of emissions; or (2) result in the applicability of an additional standard that is not specified in this permit.

**APPLICABLE REGULATIONS:**

401 KAR 63:002, Section 2.(4)(c), 40 C.F.R. 63.160 through 63.183, Tables 1 through 4 (Subpart H), National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, as referenced by 40 CFR 63, Subpart FFFF.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

401 KAR 63:002, Section 2.(4)(ii), 40 C.F.R. 63.980 through 63.999 (Subpart SS), National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(lll), 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.
*Note:*
*40 CFR 63, Subpart F has been updated as cited in 89 FR 43153-43175, dated May 16, 2024; & 40 CFR 63, Subpart FFFF has been updated as cited in 89 FR 23868-23873 dated April 4, 2024.*

**STATE-ORIGIN REQUIREMENTS:**
401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances.

**PRECLUDED REGULATIONS**:
Refer to **Section B**, **Group Requirements.**

**NON-APPLICABLE REGULATIONS:**
401 KAR 60:005, Section 2.(2)(r), 40 C.F.R. 60.110b through 60.117b (Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

401 KAR 60:005, Section 2.(2)(bbb), 40 C.F.R. 60.480 through 60.489 (Subpart VV), Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006.

401 KAR 60:005, Section 2.(2)(ppp), 40 C.F.R. 60.660 through 60.668 (Subpart NNN), Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations.

401 KAR 60:005, Section 2.(2)(ttt), 40 C.F.R. 60.700 through 60.708 (Subpart RRR), Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.

401 KAR 63:002, Section 2 (4)(a)(i), 40 C.F.R. 63.100 through 63.107, Tables 1 through 4 (Subpart F)(HON), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, and related Subparts G and H, are not applicable to the Poly Area units, as these units do not produce chemicals listed under Table 1 of 40 CFR 63, Subpart F as a primary product nor do they use as a reactant or co-product any chemical in Table 2 of 40 CFR 63, Subpart F. This determination notwithstanding, specific provisions of Subparts, G and H are included in this section since they are incorporated by reference in 40 CFR 63, Subpart FFFF.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

401 KAR 63:002, Section 2 (4)(a)(kkk), 40 C.F.R. 63.2330 through 632406, Tables 1 through 12 (Subpart EEEE), National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline), does not apply to Poly Area units pursuant to 40 CFR 63.2334(c)(1)

**1. Operating Limitations:**

a. If a Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 requirements beginning on the date the switch occurs. An initial compliance demonstration as specified in 40 CFR 63, Subpart FFFF must be conducted within 150 days after the switch occurs. [40 CFR 63.2445(d)]

b. Refer to 40 CFR 63.2540 and 40 CFR 63, Subpart FFFF, Table 12, for general provisions.

c. **General Duty:** At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements 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 source. [40 CFR 63.2450(u)]

Continuous Process Vents and Closed Vent Systems

Note: The closed vent system is constructed of hard piping as defined by 40 CFR 63.981.

d. All Group 1 process vents of EU: P01-11C, P01-11E, P01-11H, P03-12C, P03-12E, P04-13C, P06-14C, P06-14E and P07-15C shall be vented to a flare that complies with all applicable requirements of 40 CFR 63.2450(f). Refer to **Section B,** EP-F01. [40 CFR 63.2455(a) and 40 CFR 63, Subpart FFFF, Table 1, item 1.ii.]

e. The permittee shall comply with the following provisions for the closed vent systems routing the vapors to the FLARE, EP-F01. [to 40 CFR 63.983(a), and 40 CFR 63.982(b)]
   (1) Each closed vent system shall be designed and operated to collect the regulated material vapors from the emission points, and to route the collected vapors to a control device. [40 CFR 63.983(a)(1)]
   (2) Closed vent systems shall be operated at all times when emissions are vented to, or collected by, them. [40 CFR 63.983(a)(2)]
   (3) Except as provided by 40 CFR 63.2450(e)(4) per 40 CFR 63.2450(e)(6)(ii), the permittee shall comply with the provisions of either 40 CFR63.983(a)(3)(i or ii), for each closed vent system that contains bypass lines that could divert a vent stream to the atmosphere. [40 CFR 63.983(a)(3)]
      (i) To properly install, maintain, and operate a flow indicator at the entrance to any bypass line that is capable of taking periodic readings. [40 CFR 63.983(a)(3)(i)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(ii) To secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. [40 CFR 63.983(a)(3)(ii)]

(4) If there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(i)(B), the permittee shall comply with either of the following procedures. [40 CFR 63.983(d)(1)]
   (i) Eliminate the leak; [40 CFR 63.983(d)(1)(i)]
   (ii) Monitor the equipment according to the procedures therein. [40 CFR 63.983(c)]

(5) Leaks, as indicated by an instrument reading greater than 500 ppm by volume above background or by visual inspections, shall be repaired as soon as practical. [40 CFR 63.983(d)(2)]
   (i) A first attempt at repair shall be made no later than 5 days after the leak is detected. [40 CFR 63.983(d)(2)(i)]
   (ii) Except as provided in 40 CFR 63.983(d)(3) for delay of repair, repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. [40 CFR 63.983(d)(2)(ii)]

f. The use of a bypass line at any time on a closed vent system to divert emissions subject to the requirements in Tables 1 through 7 to 40 CFR 63 Subpart FFFF to the atmosphere or to a control device not meeting the requirements specified in Tables 1 through 7 of 40 CFR 63 Subpart FFFF is an emissions standard deviation. The permittee must comply with the requirements specified in 40 CFR 63.2450(e)(6)(i) through (v), as applicable [40 CFR 63.2450(e)(6)]

Equipment Leaks

g. The permittee must meet each requirement in 40 CFR 63, Subpart FFFF, Table 6, item 1.(b.). The permittee shall comply with the requirements of 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b, d and f). [40 CFR 63.2480(a)]

(1) Each piece of equipment in a process unit to which 40 CFR 63, Subpart H applies shall be identified such that it can be distinguished readily from equipment that is not subject to its requirements. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, or by designation of process unit boundaries by some form of weatherproof identification. [40 CFR 63.162(c)]

(2) When a leak is detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168 and 40 CFR 63.169; and 40 CFR 63.172 through 40 CFR 63.174, the permittee shall: [40 CFR 63.162(f)]
   (i) Clearly identify the leaking equipment. [40 CFR 63.162(f)(1)]
   (ii) The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 40 CFR 63.175(e)(7)(i)(D), and no leak has been detected during the follow-up monitoring. If the permittee elects to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored and no leak is detected during that monitoring. [40 CFR 63.162(f)(2)

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(iii) The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that is subject to 40 CFR 63.174(c)(1)(i), may be removed after it is repaired. [40 CFR 63.162(f)(3)

(3) For each piece of equipment subject to 40 CFR 63, Subpart FFFF that is added to an affected source after December 17, 2019, or replaces equipment at an affected source after December 17, 2019, the permittee must initially monitor for leaks within 30 days after August 12, 2020, or initial startup of the equipment, whichever is later. Equipment that is designated as unsafe- or difficult-to-monitor is not subject to this requirement. [40 CFR 63.2480(b)(7)]

h. Except as specified in 40 CFR 63.2480(e)(4), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(1) and (2) for pressure relief devices, such as relief valves or rupture disks, in organic HAP gas or vapor service instead of the pressure relief device requirements of 40 CFR 63.165 of Subpart H. [40 CFR 63.2480(e)]

i. Except as specified in 40 CFR 63.2480(e)(4) and (5), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(3), (6), (7), and (8) for all pressure relief devices in organic HAP service. [40 CFR 63.2480(e)]

(1) **Pressure release management.** Implement the pressure release management requirements outlined in 40 CFR 63.2480(e)(3)(i) – (v). [40 CFR 63.2480(e)(3)]

(2) **Root cause analysis and corrective action analysis.** A root cause analysis and corrective action analysis must be completed as soon as possible, but no later than 45 days after a release event. Special circumstances affecting the number of root cause analyses and/or corrective action analyses are provided in 40 CFR 63.2480(e)(6)(i) – (iii). [40 CFR 63.2480(e)(6)]

(3) **Corrective action implementation.** The permittee must implement the corrective action(s) identified in the corrective action analysis in accordance with the applicable requirements in 40 CFR 63.2480(e)(7)(i) – (iii). [40 CFR 63.2480(e)(7)]

(4) **Flowing pilot-operated pressure relief devices.** The permittee shall not install any flowing pilot-operated pressure relief device or replace any pressure relief device with a flowing pilot-operated pressure relief device after August 12, 2023. [40 CFR 63.2480(e)(8)]

Maintenance Vents

j. The permittee must meet the requirements outlined in 40 CFR 63.2450(v)(1) through (3) for any process vent designated as a maintenance vent and used only as a result of startup, shutdown, maintenance or inspection of equipment where equipment is emptied, depressurized, degassed, or placed into service. [40 CFR 63.2450(v)]

**Compliance Demonstration Method:**

a. Refer to **4. Specific Monitoring Requirements** and **5. Specific Recordkeeping Requirements** for Continuous Process Vents and Closed Vent Systems.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Equipment Leaks

b. Compliance shall be determined by review of the records required by 40 CFR 63.181 and the reports required by 40 CFR 63.182, review of performance test results, and by inspections. [40 CFR 63.162(a)]

Maintenance Vents

c. Refer to **5. Specific Recordkeeping Requirements** and **6. Specific Reporting Requirements** for Maintenance Vents.

**2. Emission Limitations:**

a. Refer to **Section D.4.** for 401 KAR 63:020 requirements.

Equipment Leaks and Closed Vent Systems

b. The permittee shall comply with the fugitive emissions standards of 40 CFR 63, Subpart H as applicable. [40 CFR 63.2480(a) and 40 CFR 63, Subpart FFFF, Table 6]

(1) Standards for Pumps in light liquid service: [40 CFR 63.163]
- 40 CFR 63.163(a): Implementation and compliance provisions
- 40 CFR 63.163(b): Monitoring requirements, Leak detection levels, frequency of monitoring
- 40 CFR 63.163(c): Repair procedures and time frames [*except 40 CFR 63.163 (c)(3)*]
- 40 CFR 63.163(d): Procedures to determine percent leaking pumps and quality improvement program requirements
- 40 CFR 63.163(e)-(j): Exemptions for specific types of pumps

(2) Standards for Compressors: [40 CFR 63.164]
- 40 CFR 63.164(a)-(e): Operational requirements
- 40 CFR 63.164(f): Criteria for Leak detection
- 40 CFR 63.164(g): Repair procedures and time frames
- 40 CFR 63.164(h)-(i): Exemptions for specific types of compressors

(3) Standards for Pressure relief devices in gas/vapor service: [40 CFR 63.2480(e)]
- 40 CFR 63.2480(e)(1): Operational requirements
- 40 CFR 63.2480(e)(2): Pressure release procedures
- 40 CFR 63.2480(e)(4): Exemptions for specific types of pressure relief devices

(4) Standards for Sampling Connection Systems: [40 CFR 63.166]
- 40 CFR 63.166(a)-(b): Operational requirements
- 40 CFR 63.166(c): Exemptions for specific types of sampling connection systems

(5) Standards for Open-ended valves or lines: [40 CFR 63.167]
- 40 CFR 63.167(a)-(c): Operational requirements
- 40 CFR 63.167(d)-(e): Exemptions for specific types of valves

(6) Standards for Valves in gas/vapor service and in light liquid service: [40 CFR 63.168]
- 40 CFR 63.168(a): Operational requirements
- 40 CFR 63.168(b)-(d): Monitoring requirements and intervals
- 40 CFR 63.168(e): Procedures to determine percent leaking valves
- 40 CFR 63.168(f): Leak repair time frames

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

40 CFR 63.168(g): First attempt repair procedures
40 CFR 63.168(h): Exemptions for unsafe-to-monitor valves
40 CFR 63.168(i): Exemptions for difficult-to-monitor valves

(7) Standards for Instrumentation systems: [40 CFR 63.169]
40 CFR 63.169(a): Monitoring frequency
40 CFR 63.169(b): Leak detection levels
40 CFR 63.169(c): Leak repair time frames

(8) Standards for Delay of repair: [40 CFR 63.171]
40 CFR 63.171 Allowances for delay of repair

(9) Standards for Closed-vent systems and control devices: [40 CFR 63.172]
40 CFR 63.172(a)-(b): Operational requirements
40 CFR 63.172(d),(m): Control device requirements
40 CFR 63.172(f)-(g): Monitoring requirements
40 CFR 63.172(h)-(i): Repair procedures and time frames
40 CFR 63.172 (j): Operational requirements for bypass lines [*except 40 CFR 63.172(j)(3)*]
40 CFR 63.172(k)-(l): Exemptions for unsafe-to-inspect and difficult-to-inspect closed-vent systems

(10) Standards for Agitators in gas/vapor service and in light liquid service: [40 CFR 63.173]
40 CFR 63.173(a): Operational requirements
40 CFR 63.173(b): Monitoring requirements and intervals
40 CFR 63.173(c): Leak repair time frames
40 CFR 63.173(d)-(g): Exemptions for specific types of agitators
40 CFR 63.173(h)-(j): Exemptions for difficult-to-monitor, inaccessible or unsafe-to-monitor agitators

(11) Standards for Connectors in gas/vapor service and in light liquid service: [40 CFR 63.174]
40 CFR 63.174(a): Operational requirements
40 CFR 63.174(b): Monitoring requirements and intervals
40 CFR 63.174(c): Procedures for open connectors or connectors with broken seals
40 CFR 63.174(d): Leak repair time frames
40 CFR 63.174(e): Monitoring frequency for repaired connectors
40 CFR 63.174(f)-(h): Exemptions for unsafe-to-monitor, unsafe-to-repair, inaccessible, or ceramic connectors
40 CFR 63.174(i): Procedures to determine percent leaking connectors
40 CFR 63.174(j): Optional credit for removed connectors

(12) In Phase III, Quality improvement program for valves: the permittee may elect to implement the following quality improvement programs if the percent of leaking valves is equal to or exceeds 2 percent: [40 CFR 63.175 and 40 CFR 63.168(d)(1)(ii)]
40 CFR 63.175(a): Quality improvement program alternatives
40 CFR 63.175(b): Criteria for ending quality improvement programs
40 CFR 63.175(c): Alternatives following achievement of less than 2 percent leaking valves target

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

40 CFR 63.175(d): Quality improvement program to demonstrate further progress
40 CFR 63.175(e): Quality improvement program of technology review and improvement

(13) If, in Phase III, Quality improvement program for pumps:, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps or three pumps in the Polymerization, Saponification, Polyrectification, Tank Farm, and Loading Areas (that are part of the 40 CFR 63, Subpart FFFF MCPU) leak, the permittee shall implement the following quality improvement programs for pumps: [40 CFR 63.176 and 40 CFR 63.163(d)(2)]
40 CFR 63.176(a): Applicability criteria
40 CFR 63.176(b): Criteria for ending the quality improvement program
40 CFR 63.176(c): Criteria for resumption of the quality improvement program
40 CFR 63.176(d): Quality improvement program elements

(14) The requirements for pressure testing in 40 CFR 63.178(b) may be applied to all processes, not just batch processes, as stated in 40 CFR 63.2480(b)(1). The permittee may elect to use pressure testing of equipment to demonstrate compliance by meeting the following requirements of 40 CFR 63.178(b). Compliance with the provisions of 40 CFR 63.178(b) exempts the permittee from the monitoring provisions of 40 CFR 63.163, 40 CFR 63.168 and 40 CFR 63.169, and 40 CFR 63.173 through 40 CFR 63.176. [40 CFR 63.2480(b)(1) and 40 CFR 63.178(b)]
(i) The permittee may switch among the alternatives provided the change is documented as specified in 40 CFR 63.181. [40 CFR 63.178(a)]
(ii) For the purposes of 40 CFR 63, Subpart FFFF pressure testing for leaks in accordance with 40 CFR 63.178(b) is not required after reconfiguration of an equipment train if flexible hose connections are the only disturbed equipment. [40 CFR 63.2480(b)(2)]

**Compliance Demonstration Method:**
Refer to **1. Operating Limitations** Compliance Demonstration b.

**3. Testing Requirements:**

Continuous Process Vents

a. Refer to **3. Testing Requirements** for the FLARE in **Section B,** EP F01.

Equipment Leaks

b. The permittee shall comply with the following test methods and procedures requirements: [40 CFR 63.180(a)]
(1) 40 CFR 63.180(b) Monitoring procedures, test methods, and calibration procedures
(2) 40 CFR 63.180(c) Leak detection monitoring procedures [*replacing reference to 40 CFR 63.165(a) with 40 CFR 63.2480(e)(1)*]
(3) 40 CFR 63.180(d) Procedures for determining organic HAP service applicability

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

c. The permittee must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1), if applicable. [40 CFR 63.2515(c)]

d. Testing shall be conducted at such times as may be requested by the Cabinet. [KAR 50:045, Section 1]

**4. Specific Monitoring Requirements:**

Continuous Process Vents and Closed Vent Systems

a. Refer to **4. Specific Monitoring Requirements** for the FLARE in **Section B,** EP-F01.

b. Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2 and 3), the permittee shall comply with the following requirements for each closed vent system: [40 CFR 63.983(b)(1)(i)]
   (1) Conduct an initial inspection according to the procedures in 40 CFR 63.983(c); and [40 CFR 63.983(b)(1)(i)(A)]
   (2) Conduct annual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 63.983(b)(1)(i)(B)]

c. For each bypass line, the permittee shall comply with either of the following requirements: [40 CFR 63.983(b)(4)]
   (1) If a flow indicator is used, take a reading at least once every 15 minutes. [40 CFR 63.983(b)(4)(i)]
   (2) If the bypass line valve is secured in the non-diverting position, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line. [40 CFR 63.983(b)(4)(ii)]

Equipment Leaks

d. Refer to **1. Operating Limitations** Compliance Demonstration Method b. and **3. Testing Requirements**.

**5. Specific Recordkeeping Requirements:**

a. All records shall be maintained in accordance with **Section F.2.**

b. The permittee must keep the following records: [40 CFR 63.2525]
   (1) Except as specified in 40 CFR 63.2450(e)(4), 40 CFR 63.2480(f), 40 CFR 63.2485(p) and (q) and 40 CFR 63.2525(t) and (u), each applicable record required by 40 CFR 63 Subpart A and in referenced subparts G and SS of 40 CFR 63. [40 CFR 63.2525(a)]
   (2) Records of each operating scenario as specified: [40 CFR 63.2525(b)]
      (i) A description of the process and the type of process equipment used. [40 CFR 63.2525(b)(1)]
      (ii) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard in 40 CFR 63.2505; wastewater point of determination (POD); storage tanks; and transfer racks.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

[40 CFR 63.2525(b)(2)]

(iii) The applicable control requirements of 40 CFR 63, Subpart FFFF including the level of required control, and for vents, the level of control for each vent. [40 CFR 63.2525(b)(3)]

(iv) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. [40 CFR 63.2525(b)(4)]

(v) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s). [40 CFR 63.2525(b)(5)]

(vi) The applicable monitoring requirements of 40 CFR 63, Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process. [40 CFR 63.2525(b)(6)]

(vii) Calculations and engineering analyses required to demonstrate compliance. [40 CFR 63.2525(b)(7)]

(viii) For reporting purposes, a change to any of these elements not previously reported, except for 40 CFR 63.2525(b)(5), constitutes a new operating scenario. [40 CFR 63.2525(b)(8)]

(3) For each deviation from an emission limit, operating limit, or work practice standard, the permittee must keep a record of the information specified in 40 CFR 63.2525(l)(1) – (3). The records must be maintained as specified in 40 CFR 63.10(b)(1) of subpart A. In the event that an affected unit does not meet an applicable standard, record the number of deviations. [40 CFR 63.2525(l)]

(i) For each deviation record the date, time, and duration of each deviation. [40 CFR 63.2525(l)(1)]

(ii) For each deviation from an applicable standard, record and retain a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions. [40 CFR 63.2525(l)(2)]

(iii) Record actions taken to minimize emissions in accordance with 40 CFR 63.2450(u) and any corrective actions taken to return the affected unit to its normal or usual manner of operation. [40 CFR 63.2525(l)(3)]

Continuous Process Vents and Closed Vent Systems

c. Refer to **5. Specific Recordkeeping Requirements** for the FLARE in **Section B,** EP-F01.

d. For the closed vent systems, the permittee shall record the following information. [40 CFR 63.998(d)(1)]

(1) The identification of all parts of the closed vent system that are designated as unsafe or difficult to inspect, an explanation of why the equipment is unsafe or difficult to inspect, and the plan for inspecting the equipment required by 40 CFR 63.983(b)(2)(ii or iii). [40 CFR 63.998(d)(1)(i)]

(2) As applicable, the information, for each closed vent system that contains bypass lines that could divert a vent stream away from the flare and to the atmosphere: [40 CFR 63.998(d)(1)(ii)(A or B)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(i) Hourly records of whether the flow indicator specified under 40 CFR 63.983(a)(3)(i) was operating and whether a diversion was detected at any time during the hour, as well as records of the times of all periods when the vent stream is diverted from the flare or the flow indicator is not operating; or [40 CFR 63.998(d)(1)(ii)(A)]

(ii) Where a seal mechanism is used to comply with 40 CFR 63.983(a)(3)(ii), hourly records of flow are not required. In such cases, the permittee shall record that the monthly visual inspection of the seals or closure mechanisms has been done, and shall record the occurrence of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has been broken. : [40 CFR 63.998(d)(1)(ii)(B)]

(3) For a closed vent system collecting regulated material from a regulated source, when a leak is detected as specified in 40 CFR 63.983(d)(2), the information specified in (d)(1)(iii)(A through F) of 40 CFR 63.998, below, shall be recorded and kept for 5 years. [40 CFR 63.998(d)(1)(iii)]

(i) The instrument and equipment identification number and the operator name, initials, or identification number. [40 CFR 63.998(d)(1)(iii)(A)]

(ii) The date the leak was detected and the date of the first attempt to repair the leak. [40 CFR 63.998(d)(1)(iii)(B)]

(iii) The date of successful repair of the leak. [40 CFR 63.998(d)(1)(iii)(C)]

(iv) The maximum instrument reading measured by the procedures in 40 CFR 63.983(c) after the leak is successfully repaired or determined to be nonrepairable. [40 CFR 63.998(d)(1)(iii)(D)]

(v) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 days after discovery of the leak. The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. [40 CFR 63.998(d)(1)(iii)(E)]

(vi) Copies of the Periodic Reports as specified in 40 CFR 63.999(c), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.998(d)(1)(iii)(F)]

(4) For each instrumental or visual inspection conducted in accordance with 40 CFR 63.983(b)(1) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 63.998(d)(1)(iv)]

e. For each flow event from a bypass line subject to the requirements 63.2450(e)(6), the permittee must maintain records sufficient to determine whether or not the detected flow included flow requiring control. For each flow event from a bypass line requiring control that is released either directly to the atmosphere or to a control device not meeting the requirements specified in Tables 1 through 7 to 40 CFR 63, Subpart FFFF, the permittee must include an estimate of the volume of gas, the concentration of organic HAP in the gas and the resulting emissions of organic HAP that bypassed the control device using process knowledge and engineering estimates. [40 CFR 63.2525(n)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Equipment Leaks

f. The permittee shall comply with the recordkeeping requirements for the equipment in the Polymerization, Saponification, Polyrectification, AAR, Tank Farm, and Loading Areas in one recordkeeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records required by 40 CFR 63.181 shall be maintained in a manner that can be readily accessed at the plant site. [40 CFR 63.181(a)]

g. Except as provided in 40 CFR 63.181(e), and amended by 40 CFR 63.2480(f)(18), the following information pertaining to all equipment in each process unit subject to the requirements in 40 CFR 63.162 through 40 CFR 63.174 shall be recorded: [40 CFR 63.181(b)]
   (1) The permittee shall keep the following records: [40 CFR 63.181(b)(1)]
      (i) A list of identification numbers for equipment (except connectors exempt from monitoring and recordkeeping identified in 40 CFR 63.174 and instrumentation systems). Connectors need not be individually identified if all connectors in a designated area or length of pipe subject to the provisions of 40 CFR 63, Subpart H are identified as a group, and the number of connectors subject is indicated. Pursuant to 40 CFR63.2480(b)(3), as an existing source under 40 CFR 63, Subpart FFFF the permittee is not required to develop an initial list of identification numbers for connectors. [40 CFR 63.181(b)(1)(i)]
      (ii) A schedule by process unit for monitoring connectors subject to 40 CFR 63.174(a) and valves subject to 40 CFR 63.168(d). [40 CFR 63.181(b)(1)(ii)]
      (iii) Physical tagging of the equipment to indicate that it is in organic HAP service is not required. Equipment subject to the provisions of 40 CFR 63, Subpart H may be identified on a plant site plan, in log entries, or by other appropriate methods. [40 CFR 63.181(b)(1)(iii)]
   (2) The permittee shall keep the following records: [40 CFR 63.181(b)(2)]
      (i) A list of identification numbers for equipment that the permittee elects to equip with a closed-vent system and control device, under the provisions of 40 CFR 63.163(g), 40 CFR 63.164(h), 40 CFR 2480(e)(4) or 40 CFR 63.173(f). [40 CFR 63.181(b)(2)(i)]
      (ii) A list of identification numbers for compressors that the permittee elects to designate as operating with an instrument reading of less than 500 parts per million above background, under the provisions of 40 CFR 63.164(i). [[40 CFR 63.181(b)(2)(ii)]
   (3) A list of identification numbers for pressure relief devices subject to 40 CFR 63.2480(e)(1) and for pressure relief devices equipped with rupture disks, under the provisions of 40 CFR 63.2480(e)(ii) and (iii). [40 CFR 63.181(b)(3) and 40 CFR 63.2480(f)(10)(iii) and (iv)]
   (4) Identification of instrumentation systems. Individual components in an instrumentation system need not be identified. [40 CFR 63.181(b)(4)]
   (5) Identification of screwed connectors subject to 40 CFR 63.174(c)(2). Identification can be by area or grouping as long as the total number within each group or area is recorded. [40 CFR 63.181(b)(5)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(6) The following information shall be recorded for each dual mechanical seal system: [40 CFR 63.181(b)(6)]
  (i) Design criteria required in 40 CFR 63.163(e)(6)(i), 40 CFR 63.164(e)(2), and 40 CFR 63.173(d)(6)(i) and an explanation of the design criteria; and [40 CFR 63.181(b)(6)(i)]
  (ii) Any changes to these criteria and the reasons for the changes. [40 CFR 63.181(b)(6)(ii)]

(7) The following information pertaining to all pumps subject to 40 CFR 63.163(j), valves subject to 40 CFR 63.168(h and i), agitators subject to 40 CFR 63.173(h through j), and connectors subject to 40 CFR 63.174(f and g) shall be recorded: [40 CFR 63.181(b)(7)]
  (i) Identification of equipment designated as unsafe to monitor, difficult to monitor, or unsafe to inspect and the plan for monitoring or inspecting this equipment. [40 CFR 63.181(b)(7)(i)]
  (ii) A list of identification numbers for the equipment that is designated as difficult to monitor, an explanation of why the equipment is difficult to monitor, and the planned schedule for monitoring this equipment. [40 CFR 63.181(b)(7)(ii)]
  (iii) A list of identification numbers for connectors that are designated as unsafe to repair and an explanation why the connector is unsafe to repair. [40 CFR 63.181(b)(7)(iii)]

(8) The permittee shall keep the following records: [40 CFR 63.181(b)(8)]
  (i) A list of valves removed from and added to the process unit, as described in 40 CFR 63.168(e)(1), if the net credits for removed valves is expected to be used. [[40 CFR 63.181(b)(8)(i)]
  (ii) A list of connectors removed from and added to the process unit, as described in 40 CFR 63.174(i)(1), and documentation of the integrity of the weld for any removed connectors, as required in 40 CFR 63.174(j). This is not required unless the net credits for removed connectors are expected to be used. [40 CFR 63.181(b)(8)(ii)]

(9) For any leaks detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168; and 40 CFR 63.172 through 40 CFR 63.174, a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. [40 CFR 63.181(b)(10)]

h. For visual inspections of equipment subject to the provisions of 40 CFR 63.163(b)(3) and 40 CFR 63.163(e)(4)(i), the permittee shall document that the inspection was conducted and the date of the inspection. The permittee shall maintain records as specified in 40 CFR 60.181(d) for leaking equipment identified in this inspection. These records shall be retained for 2 years. [40 CFR 63.181(c)]

i. When a leak is detected, the following information shall be recorded and kept for two years: [40 CFR 63.181(d)]
  (1) The instrument and the equipment identification number and the operator name, initials, or identification number. [40 CFR 63.181(d)(1)]
  (2) The date the leak was detected and the date of first attempt to repair the leak. [40 CFR 63.181(d)(2)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(3) The date of successful repair of the leak. [40 CFR 63.181(d)(3)]
(4) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonrepairable. [40 CFR 63.181(d)(4)]
(5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. [40 CFR 63.181(d)(5)]
  (i) The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. [40 CFR 63.181(d)(5)(i)]
  (ii) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion. [40 CFR 63.181(d)(5)(ii)]
(6) Dates of process unit shutdowns that occur while the equipment is unrepaired. [40 CFR 63.181(d)(6)]
(7) The permittee shall keep the following records: [40 CFR 63.181(d)(7)]
  (i) Identification, either by list, location (area or grouping), or tagging of connectors that have been opened or otherwise had the seal broken since the last monitoring period required in 40 CFR 63.174(b), as described in 40 CFR 63.174(c)(1), unless the permittee elects to comply with 40 CFR 63.174(c)(1)(ii). [40 CFR 63.181(d)(7)(i)]
  (ii) The date and results of monitoring as required in 40 CFR 63.174(c). If identification of connectors that have been opened or otherwise had the seal broken is made by location under 40 CFR 63.181(d)(7)(i), then all connectors within the designated location shall be monitored. [40 CFR 63.181(d)(7)(ii)]
(8) Copies of the periodic reports as specified in 40 CFR 63.182(d), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.181(d)(9)]

j. If the permittee elects to comply with the pressure testing requirements in accordance with **2. Emission Limitations b. (14),** the permittee is exempt from the requirements of paragraphs f, g, h and j of this section **B**. Instead, the permittee shall maintain records as specified in 40 CFR 63.181(e)(1 through 6). [CFR 63.178(b)]

k. The dates and results of compliance tests required for compressors and the dates and results of monitoring following a pressure relief valve pressure release subject to 40 CFR 63.2480(e)(1) and (2) shall be recorded. The results shall include: [40 CFR 63.181(f) and 40 CFR 63.2480(f)(18)(v)]
(1) The background level measured during each compliance test. [40 CFR 63.181(f)(1)]
(2) The maximum instrument reading measured at each piece of equipment during each compliance test. [40 CFR 63.181(f)(2)]

l. The permittee shall maintain records required for closed-vent systems and control devices subject to 40 CFR 63.172. [40 CFR 63.181(g)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) The design specifications and performance demonstrations specified in 40 CFR 63.181(g)(1)(i through iv) shall be retained for the life of the equipment. [40 CFR 63.181(g)(1)]
   (i) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams. 40 CFR 63.181(g)(1)(i)]
   (ii) The dates and descriptions of any changes in the design specifications. 40 CFR 63.181(g)(1)(ii)]
   (iii) Except as specified in 40 CFR 63.108(a), the flare design (i.e., steam-assisted, air-assisted, or non-assisted) and the results of the compliance demonstration required by 40 CFR 63.11(b). 40 CFR 63.181(g)(1)(iii)]
   (iv) A description of the parameter or parameters monitored, as required in 40 CFR 63.172(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. 40 CFR 63.181(g)(1)(iv)]

(2) Records of operation of closed-vent systems and control devices, as specified in 40 CFR 63.181(g)(2)(i through iii) shall be retained for 2 years. [40 CFR 63.181(g)(2)]
   (i) Dates and durations when the closed-vent systems and control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170 are not operated as designed as indicated by the monitored parameters, including periods when a flare pilot light system does not have a flame. [40 CFR 63.181(g)(2)(i)]
   (ii) Dates and durations during which the monitoring system or monitoring device is inoperative. [40 CFR 63.181(g)(2)(ii)]
   (iii) Dates and durations of start-ups and shutdowns of control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170. [40 CFR 63.181(g)(2)(iii)]

(3) Records of inspections of closed-vent systems subject to the provisions of 40 CFR 63.172, as specified in 40 CFR 63.181(g)(3)(i and ii) shall be retained for 2 years. [40 CFR 63.181(g)(3)]
   (i) For each inspection conducted in accordance with the provisions of 40 CFR 63.172(f)(1 or 2) during which no leaks were detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 63.181(g)(3)(i)]
   (ii) For each inspection conducted in accordance with 40 CFR 63.172(f)(1 or 2) during which leaks were detected, the information specified in 40 CFR 63.181(d) shall be recorded. [40 CFR 63.181(g)(3)(ii)]

m. If the permittee implements any of the quality improvement programs required by 40 CFR 63.175 or 40 CFR 63.176, the records specified in 40 CFR 63.181(h)(1 through 9) shall be maintained for a period of the quality improvement plan for the process unit. [40 CFR 63.181(h)]

n. For each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.2480(e), the permittee must keep the records specified in 40 CFR 63.2525(q) (1) - (3). [40 CFR 63.2525(q)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) Records of the prevention measures implemented as required in 40 63.2480(e)(3)(ii). [40 CFR 63.2525(q)(1)]
(2) Records of the number of releases during each calendar year and the number of those releases for which the root cause was determined to be a force majeure event. Keep these records for the current calendar year and the past 5 calendar years. [40 CFR 63.2525(q)(2)]
(3) For each release to the atmosphere, the permittee must keep the records specified in 40 CFR 63.2525(q)(3)(i) - (iv). [40 CFR 63.2525(q)(3)]
    (i) The start and end time and date of each pressure release to the atmosphere; [40 CFR 63.2525(q)(3)(i)]
    (ii) Records of any data, assumptions, and calculations used to estimate of the mass quantity of each organic HAP released during the event; [40 CFR 63.2525(q)(3)(ii)]
    (iii) Records of the root cause analysis and corrective action analysis conducted as required in 40 CFR 63.2480(e)(3)(iii), including an identification of the affected facility, a statement noting whether the event resulted from the same root cause(s) identified in a previous analysis and either a description of the recommended corrective action(s) or an explanation of why corrective action is not necessary under 40 CFR 63.2480(e)(7)(i); [40 CFR 63.2525(q)(3)(iii)]
    (iv) For any corrective action analysis for which implementation of corrective actions are required in 40 CFR 63.2480(e)(7), a description of the corrective action(s) completed within the first 45 days following the discharge and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates. [40 CFR 63.2525(q)(3)(iv)]

All Process Equipment

o. "Continuous record" means documentation, either in hard copy or computer readable form, of data values measured at least once every 15 minutes and recorded at the frequency specified in 40 CFR 63.998(b), except that periods of startup, shutdown, and malfunction shall not be excluded pursuant to 40 CFR 63.2450(e)(4)(vii). [40 CFR 63.981]

p. Where 40 CFR 63, Subpart SS, requires a continuous record, the owner or operator shall maintain a record as specified in 40 CFR 63.998(b)(1) as applicable: [40 CFR 63.998(b)(1)]
    (1) Record of values measured at least once every 15 minutes or each measured value for systems which measure more frequently than once every 15 minutes; or [40 CFR 63.998(b)(1)(i)]
    (2) A record of block average values for 15-minute or shorter periods calculated from all measured data values during each period or from at least one measured data value per minute if measured more frequently than once per minute. [40 CFR 63.998(b)(1)(ii)]
    (3) Where data is collected from an automated continuous parameter monitoring system, the owner or operator may calculate and retain block hourly average values from each 15-minute block average period or from at least one measured value per minute if measured more frequently than once per minute, and discard all but the

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

most recent three valid hours of continuous (15-minute or shorter) records, if the hourly averages do not exclude periods of CPMS breakdown or malfunction. An automated CPMS records the measured data and calculates the hourly averages through the use of a computerized data acquisition system. 40 CFR 63.998(b)(1)(iii)]

(4) A record as required by an alternative approved under a referencing subpart. [40 CFR 63.998(b)(1)(iv)]

Maintenance Vents

q. For maintenance vent openings, subject to 40 CFR 63.2450(v), the permittee must record the following information, as applicable. [40 CFR 63.2525(p)]

(1) Maintain standard site procedures used to deinventory equipment for safety purposes to document the procedures used to meet the requirements in 40 CFR 63.2450(v). The current copy of the procedures must be retained and available on-site at all times. Previous versions of the standard site procedures, as applicable, must be retained for five years. [40 CFR 63.2525(p)(1)]

(2) If complying with the requirements of 40 CFR 63.2450(v)(1)(i), and the lower explosive limit at the time of the vessel opening exceeds 10 percent, identification of the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, and the lower explosive limit at the time of the vessel opening. 40 CFR 63.2525(p)(2)]

(3) If complying with the requirements of 40 CFR 63.2450(v)(1)(ii) and either the vessel pressure at the time of the vessel opening exceeds 5 psig or the lower explosive limit at the time of the active purging was initiated exceeds 10 percent, identification of the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, the pressure of the vessel or equipment at the time of discharge to the atmosphere and, if applicable, the lower explosive limit of the vapors in the equipment when active purging was initiated. 40 CFR 63.2525(p)(3)]

(4) If complying with the requirements of 40 CFR 63.2450(v)(1)(iii), records of the estimating procedures used to determine the total quantity of VOC in the equipment and the type and size limits of equipment that contain less than 50 pounds of VOC at the time of maintenance vent opening. For each maintenance vent opening that contains greater than 50 pounds of VOC for which the deinventory procedures specified in 40 CFR 63.2525(p)(1) are not followed or for which the equipment opened exceeds the type and size limits established in the records specified in this condition, records that identify the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, and records used to estimate the total quantity of VOC in the equipment at the time the maintenance vent was opened to the atmosphere. 40 CFR 63.2525(p)(4)]

(5) If complying with the requirements of 40 CFR 63.2450(v)(1)(iv), identification of the maintenance vent, the process units or equipment associated with the maintenance vent, records documenting actions taken to comply with other applicable alternatives and why utilization of this alternative was required, the date of maintenance vent opening, the equipment pressure and lower explosive limit of

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

the vapors in the equipment at the time of discharge, an indication of whether active purging was performed and the pressure of the equipment during the installation or removal of the blind if active purging was used, the duration the maintenance vent was open during the blind installation or removal process, and records used to estimate the total quantity of VOC in the equipment at the time the maintenance. 40 CFR 63.2525(p)(5)]

**6. Specific Reporting Requirements:**

a. For equipment subject to 40 CFR 63, Subpart FFFF the permittee must submit a Compliance report containing the information specified in 40 CFR 63.2520(e)(1 through 10), semiannually. [40 CFR 63.2520(b) and 40 CFR 63, Subpart FFFF, Table 11]

b. ***Compliance report.*** The compliance report must contain the information specified in 40 CFR 63.2520(e)(1) through (17). On and after August 12, 2023 or once the reporting template for this subpart has been available on the CEDRI website for 1 year, whichever date is later, you must submit all subsequent reports following the procedure specified in 40 CFR 63.9(k), except any medium submitted through mail must be sent to the attention of the Miscellaneous Organic Chemical Manufacturing Sector Lead. You must use the appropriate electronic report template on the CEDRI website (*https://www.epa.gov/electronic-reporting-air-emissions/cedri*) for this subpart. The date report templates become available will be listed on the CEDRI website. Unless the Administrator or delegated state agency or other authority has approved a different schedule for submission of reports under 40 CFR 63.9(i) and 40 CFR 63.10(a) of subpart A, the report must be submitted by the deadline specified in this subpart, regardless of the method in which the report is submitted. [40 CFR 63.2520(e)]

c. The permittee must submit a precompliance report as specified in 40 CFR 63.2520(c)(1 through c) at least 6 months prior for new sources, with an application for approval of construction or reconstruction. [40 CFR 63.2520(b) and 40 CFR 63, Subpart FFFF, Table 11]

Continuous Process Vents and Closed Vent Systems

d. The permittee shall furnish reports as specified in **5. Specific Recordkeeping Requirements** for the flare in **Section B**, EP-F01.

e. The permittee shall submit Periodic reports that shall include the reporting period dates, the total source operating time for the reporting period, and, as applicable, all information specified in 40 CFR 63.999 and in 40 CFR 63, Subpart FFFF including reports of periods when monitored parameters are outside their established ranges. [40 CFR 63.999(c)(1)]

f. The permittee shall submit, as part of the periodic report: [40 CFR 63.999(c)(2)]
   (1) The information recorded in 40 CFR 63.998(d)(1)(iii)(B through E). [40 CFR 63.999(c)(2)(i)]
   (2) Reports of the times of all periods recorded under 40 CFR 63.998(d)(1)(ii)(A) when the vent stream is diverted from the flare through a bypass line; and [40 CFR 63.999(c)(2)(ii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(3) Reports of all times recorded under 40 CFR 63.998(d)(1)(ii)(B) when maintenance is performed in car-sealed valves, when the seal is broken, when the bypass line valve position is changed, or the key for a lock-and-key type configuration has been checked out. [40 CFR 63.999(c)(2)(iii)]

g. Bypass lines must include in the compliance report the start date, start time, duration in hours, estimate of the volume of gas in standard cubic feet, the concentration of organic HAP in the gas in parts per million by volume and the resulting mass emissions of organic HAP in pounds that bypass a control device. For periods when the flow indicator is not operating, report the start date, start time, and duration in hours. [40 CFR 63.2520(e)(12)]

Equipment Leaks

h. Compliance reports for pressure relief devices subject to the requirements 40 CFR 63.2480(e) must include the information specified in 40 CFR 63.2520(e)(15)(i) through (iii). [40 CFR 63.2520(e)(15)]
   (1) For pressure relief devices in organic HAP gas or vapor service, pursuant to 40 CFR 63.2480(e)(1), report the instrument readings and dates for all readings of 500 ppmv or greater. [40 CFR 63.2520(e)(15)(i)]
   (2) For pressure relief devices in organic HAP gas or vapor service subject to 40 CFR 63.2480(e)(2), report the instrument readings and dates of instrument monitoring conducted. [40 CFR 63.2520(e)(15)(ii)]
   (3) For pressure relief devices in organic HAP service subject to 40 CFR 63.2480(e)(3), report each pressure release to the atmosphere, including the start date, start time, and duration in minutes of the pressure release and an estimate of the mass quantity in pounds of each organic HAP released; the results of any root cause analysis and corrective action analysis completed during the reporting period, including the corrective actions implemented during the reporting period; and, if applicable, the implementation schedule for planned corrective actions to be implemented subsequent to the reporting period. [40 CFR 63.2520(e)(15)(iii)]

Maintenance Vents

i. The permittee must submit, as part of the compliance report for any maintenance vent release exceeding the applicable limits in 40 CFR 63.2450(v)(1), the items specified in 40 CFR 63.2520(e)(14)(i)-(iv). For any maintenance vent release complying with 40 CFR 63.2450(v)(1)(iv), report an explanation for any event as to why utilization of this alternative was required. [40 CFR 63.2520(e)(14)]

**7. Specific Control Equipment Operating Conditions:**

Continuous Process Vents

a. The FLARE (EP F01) shall be in operation at all times the emission units that vent to the FLARE are operating. Refer to **Section B** for EP F01. [40 CFR 63.11(b)(3)]

b. The permittee must be in compliance with the emission limits and work practice standards in 40 CFR 63, Subpart FFFF, Tables 1 through 7, at all times, the permittee must meet the requirements specified in 40 CFR 63.2455 through 40 CFR 63.2490 (or the

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

alternative means of compliance in 40 CFR 63.2495, 40 CFR 63.2500, or 40 CFR 63.2505), except as specified in of 40 CFR 63.2450(b) through (v). The permittee must meet the notification, reporting, and recordkeeping requirements specified in 40 CFR 63.2515, 40 CFR 63.2520, and 40 CFR 63.2525. [40 CFR 63.2450(a)]

**8. Alternate Operating Scenarios:**

a. For the equipment leaks subject to 40 CFR 63, Subpart FFFF, the permittee may comply with one of the following requirements: [40 CFR 63.2480(a) and Table 6 to 40 CFR 63, Subpart FFFF]

(1) 40 CFR 63, Subpart UU and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f);

(2) 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f); or

(3) 40 CFR 65, Subpart F and the requirements referenced therein, except as specified in 40 CFR 63.2480(c) and (d)-(f).

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## SAPONIFICATION (SAP) PROCESS AREA

| **EP(**Source ID**)** | **EU** | **Emission Unit/Point Description** |
|---|---|---|
| **S01** | S01 | **Description: Saponification Process Unit**, consisting of Four (4) Parallel Production Lines (200, 250, 400, 600)<br>**Recovery/Control Device** (Recovery device as defined in the HON & MON): Countercurrent, crossflow packed bed scrubber, identified as **600 SAP Vent Scrubber**, DA-5602/DA-5604<br>Scrubbing Liquid: Water, methanol and methyl acetate<br>Scrubbing Liquid Flow Rate: 35 gal/min<br>Control Efficiency: 99% for Methyl Acetate and Methanol<br>600 SAP Vent Scrubber, DA-5602/DA-5604, is a MON Recovery device and a **MON Group 2 Continuous Process Vent** |
| | S01-A: | **Description: Saponification 200 Line Process**<br>Maximum Processing Rate: 41,485 lbs/hr |
| | *S01-A1* | 200 Line Paste Mixer, GD-5201 A/B |
| | *S01-A2* | 200 Line Belt Saponifier, DC-5201 |
| | *S01-A3* | 200 Line Primary Crushing Mill (#1 Polymer Cutting Machine (PCM)), PA-5201 |
| | *S01-A4* | 200 Line Slurry Grinder (#2 PCM), PA-5202 |
| | *S01-A5* | 200 Line Slurry Tank, FA-5201 (1,940 gallons)<br>**MON Surge Control Vessel** |
| | *S01-A6* | 200 Line Centrifuge, JB-5201 |
| | *S01-A7* | 200 Line Filtrate Tank, FA-5214 (415 gallons)<br>**MON Surge Control Vessel** |
| | S01-B: | **Description: Saponification 250 Line Process**<br>Maximum Processing Rate: 41,485 lbs/hr |
| | *S01-B1* | 250 Line Paste Mixer, GD-5251 A/B |
| | *S01-B2* | 250 Line Belt Saponifier, DC-5251 |
| | *S01-B3* | 250 Line Primary Crushing Mill (#1 PCM), PA-5251 |
| | *S01-B4* | 250 Line Slurry Grinder (#2 PCM), PA-5252 |
| | *S01-B5* | 250 Line Slurry Tank, FA-5251 (1,940 gallons)<br>**MON Surge Control Vessel** |
| | *S01-B6* | 250 Line Centrifuge, JB-5251 |
| | *S01-B7* | 250 Line Filtrate Tank, FA-5254 (650 gallons)<br>**MON Surge Control Vessel** |
| **S01** | S01-C: | **Description: Saponification 400 Line Process**<br>Maximum Processing Rate: 41,485 lbs/hr |
| | *S01-C1* | 400 Line Paste Mixer, GD-5401 A/B |
| | *S01-C2* | 400 Line Belt Saponifier, DC-5401 |
| | *S01-C3* | 400 Line Primary Crushing Mill (#1 Polymer Cutting Machine (PCM)), PA-5401 |
| | *S01-C4* | 400 Line Slurry Grinder (#2 PCM), PA-5402 |
| | *S01-C5* | 400 Line Slurry Tank, FA-5401 (1,940 gallons)<br>**MON Surge Control Vessel** |
| | *S01-C6* | 400 Line Centrifuge, JB-5401 |
| | *S01-C7* | 400 Line Filtrate Tank, FA-5404 (630 gallons)<br>**MON Surge Control Vessel** |

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| **EP(**Source ID**)** | **EU** | **Emission Unit/Point Description** |
|---|---|---|
| **S01** | S01-D: | **Description: Saponification 600 Line Process**<br>Maximum Processing Rate: 55,300 lbs/hr |
| | *S01-D1* | 600 Line Paste Mixer, GD-5601 A/B |
| | *S01-D2* | 600 Line Belt Saponifier, DC-5601 |
| | *S01-D3* | 600 Line Primary Crushing Mill (#1 PCM), PA-5601 |
| | *S01-D4* | 600 Line Slurry Grinder (#2 PCM), PA-5602 |
| | *S01-D5* | 600 Line Slurry Tank, FA-5601 (1,940 gallons)<br>**MON Surge Control Vessel** |
| | *S01-D6* | 600 Line Centrifuge, JB-5601 |
| | *S01-D7* | 600 Line Filtrate Tank, FA-5604 (1,170 gallons)<br>**MON Surge Control Vessel** |
| **S01(E1,F1)** | S01-E1, F1 | **Saponification Process Tanks**<br>Tank Description: Fixed Roof Tanks<br>**MON Group 2 Storage Tanks** |
| **S01(E1)** | S01-E1 | Chilled Methanol Return Tank, FA-5203, storing methanol (250 gallons) |
| **S01(F1)** | S01-F1 | Sodium Hydroxide Feed Tank, FA-5211, storing a solution of 10 weight percent sodium hydroxide (4,210 gallons) |
| **S01(G1)** | S01-G1 | Mixer Flush Tank, FA-5216, storing polyvinyl acetate and polyvinyl alcohol in methanol (2,200 gallons) |
| **S01(H1)** | S01-H1 | SAP Catalyst Make-up Tank, FA-5261, storing a solution of 10 weight percent sodium hydroxide (4,260 gallons) |
| **S02** | S02 | **Description: Saponification Process Unit Drying**<br>**Recovery/Control Device** (Recovery device as defined in the HON & MON): Countercurrent packed bed scrubber, identified as **Main Vent Scrubber**, DA-5605/DA-5605B<br>Scrubbing Liquid: Chilled recovered methanol and methyl acetate recycled to the scrubber, chilled methanol, and water<br>Scrubbing Liquid Flow Rate: 50 gal/min recycled methanol and methyl acetate, 5gal/min chilled methanol, and 5 gal/min water<br>Control Efficiency: 92% for Methyl Acetate, 99% for Methanol<br>Main Vent Scrubber, DA-5605/DA5605B, is a MON Recovery device and a<br>**MON Group 2 Continuous Process Vent** |
| **S02(A)** | S02-A: | **Description: Saponification 200 Line Drying**<br>Maximum Processing Rate: 41,485 lbs/hr |
| | *S02-A1* | 200 Line Turbo Dryer, PA-5205 |
| | *S02-A2* | 200 Line Post Dryer, DA-5206 |
| | *S02-A4* | 200 Line Scrub Tower, DA-5201 |
| | *S02-A5* | 200 Line Dryer Condensate Tank, FA-5202 (1,150 gallons)<br>**MON Surge Control Vessel** |
| **S02(B)** | S02-B: | **Description: Saponification 250 Line Drying**<br>Maximum Processing Rate: 41,485 lbs/hr |
| | *S02-B1* | 250 Line Turbo Dryer, PA-5255 |
| | *S02-B2* | 250 Line Post Dryer, DA-5256 |
| | *S02-B4* | 250 Line Scrub Tower, DA-5251 |
| | *S02-B5* | 250 Line Dryer Condensate Tank, FA-5252 (1,350 gallons)<br>**MON Surge Control Vessel** |
| **S02(C)** | S02-C: | **Description: Saponification 400 Line Drying**<br>Maximum Processing Rate: 41,485 lbs/hr |
| | *S02-C1* | 400 Line Turbo Dryer, PA-5405 |

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| **EP(**Source ID**)** | **EU** | **Emission Unit/Point Description** |
|---|---|---|
| | *S02-C2* | 400 Line Post Dryer, DA-5403 |
| | *S02-C4* | 400 Line Scrub Tower, DA-5401 |
| | *S02-C5* | 400 Line Dryer Condensate Tank, FA-5402 (810 gallons)<br>**MON Surge Control Vessel** |
| **S02(D)** | S02-D: | **Description: Saponification 600 Line Drying**<br>Maximum Processing Rate: 55,300 lbs/hr |
| | *S02-D1* | 600 Line Turbo Dryer, PA-5605 |
| | *S02-D2* | 600 Line Post Dryer, DA-5606 |
| | *S02-D4* | 600 Line Scrub Tower, DA-5603 |
| | *S02-D5* | 600 Line Dryer Condensate Tank, FA-5602 (2,750 gallons)<br>**MON Surge Control Vessel** |
| **S03** | S03 | **200 Line Turbo Dryer Startups**, PA-5202 |
| **S04** | S04 | **200 Line Product Transfer Collector**, FD-5216<br>Description: Pneumatically transfers solids to the Pre-Grinded Product Silos<br>**Control Device:** Baghouse, 99.6% control efficiency for PM |
| **S05** | S05 | **200 Line Boilout Emissions**<br>Boilout from Paste Mixer is a **MON Group 2 Wastewater Stream**<br>Boilout from the Saponifier and Slurry Tank, Centrifuge and Filtrate Tank, Turbo Dryer, and Post Dryer are **MON Maintenance Wastewater Streams** |
| **S06** | S06 | **200/250 Saponification Lines Spot Vent Blower**, GB-5215<br>Captures 200/250 Line fugitive emissions |
| **S07** | S07 | **250 Line Turbo Dryer Startups**, PA-5255 |
| **S08** | S08 | **250 Line Product Transfer Collector**, FD-5266<br>Pneumatically transfers solids to the Pre-Grinded Product Silos<br>**Control Device:** Baghouse, 99.6% control efficiency for PM |
| **S09** | S09 | **250 Line Boilout Emissions**<br>Boilout from Paste Mixer is a **MON Group 2 Wastewater Stream**<br>Boilout from the Saponifier and Slurry Tank, Centrifuge and Filtrate Tank, Turbo Dryer, and Post Dryer are **MON Maintenance Wastewater Streams** |
| **S10** | S10 | **400 Line Spot Vent Blower**, GB-5429<br>Captures 400 Line fugitive emissions |
| **S11** | S11 | **400 Line Turbo Dryer Startups**, PA-5405 |
| **S12** | S12 | **400 Line Product Transfer Collector**, FD-5416<br>Pneumatically transfers solids to the Pre-Grinded Product Silos<br>**Control Device:** Baghouse, 99.6% control efficiency for PM |
| **S13** | S13 | **400 Line Boilout Emissions**<br>Boilout from Paste Mixer is a **MON Group 2 Wastewater Stream**<br>Boilout from the Saponifier and Slurry Tank, Centrifuge and Filtrate Tank, Turbo Dryer, and Post Dryer are **MON Maintenance Wastewater Streams** |
| **S14** | S14 | **600 Line Spot Vent Blower**, GB-5602<br>Captures 600 Line fugitive emissions |
| **S15** | S15 | **600 Line Turbo Dryer Startups**, PA-5605 |
| **S16** | S16 | **600 Line Product Transfer Collector**, PA-5606<br>Pneumatically transfers solids to the Pre-Grinded Product Silos<br>**Control Device:** Baghouse 99.6% control efficiency for PM |
| **S17** | S17 | **600 Line Boilout Emissions**<br>Boilout from Paste Mixer is a **MON Group 2 Wastewater Stream**<br>Boilout from the Saponifier and Slurry Tank, Centrifuge and Filtrate Tank, Turbo Dryer, and Post Dryer are **MON Maintenance Wastewater Streams** |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| **EP(**Source ID**)** | **EU** | **Emission Unit/Point Description** |
|---|---|---|
| **S18** | S18 | **SAP Acid Tank**, FA-5215, storing Acetic Acid (185 gallons)<br>**MON Group 2 Storage Tank** |
| **S19** | S19 | **Equipment Leaks (Saponification Process Area Fugitives)**<br>Gas Vapor Valves: 345<br>Light Liquid Valves: 2,312<br>Light Liquid Pumps: 57<br>Connectors: 8,769<br>Agitators: 77<br>Instrumentation Systems: 32<br>Pressure Relief Devices<br>Gas/Vapor: 15<br>Light Liquid: 31 |

The equipment leak component count for the Saponification Process Area, listed above, as submitted in the application, reflects an accurate count of the equipment as of the date of issuance of this permit but is not intended to limit the permittee to the exact numbers specified. The permittee may add or remove equipment leak components without a permit revision as long as the components continue to comply with the applicable requirements listed below, and the changes do not: (1) cause a significant increase of emissions; or (2) result in the applicability of an additional standard that is not specified in this permit.

**APPLICABLE REGULATIONS:**

401 KAR 59:010, New Process Operations.

401 KAR 63:002, Section 2.(4)(lll), 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.

401 KAR 63:002, Section 2.(4)(a), 40 C.F.R. 63.100 through 63.107, Tables 1 through 4 (Subpart F), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(b), 40 C.F.R. 63.110 through 63.153, Tables 1 through 37 (Subpart G), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(c), 40 C.F.R. 63.160 through 63.183, Tables 1 through 4 (Subpart H), National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(ii), 40 C.F.R. 63.980 through 63.999 (Subpart SS), National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, as referenced by 40 CFR 63, Subpart FFFF.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

401 KAR 63:002, Section 2.(4)(mm), 40 C.F.R. 63.1060 through 63.1067 (Subpart WW), National Emission Standards for Storage Vessels (Tanks) - Control Level 2, as referenced by 40 CFR 63, Subpart FFFF.

*Note:*
*40 CFR 63, Subpart F, G and H have been updated as cited in 89 FR 43153-43175; 89 FR 43175-43220; and 89 FR 43220-43234, dated May 16, 2024;*
*40 CFR 63, Subpart FFFF has been updated as cited in 89 FR 23868-23873 dated April 4, 2024.*

**STATE-ORIGIN REQUIREMENTS:**
401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances.

**PRECLUDED REGULATIONS**:
Refer to **Section B**, **Group Requirements.**

**NON-APPLICABLE REGULATIONS:**
401 KAR 60:005, Section 2.(2)(r), 40 C.F.R. 60.110b through 60.117b (Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. This regulation does not apply to the storage tanks at EU: D5, D7 and D5.

401 KAR 60:005, Section 2.(2)(bbb), 40 C.F.R. 60.480 through 60.489 (Subpart VV), Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006.

401 KAR 60:005, Section 2.(2)(ppp), 40 C.F.R. 60.660 through 60.668 (Subpart NNN), Standards of Performance for Volatile Organic Compound (VOC) Emissions From SOCMI Distillation Operations.

401 KAR 60:005, Section 2.(2)(ttt), 40 C.F.R. 60.700 through 60.708 (Subpart RRR), Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.

401 KAR 63:002, Section 2 (4)(a)(i), 40 C.F.R. 63.100 through 63.107, Tables 1 through 4 (Subpart F), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, and related Subparts G and H, are not applicable to the Sap Area units, as these units do not produce chemicals listed under Table 1 of 40 CFR 63, Subpart F as a primary product nor do they use as a reactant or co-product any chemical in Table 2 of 40 CFR 63, Subpart F.

401 KAR 63:002, Section 2 (4)(a)(kkk), 40 C.F.R. 63.2330 through 63.2406, Tables 1 through 12 (Subpart EEEE), National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**1. Operating Limitations:**

a. If a Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 requirements beginning on the date the switch occurs. An initial compliance demonstration as specified in 40 CFR 63, Subpart FFFF must be conducted within 150 days after the switch occurs. [40 CFR 63.2445(d)]

b. The particulate control devices shall be in operation at all times the Product Transfer Collectors at EP-S04, S08, S12, and S16 are operating. [401 KAR 52:020, Section 10]

c. Refer to 40 CFR 63.2540 and 40 CFR 63, Subpart FFFF, Table 12, for general provisions.

d. The permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements 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 source. [40 CFR 63.2540(u)]

Continuous Process Vents and Closed Vent Systems

Note: The closed vent system is constructed of hard piping as defined by 40 CFR 63.981.

e. The permittee using recovery devices to continuously maintain the TRE greater than 5.0 must comply with 40 CFR 63.993(a)(2) and the requirements therein as follows: [40 CFR 63.2455(c)]

For the Group 2 continuous process vents at EP-S01 and S02, the recovery devices, including the 600 SAP Vent Scrubber and the Main Vent Scrubber, shall be operated at all times when emissions are vented to them. Refer to **7. Specific Control Equipment Operating Conditions**.

Maintenance Wastewater Streams

f. The permittee must comply with the requirements in 40 CFR 63.105(a) and the requirements referenced therein, except as specified in 40 CFR 63.2485, for the maintenance wastewaters from Boilout of the Saponifiers and Slurry Tanks, Centrifuges and Filtrate Tanks, Turbo Dryers, and Post Dryers in the SAP Area containing organic HAPs listed in 40 CFR 63, Subpart FFFF, Tables 8 and 9. [40 CFR 63.2485(a) and 40 CFR 63, Subpart FFFF, Table 7, item 2]

Process Wastewater Streams

g. The permittee must comply with the requirements in 40 CFR 63.132 through 40 CFR 63.148 and the requirements referenced therein, except as specified in 40 CFR 63.2485 below: [40 CFR 63.2485(a), and 40 CFR 63, Subpart FFFF, Table 7, item 1]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

The permittee shall not discard liquid or solid organic materials with a concentration of greater than 30,000 ppmw of total partially soluble HAP (PSHAP) and soluble HAP (SHAP) or greater than 10,000 ppmw of PSHAP (as determined by analysis of the stream composition, engineering calculations, or process knowledge, according to the provisions of 40 CFR 63.144(b)), as amended by 40 CFR 63.2485(h)(4), from a chemical manufacturing process unit to water or wastewater, unless the receiving stream is managed and treated as a Group 1 wastewater stream. [40 CFR 63.132(f)]

This prohibition does not apply to materials from the following activities: [40 CFR 63.132(f)]

(1) Equipment leaks; [40 CFR 63.132(f)(1)]
(2) Except as specified in 40 CFR 63.132(f)(5), activities included in maintenance; [40 CFR 63.132(f)(2) and 40 CFR 63.2485(q)(3)]
(3) Spills; or [40 CFR 63.132(f)(3)]
(4) Samples of a size not greater than reasonably necessary for the method of analysis that is used. [40 CFR 63.132(f)(4)]

Liquid Streams in Open Systems

h. The permittee must comply with the requirements in 40 CFR 63.149 and the requirements referenced therein, except as specified in 40 CFR 63.2485. For the Saponifier enclosure manhole hatches, at EU S01-A2, S01-B2, S01-C2 and S01-D2, the permittee must maintain tight-fitting solid covers (TFSC) with no visible gaps or openings, except during periods of sampling, inspection, or maintenance pursuant to 40 CFR 63.149(a) and 40 CFR 63, Subpart G, Table 35, item "Manhole." [40 CFR 63.2485(a) and 40 CFR 63, Subpart FFFF, Table 7, item 3]

Equipment Leaks

i. The permittee must meet each requirement in 40 CFR 63, Subpart FFFF, Table 6, item 1.(b.). The permittee must comply with the requirements of 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d) through (f). [40 CFR 63.2480(a)]
    (1) Each piece of equipment in a process unit to which 40 CFR 63, Subpart H applies shall be identified such that it can be distinguished readily from equipment that is not subject to its requirements. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, or by designation of process unit boundaries by some form of weatherproof identification. [40 CFR 63.162(c)]
    (2) When a leak is detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168 and 40 CFR 63.169; and 40 CFR 63.172 through 40 CFR 63.174, the permittee shall: [40 CFR 63.162(f)]
        (i) Clearly identify the leaking equipment. [40 CFR 63.162(f)91)]
        (ii) The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 40 CFR 63.175(e)(7)(i)(D), and no leak has been detected during the follow-up monitoring. If the permittee elects to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

connector may be removed after it is monitored and no leak is detected during that monitoring. [40 CFR 63.162(f)(2)]

(iii) The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that is subject to 40 CFR 63.174(c)(1)(i), may be removed after it is repaired. [40 CFR 63.162(f)(3)]

(3) For each piece of equipment subject to 40 CFR 63, Subpart FFFF that is added to an affected source after December 17, 2019, or replaces equipment at an affected source after December 17, 2019, the permittee must initially monitor for leaks within 30 days after August 12, 2020, or initial startup of the equipment, whichever is later. Equipment that is designated as unsafe- or difficult-to-monitor is not subject to this requirement. [40 CFR 63.2480(b)(7)]

j. Except as specified in 40 CFR 63.2480(e)(4), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(1) and (2) for pressure relief devices, such as relief valves or rupture disks, in organic HAP gas or vapor service instead of the pressure relief device requirements of 40 CFR 63.165 of Subpart H. [40 CFR 63.2480(e)]

k. Except as specified in 40 CFR 63.2480(e)(4) and (5), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(3), (6), (7), and (8) for all pressure relief devices in organic HAP service. [40 CFR 63.2480(e)]

(1) To implement the pressure release management requirements outlined in 40 CFR 63.2480(e)(3)(i) – (v). [40 CFR 63.2480(e)(3)]

(2) A root cause analysis and corrective action analysis must be completed as soon as possible, but no later than 45 days after a release event. Special circumstances affecting the number of root cause analyses and/or corrective action analyses are provided in 40 CFR 63.2480(e)(6)(i) – (iii). [40 CFR 63.2480(e)(6)]

(3) The permittee must implement the corrective action(s) identified in the corrective action analysis in accordance with the applicable requirements in 40 CFR 63.2480(e)(7)(i) – (iii). [40 CFR 63.2480(e)(7)]

(4) The permittee is prohibited from installing any flowing pilot-operated pressure relief device or replacing any pressure relief device with a flowing pilot operated pressure relief device after August 12, 2023. [40 CFR 63.2480(e)(8)]

Maintenance Vents

l. The permittee must meet the requirements outlined in 40 CFR 63.2450(v)(1) through (3) for any process vent designated as a maintenance vent and used only as a result of startup, shutdown, maintenance or inspection of equipment where equipment is emptied, depressurized, degassed, or placed into service. [40 CFR 63.2450(v)]

**Compliance Demonstration Method:**

a. Refer to **4. Specific Monitoring Requirements** for Continuous Process Vents and Maintenance Wastewater Streams.

Process Wastewater Streams

b. Total annual average concentration shall be determined according to the procedures specified in 40 CFR 63.144(b) as amended by 40 CFR 63.2485(h)(4). Annual average

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

flow rate shall be determined according to the procedures specified in 40 CFR 63.144(c). [40 CFR 63.132(c)]

c. For a Group 2 wastewater, the permittee shall re-determine group status for each Group 2 stream, as necessary, to determine whether the stream is Group 1 or Group 2 whenever process changes are made that could reasonably be expected to change the stream to a Group 1 stream. Examples of process changes include, but are not limited to, changes in production capacity, production rate, feedstock type, or whenever there is a replacement, removal, or addition of recovery or control equipment. Process changes do not include: Process upsets; unintentional, temporary process changes; and changes that are within the range on which the original determination was based. [40 CFR 63.132(c)(3)]

Liquid Streams in Open Systems

d. Compliance with **1. g. Operating Limitations** shall be determined by inspection.

Equipment Leaks

e. Compliance shall be determined by review of the records required by 40 CFR 63.181 and the reports required by 40 CFR 63.182, review of performance test results, and by inspections. [40 CFR 63.162(a)]

Maintenance Vents

f. The permittee must meet the requirements outlined in 40 CFR 63.2450(v)(1) through (3) for any process vent designated as a maintenance vent and used only as a result of startup, shutdown, maintenance or inspection of equipment where equipment is emptied, depressurized, degassed, or placed into service. [40 CFR 63.2450(v)]

**2. Emission Limitations:**

a. Emissions of particulate matter (PM) from each emission point, EP-S04, S08, S12 or S16, shall not exceed the values calculated by the equation below: [401 KAR 59:010, Section 3(2)]

$$E = 3.59(P)^{0.62}$$ Where:

E = Allowable Emission Rate in lbs/hr and P = Process Weight Rate in tons/hr

b. For each Product Transfer Collector at EP-S04, S08, S12 or S16, no person shall cause, suffer, allow or permit any continuous emissions into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity. [401 KAR 59:010, Section 3(1)(a)]

c. Refer to **Section D.4.** for 401 KAR 63:020 requirements.

Equipment Leaks and Closed Vent Systems

d. The permittee must comply with the fugitive emissions standards of 40 CFR 63, Subpart H as applicable. [40 CFR 63.2480(a) and Table 6 to 40 CFR 63, Subpart FFFF]

e. The permittee shall comply with the fugitive emissions standards as applicable. [40 CFR 63, Subpart H]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) Standards for Pumps in light liquid service: [40 CFR 63.163]
- 40 CFR 63.163(a): Implementation and compliance provisions
- 40 CFR 63.163(b): Monitoring requirements, Leak detection levels, frequency of monitoring
- 40 CFR 63.163(c): Repair procedures and time frames [*except 40 CFR 63.163(c)(3)*]
- 40 CFR 63.163(d): Procedures to determine percent leaking pumps and quality improvement program requirements
- 40 CFR 63.163(e)-(j): Exemptions for specific types of pumps

(2) Standards for Compressors: [40 CFR 63.164]
- 40 CFR 63.164(a)-(e): Operational requirements
- 40 CFR 63.164(f): Criteria for Leak detection
- 40 CFR 63.164(g): Repair procedures and time frames
- 40 CFR 63.164(h)-(i): Exemptions for specific types of compressors

(3) Standards for Pressure relief devices in gas/vapor service: [40 CFR 63.2480(e)]
- 40 CFR 63.2480(e)(1): Operational requirements
- 40 CFR 63.2480(e)(2): Pressure release procedures
- 40 CFR 63.2480(e)(4): Exemptions for specific types of pressure relief devices

(4) Standards for Sampling Connection Systems: [40 CFR 63.166]
- 40 CFR 63.166(a)-(b): Operational requirements
- 40 CFR 63.166(c): Exemptions for specific types of sampling connection systems

(5) Standards for Open-ended valves or lines: [40 CFR 63.167]
- 40 CFR 63.167(a)-(c): Operational requirements
- 40 CFR 63.167(d)-(e): Exemptions for specific types of valves

(6) Standards for Valves in gas/vapor service and in light liquid service: [40 CFR 63.168]
- 40 CFR 63.168(a): Operational requirements
- 40 CFR 63.168(b)-(d): Monitoring requirements and intervals
- 40 CFR 63.168(e): Procedures to determine percent leaking valves
- 40 CFR 63.168(f): Leak repair time frames
- 40 CFR 63.168(g): First attempt repair procedures
- 40 CFR 63.168(h): Exemptions for unsafe-to-monitor valves
- 40 CFR 63.168(i): Exemptions for difficult-to-monitor valves

(7) Standards for Instrumentation systems: [40 CFR 63.169]
- 40 CFR 63.169(a): Monitoring frequency
- 40 CFR 63.169(b): Leak detection levels
- 40 CFR 63.169(c): Leak repair time frames

(8) Standards for Delay of repair: [40 CFR 63.171]
- 40 CFR 63.171: Allowances for delay of repair

(9) Standards for Closed-vent systems and control devices: [40 CFR 63.172]
- 40 CFR 63.172(a)-(b): Operational requirements
- 40 CFR 63.172(d),(m): Control device requirements
- 40 CFR 63.172(f)-(g): Monitoring requirements
- 40 CFR 63.172(h)-(i): Repair procedures and time frames
- 40 CFR 63.172 (j): Operational requirements for bypass lines

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

[*except 40 CFR 63.172(j)(3)*]

40 CFR 63.172(k)-(l): Exemptions for unsafe-to-inspect and difficult-to-inspect closed-vent systems

(10) Standards for Agitators in gas/vapor service and in light liquid service: [40 CFR 63.173]

40 CFR 63.173(a): Operational requirements
40 CFR 63.173(b): Monitoring requirements and intervals
40 CFR 63.173(c): Leak repair time frames
40 CFR 63.173(d)-(g): Exemptions for specific types of agitators
40 CFR 63.173(h)-(j): Exemptions for difficult-to-monitor, inaccessible or unsafe-to-monitor agitators

(11) Standards for connectors in gas/vapor service and in light liquid service [40 CFR 63.174]

40 CFR 63.174(a): Operational requirements
40 CFR 63.174(b): Monitoring requirements and intervals
40 CFR 63.174(c): Procedures for open connectors or connectors with broken seals
40 CFR 63.174(d): Leak repair time frames
40 CFR 63.174(e): Monitoring frequency for repaired connectors
40 CFR 63.174(f)-(h): Exemptions for unsafe-to-monitor, unsafe-to-repair, inaccessible, or ceramic connectors
40 CFR 63.174(i): Procedures to determine percent leaking connectors
40 CFR 63.174(j): Optional credit for removed connectors

(12) In Phase III, Quality improvement program for valves: the permittee may elect to implement the following quality improvement programs if the percent of leaking valves is equal to or exceeds 2 percent: [40 CFR 63.175 and 40 CFR 63.168(d)(1)(ii)]

40 CFR 63.175(a): Quality improvement program alternatives
40 CFR 63.175(b): Criteria for ending quality improvement programs
40 CFR 63.175(c): Alternatives following achievement of less than 2 percent leaking valves target
40 CFR 63.175(d): Quality improvement program to demonstrate further progress
40 CFR 63.175(e): Quality improvement program of technology review and improvement

(13) If in Phase III, Quality improvement program for pumps: calculated on a 6-month rolling average, the greater of either 10 percent of the pumps or three pumps in the Polymerization, Saponification, Polyrectification, Tank Farm, and, Loading Areas (that are part of the 40 CFR 63, Subpart FFFF MCPU) leak, the permittee shall implement the following quality improvement programs for pumps: [40 CFR 63.176 and 40 CFR 63.163(d)(2)]

40 CFR 63.176(a): Applicability criteria
40 CFR 63.176(b): Criteria for ending the quality improvement program
40 CFR 63.176(c): Criteria for resumption of the quality improvement program
40 CFR 63.176(d): Quality improvement program elements

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(14) The requirements for pressure testing in 40 CFR 63.178(b) may be applied to all processes, not just batch processes, as stated in 40 CFR 63.2480(b)(1). The permittee may elect to use pressure testing of equipment to demonstrate compliance by meeting the following requirements of 40 CFR 63.178(b). Compliance with the provisions of 40 CFR 63.178(b) exempts the permittee from the monitoring provisions of 40 CFR 63.163, 40 CFR 63.168 and 40 CFR 63.169, and 40 CFR 63.173 through 40 CFR 63.176. [40 CFR 40 63.2480(b)(1) and 40 CFR 63.178(b)]

(i) The permittee may switch among the alternatives provided the change is documented as specified in 40 CFR 63.181. [40 CFR 63.178(a)]

(ii) Pressure testing for leaks in accordance with 40 CFR 63.178(b) is not required after reconfiguration of an equipment train if flexible hose connections are the only disturbed equipment. [40 CFR 63, Subpart FFFF]

**Compliance Demonstration Method:**

a. The permittee shall monitor the amount of process weight added to each emissions unit. The process weight rate shall be determined by dividing the tons of material added to each emission unit in a calendar month by the total hours the unit operated that month. Average particulate (PM) emissions shall be calculated as follows:

Controlled PM Emissions = PR x EF x (1 – CE/100)

Where: PR = PVOH Production Rate for the emission point (tons/hr)
EF = Emission Factor (lbs PM / ton PVOH produced)
CE = Control Efficiency (%)

b. For compliance with the opacity limit, refer to **4. Specific Monitoring Requirements.**

c. If a Product Transfer Collector at EP-S04, S08, S12 or S16 is in operation during any period of malfunction of the particulate control device, the permittee shall shut down the affected emission unit until associated repairs are complete and take the necessary corrective actions in accordance with **5. Specific Recordkeeping Requirements d.**

Equipment Leaks

d. Refer to **1. Operating Limitations** Compliance Demonstration e.

**3. Testing Requirements:**

Equipment Leaks

a. The permittee shall comply with the following test methods and procedures requirements: [40 CFR 63.180(a)]

(1) 40 CFR 63.180(b) Monitoring procedures, test methods, and calibration procedures

(2) 40 CFR 63.180(c) Leak detection monitoring procedures [*replacing reference to 40 CFR 63.165(a) with 40 CFR 63.2480(e)(1)*]

(3) 40 CFR 63.180(d) Procedures for determining organic HAP service applicability

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

b. The permittee must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1), if applicable. [40 CFR 63.2515(c)]

c. Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1].

**4. Specific Monitoring Requirements:**

a. The permittee shall also perform the following monitoring:

(1) A qualitative visual observation of the opacity of emissions once each calendar month while operating each Product Transfer Collector at EP-S04, S08, S12 and S16. If visible emissions are seen (not including condensed water vapor within the plume), the permittee shall determine the opacity using U.S. EPA Reference Method 9. In lieu of determining the opacity using U.S. EPA Reference Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume). [401 KAR 52:020, Section 10]

(2) The pressure drop across each dust collector once each calendar month. [401 KAR 52:020, Section 10]

b. Refer to **7. Specific Control Equipment Operating Conditions**.

Continuous Process Vents and Closed Vent Systems

c. The permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications, a device for the continuous measurement of the scrubbing liquid flow rate and temperature at scrubbers EP-S01 (600 SAP Vent Scrubber**)** and the S02 (Main Vent Scrubber). [401 KAR 52:020, Section 10]

d. For the Group 2 process vents at EP-S01 and S02, if the TRE index value is >1.9 but less than or equal to 5.0, the permittee shall comply with the requirements specified in 40 CFR 63.2450(k)(5). [40 CFR 63.982(e)]

Maintenance Wastewater

e. The permittee shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance). The descriptions shall: [40 CFR 63.105(b)]

(1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities; [40 CFR 63.105(b)(1)]

(2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and [40 CFR 63.105(b)(2)]

(3) The procedures to be followed when clearing materials from process equipment. [40 CFR 63.105(b)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

f. The permittee shall modify and update the information required by 40 CFR 63.105(b) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure. [40 CFR 63.105(c)]

Equipment Leaks

g. Refer to **1. Operating Limitations** Compliance Demonstration Method b. and **3. Testing Requirements**

**5. Specific Recordkeeping Requirements:**

a. The permittee shall maintain a log of the qualitative visual observations made as specified in **4. Specific Monitoring Requirements** a. including the date, time, initials of observer, whether any emissions were observed (yes/no), and any Method 9 readings taken. [401 KAR 52:020, Section 10]

b. The permittee shall maintain records of preventive maintenance and inspections of the particulate control devices and the scrubbers at EP S01 and S02 in accordance with **7. Specific Control Equipment Operating Conditions**. [401 KAR 52:020, Section 10]

c. The permittee shall record the occurrence, duration, cause and any corrective action taken for each incident when a Product Transfer Collector at EP-S04, S08, S12 or S16 is in operation but its respective particulate control device is not. [401 KAR 52:020, Section 10]

d. The permittee shall maintain records of the pressure drop across the particulate control devices at EP-S04, S08, S12, and S16 and the flow rate and temperature of the scrubbing liquid at the scrubbers at EP-S01 and S02. [401 KAR 52:020, Section 10]

e. All records shall be maintained in accordance with **Section F.2.**

f. The permittee must keep the following records: [40 CFR 63.2525]

(1) Except as specified in 40 CFR 63.2450(e)(4), 40 CFR 63.2480(f), and 40 CFR 63.2485(p) and (q) and 40 CFR 63.2525(t) and (u), each applicable record required by 40 CFR 63 Subpart A and in referenced subparts F, G and SS of 40 CFR 63. [40 CFR 63.2525(a)]

(2) Records of each operating scenario as specified: [40 CFR 63.2525(b)]

(i) A description of the process and the type of process equipment used. [40 CFR 63.2525(b)(1)]

(ii) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard in 40 CFR 63.2505; wastewater point of determination (POD); storage tanks; and transfer racks. [40 CFR 63.2525(b)(2)]

(iii) The applicable control requirements of 40 CFR 63, Subpart FFFF including the level of required control, and for vents, the level of control for each vent. [40 CFR 63.2525(b)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(iv) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. [40 CFR 63.2525(b)(4)]

(v) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s). [40 CFR 63.2525(b)(5)]

(vi) The applicable monitoring requirements of 40 CFR 63, Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process. [40 CFR 63.2525(b)(6)]

(vii) Calculations and engineering analyses required to demonstrate compliance. [40 CFR 63.2525(b)(7)]

(viii) For reporting purposes, a change to any of these elements not previously reported, except for 40 CFR 63.2525(b)(5), constitutes a new operating scenario. [40 CFR 63.2525(b)(8)]

(3) For each deviation from an emission limit, operating limit, or work practice standard, the permittee must keep a record of the information specified in 40 CFR 63.2525(l)(1) – (3). The records shall be maintained as specified in 40 CFR 63.10(b)(1) of subpart A. In the event that an affected unit does not meet an applicable standard, record the number of deviations. [40 CFR 63.2525(l)]

(i) For each deviation record the date, time, and duration of each deviation. [40 CFR 63.2525(l)(1)]

(ii) For each deviation from an applicable standard, record and retain a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions. [40 CFR 63.2525(l)(2)]

(iii) Record actions taken to minimize emissions in accordance with 40 CFR 63.2450(u) and any corrective actions taken to return the affected unit to its normal or usual manner of operation. [40 CFR 63.2525(l)(3)]

Continuous Process Vents and Closed Vent Systems

g. For the Group 2 process vents at EP-S01 and S02, TRE index value determination information shall be recorded as specified in 40 CFR 63.998(a)(3). [40 CFR 63.993(b) and 40 CFR 63.982(e)]

Storage Vessels

h. For all Group 2 storage vessels, a record shall be kept for as long as the liquid is stored of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored. [40 CFR 63.1065(a)]

Maintenance wastewater

i. The permittee shall maintain a record of the information required by 40 CFR 63.105(b and c). [40 CFR 63.105(e) and 40 CFR 63.2485(q)]

Process Wastewater Streams

j. For the Group 2 wastewater streams, the permittee shall keep in a readily accessible location the following records: [40 CFR 63.147(b)(8) and 40 CFR 63.147(f)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) Process unit identification and description of the process unit. [40 CFR 63.147(b)(8)(i)]
(2) Stream identification code. [40 CFR 63.147(b)(8)(ii)]
(3) The concentration of the compound(s) in Tables 8 and 9 of 40 CFR 63, Subpart FFFF in parts per million, by weight, including documentation of the methodology used to determine concentration. [40 CFR 63.147(b)(8)(iii)]
(4) Flow rate in liter per minute. [40 CFR 63.147(b)(8)(iv)]
(5) If the permittee uses process knowledge to determine the annual average concentration of a wastewater stream as specified in 40 CFR 63.144(b)(3) and/or uses process knowledge to determine the annual average flow rate as specified in 40 CFR 63.144(c)(1), and determines that the wastewater stream is not a Group 1 wastewater stream, the permittee shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream. [40 CFR 63.147(f)]

Equipment Leaks

k. The permittee may comply with the recordkeeping requirements for the equipment in the Polymerization, Saponification, Polyrectification, AAR, Tank Farm, and Loading Areas in one recordkeeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records required by 40 CFR 63.181 shall be maintained in a manner that can be readily accessed at the plant site. [40 CFR 63.181(a)]

l. Except as provided in 40 CFR 63.181(e), and amended by 40 CFR 63.2480(f)(18), the following information pertaining to all equipment in each process unit subject to the requirements in 40 CFR 63.162 through 40 CFR 63.174 shall be recorded: [40 CFR 63.181(b)]
   (1) The permittee shall keep the following records: [40 CFR 63.181(b)(1)]
      (i) A list of identification numbers for equipment (except connectors exempt from monitoring and recordkeeping identified in 40 CFR 63.174 and instrumentation systems). Connectors need not be individually identified if all connectors in a designated area or length of pipe subject to the provisions of CFR 63, Subpart H are identified as a group, and the number of connectors subject is indicated. Pursuant to 40 CFR 63.2480(b)(3), as an existing source under 40 CFR 63, Subpart FFFF the permittee is not required to develop an initial list of identification numbers for connectors. 40 CFR 63.181(b)(1)(i)]
      (ii) A schedule by process unit for monitoring connectors subject to 40 CFR 63.174(a) and valves subject to 40 CFR 63.168(d). 40 CFR 63.181(b)(1)(ii)]
      (iii) Physical tagging of the equipment to indicate that it is in organic HAP service is not required. Equipment subject to the provisions of 40 CFR 63, Subpart H may be identified on a plant site plan, in log entries, or by other appropriate methods. 40 CFR 63.181(b)(1)(iii)]
   (2) The permittee shall maintain the following information: [40 CFR 63.181(b)(2)]
      (i) A list of identification numbers for equipment that the permittee elects to equip with a closed-vent system and control device, under the provisions of

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

40 CFR 63.163(g), 63.164(h), 63.2480(e)(4), or 63.173(f). [40 CFR 63.181(b)(2)(i)]

(ii) A list of identification numbers for compressors that the permittee elects to designate as operating with an instrument reading of less than 500 parts per million above background, under the provisions of 40 CFR 63.164(i). 40 CFR 63.181(b)(2)(ii)]

(3) A list of identification numbers for pressure relief devices subject to 40 CFR 63.2480(e)(1) and for pressure relief devices equipped with rupture disks, under the provisions of 40 CFR 63.2480(e)(2)(ii) and (iii) [40 CFR 63.181(b)(3) and 40 CFR 63.2480(f)(18)(iii) and (iv)]

(4) Identification of instrumentation systems. Individual components in an instrumentation system need not be identified. [40 CFR 63.181(b)(4)]

(5) Identification of screwed connectors subject to 40 CFR 63.174(c)(2). Identification can be by area or grouping as long as the total number within each group or area is recorded. [40 CFR 63.181(b)(5)]

(6) The following information shall be recorded for each dual mechanical seal system: [40 CFR 63.181(b)(6)]

(i) Design criteria required in 40 CFR 63.163(e)(6)(i), 40 CFR 63.164(e)(2), and 40 CFR 63.173(d)(6)(i) and an explanation of the design criteria; and [40 CFR 63.181(b)(6)(i)]

(ii) Any changes to these criteria and the reasons for the changes. [40 CFR 63.181(b)(6)(ii)]

(7) The following information pertaining to all pumps subject to 40 CFR 63.163(j), valves subject to 40 CFR 63.168(h and i), agitators subject to 40 CFR 63.173(h through j), and connectors subject to 40 CFR 63.174(f and g) shall be recorded: [40 CFR 63.181(b)(7)]

(i) Identification of equipment designated as unsafe to monitor, difficult to monitor, or unsafe to inspect and the plan for monitoring or inspecting this equipment. 40 CFR 63.181(b)(7)(i)]

(ii) A list of identification numbers for the equipment that is designated as difficult to monitor, an explanation of why the equipment is difficult to monitor, and the planned schedule for monitoring this equipment. 40 CFR 63.181(b)(7)(ii)]

(iii) A list of identification numbers for connectors that are designated as unsafe to repair and an explanation why the connector is unsafe to repair. 40 CFR 63.181(b)(7)(iii)]

(8) The permittee shall keep the following records: [40 CFR 63.181(b)(8)]

(i) A list of valves removed from and added to the process unit, as described in 40 CFR 63.168(e)(1), if the net credit for removed valves is expected to be used. [40 CFR 63.181(b)(8)(i)]

(ii) A list of connectors removed from and added to the process unit, as described in 40 CFR 63.174(i)(1), and documentation of the integrity of the weld for any removed connectors, as required in 40 CFR 63.174(j). This is not required unless the net credits for removed connectors is expected to be used. [40 CFR 63.181(b)(8)(ii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(9) For any leaks detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168; and 40 CFR 63.172 through 40 CFR 63.174, a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. [40 CFR 63.181(b)(10)]

m. For visual inspections of equipment subject to the provisions of 40 CFR 63.163(b)(3) and 40 CFR 63.163(e)(4)(i), the permittee shall document that the inspection was conducted and the date of the inspection. The owner or operator shall maintain records as specified in 40 CFR 63.181(d) for leaking equipment identified in this inspection. These records shall be retained for 2 years. [40 CFR 63.181(c)]

n. When a leak is detected, the following information shall be recorded and kept for two years. [40 CFR 63.181(cd)]
   (1) The instrument and the equipment identification number and the operator name, initials, or identification number. [40 CFR 63.181(d)(1)]
   (2) The date the leak was detected and the date of first attempt to repair the leak. [40 CFR 63.181(d)(2)]
   (3) The date of successful repair of the leak. [40 CFR 63.181(d)(3)]
   (4) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonrepairable. [40 CFR 63.181(d)(4)]
   (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. [40 CFR 63.181(d)(5)]
      (i) The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. [40 CFR 63.181(d)(5)(i)]
      (ii) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion. [40 CFR 63.181(d)(5)(ii)]
   (6) Dates of process unit shutdowns that occur while the equipment is unrepaired. [40 CFR 63.181(d)(6)]
   (7) The permittee shall keep the following records: [40 CFR 63.181(d)(7)]
      (i) Identification, either by list, location (area or grouping), or tagging of connectors that have been opened or otherwise had the seal broken since the last monitoring period required in 40 CFR 63.174(b), as described in 40 CFR 63.174(c)(1), unless the permittee elects to comply with 40 CFR 63.174(c)(1)(ii). [40 CFR 63.181(d)(7)(i)]
      (ii) The date and results of monitoring as required in 40 CFR 63.174(c). If identification of connectors that have been opened or otherwise had the seal broken is made by location under 40 CFR 63.181(d)(7)(i), then all connectors within the designated location shall be monitored. [40 CFR 63.181(d)(7)](ii)]
   (8) Copies of the periodic reports as specified in 40 CFR 63.182(d), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.181(d)(9)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

o. If the permittee elects to comply with the pressure testing requirements in accordance with **2. Emission Limitations e.(14),** the permittee is exempt from the requirements of paragraphs l, m, n and p of this permit section. Instead, the permittee shall maintain records as specified in 40 CFR 63.181(e)(1 through 6). [40 CFR 63.178(b)]

p. The dates and results of compliance tests required for compressors and the dates and results of monitoring following a pressure relief valve pressure release subject to 40 CFR 63.2480(e)(1) and (2) shall be recorded. The results shall include: [40 CFR 63.181(f) and 40 CFR 63.2480(f)(18)(v)]
   (1) The background level measured during each compliance test. [40 CFR 63.181(f)(1)]
   (2) The maximum instrument reading measured at each piece of equipment during each compliance test. [40 CFR 63.181(f)(2)]

q. The permittee shall maintain records required for closed-vent systems and control devices subject to 40 CFR 63.172. [40 CFR 63.181(g)]
   (1) The design specifications and performance demonstrations specified in shall be retained for the life of the equipment. [40 CFR 63.181(g)(1)]
      (i) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams. [40 CFR 63.181(g)(1)(i)]
      (ii) The dates and descriptions of any changes in the design specifications. [40 CFR 63.181(g)(1)(ii)]
      (iii) Except as specified in 40 CFR 63.108(a), the flare design (i.e., steam-assisted, air-assisted, or non-assisted) and the results of the compliance demonstration required by 40 CFR 63.11(b) of 40 CFR 63 Subpart A. [40 CFR 63.181(g)(1)(iii)]
      (iv) A description of the parameter or parameters monitored, as required in 40 CFR 63.172(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. [40 CFR 63.181(g)(1(iv))]
   (2) Records of operation of closed-vent systems and control devices, as specified in shall be retained for 2 years. [40 CFR 63.181(g)(2)]
      (i) Dates and durations when the closed-vent systems and control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170 are not operated as designed as indicated by the monitored parameters. 40 CFR 63.181(g)(2)(i)]
      (ii) Dates and durations during which the monitoring system or monitoring device is inoperative. 40 CFR 63.181(g)(2)(ii)]
      (iii) Dates and durations of start-ups and shutdowns of control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170. 40 CFR 63.181(g)(2)(iii)]
   (3) Records of inspections of closed-vent systems subject to the provisions of 40 CFR 63.172, as specified therein, shall be retained for 2 years. [40 CFR 63.181(g)(3)]
      (i) For each inspection conducted in accordance with the provisions of 40 CFR 63.172(f)(1) or (f)(2) during which no leaks were detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 63.181(g)(3)(i)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(ii) For each inspection conducted in accordance with 63.172(f)(1) or (f)(2) during which leaks were detected, the information specified in 40 CFR 63.181(d) shall be recorded. [40 CFR 63.181(g)(3)(ii)]

r. If the permittee implements any of the quality improvement programs required by 40 CFR 63.175 or 40 CFR 63.176, the records specified in 40 CFR 63.181(h)(1 through 9) shall be maintained for a period of the quality improvement plan for the process unit. [40 CFR 63.181(h)]

s. For each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.2480(e), the permittee must keep the records specified in 40 CFR 63.2525(q) (1) – (3). [40 CFR 63.2525(q)]
   (1) Records of the prevention measures implemented as required in 40 63.2480(e)(3)(ii).
   (2) Records of the number of releases during each calendar year and the number of those releases for which the root cause was determined to be a force majeure event. Keep these records for the current calendar year and the past 5 calendar years.
   (3) For each release to the atmosphere, the permittee must keep the records specified in 40 CFR 63.2525(q)(3)(i) – (iv).
      (i) The start and end time and date of each pressure release to the atmosphere; [40 CFR 63.2525(q)(3)(i)]
      (ii) Records of any data, assumptions, and calculations used to estimate of the mass quantity of each organic HAP released during the event; [40 CFR 63.2525(q)(3)(ii)]
      (iii) Records of the root cause analysis and corrective action analysis conducted as required in 40 CFR 63.2480(e)(3)(iii), including an identification of the affected facility, a statement noting whether the event resulted from the same root cause(s) identified in a previous analysis and either a description of the recommended corrective action(s) or an explanation of why corrective action is not necessary under 40 CFR 63.2480(e)(7)(i); [40 CFR 63.2525(q)(3)(iii)]
      (iv) For any corrective action analysis for which implementation of corrective actions are required in 40 CFR 63.2480(e)(7), a description of the corrective action(s) completed within the first 45 days following the discharge and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates. [40 CFR 63.2525(q)(3)(iv)]

All Process Equipment

t. "Continuous record" means any documentation, either in hard copy or computer readable form, of data values measured at least once every 15 minutes and recorded at the frequency specified in 40 CFR 63.998(b) except that periods of startup, shutdown and malfunction shall not be excluded per 40 CFR 63.2450(e)(4)(vii). [40 CFR 63.981]

u. Values that are recorded and monitored at least once every 15 minutes meet the definition of "continuous records." [40 CFR 63.998(b)(1)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Maintenance Vents

v. For maintenance vent openings subject to 40 CFR 63.2450(v), the permittee must record the following information, as applicable. [40 CFR 63.2525(p)]
   (1) Maintain standard site procedures used to deinventory equipment for safety purposes to document the procedures used to meet the requirements in 40 CFR 63.2450(v). The current copy of the procedures must be retained and available on-site at all times. Previous versions of the standard site procedures, as applicable, must be retained for five years. [40 CFR 63.2525(p)(1)]
   (2) If complying with the requirements of 40 CFR 63.2450(v)(1)(i), and the lower explosive limit at the time of the vessel opening exceeds 10 percent, identification of the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, and the lower explosive limit at the time of the vessel opening. [40 CFR 63.2525(p)(2)]
   (3) If complying with the requirements of 40 CFR 63.2450(v)(1)(ii) and either the vessel pressure at the time of the vessel opening exceeds 5 psig or the lower explosive limit at the time of the active purging was initiated exceeds 10 percent, identification of the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, the pressure of the vessel or equipment at the time of discharge to the atmosphere and, if applicable, the lower explosive limit of the vapors in the equipment when active purging was initiated. [40 CFR 63.2525(p)(3)]
   (4) If complying with the requirements of 40 CFR 63.2450(v)(1)(iii), records of the estimating procedures used to determine the total quantity of VOC in the equipment and the type and size limits of equipment that contain less than 50 pounds of VOC at the time of maintenance vent opening. For each maintenance vent opening that contains greater than 50 pounds of VOC for which the deinventory procedures specified in 40 CFR 63.2525(p)(1) are not followed or for which the equipment opened exceeds the type and size limits established in the records specified in this condition, records that identify the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, and records used to estimate the total quantity of VOC in the equipment at the time the maintenance vent was opened to the atmosphere. [40 CFR 63.2525(p)(4)]
   (5) If complying with the requirements of 40 CFR 63.2450(v)(1)(iv), identification of the maintenance vent, the process units or equipment associated with the maintenance vent, records documenting actions taken to comply with other applicable alternatives and why utilization of this alternative was required, the date of maintenance vent opening, the equipment pressure and lower explosive limit of the vapors in the equipment at the time of discharge, an indication of whether active purging was performed and the pressure of the equipment during the installation or removal of the blind if active purging was used, the duration the maintenance vent was open during the blind installation or removal process, and records used to estimate the total quantity of VOC in the equipment at the time the maintenance vent was opened to the atmosphere for each applicable maintenance vent opening. [40 CFR 63.2525(p)(5)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**6. Specific Reporting Requirements:**

a. All monitoring conducted for visual emission observation and any U.S. EPA Reference Method 9 observations conducted shall be submitted to the Regional Office listed on the front of the permit. [401 KAR 52:020, Section 10]

b. For equipment subject to 40 CFR 63, Subpart FFFF the permittee must submit a Compliance report containing the information specified in 40 CFR 63.2520(e)(1 through 10), semiannually. [40 CFR 63.2520(b) and 40 CFR 63, Subpart FFFF, Table 11]

c. ***Compliance report.*** The compliance report must contain the information specified in 40 CFR 63.2520(e)(1) through (17). On and after August 12, 2023 or once the reporting template for this subpart has been available on the CEDRI website for 1 year, whichever date is later, you must submit all subsequent reports following the procedure specified in 40 CFR 63.9(k), except any medium submitted through mail must be sent to the attention of the Miscellaneous Organic Chemical Manufacturing Sector Lead. You must use the appropriate electronic report template on the CEDRI website (*https://www.epa.gov/electronic-reporting-air-emissions/cedri*) for this subpart. The date report templates become available will be listed on the CEDRI website. Unless the Administrator or delegated state agency or other authority has approved a different schedule for submission of reports under 40 CFR 63.9(i) and 40 CFR 63.10(a) of subpart A, the report must be submitted by the deadline specified in this subpart, regardless of the method in which the report is submitted. [40 CFR 63.2520(e)]

d. Refer to **Section F.5**.

Process Wastewater Streams

e. For the Group 2 wastewater stream, the permittee shall submit the information specified in Table 15 of 40 CFR 63, Subpart G as part of the Compliance Report. [40 CFR 63.146(b)(1 and 2)]

Equipment Leaks

f. Compliance reports for pressure relief devices subject to the requirements 40 CFR 63.2480(e) must include the information specified in 40 CFR 63.2520(e)(15)(i) through (iii). [40 CFR 63.2520(e)(15)]
   (1) For pressure relief devices in organic HAP gas or vapor service, pursuant to 40 CFR 63.2480(e)(1), report the instrument readings and dates for all readings of 500 ppmv or greater. [40 CFR 63.2520(e)(15)(i)]
   (2) For pressure relief devices in organic HAP gas or vapor service subject to 40 CFR 63.2480(e)(2), report the instrument readings and dates of instrument monitoring conducted. 40 CFR 63.2520(e)(15)(ii)]
   (3) For pressure relief devices in organic HAP service subject to 40 CFR 63.2480(e)(3), report each pressure release to the atmosphere, including the start date, start time, and duration in minutes of the pressure release and an estimate of the mass quantity in pounds of each organic HAP released; the results of any root cause analysis and corrective action analysis completed during the reporting period, including the corrective actions implemented during the reporting period; and, if applicable, the

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

implementation schedule for planned corrective actions to be implemented subsequent to the reporting period. 40 CFR 63.2520(e)(15)(iii)]

Maintenance Vents

g. The permittee must submit, as part of the compliance report for any maintenance vent release exceeding the applicable limits in 40 CFR 63.2450(v)(1), the items specified in 40 CFR 63.2520(e)(14)(i)-(iv). For any maintenance vent release complying with 40 CFR 63.2450(v)(1)(iv), report an explanation for any event as to why utilization of this alternative was required. [40 CFR 63.2520(e)(14)]

**7. Specific Control Equipment Operating Conditions:**

a. The particulate control devices shall be in operation at all times any of the Product Transfer Collectors at EP-S04, S08, S12, and S16 are operating. [401 KAR 52:020, Section 10]

b. Preventive maintenance shall be performed, for all particulate control devices, in accordance with the manufacturers' recommendations. Each device shall be inspected monthly for proper operation of the following: [401 KAR 52:020, Section 10]
   (1) Pulse jet device to release dust cake from bags.
   (2) Air flow source and equipment.
   (3) Pressure drop measuring system.

c. The permittee shall maintain the pressure drop across each dust collector and maintain and monitor the flow rate and temperature of the scrubbing liquid at the scrubbers at EP-S01 and S02 within the range recommended by the manufacturer or the range based on process engineering assessments that result in normal operation of the equipment. [401 KAR 52:020, Section 10]

d. The permittee must be in compliance with the emission limits and work practice standards in Tables 1 through 7 to 40 CFR 63, Subpart FFFF at all times, and the permittee must meet the requirements specified in 40 CFR 63.2455 through 63.2490 (or the alternative means of compliance in 40 CFR 63.2495, 40 CFR 63.2500, or 40 CFR 63.2505), except as specified in 40 CFR 63.2450(b) through (v). The permittee must meet the notification, reporting, and recordkeeping requirements specified in 40 CFR 40 CFR 63.2515, 40 CFR 63.2520, and 40 CFR 63.2525. [40 CFR 63.2450]

**8. Alternate Operating Scenarios:**

a. For the equipment leaks subject to 40 CFR 63, Subpart FFFF, the permittee may comply with one of the following requirements: [40 CFR 63.2480(a) and Table 6 to 40 CFR 63, Subpart FFFF]
   (1) 40 CFR 63, Subpart UU and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f);
   (2) 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f); or
   (3) 40 CFR 65, Subpart F and the requirements referenced therein, except as specified in 40 CFR 63.2480(c) and (d)-(f).

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

b. The process gas from the scrub towers, EP S02-A4, S02-B4, S02-C4, and S02-D4, in the SAP Process Unit Drying area may be diverted from the Main Vent Scrubber (DA-5605) to the 600 SAP Vent Scrubber (DA-5602/DA-5604) for periods of maintenance on the Main Vent Scrubber. Prior to diverting the process vent to 600 SAP Vent Scrubber, the permittee shall develop and maintain records of a TRE index value determination for this mode of operation using available process data to demonstrate EP-S02 retains its Group 2 status. Pursuant to 40 CFR 63.2455(c), 40 CFR 63.982(e), and 40 CFR 63.993(b), the permittee must also submit the following reports in the semiannual reporting period when the new operating scenario is implemented:

(1) The semiannual compliance report must include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, the permittee must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. A revised operating scenario for an existing process is considered to be a new operating scenario. [40 CFR 63.2520(e)(7)]

(2) Except as specified in paragraph 40 CFR 63.2520(e)(10)(ii), whenever the permittee makes a process change, or change any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, the permittee must document the change in the compliance report. The notification must include all of the information specified below. [40 CFR 63.2520(e)(10)]

(i) A description of the process change. [40 CFR 63.2520(e)(10)(A)]

(ii) Revisions to any of the information reported in the original notification of compliance status report under 40 CFR 63.2520(d). [40 CFR 63.2520(e)(10)(B)]

(iii) Information required by the notification of compliance status report under 40 CFR 63.2520 for changes involving the addition of processes or equipment at the affected source. [40 CFR 63.2520(e)(10)(C)]

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## POLYRECTIFICATION (POLYREC) AREA

| **EP**(Source ID) | **EU** | **Emission Unit/Point Description** |
|---|---|---|
| **F01(8)** | R01-8: | **Description: Polymethanol Tower** (DA-5103)- Separates Vinyl Extraction Tower Bottoms to Methanol and Wastewater<br>Maximum Processing Rate: 75,000 lbs/hr<br>Control Device: FLARE, BA-5000 (see Section B, EP-F01) |
| | *R01-8A* | Polymethanol Tower, DA-5103; (R01-8A) bottoms product stream to (R03-10A); overheads to Condenser, EA-5109, to FA-5120; (R01-8B)<br>**MON Group 2 Process Wastewater Stream** |
| **T05** | R01-8B | Polymethanol Reflux Accumulator, FA-5120 (1,070 gallons); (R01-8B) product stream to (R01-8A) or Methanol Tank T05 |
| **R01** | R01 | **Description: Polymethanol Tower Startups** |
| **F01(9)** | R02-9: | **Description: Vinyl Recovery Tower** (DA-5104)- Purifies Vinyl Extraction Tower Overheads<br>Maximum Processing Rate: 55,420 lbs/hr<br>**Control Device:** FLARE, BA-5000 (EP-F01) |
| | *R02-9A* | Vinyl Recovery Tower, DA-5104; (R02-9A) bottoms product stream to (R02-9E); (R02 9A) side draw product to (R02-9F), overheads to (R02-9C) |
| | *R02-9C* | East Vinyl Recovery Condenser, EA-5108; (R02-9C) product stream to (R02-9D), exhaust to FLARE (EP-F01)<br>**MON Group 1 Continuous Process Vent** |
| | *R02-9D* | Vinyl Recovery Tower Accumulator, FA-5107 (2,053 gallons); (R02-9D) product stream to (R02-9A) or to wastewater, exhaust to FLARE (EP-F01)<br>**MON Group 1 Continuous Process Vent**<br>**MON Group 1 Process Wastewater Stream** |
| | *R02-9E* | Vinyl Sludge Still, FA-5117; (R02-9E) overheads to DA 5110 (R03-10A); bottoms product to waste disposal |
| **F01(19 A-C)** | R02-9F | Vinyl Redistillation Tower, DA-5105; (R02-9F) product stream to (R02-9G) |
| **F01(19 A-C)** | R02-9G | Redistillation Condenser, EA-5171; (R02-9G) product stream to T10(19A-19B) |
| **R02** | R02 | **Description: Vinyl Recovery Tower Startups** |
| **F01(10)** | R03-10: | **Description: Vinyl Extraction Tower** (DA-5110)-Separates Polymerization Unit Paste Stripper Accumulator Overheads to Vinyl Acetate and Methanol<br>Maximum Processing Rate: 55,260 pounds/hour<br>**Control Device:** FLARE, BA-5000 (EP F01) |
| | *R03-10A* | Vinyl Extraction Tower, DA-5110; (R03 10A) bottoms product stream to (R01-8A) or (A04-5A), overheads to (R03-10B); exhaust to (R03-10C) |
| | *R03-10B* | Vinyl Extraction Tower Condenser, EA-5170; (R03-10B) product stream to (R03-10D) |
| | *R03-10C* | Vinyl Extraction Vent Absorber, DA-5108; (R03-10C) product stream to (R03-10D); exhaust to FLARE (EP F01)<br>**MON Group 1 Continuous Process Vent** |
| **F01(9C)** | R03-10D | Vinyl Extraction Tower Accumulator, FA-5104 (3,100 gallons); (R03-10D) product stream to (R02-9A) |
| **R03** | R03 | **Description: Vinyl Extraction Tower Startups** |
| **R04** | R04 | **Inhibitor (BQ) Feed Tank, FA-5109**<br>Description: Vinyl Acetate Storage Tank (265 gallons)<br>Maximum throughput: 193,450 gallons/yr<br>**MON Group 2 Storage Tank** |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| **EP**(Source ID) | **EU** | **Emission Unit/Point Description** |
|---|---|---|
| **R05** | R05 | **Equipment Leaks (Polyrectification Process Unit Fugitives)**<br>Gas Vapor Valves: 38<br>Light Liquid Valves: 850<br>Light Liquid Pumps: 21<br>Connectors: 3,373<br>Agitators: 158<br>Instrumentation Systems: 20 |

The equipment leak component count for the Polyrectification Process Area, listed above, as submitted in the application, reflects an accurate count of the equipment as of the date of issuance of this permit but is not intended to limit the permittee to the exact numbers specified. The permittee may add or remove equipment leak components without a permit revision as long as the components continue to comply with the applicable requirements listed below, and the changes do not: (1) cause a significant increase of emissions; or (2) result in the applicability of an additional standard that is not specified in this permit.

**APPLICABLE REGULATIONS:**

401 KAR 63:002, Section 2.(4)(lll), 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.

401 KAR 63:002, Section 2.(4)(b), 40 C.F.R. 63.110 through 63.153, Tables 1 through 37 (Subpart G), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(c), 40 C.F.R. 63.160 through 63.183, Tables 1 through 4 (Subpart H), National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(ii), 40 C.F.R. 63.980 through 63.999 (Subpart SS), National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, as referenced by 40 CFR 63, Subpart FFFF.

*Note:*
*40 CFR 63, Subpart G and H have been updated as cited in 89 FR 43175-43220; and 89 FR 43220-43234, dated May 16, 2024; &*
*40 CFR 63, Subpart FFFF has been updated as cited in 89 FR 23868-23873 dated April 4, 2024.*

**PRECLUDED REGULATIONS:**

Refer to **Section B**, **Group Requirements.**

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**NON-APPLICABLE REGULATIONS:**

401 KAR 60:005, Section 2.(2)(r), 40 C.F.R. 60.110b through 60.117b (Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, does not apply to the storage tank EU R04.

401 KAR 63:002, Section 2 (4)(a)(i), 40 C.F.R. 63.100 through 63.107, Tables 1 through 4 (Subpart F), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, and related Subparts G and H, are not applicable to the Polyrec Area units, as these units do not produce chemicals listed under Table 1 of 40 CFR 63, Subpart F as a primary product nor do they use as a reactant or co-product any chemical in Table 2 of 40 CFR 63, Subpart F. This determination notwithstanding, specific provisions of Subparts H and G are included in this section since they are incorporated by reference in 40 CFR 63 Subpart FFFF.

401 KAR 63:002, Section 2 (4)(a)(kkk), 40 C.F.R. 63.2330 through 63.2406, Tables 1 through 12 (Subpart EEEE), National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).

401 KAR 60:005, Section 2.(2)(bbb), 40 C.F.R. 60.480 through 60.489 (Subpart VV), Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006.

401 KAR 60:005, Section 2.(2)(ppp), 40 C.F.R. 60.660 through 60.668 (Subpart NNN), Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry Distillation Operations.

1. **Operating Limitations:**
   a. If a Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 requirements beginning on the date the switch occurs. An initial compliance demonstration as specified in 40 CFR 63, Subpart FFFF must be conducted within 150 days after the switch occurs. [40 CFR Part 63.2445(d)]

   b. Refer to 40 CFR 63.2540 and 40 CFR 63, Subpart FFFF, Table 12, for general provisions.

   c. The permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.2450(u)]

Continuous Process Vents and Closed Vent Systems

Note: The closed vent system is constructed of hard piping as defined by 40 CFR 63.981.

d. All Group 1 process vents of EU, R02-9C, R02-9D and R03-10C must be vented to a flare. Refer to **Section B,** EP-F01. [40 CFR 63.2455(a) and Table 1 of 40 CFR 63, Subpart FFFF]

e. The permittee shall comply with the following provisions for the closed vent systems routing the vapors the FLARE, EP-F01: [40 CFR 63.2450(e)(2), 40 CFR 63.983(a) and 40 CFR 63.982(b)]
   (1) Closed vent systems shall be designed and operated to collect the regulated material vapors from the emission points, and to route the collected vapors to a control device (FLARE). [40 CFR 63.983(a)(1)]
   (2) Closed vent systems shall be operated at all times when emissions are vented to, or collected by, them. [40 CFR 63.983(a)(2)]
   (3) Except as provided by 40 CFR 63.2450(e)(4) per 40 CFR 63.2450(e)(6)(ii), the permittee shall comply with the provisions of either paragraphs (a)(3)(i) or (ii) of 40 CFR 63.983, below, for each closed vent system that contains bypass lines that could divert a vent stream to the atmosphere. [40 CFR 63.983(a)(3)]
      (i) Properly install, maintain, and operate a flow indicator at the entrance to any bypass line that is capable of taking periodic readings. [40 CFR 63.983(a)(3)(i)]
      (ii) Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. [40 CFR 63.983(a)(3)(ii)]
   (4) If there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(i)(B), the permittee shall comply with either of the following procedures. [40 CFR 63.983(d)(1)]
      (i) Eliminate the leak; and [40 CFR 63.983(d)(1)(i)]
      (ii) Monitor the equipment according to the procedures therein. [40 CFR 63.983(c)]
   (5) Leaks, as indicated by an instrument reading greater than 500 ppm by volume above background or by visual inspections, shall be repaired as soon as practical. [40 CFR 63.983(d)(2)]
      (i) A first attempt at repair shall be made no later than 5 days after the leak is detected. 40 CFR 63.983(d)(2)(i)]
      (ii) Except as provided in 40 CFR 63.983(d)(3) for delay of repair, repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. [40 CFR 63.983(d)(2)(ii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

f. The use of a bypass line at any time on a closed vent system to divert emissions subject to the requirements in Tables 1 through 7 to 40 CFR 63 Subpart FFFF to the atmosphere or to a control device not meeting the requirements specified in Tables 1 through 7 of 40 CFR 63, Subpart FFFF is an emissions standard deviation. [40 CFR 63.2450(e)(6)]

Process Wastewater Streams

g. The permittee must comply with the requirements in 40 CFR 63.132 through 40 CFR 63.148 and the requirements referenced therein, except as specified in 40 CFR 63.2485 below: [40 CFR 63.2485(a), and 40 CFR 63, Subpart FFFF, Table 7, item 1]
The permittee shall not discard liquid or solid organic materials with a concentration of greater than 30,000 ppmw of total partially soluble HAP (PSHAP) and soluble HAP (SHAP) or greater than 10,000 ppmw of PSHAP (as determined by analysis of the stream composition, engineering calculations, or process knowledge, according to the provisions of 40 CFR 63.144(b), as amended by 40 CFR 63.2485(h)(4)), from a chemical manufacturing process unit to water or wastewater, unless the receiving stream is managed and treated as a Group 1 wastewater stream. This prohibition does not apply to materials from the following activities: [40 CFR 63.132(f)]
    (1) Equipment leaks; [40 CFR 63.132(f)(1)]
    (2) Spills; or; [40 CFR 63.132(f)(3)]
    (3) Samples of a size not greater than reasonably necessary for the method of analysis that is used. [40 CFR 63.132(f)(4)]

h. For the Group 1 wastewater stream from EU-(R02-9D), the permittee has elected to transfer this stream to an off-site treatment operation. [40 CFR 63.132(g)]

Equipment Leaks

i. The permittee must meet each requirement in 40 CFR 63, Subpart FFFF, Table 6, item 1.(b.). The permittee shall comply with the requirements of 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d) – (f). [40 CFR 63.2480(a)]
    (1) Each piece of equipment leaks subject to 40 CFR 63, Subpart FFFF shall be identified such that it can be distinguished readily from equipment that is not subject to 40 CFR 63, Subpart H. [40 CFR 63.162(c)]
    (2) When a leak is detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168 and 40 CFR 63.169; and 40 CFR 63:172 through 40 CFR 63.174, the permittee shall: [40 CFR 63.162(f)]
        (i) Clearly identify the leaking equipment. [40 CFR 63.162(f)(1)]
        (ii) The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 40 CFR 63.175(e)(7)(i)(D), and no leak has been detected during the follow-up monitoring. If the permittee elects to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored and no leak is detected during that monitoring. 40 CFR 63.162(f)(2)]
        (iii) The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that is subject to 40 CFR 63.174(c)(1)(i), may be removed after it is repaired. 40 CFR 63.162(f)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(3) For each piece of equipment subject to 40 CFR 63, Subpart FFFF that is added to an affected source after December 17, 2019, or replaces equipment at an affected source after December 17, 2019, the permittee must initially monitor for leaks within 30 days after August 12, 2020, or initial startup of the equipment, whichever is later. Equipment that is designated as unsafe- or difficult-to-monitor is not subject to this requirement. [40 CFR 63.2480(b)(7)]

j. Except as specified in 40 CFR 63.2480(e)(4), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(1) and (2) for pressure relief devices, such as relief valves or rupture disks, in organic HAP gas or vapor service instead of the pressure relief device requirements of 40 CFR 63.165 of Subpart H. [40 CFR 63.2480(e)]

k. Except as specified in 40 CFR 63.2480(e)(4) and (5), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(3), (6), (7), and (8) for all pressure relief devices in organic HAP service. [40 CFR 63.2480(e)]
   (1) Implement the pressure release management requirements outlined in 40 CFR 63.2480(e)(3)(i) – (v). [40 CFR 63.2480(e)(3)]
   (2) A root cause analysis and corrective action analysis must be completed as soon as possible, but no later than 45 days after a release event. Special circumstances affecting the number of root cause analyses and/or corrective action analyses are provided in 40 CFR 63.2480(e)(6)(i) – (iii). [40 CFR 63.2480(e)(6)]
   (3) The permittee must implement the corrective action(s) identified in the corrective action analysis in accordance with the applicable requirements in 40 CFR 63.2480(e)(7)(i) – (iii). [40 CFR 63.2480(e)(7)]
   (4) The permittee is prohibited from installing any flowing pilot-operated pressure relief device or replace any pressure relief device with a flowing pilot-operated pressure relief device after August 12, 2023. [40 CFR 63.2480(e)(8)]

Maintenance Vents

l. The permittee must meet the requirements outlined in 40 CFR 63.2450(v)(1) through (3) for any process vent designated as a maintenance vent and used only as a result of startup, shutdown, maintenance or inspection of equipment where equipment is emptied, depressurized, degassed, or placed into service. [40 CFR 63.2450(v)]

**Compliance Demonstration Method:**

a. Refer to **4. Specific Monitoring Requirements** and **5. Specific Recordkeeping Requirements** for Continuous Process Vents and Closed Vent Systems.

Process Wastewater Streams

b. Total annual average concentration shall be determined according to the procedures specified in 40 CFR 63.144(b), as amended by 40 CFR 63.2485(h)(4). Annual average flow rate shall be determined according to the procedures specified in 40 CFR 63.144(c). [40 CFR 63.132(c)]

c. For a Group 2 wastewater, the permittee shall re-determine group status for each Group 2 stream, as necessary, to determine whether the stream is Group 1 or Group 2 whenever

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

process changes are made that could reasonably be expected to change the stream to a Group 1 stream. Examples of process changes include, but are not limited to, changes in production capacity, production rate, feedstock type, or whenever there is a replacement, removal, or addition of recovery or control equipment. For purposes of this paragraph, process changes do not include: Process upsets; unintentional, temporary process changes; and changes that are within the range on which the original determination was based. [40 CFR 63.132(c)(3)]

Equipment Leaks

d. Compliance shall be determined by review of the records required by 40 CFR 63.181 and the reports required by 40 CFR 63.182, review of performance test results, and by inspections. [40 CFR 63.162(a)]

Maintenance Vents

e. Refer to **5. Specific Recordkeeping Requirements** and **6. Specific Reporting Requirements** for Maintenance Vents.

**2. Emission Limitations:**

Equipment Leaks and Closed Vent Systems

a. The permittee shall comply with the fugitive emissions standards of 40 CFR 63, Subpart H as applicable. [40 CFR 63.2480(a) and 40 CFR 63, Subpart FFFF, Table 6]

(1) Standards for Pumps in light liquid service: [40 CFR 63.163]

| | |
|---|---|
| 40 CFR 63.163(a): | Implementation and compliance provisions |
| 40 CFR 63.163(b): | Monitoring requirements, Leak detection levels, frequency of monitoring |
| 40 CFR 63.163(c): | Repair procedures and time frames [*except 40 CFR 63.163 (c)(3)]* |
| 40 CFR 63.163(d): | Procedures to determine percent leaking pumps and quality improvement program requirements |
| 40 CFR 63.163(e)-(j): | Exemptions for specific types of pumps |

(2) Standards for Compressors: [40 CFR 63.164]

| | |
|---|---|
| 40 CFR 63.164(a)-(e): | Operational requirements |
| 40 CFR 63.164(f): | Criteria for Leak detection |
| 40 CFR 63.164(g): | Repair procedures and time frames |
| 40 CFR 63.164(h)-(i): | Exemptions for specific types of compressors |

(3) Standards for Pressure relief devices in gas/vapor service: [40 CFR 63.2480(e)]

| | |
|---|---|
| 40 CFR 63.2480(e)(1): | Operational requirements |
| 40 CFR 63.2480(e)(2): | Pressure release procedures |
| 40 CFR 63.2480(e)(4): | Exemptions for specific types of pressure relief devices |

(4) Standards for Sampling Connection Systems: [40 CFR 63.166]

| | |
|---|---|
| 40 CFR 63.166(a)-(b): | Operational requirements |
| 40 CFR 63.166(c): | Exemptions for specific types of sampling connection systems |

(5) Standards for Open-ended valves or lines: [40 CFR 63.167]

| | |
|---|---|
| 40 CFR 63.167(a)-(c): | Operational requirements |
| 40 CFR 63.167(d)-(e): | Exemptions for specific types of valves |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(6) Standards for Valves in gas/vapor service and in light liquid service: [40 CFR 63.168]

| | |
|---|---|
| 40 CFR 63.168(a): | Operational requirements |
| 40 CFR 63.168(b)-(d): | Monitoring requirements and intervals |
| 40 CFR 63.168(e): | Procedures to determine percent leaking valves |
| 40 CFR 63.168(f): | Leak repair time frames |
| 40 CFR 63.168(g): | First attempt repair procedures |
| 40 CFR 63.168(h): | Exemptions for unsafe-to-monitor valves |
| 40 CFR 63.168(i): | Exemptions for difficult-to-monitor valves |

(7) Standards for Instrumentation systems: [40 CFR 63.169]

| | |
|---|---|
| 40 CFR 63.169(a): | Monitoring frequency |
| 40 CFR 63.169(b): | Leak detection levels |
| 40 CFR 63.169(c): | Leak repair time frames |

(8) Standards for Delay of repair: [40 CFR 63.171]

| | |
|---|---|
| 40 CFR 63.171 | Allowances for delay of repair |

(9) Standards for Closed-vent systems and control devices: [40 CFR 63.172]

| | |
|---|---|
| 40 CFR 63.172(a)-(b): | Operational requirements |
| 40 CFR 63.172(d),(m): | Control device requirements |
| 40 CFR 63.172(f)-(g): | Monitoring requirements |
| 40 CFR 63.172(h)-(i): | Repair procedures and time frames |
| 40 CFR 63.172 (j): | Operational requirements for bypass lines [*except 40 CFR 63.172(j)(3)*] |
| 40 CFR 63.172(k)-(l): | Exemptions for unsafe-to-inspect and difficult-to-inspect closed-vent systems |

(10) Standards for Agitators in gas/vapor service and in light liquid service: [40 CFR 63.173]

| | |
|---|---|
| 40 CFR 63.173(a): | Operational requirements |
| 40 CFR 63.173(b): | Monitoring requirements and intervals |
| 40 CFR 63.173(c): | Leak repair time frames |
| 40 CFR 63.173(d)-(g): | Exemptions for specific types of agitators |
| 40 CFR 63.173(h)-(j): | Exemptions for difficult-to-monitor, inaccessible or unsafe-to-monitor agitators |

(11) Standards for connectors in gas/vapor service and in light liquid service: [40 CFR 63.174]

| | |
|---|---|
| 40 CFR 63.174(a): | Operational requirements |
| 40 CFR 63.174(b): | Monitoring requirements and intervals |
| 40 CFR 63.174(c): | Procedures for open connectors or connectors with broken seals |
| 40 CFR 63.174(d): | Leak repair time frames |
| 40 CFR 63.174(e): | Monitoring frequency for repaired connectors |
| 40 CFR 63.174(f)-(h): | Exemptions for unsafe-to-monitor, unsafe-to-repair, inaccessible, or ceramic connectors |
| 40 CFR 63.174(i): | Procedures to determine percent leaking connectors |
| 40 CFR 63.174(j): | Optional credit for removed connectors |

(12) Quality improvement program for valves: In Phase III, the permittee may elect to implement the following quality improvement programs if the percent of leaking

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

valves is equal to or exceeds 2 percent: [40 CFR 63.175 and 40 CFR 63.168(d)(1)(ii)]

40 CFR 63.175(a): Quality improvement program alternatives
40 CFR 63.175(b): Criteria for ending quality improvement programs
40 CFR 63.175(c): Alternatives following achievement of less than 2 percent leaking valves target
40 CFR 63.175(d): Quality improvement program to demonstrate further progress
40 CFR 63.175(e): Quality improvement program of technology review and improvement

(13) Quality improvement program for pumps: If, in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps or three pumps in the Polymerization, Saponification, Polyrectification, Tank Farm, and Loading Areas (that are part of the 40 CFR 63, Subpart FFFF MCPU) leak, the permittee shall implement the following quality improvement programs for pumps: [40 CFR 63.176 and 40 CFR 63.163(d)(2)]

40 CFR 63.176(a): Applicability criteria
40 CFR 63.176(b): Criteria for ending the quality improvement program
40 CFR 63.176(c): Criteria for resumption of the quality improvement program
40 CFR 63.176(d): Quality improvement program elements

(14) The requirements for pressure testing in 40 CFR 63.178(b) may be applied to all processes, not just batch processes, as stated in 40 CFR 63.2480(b)(1). The permittee may elect to use pressure testing of equipment to demonstrate compliance by meeting the following requirements of 40 CFR 63.178(b). Compliance with the provisions of 40 CFR 63.178(b) exempts the permittee from the monitoring provisions of 40 CFR 63.163, 40 CFR 63.168 and 40 CFR 63.169, and 40 CFR 63.173 through 40 CFR 63.176. [40 CFR 63.2480(b)(1) and 40 CFR 63.178(b)]

(i) The permittee may switch among the alternatives provided the change is documented as specified in 40 CFR 63.181. [40 CFR 63.178(a)]
(ii) For the purposes of 40 CFR 63, Subpart FFFF pressure testing for leaks in accordance with 40 CFR 63.178(b) is not required after reconfiguration of an equipment train if flexible hose connections are the only disturbed equipment.

**Compliance Demonstration Method:**
Equipment Leaks
Refer to **1. Operating Limitations** Compliance Demonstration Method e.

**3. Testing Requirements:**
Continuous Process Vents
a. Refer to **3. Testing Requirements** for the FLARE in **Section B**, EP-F01.
Equipment Leaks
b. The permittee shall comply with the following test methods and procedures requirements: [40 CFR 63.180(a)]
(1) Monitoring procedures, test methods, and calibration procedures; [40 CFR 63.180(b)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) Leak detection monitoring procedures; [*replacing reference to 40 CFR 63.165(a) with 40 CFR 63.2480(e)(1)*]; and [40 CFR 63.180(c)]
(3) Procedures for determining organic HAP service applicability. [40 CFR 63.180(d)]

c. The permittee must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1), if applicable. [40 CFR 63.2515(c)]

d. Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1]

**4. Specific Monitoring Requirements:**

Continuous Process Vents and Closed Vent Systems

a. Refer to **4. Specific Monitoring Requirements** for the FLARE in **Section B**, EP-F01.

b. Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2 and 3), the permittee shall comply with the following requirements for each closed vent system. [40 CFR 63.983(b)(1)(i)]
(1) Conduct an initial inspection according to the procedures in 40 CFR 63.983(c); and [40 CFR 63.983(b)(1)(i)(A)]
(2) Conduct annual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 63.983(b)(1)(i)(B)]

c. For each bypass line, the permittee shall comply with either of the following requirements. [40 CFR 63.983(b)(4)]
(1) If a flow indicator is used, take a reading at least once every 15 minutes. [40 CFR 63.983(b)(4)(i)]
(2) If the bypass line valve is secured in the non-diverting position, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line. [40 CFR 63.983(b)(4)(ii)]

Process Wastewater Streams

d. The permittee shall include a notice with the shipment or transport of each Group 1 wastewater stream stating that the wastewater stream contains organic hazardous air pollutants that are to be treated in accordance with the provisions of 40 CFR 63, Subpart G as referenced by 40 CFR 63, Subpart FFFF. When the transport is continuous or ongoing, the notice shall be submitted to the treatment operator initially and whenever there is a change in the required treatment. [40 CFR 63.132(g)(1)(ii)]

e. The permittee must comply with either of the following requirements: [40 CFR 63.132(g)(2) and 40 CFR 63.2485(i)(1)]
(1) The permittee may not transfer the wastewater stream unless the transferee has submitted to the Division a written certification, as specified in 40 CFR 63.132(g)(2). [40 CFR 63.132(g)(2)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) The permittee may document in the notification of compliance status report that the wastewater will be treated as a hazardous waste at a facility that meets the requirements of 40 CFR 63.138(h). [40 CFR 63.2485(i)(1)]

Equipment Leaks

f. Refer to **1. Operating Limitations** Compliance Demonstration Method e. and **3. Testing Requirements**.

**5. Specific Recordkeeping Requirements:**

a. All records shall be maintained in accordance with **Section F.2.**

b. The permittee must keep the following records: [40 CFR 63.2525]

(1) Except as specified in 40 CFR 63.2450(e)(4), 40 CFR 63.2480(f), 40 CFR 63.2485(p) and (q) and 40 CFR 63.2525(t) and (u), each applicable record required by 40 CFR 63 Subpart A and in referenced subparts F, G and SS of 40 CFR Part 63. [40 CFR 63.2525(a)]

(2) Records of each operating scenario as specified: [40 CFR 63.2525(b)]

(i) A description of the process and the type of process equipment used. [40 CFR 63.2525(b)(1)]

(ii) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard in 40 CFR 63.2505; wastewater point of determination (POD); storage tanks; and transfer racks. [40 CFR 63.2525(b)(2)]

(iii) The applicable control requirements of 40 CFR 63, Subpart FFFF including the level of required control, and for vents, the level of control for each vent. [40 CFR 63.2525(b)(3)]

(iv) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. [40 CFR 63.2525(b)(4)]

(v) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s). [40 CFR 63.2525(b)(5)]

(vi) The applicable monitoring requirements of 40 CFR 63, Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process. [40 CFR 63.2525(b)(6)]

(vii) Calculations and engineering analyses required to demonstrate compliance. [40 CFR 63.2525(b)(7)]

(viii) For reporting purposes, a change to any of these elements not previously reported, except for 63.2525(b)(5), constitutes a new operating scenario. [40 CFR 63.2525(b)(8)]

(3) For each deviation from an emission limit, operating limit, or work practice standard, the permittee must keep a record of the information specified in 40 CFR 63.2525(l)(1) – (3). The records must be maintained as specified in 40 CFR 63.10(b)(1) of subpart A. In the event that an affected unit does not meet an applicable standard, record the number of deviations. [40 CFR 63.2525(l)]

(i) For each deviation record the date, time, and duration of each deviation. [40 CFR 63.2525(l)(1)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(ii) For each deviation from an applicable standard, record and retain a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions. [40 CFR 63.2525(l)(2)]

(iii) Record actions taken to minimize emissions in accordance with 40 CFR 63.2450(u) and any corrective actions taken to return the affected unit to its normal or usual manner of operation. [40 CFR 63.2525(l)(3)]

Continuous Process Vents and Closed Vent Systems

c. Refer to **5. Specific Recordkeeping Requirements** for the FLARE in **Section B,** EP-F01.

d. For the closed vent systems, the permittee shall record the following information. [40 CFR 63.998(d)(1)]

(1) The identification of all parts of the closed vent system that are designated as unsafe or difficult to inspect, an explanation of why the equipment is unsafe or difficult to inspect, and the plan for inspecting the equipment required by 40 CFR 63.983(b)(2)(ii or iii). [40 CFR 63.998(d)(1)(i)]

(2) The information specified in either 40 CFR 63.998(d)(1)(ii)(A or B), as applicable, for each closed vent system that contains bypass lines that could divert a vent stream away from the flare and to the atmosphere. [40 CFR 63.998(d)(1)(ii)]

(i) Hourly records of whether the flow indicator specified under 40 CFR 63.983(a)(3)(i) was operating and whether a diversion was detected at any time during the hour, as well as records of the times of all periods when the vent stream is diverted from the flare or the flow indicator is not operating; or [40 CFR 63.998(d)(1)(ii)(A)]

(ii) Where a seal mechanism is used to comply with 40 CFR 63.983(a)(3)(ii), hourly records of flow are not required. In such cases, the permittee shall record that the monthly visual inspection of the seals or closure mechanisms has been done, and shall record the occurrence of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has been broken. [40 CFR 63.998(d)(1)(ii)(B)]

(3) When a leak is detected as specified in 40 CFR 63.983(d)(2). These records shall be kept for 5 years. [40 CFR 63.998(d)(1)(iii)]

(i) The instrument and equipment identification number and the operator name, initials, or identification number. [40 CFR 63.998(d)(1)(iii)(A)]

(ii) The date the leak was detected and the date of the first attempt to repair the leak. [40 CFR 63.998(d)(1)(iii)(B)]

(iii) The date of successful repair of the leak. [40 CFR 63.998(d)(1)(iii)(C)]

(iv) The maximum instrument reading measured by the procedures in 40 CFR 63.983(c) after the leak is successfully repaired or determined to be nonrepairable. [40 CFR 63.998(d)(1)(iii)(D)]

(v) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 days after discovery of the leak. The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. [40 CFR 63.998(d)(1)(iii)(E)]

(vi) Copies of the Periodic Reports as specified in 40 CFR 63.999(c), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.998(d)(1)(iii)(F)]

(4) For each instrumental or visual inspection conducted in accordance with 40 CFR 63.983(b)(1) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 63.998(d)(iv)]

e. For each flow event from a bypass line subject to the requirements 63.2450(e)(6), the permittee must maintain records sufficient to determine whether or not the detected flow included flow requiring control. For each flow event from a bypass line requiring control that is released either directly to the atmosphere or to a control device not meeting the requirements specified in Tables 1 through 7 to 40 CFR 63, Subpart FFFF, the permittee must include an estimate of the volume of gas, the concentration of organic HAP in the gas and the resulting emissions of organic HAP that bypassed the control device using process knowledge and engineering estimates. [40 CFR 63.2525(n)

Storage Vessels

f. For all Group 2 storage vessels, a record shall be kept for as long as the liquid is stored of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored. [40 CFR 63.1065(a)]

Process Wastewater Streams

g. For the Group 1 wastewater stream transferred in accordance with 40 CFR 63.132(g), the permittee shall keep a record of the notice sent to the treatment operator stating that the wastewater stream contains organic hazardous air pollutants which are required to be managed and treated in accordance with the provisions of 40 CFR 63 Subpart G. [40 CFR 63.147(a)]

h. For the Group 2 wastewater streams, the permittee shall keep in a readily accessible location the following records. [40 CFR 63.147(b)(8) and 40 CFR 63.147(f)]

(1) Process unit identification and description of the process unit. [40 CFR 63.147(b)(8)(i)]

(2) Stream identification code. [40 CFR 63.147(b)(8)(ii)]

(3) The concentration of the compound(s) in Tables 8 and 9 of 40 CFR 63, Subpart FFFF in parts per million, by weight, including documentation of the methodology used to determine concentration. [40 CFR 63.147(b)(8)(iii)]

(4) Flow rate in liter per minute. [40 CFR 63.147(b)(8)(iv)]

(5) If the permittee uses process knowledge to determine the annual average concentration of a wastewater stream as specified in 40 CFR 63.144(b)(3) and/or uses process knowledge to determine the annual average flow rate as specified in 40 CFR 63.144(c)(1), and determines that the wastewater stream is not a Group 1 wastewater stream, the permittee shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

average concentration and/or the annual average flow rate of the wastewater stream. [40 CFR 63.147(f)]

i. Refer to **4. Specific Monitoring Requirements** for Process Wastewater Streams

Equipment Leaks

j. The permittee shall comply with the recordkeeping requirements for the equipment in the Polymerization, Saponification, Polyrectification, AAR, Tank Farm, and Loading Areas in one recordkeeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records required by 40 CFR 63.181 shall be maintained in a manner that can be readily accessed at the plant site. [40 CFR 63.181(a)]

k. Except as provided in 40 CFR 63.181(e), and amended by 40 CFR 63.2480(f)(18), the following information pertaining to all equipment in each process unit subject to the requirements in 40 CFR 63.162 through 40 CFR 63.174 shall be recorded: [40 CFR 63.181(b)]
   (1) The permittee shall keep the following records: [40 CFR 63.181(b)(1)]
      (i) A list of identification numbers for equipment (except connectors exempt from monitoring and recordkeeping identified in 40 CFR 63.174 and instrumentation systems). Connectors need not be individually identified if all connectors in a designated area or length of pipe subject to the provisions of 40 CFR 63, Subpart H are identified as a group, and the number of connectors subject is indicated. Pursuant to 40 CFR 63.2480(b)(3), as an existing source under 40 CFR 63, Subpart FFFF the permittee is not required to develop an initial list of identification numbers for connectors. 40 CFR 63.181(b)(1)(i)
      (ii) A schedule by process unit for monitoring connectors subject to 40 CFR 63.174(a) and valves subject to 40 CFR 63.168(d). 40 CFR 63.181(b)(1)(ii)
      (iii) Physical tagging of the equipment to indicate that it is in organic HAP service is not required. Equipment subject to the provisions of subpart may be identified on a plant site plan, in log entries, or by other appropriate methods. 40 CFR 63.181(b)(1)(iii)

   (2) The permittee shall keep the following records: [40 CFR 63.181(b)(2)]
      (i) A list of identification numbers for equipment that the permittee elects to equip with a closed-vent system and control device, under the provisions of 40 CFR 63.163(g), 40 CFR 63.164(h), 40 CFR 63.2480(e)(4), or 40 CFR 63.173(f). [40 CFR 63.181(b)(2)(i)]
      (ii) A list of identification numbers for compressors that the permittee elects to designate as operating with an instrument reading of less than 500 parts per million above background, under the provisions of 40 CFR 63.164(i). [40 CFR 63.181(b)(2)(ii)]
   (3) A list of identification numbers for pressure relief devices subject to 40 CFR 63.2480(e)(1) and for pressure relief devices equipped with rupture disks, under the provisions of 40 CFR 63.2480(e)(ii) and (iii). [40 CFR 63.181(b)(3) and 40 CFR 63.2480(f)(10)(iii) and (iv)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(4) Identification of instrumentation systems subject to 40 CFR 63, Subpart H. Individual components in an instrumentation system need not be identified. [40 CFR 63.181(b)(4]

(5) Identification of screwed connectors subject to 40 CFR 63.174(c)(2). Identification can be by area or grouping as long as the total number within each group or area is recorded. 40 CFR 63.181(b)(5)]

(6) The following information shall be recorded for each dual mechanical seal system: [40 CFR 63.181(b)(6)]

(i) Design criteria required in 40 CFR 63.163(e)(6)(i), 40 CFR 63.164(e)(2), and 40 CFR 63.173(d)(6)(i) and an explanation of the design criteria; and [40 CFR 63.181(b)(6)(i)]

(ii) Any changes to these criteria and the reasons for the changes. [40 CFR 63.181(b)(6)(ii)]

(7) The following information pertaining to all pumps subject to 40 CFR 63.163(j), valves subject to 40 CFR 63.168(h and i), agitators subject to 40 CFR 63.173(h through j), and connectors subject to 40 CFR 63.174(f and g) shall be recorded: [40 CFR 63.181(b)(7)]

(i) Identification of equipment designated as unsafe to monitor, difficult to monitor, or unsafe to inspect and the plan for monitoring or inspecting this equipment. [40 CFR 63.181(b)(7)(i)]

(ii) A list of identification numbers for the equipment that is designated as difficult to monitor, an explanation of why the equipment is difficult to monitor, and the planned schedule for monitoring this equipment. [40 CFR 63.181(b)(7)(ii)]

(iii) A list of identification numbers for connectors that are designated as unsafe to repair and an explanation why the connector is unsafe to repair. [40 CFR 63.181(b)(7)(iii)]

(8) The permittee shall keep the following records:[40 CFR 63.181(b)(8)]

(i) A list of valves removed from and added to the process unit, as described in 40 CFR 63.168(e)(1), if the net credits for removed valves is expected to be used. :[40 CFR 63.181(b)(8)(i)]

(ii) A list of connectors removed from and added to the process unit, as described in 40 CFR 63.174(i)(1), and documentation of the integrity of the weld for any removed connectors, as required in 40 CFR 63.174(j). This is not required unless the net credits for removed connectors is expected to be used. :[40 CFR 63.181(b)(8)(ii)]

(9) For any leaks detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168; and 40 CFR 63.172 through 40 CFR 63.174, a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. [40 CFR 63.181(b)(10)]

l. For visual inspections of equipment subject to the provisions of 40 CFR 63.163(b)(3) and 40 CFR 63.163(e)(4)(i), the permittee shall document that the inspection was conducted and the date of the inspection. The owner or operator shall maintain records as specified in 40 CFR 60.181(d) for leaking equipment identified in this inspection. These records shall be retained for 2 years. [40 CFR 63.181(c)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

m. When a leak is detected, the following information shall be recorded and kept for two years. [40 CFR 63.181(d)]
   (1) The instrument and the equipment identification number and the operator name, initials, or identification number. [40 CFR 63.181(d)(1)]
   (2) The date the leak was detected and the date of first attempt to repair the leak. [40 CFR 63.181(d)(2)]
   (3) The date of successful repair of the leak. [0 CFR 63.181(d)(3)]
   (4) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonrepairable. [40 CFR 63.181(d)(4)]
   (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. [40 CFR 63.181(d)(5)]
      (i) The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.
      (ii) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
   (6) Dates of process unit shutdowns that occur while the equipment is unrepaired. [40 CFR 63.181(d)(6)]
   (7) The permittee shall comply with the following: [40 CFR 63.181(d)(7)]
      (i) Identification, either by list, location (area or grouping), or tagging of connectors that have been opened or otherwise had the seal broken since the last monitoring period required in 40 CFR 63.174(b), as described in 40 CFR 63.174(c)(1), unless the permittee elects to comply with 40 CFR 63.174(c)(1)(ii). [40 CFR 63.181(d)(7)(i)]
      (ii) The date and results of monitoring as required in 40 CFR 63.174(c). If identification of connectors that have been opened or otherwise had the seal broken is made by location under 40 CFR 63.181(d)(7)(i), then all connectors within the designated location shall be monitored. [[40 CFR 63.181(d)(7)(ii)]
   (8) Copies of the periodic reports as specified in 40 CFR 63.182(d), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.181(d)(9)]

n. If the permittee elects to comply with the pressure testing requirements in accordance with **2. Emission Limitations a.(14),** the permittee is exempt from the requirements of paragraphs j, k, l and n of this section. Instead, the permittee shall maintain records as specified in 40 CFR 63.181(e)(1 through 6). [40 CFR 63.178(b)]

o. The results of compliance tests required for compressors and the dates and results of monitoring following a pressure relief valve pressure release subject to 40 CFR 63.2480(e)(1) and (2) shall be recorded. The results shall include: [40 CFR 63.181(f) and 40 CFR 63.2480(f)(18)(v)]
   (1) The background level measured during each compliance test. [40 CFR 63.181(f)(1)]
   (2) The maximum instrument reading measured at each piece of equipment during each compliance test. [40 CFR 63.181(f)(2)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

p. The permittee shall maintain records required for closed-vent systems and control devices subject to 40 CFR 63.172. [40 CFR 63.181(g)]
   (1) The design specifications and performance demonstrations specified in 40 CFR 63.181(g)(1)(i through iv) shall be retained for the life of the equipment. [40 CFR 63.181(g)(1)]
      (i) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams. [40 CFR 63.181(g)(1)(i)]
      (ii) The dates and descriptions of any changes in the design specifications. [40 CFR 63.181(g)(1)(ii)]
      (iii) Except as specified in 40 CFR 63.108(a), the flare design (i.e., steam-assisted, air-assisted, or non-assisted) and the results of the compliance demonstration required by 40 CFR 63.11(b) of 40 CFR 63 Subpart A. [40 CFR 63.181(g)(1)(iii)]
      (iv) A description of the parameter or parameters monitored, as required in 40 CFR 63.172(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. [40 CFR 63.181(g)(1)(iv)]
   (2) Records of operation of closed-vent systems and control devices, as specified in 40 CFR 63.181(g)(2)(i through iii) shall be retained for 2 years. [40 CFR 63.181(g)(2)]
      (i) Dates and durations when the closed-vent systems and control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170 are not operated as designed as indicated by the monitored parameters, including periods when a flare pilot light system does not have a flame. [40 CFR 63.181(g)(2)(i)]
      (ii) Dates and durations during which the monitoring system or monitoring device is inoperative. [40 CFR 63.181(g)(2)(ii)]
      (iii) Dates and durations of start-ups and shutdowns of control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170. [40 CFR 63.181(g)(2)(iii)]
   (3) Records of inspections of closed-vent systems subject to the provisions of 40 CFR 63.172, as specified in 40 CFR 63.181(g)(3)(i and ii) shall be retained for 2 years. [40 CFR 63.181(g)(3)]
      (i) For each inspection conducted in accordance with the provisions of 40 CFR 63.172(f)(1) or (f)(2) during which no leaks were detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 63.181(g)(3)(i)]
      (ii) For each inspection conducted in accordance with 40 CFR 63.172(f)(1 or 2) during which leaks were detected, the information specified in 40 CFR 63.181(d) shall be recorded. [40 CFR 63.181(g)(3)(ii)]

q. If the permittee implements any of the quality improvement programs required by 40 CFR 63.175 or 40 CFR 63.176, the records specified in 40 CFR 63.181(h) shall be maintained for a period of the quality improvement plan for the process unit. [40 CFR 63.181(h)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

r. For each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.2480(e), the permittee must keep the records specified in 40 CFR 63.2525(q) (1) – (3). [40 CFR 63.2525(q)]
   (1) Records of the prevention measures implemented as required in 40 63.2480(e)(3)(ii).
   (2) Records of the number of releases during each calendar year and the number of those releases for which the root cause was determined to be a force majeure event. Keep these records for the current calendar year and the past 5 calendar years.
   (3) For each release to the atmosphere, the permittee must keep the records specified in 40 CFR 63.2525(q)(3)(i) – (iv).
      (i) The start and end time and date of each pressure release to the atmosphere; [40 CFR 63.2525(q)(3)(i)]
      (ii) Records of any data, assumptions, and calculations used to estimate of the mass quantity of each organic HAP released during the event; [40 CFR 63.2525(q)(3)(ii)]
      (iii) Records of the root cause analysis and corrective action analysis conducted as required in 40 CFR 63.2480(e)(3)(iii), including an identification of the affected facility, a statement noting whether the event resulted from the same root cause(s) identified in a previous analysis and either a description of the recommended corrective action(s) or an explanation of why corrective action is not necessary under 40 CFR 63.2480(e)(7)(i); [40 CFR 63.2525(q)(3)(iii)]
      (iv) For any corrective action analysis for which implementation of corrective actions are required in 40 CFR 63.2480(e)(7), a description of the corrective action(s) completed within the first 45 days following the discharge and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates. [40 CFR 63.2525(q)(3)(iv)]

All Process Equipment

s. "Continuous record" is defined as any documentation, either in hard copy or computer readable form, of data values measured at least once every 15 minutes and recorded at the frequency specified in 40 CFR 63.998(b) except that periods of startup, shutdown and malfunction shall not be excluded per 40 CFR 63.2450(e)(4)(vii). [40 CFR 63.981]

t. Where 40 CFR 63, Subpart SS, requires a continuous record, the owner or operator shall maintain a record as specified in 40 CFR 63.998(b)(1), as applicable: [40 CFR 63.998(b)(1)]
   (1) A record of values measured at least once every 15 minutes or each measured value for systems which measure more frequently than once every 15 minutes; or [40 CFR 63.998(b)(1)(i)]
   (2) A record of block average values for 15-minute or shorter periods calculated from all measured data values during each period or from at least one measured data value per minute if measured more frequently than once per minute. [40 CFR 63.998(b)(1)(ii)]
   (3) Where data is collected from an automated continuous parameter monitoring system, the owner or operator may calculate and retain block hourly average values from each 15-minute block average period or from at least one measured value per minute if measured more frequently than once per minute, and discard all but the

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

most recent three valid hours of continuous (15-minute or shorter) records, if the hourly averages do not exclude periods of CPMS breakdown or malfunction. An automated CPMS records the measured data and calculates the hourly averages through the use of a computerized data acquisition system. [40 CFR 63.998(b)(1)(iii)]

(4) A record as required by an alternative approved under a referencing subpart. [40 CFR 63.998(b)(1)(iv)]

Maintenance Vents

u. For maintenance vent openings subject to 40 CFR 63.2450(v), the permittee must keep record the following information, as applicable. [40 CFR 63.2525(p)]

(1) Maintain standard site procedures used to deinventory equipment for safety purposes to document the procedures used to meet the requirements in 40 CFR 63.2450(v). The current copy of the procedures must be retained and available on-site at all times. Previous versions of the standard site procedures, as applicable, must be retained for five years. [40 CFR 63.2525(p)(1)]

(2) If complying with the requirements of 40 CFR 63.2450(v)(1)(i), and the lower explosive limit at the time of the vessel opening exceeds 10 percent, identification of the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, and the lower explosive limit at the time of the vessel opening. [40 CFR 63.2525(p)(2)]

(3) If complying with the requirements of 40 CFR 63.2450(v)(1)(ii) and either the vessel pressure at the time of the vessel opening exceeds 5 psig or the lower explosive limit at the time of the active purging was initiated exceeds 10 percent, identification of the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, the pressure of the vessel or equipment at the time of discharge to the atmosphere and, if applicable, the lower explosive limit of the vapors in the equipment when active purging was initiated. [40 CFR 63.2525(p)(3)]

(4) If complying with the requirements of 40 CFR 63.2450(v)(1)(iii), records of the estimating procedures used to determine the total quantity of VOC in the equipment and the type and size limits of equipment that contain less than 50 pounds of VOC at the time of maintenance vent opening. For each maintenance vent opening that contains greater than 50 pounds of VOC for which the deinventory procedures specified in 40 CFR 63.2525(p)(1) are not followed or for which the equipment opened exceeds the type and size limits established in the records specified in this condition, records that identify the maintenance vent, the process units or equipment associated with the maintenance vent, the date of maintenance vent opening, and records used to estimate the total quantity of VOC in the equipment at the time the maintenance vent was opened to the atmosphere. [40 CFR 63.2525(p)(4)]

(5) If complying with the requirements of 40 CFR 63.2450(v)(1)(iv), identification of the maintenance vent, the process units or equipment associated with the maintenance vent, records documenting actions taken to comply with other applicable alternatives and why utilization of this alternative was required, the date of maintenance vent opening, the equipment pressure and lower explosive limit of

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

the vapors in the equipment at the time of discharge, an indication of whether active purging was performed and the pressure of the equipment during the installation or removal of the blind if active purging was used, the duration the maintenance vent was open during the blind installation or removal process, and records used to estimate the total quantity of VOC in the equipment at the time the maintenance vent was opened to the atmosphere for each applicable maintenance vent opening. [40 CFR 63.2525(p)(5)]

**6. Specific Reporting Requirements:**

a. For equipment subject to 40 CFR 63, Subpart FFFF the permittee must submit a Compliance report containing the information specified in 40 CFR 63.2520(e)(1 through 10), semiannually. [40 CFR 63.2520(b) and 40 CFR 63, Subpart FFFF, Table 11]

b. The permittee must submit a precompliance report as specified in 40 CFR 63.2520(c)(1 through c) at least 6 months prior for new sources, with an application for approval of construction or reconstruction. [40 CFR 63.2520(b) and 40 CFR 63, Subpart FFFF, Table 11]

c. ***Compliance report.*** The compliance report must contain the information specified in 40 CFR 63.2520(e)(1) through (17). On and after August 12, 2023 or once the reporting template for this subpart has been available on the CEDRI website for 1 year, whichever date is later, you must submit all subsequent reports following the procedure specified in 40 CFR 63.9(k), except any medium submitted through mail must be sent to the attention of the Miscellaneous Organic Chemical Manufacturing Sector Lead. You must use the appropriate electronic report template on the CEDRI website (*https://www.epa.gov/electronic-reporting-air-emissions/cedri*) for this subpart. The date report templates become available will be listed on the CEDRI website. Unless the Administrator or delegated state agency or other authority has approved a different schedule for submission of reports under 40 CFR 63.9(i) and 40 CFR 63.10(a) of subpart A, the report must be submitted by the deadline specified in this subpart, regardless of the method in which the report is submitted. [40 CFR 63.2520(e)]

Continuous Process Vents and Closed Vent Systems

d. The permittee shall furnish reports as specified in **6. Specific Reporting Requirements** for the FLARE in **Section B**, EP-F01.

e. The permittee shall submit Periodic reports that shall include the reporting period dates, the total source operating time for the reporting period, and, as applicable, all information specified in 40 CFR 63.999 and in 40 CFR 63, Subpart FFFF including reports of periods when monitored parameters are outside their established ranges. [40 CFR 63.999(c)(1)]

f. The permittee shall submit, as part of the periodic report: [40 CFR 63.999(c)(2)]
   (1) The information recorded in 40 CFR 63.998(d)(1)(iii)(B through E); [40 CFR 63.999(c)(2)(i)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) Reports of the times of all periods recorded under 40 CFR 63.998(d)(1)(ii)(A) when the vent stream is diverted from the flare through a bypass line; and [40 CFR 63.999(c)(2)(ii)]
(3) Reports of all times recorded under 40 CFR 63.998(d)(1)(ii)(B) when maintenance is performed in car-sealed valves, when the seal is broken, when the bypass line valve position is changed, or the key for a lock-and-key type configuration has been checked out. [40 CFR 63.999(c)(2)(iii)]

g. Bypass lines must include in the compliance report the start date, start time, duration in hours, estimate of the volume of gas in standard cubic feet, the concentration of organic HAP in the gas in parts per million by volume and the resulting mass emissions of organic HAP in pounds that bypass a control device. For periods when the flow indicator is not operating, report the start date, start time, and duration in hours. [40 CFR 63.2520(e)(12)]

Equipment Leaks

h. Compliance reports for pressure relief devices subject to the requirements 40 CFR 63.2480(e) must include the information specified in 40 CFR 63.2520(e)(15)(i) through (iii). [40 CFR 63.2520(e)(15)]
(1) For pressure relief devices in organic HAP gas or vapor service, pursuant to 40 CFR 63.2480(e)(1), report the instrument readings and dates for all readings of 500 ppmv or greater. 40 CFR 63.2520(e)(15)(i)]
(2) For pressure relief devices in organic HAP gas or vapor service subject to 40 CFR 63.2480(e)(2), report the instrument readings and dates of instrument monitoring conducted. 40 CFR 63.2520(e)(15)(ii)]
(3) For pressure relief devices in organic HAP service subject to 40 CFR 63.2480(e)(3), report each pressure release to the atmosphere, including the start date, start time, and duration in minutes of the pressure release and an estimate of the mass quantity in pounds of each organic HAP released; the results of any root cause analysis and corrective action analysis completed during the reporting period, including the corrective actions implemented during the reporting period; and, if applicable, the implementation schedule for planned corrective actions to be implemented subsequent to the reporting period. 40 CFR 63.2520(e)(15)(iii)]

Maintenance Vents

i. The permittee must submit, as part of the compliance report for any maintenance vent release exceeding the applicable limits in 40 CFR 63.2450(v)(1), the items specified in 40 CFR 63.2520(e)(14)(i)-(iv). For any maintenance vent release complying with 40 CFR 63.2450(v)(1)(iv), report an explanation for any event as to why utilization of this alternative was required. [40 CFR 63.2520(e)(14)]

**7. Specific Control Equipment Operating Conditions:**

Continuous Process Vents

a. The FLARE (EP F01) shall be in operation at all times the emission units that vent to the FLARE are operating. Refer to **Section B** for EP-F01. [40 CFR 63.11(b)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

b. The permittee must be in compliance with the emission limits and work practice standards in Tables 1 through 7 to 40 CFR 63, Subpart FFFF at all times, and the permittee must meet the requirements specified in 40 CFR 63.2455 through 40 CFR 63.2490 (or the alternative means of compliance in 40 CFR 63.2495, 40 CFR 63.2500, or 40 CFR 63.2505), except as specified in paragraphs (b) through (v) of 40 CFR 63.2450. The permittee must meet the notification, reporting, and recordkeeping requirements specified in 40 CFR 63.2515, 40 CFR 63.2520, and 40 CFR 63.2525. [40 CFR 63.2450]

**8. Alternate Operating Scenarios:**

a. For the equipment leaks subject to 40 CFR 63, Subpart FFFF, the permittee may comply with one of the following requirements: [40 CFR 63.2480(a) and Table 6 to 40 CFR 63, Subpart FFFF]
   (1) 40 CFR 63, Subpart UU and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f);
   (2) 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f); or
   (3) 40 CFR 65, Subpart F and the requirements referenced therein, except as specified in 40 CFR 63.2480(c) and (d)-(f).

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## WEDCO AREA

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **W01-02** | W01<br>W02 | **Description: Product Grinding**<br>Description: Dry material pneumatic handling and grinding of PVOH product. Two product separation cyclones (FC-5203 and FC-5205) for transfer to hoppers/grinders and recycle, and product separation baghouse (FD-5204) for enhanced material recycle (W-01). Product separation baghouse (FD-5207) for transfer to screener (W-02). Outlet grain loading 0.005 gr/dscf<br>Maximum Processing Rate: 8,000 lbs/hr<br>Construction Date: 2024<br>Control Device: N/A |
| **W04-05** | W04<br>W05 | **Description: Product Grinding**<br>Description: Dry material pneumatic handling and grinding of PVOH product. Two product separation cyclones (FC-5253 and FC-5255) for transfer to hoppers/grinders and recycle, and product separation baghouse (FD-5254) for enhanced material recycle (W-04). Product separation baghouse (FD-5257) for transfer to screener (W-05). Outlet grain loading 0.005 gr/dscf<br>Maximum Processing Rate: 8,000 lbs/hr<br>Construction Date: 2024<br>Control Device: N/A |
| **W07-08** | W07<br>W08 | **Description: Product Grinding**<br>Description: Dry material pneumatic handling and grinding of PVOH product. Two product separation cyclones (FC-5403 and FC-5405) for transfer to hoppers/grinders and recycle, and product separation baghouse (FD-5404) for enhanced material recycle (W-07). Product separation baghouse (FD-5407) for transfer to screener (W-08). Outlet grain loading 0.005 gr/dscf<br>Maximum Processing Rate: 8,000 lbs/hr<br>Construction Date: 2022<br>Control Device: N/A |
| **W10-12** | W10<br>W11<br>W12 | **Description: Product Grinding**<br>Description: Dry material pneumatic handling and grinding of PVOH product.<br>Product separation baghouses for transfer to hopper/grinders FD-5630 (W-10), transfer to screener FD-5632 (W-11) and recycle FD-5631 (W-12). Outlet grain loading 0.005 gr/dscf<br>Maximum Processing Rate: 8,000 lbs/hr<br>Construction Date: 2021<br>Control Device: NA |
| **W14** | | **Description: Final Product Silos #1-#4**<br>Description: Final product storage<br>Maximum Processing Rate: 18,000 lbs/hr each<br>Construction Date: 1959<br>Control Device: Silo #1, #2, #3, and #4Vent Filters, 99.6% control efficiency<br>Construction Date: 1978 |
| | W14 | Final Product Silo #1, FB-5701<br>Control Device: Silo #1 Vent Filter, FD-5704 |
| | W15 | Final Product Silo #2, FB-5702<br>Control Device: Silo #2 Vent Filter, FD-5705 |
| | W16 | Final Product Silo #3, FB-5703<br>Control Device: Silo #3 Vent Filter, FD-5706 |
| | W17 | Final Product Silo #4, FB-5704<br>Control Device: Silo #4 Vent Filter, FD-5707 |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **W18-25** | | **Intermediate Product Silos #7 - #14**<br>Description: SAP Area product storage<br>Maximum Processing Rate: 18,000 lbs/hr each<br>Construction Date: 1959<br>Control Device: Silo #7, #8, #9, #10, #11, #12, #13 and #14 Vent Filters, 99.6% control efficiency<br>Construction Date: 1978 |
| | W18 | Intermediate Product Silo #7, FB-5707<br>Control Device: Silo #7 Vent Filter, FD-5708 |
| | W19 | Intermediate Product Silo #8, FB-5708<br>Control Device: Silo #8 Vent Filter, FD-5709 |
| | W20 | Intermediate Product Silo #9, FB-5709<br>Control Device: Silo #9 Vent Filter, FD-5710 |
| | W21 | Intermediate Product Silo #10, FB-5710<br>Control Device: Silo #10 Vent Filter, FD-5711 |
| | W22 | Intermediate Product Silo #11, FB-5711<br>Control Device: Silo #11 Vent Filter, FD-5712 |
| | W23 | Intermediate Product Silo #12, FB-5712<br>Control Device: Silo #12 Vent Filter, FD-5713 |
| | W24 | Intermediate Product Silo #13, FB-5713<br>Control Device: Silo #13 Vent Filter, FD-5714 |
| | W25 | Intermediate Product #14**,** FB-5714<br>Control Device: Silo #14 Vent Filter, FD-5715 |
| **W26-28** | | **Description: Final Product Silos #15, #16 &#17**<br>Maximum Processing Rate: 18,000 lbs/hr each<br>Construction Date: 1985<br>Control Device: Silo #15, #16 and #17 Pulse Jet Bin Vent Filters, 99.6% control efficiency<br>Construction Date: 1985 |
| | W26 | Final Product Silo #15, FB-5715<br>Control Device: Silo #15 Pulse Jet Bin Vent Filter, FD-5739 |
| | W27 | Final Product Silo #16, FB-5716<br>Control Device: Silo #16 Pulse Jet Bin Vent Filter, FD-5740 |
| | W28 | Final Product Silo #17, FB-5717<br>Control Device: Silo #17 Pulse Jet Bin Vent Filter, FD-5741 |
| **W29** | W29 | **PVOH Bulk Loading - Railcar**<br>Maximum Processing Rate: 36,000 lbs/hr<br>Construction Date: 1985<br>Control Device: Bulk Loading Baghouse, FD-5716, 99.6% control efficiency<br>Construction Date: 1985 |
| **W30** | W30 | **PVOH Bulk Unloading**<br>Maximum Processing Rate: 7,200 lbs/hr<br>Construction Date: 1985<br>Control Device: Bulk Unloading Baghouse, FD-5718, 99.6% control efficiency<br>Construction Date: 1985 |
| **W32** | W32 | **Bulk Loading/Unloading Fugitives**<br>Maximum Processing Rate: 3,548 lbs/hr |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **W33** | W33 | **Bagging Operation: Filling - Sackmatic**, PA-5716<br>Description: Filling Operation<br>Maximum Processing Rate: 900 lbs/hr<br>Construction Date: 1978<br>Control Measure: Bag cinching around loading spout |
| **W34** | W34 | **Bagging Hopper**, FB-5723<br>Description: PVOH Filling Operation<br>Maximum Processing Rate: 30,000 lbs/hr<br>Construction Date: 1978<br>Control Device: Bagging Hopper Dust Collector, FD-5759, 99.6% control efficiency<br>Construction Date: 1978 |
| **W36** | W36 | **Bagging Area Fugitives**<br>Maximum Processing Rate: 30,000 lbs/hr |
| **W37** | W37 | **North Bulk Truck Loading Station**<br>Description: Loading from Silos #1 and #4 and the bagging hopper<br>Maximum Processing Rate: 100,000 lb/hr<br>Construction Date: 2003<br>Control Device: 40" Trailer Mounted Filter Canister, 99.6% control efficiency for PM |
| **W38** | W38 | **South Bulk Truck Loading Station**<br>Description: Loading from Silos #15-17<br>Maximum Processing Rate: 100,000 lb/hr<br>Construction Date: 2003<br>Control Device: 40" Trailer Mounted Filter Canister, 99.6% control efficiency for PM |

**APPLICABLE REGULATIONS:**
401 KAR 59:010, New Process Operations

401 KAR 63:010, Fugitive Emissions

**STATE-ORIGIN REQUIREMENTS:**
401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances

**PRECLUDED REGULATIONS**:
Refer to **Section B**, **Group Requirements.**

1. **Operating Limitations:**
   a. The particulate control devices shall be in operation at all times any emission unit at EU W14-W28, W29, W30 W33, W34, W37 or W38 are operating. [401 KAR 52:020, Section 10]

   **Compliance Demonstration Method:**
   Refer to **Section B, Group Requirements**.

   b. A person shall not cause, suffer, or allow any material to be handled, processed, transported, or stored; a building or its appurtenances to be constructed, altered, repaired,

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

or demolished; or a road to be used without taking reasonable precaution to prevent particulate matter from becoming airborne. Reasonable precautions shall include, as applicable: [401 KAR 63:010, Section 3(1)]

(1) Use, if possible, of water or suitable chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land; [401 KAR 63:010, Section 3(1)(a)]
(2) Application and maintenance of asphalt, oil, water, or suitable chemicals on roads, materials stockpiles, and other surfaces which can create airborne dusts; [401 KAR 63:010, Section 3(1)(b)]
(3) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials, or the use of water sprays or other measures to suppress the dust emissions during handling. Adequate containment methods shall be employed during sandblasting or other similar operations. [401 KAR 63:010, Section 3(1)(c)]
(4) Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; [401 KAR 63:010, Section 3(1)(d)]
(5) The maintenance of paved roadways in a clean condition; or [401 KAR 63:010, Section 3(1)(e)]
(6) The prompt removal of earth or other material from a paved street which earth or other material has been transported thereto by trucking or earth moving equipment or erosion by water. [401 KAR 63:010, Section 3(1)(f)]

c. If dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance or to violate any administrative regulation, the secretary may, based on the cause, type, or amount of a fugitive emission, order that the building or equipment in which processing, handling and storage are done be tightly closed and ventilated in such a way that all air and gases and air or gas borne material leaving the building or equipment are treated by removal or destruction of air contaminants before discharge to the open air. [401 KAR 63:010, Section 3(3)]

d. At all times while in motion, open bodied trucks, operating outside company property, transporting materials likely to become airborne shall be covered. [401 KAR 63:010, Section 4(1)]

e. A person shall not cause, suffer, or allow earth or other material being transported by truck or earth moving equipment to be deposited onto a paved street or roadway. [401 KAR 63:010, Section 4(3)]

**2. Emission Limitations:**

a. Emissions of particulate matter (PM) from each EP W01-W02, W04-W05, W07-08, W10-12, W14-W28, W29, W30, W33, W34, W37 and W38 shall not exceed the values listed below: [401 KAR 59:010, Section 3(2)]

$$E = 3.59(P)^{0.62}$$ where

E = Allowable Emission Rate in lbs/hr and P = Process Weight Rate in tons/hr

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

b. For each emission unit EP W01-W02, W04-W05, W07-08, W10-12, W14-W28, W29, W30, W33, W34, W37 and W38, no person shall cause, suffer, allow or permit any continuous emissions into the open air from a control device or stack associated facility which is equal to or greater than twenty (20) percent opacity. [401 KAR 59:010, Section 3(1)(a)]

c. For 401 KAR 63:020 requirements, refer to **Section D.4.**

d. A person shall not cause, suffer, or allow visible fugitive dust emissions beyond the lot line of the property on which the emissions originate, as determined by Reference Method 22 of Appendix A in 40 C.F.R. Part 60, for: [401 KAR 63:010, Section 3(2)]
   (1) More than five (5) minutes of emission time during any sixty (60) minute observation period; or [401 KAR 63:010, Section 3(2)(a)]
   (2) More than twenty (20) minutes of emission time during any twenty-four (24) hour period. [401 KAR 63:010, Section 3(2)(b)]

**Compliance Demonstration Method:**

a. The permittee shall monitor the amount of process weight added to each emissions unit. The process weight rate shall be determined by dividing the tons of material added to each emission unit in a calendar month by the total hours the unit operated that month. Average particulate matter (PM) emissions shall be calculated as follows:

Controlled PM Emissions = PR x EF x (1 – CE/100) Where:

PR = PVOH Production Rate for the emission point (tons/hr)
EF = Emission Factor (lbs PM / ton PVOH produced)
CE = Control Efficiency (%)

b. For compliance with the opacity limit, refer to **4. Specific Monitoring Requirements**.

c. If an emissions unit at EU W14-W30, W33, W34, W37 or W38 is in operation during any period of malfunction of the particulate control device, the permittee shall shut down the affected emission unit until associated repairs are complete and take the necessary corrective actions in accordance with **5. Specific Recordkeeping Requirements d.**

**3. Testing Requirements:**

Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1].

**4. Specific Monitoring Requirements:**

a. The permittee shall also perform the following monitoring: [401 KAR 52:020, Section 10]
   (1) A qualitative visual observation of the opacity of emissions once each calendar month while operating each emission unit at EU W01-W02, W04-W05, W07-08, W10-12, W14-W28, W29, W30, W33, W34, W37 and W38. For W14-W28, the visible observation must be conducted when product is being loaded into the silos.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

If visible emissions are seen (not including condensed water vapor within the plume), the permittee shall determine the opacity using U.S. EPA Reference Method 9. In lieu of determining the opacity using U.S. EPA Reference Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume).

(2) The pressure drop across each dust collector once each calendar month.

(3) The information specified in **5. Specific Recordkeeping Requirements**.

b. Refer to **7. Specific Control Equipment Operating Conditions**.

c. The permittee shall monitor the reasonable precautions taken to prevent particulate matter from becoming airborne on a daily basis. [401 KAR 52:020, Section 10]

d. If fugitive dust emissions beyond the lot line of the property are observed, the permittee shall conduct Reference Method 22 (visual determination of fugitive emissions) observations per Appendix A of 40 C.F.R. Part 60. In lieu of conducting U.S. EPA Reference Method 22, the permittee shall immediately perform a corrective action which results in no visible fugitive dust emissions beyond the lot line of the property.

e. See also 5. **Specific Recordkeeping Requirements** f.

**5. Specific Recordkeeping Requirements:**

a. The permittee shall maintain a log of the qualitative visual observations made as specified in **4. Specific Monitoring Requirements a.** including the date, time, initials of observer, whether any emissions were observed (yes/no), and any Method 9 readings taken**.** [401 KAR 52:020, Section 10]

b. The permittee shall maintain records of preventive maintenance and inspections of the particulate control devices in accordance with **7. Specific Control Equipment Operating Conditions. [**401 KAR 52:020, Section 10]

c. All records shall be maintained in accordance with **Section F.2.**

d. The permittee shall maintain a log of the reasonable precautions taken to prevent particulate matter from becoming airborne, on a daily basis. Notation of the operating status, down-time, or relevant weather conditions are acceptable for entry to the log. [401 KAR 52:020, Section 10]

e. The permittee shall maintain a log of the following: 401 KAR 52:020, Section 10

(1) Qualitative fugitive emissions observations conducted including the date, time, initials of observer, whether any fugitive dust emissions were observed,

(2) Any Reference Method 22 performed and field records identified in Reference Method 22.

(3) Any corrective action taken and the results.

f. The permittee shall monitor or calculate the throughput through each emission unit in the

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

WEDCO AREA. [401 KAR 52:020, Section 10]

**6. Specific Reporting Requirements:**

a. The permittee shall furnish reports as specified in **5. Specific Recordkeeping Requirements.**

b. Refer to **Section F.5.**

**7. Specific Control Equipment Operating Conditions:**

Preventive maintenance shall be performed, for all particulate control devices, in accordance with the manufacturers' recommendations. Each device shall be inspected monthly for proper operation of the following: [401 KAR 52:020, Section 10]

a. Pulse jet device to release dust cake from bags.

b. Air flow source and equipment.

c. Pressure drop measuring system.

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## ACETIC ACID RECOVERY (AAR) AREA

| | EU | Emission Unit/Point Description |
|---|---|---|
| **F01(2)** | A01-2: | **Description: East Methyl Acetate (MeAc) Extraction Tower** - Separates Mother Liquor from the SAP Unit to Methyl Acetate and Methanol. Receives MeAc from Tank Farm supplied via railcars/tank trucks as a supplemental feed stream to Mother Liquor Tank<br>Maximum Processing Rate: 53,000 lbs/hr<br>**Control Device:** FLARE, BA-5000 (EP-F01)<br>**HON Maintenance Wastewater Stream** |
| **F01(2C)** | *A01-2A* | East MeAc Extraction Tower (A01-2A), DA-5300 |
| | *A01-2B* | East MeAc Extraction Tower Condenser (A01-2B), EA-5310B |
| | *A01-2C* | East MeAc Extraction Tower Vent Condenser (A01-2C), EA-5341<br>**HON Group 1 Continuous Process Vent** |
| **F01(4B)** | A01-2D | East MeAc Extraction Tower Reflux Accumulator (A01-2D), FA-5331 (2,538 gal) |
| **A01** | A01 | **Description: East Methyl Acetate (MeAc) Extraction Tower Startups** |
| **F01(3)** | A02-3: | **Description: West Methyl Acetate (MeAc) Extraction Tower** - Separates Mother Liquor from the SAP Unit to Methyl Acetate and Methanol Receives MeAc from Tank Farm supplied via railcars/tank trucks as a supplemental feed stream to Mother Liquor tank.<br>Maximum Processing Rate: 85,000 lbs/hr<br>**Control Device:** FLARE, BA-5000 (EP-F01)<br>**HON Maintenance Wastewater Stream** |
| **F01(3C)** | *A02-3A* | West MeAc Extraction Tower (A02-3A), DA-5304 |
| | *A02-3B* | West MeAc Extraction Tower Condenser (A02-3B), EA-5313 |
| | *A02-3C* | West MeAc Extraction Tower Vent Condenser (A02-3C), EA-5339<br>**HON Group 1 Continuous Process Vent** |
| **F01(4B)** | A02-3D | West MeAc Extraction Tower Reflux Drum (A02-3D), FA-5309 (5,299 gallons) |
| **A02** | A02 | **Description: West Methyl Acetate (MeAc) Extraction Tower Startups** |
| **F01(4)** | A03-4: | **Description: Aldehyde Tower** - Processes MeAc Towers' Overheads. Receives MeAc from Tank Farm supplied via railcars/tank trucks as a supplemental feed stream to MeAc Towers' overheads.<br>Maximum Processing Rate: 120,000 lbs/hr<br>Control Device: FLARE, BA-5000 (EP-F01)<br>**HON Maintenance Wastewater Stream** |
| **F01(4B)** | *A03-4A* | Aldehyde Tower, DA-5302 |
| | *A03-4B* | Aldehyde Tower Condenser (A03-4A), EA-5308<br>**HON Group 1 Continuous Process Vent** |
| | *A03-4C* | Aldehyde Tower Reflux Drum (A03-4C), FA-5311 (1,018 gallons) |
| **A03** | A03 | **Description: Aldehyde Tower Startups** |
| **F01(5)** | A04-5: | **Description: SAP Methanol Tower** - Separates MeAc Towers' Bottoms and Vinyl Extraction Tower Bottoms to Methanol and Water<br>Maximum Processing Rate: 100,000 lbs/hr<br>Control Device: FLARE, BA-5000 (EP F01)<br>**HON Group 2 Maintenance Wastewater Stream** |
| **F01(5A)** | *A04-5A* | SAP Methanol Tower (A04-5A), DA-5303<br>**HON Group 1 Continuous Process Vent**, **HON Group 2 Process Wastewater Stream** |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| | EU | Emission Unit/Point Description |
|---|---|---|
| | *A04-5B* | Methanol Reboiler (A04-5B), EA-5309A |
| | *A04-5C* | Methanol Reflux Drum (A04-5C), FA-5312 (9,000 gallons) |
| **A04** | A04 | **Description: SAP Methanol Tower Startups** |
| **F01(7B)** | A05-6A | **Description: Crude Acid Tower** - Processes Ion Exchange Reactors' Product Stream<br>Maximum Processing Rate: 100,000 lbs/hr<br>**Control Device:** FLARE, BA-5000 (EP F01)<br>**HON Maintenance Wastewater Stream** |
| | A05-6A | Crude Acid Tower (A05-6A), DA-5308 |
| | A05-6B | Crude Acid Condenser (A05-6B), EA-5328 |
| | A05-6C | Crude Acid Tower Reflux Accumulator (A05-6C), FA-5325 (1,183 gal) |
| | A05-6D, 6E & 6F | **Description: Three (3) Ion Exchange Reactors** - Processes Aldehyde Tower Bottoms to Methanol and Acetic Acid<br>**HON Maintenance Wastewater Stream** |
| | A05-6D | Ion Exchange Reactor (A05-6D), FA-5306A |
| | A05-6E | Ion Exchange Reactor (A05-6E), FA-5306B |
| | A05-6F | Ion Exchange Reactor (A05-6F), FA-5306E |
| **A05** | A05-6D, 6E &-6F | **Description: Three (3) Ion Exchange Reactors and Crude Acid Tower Startups** |
| **F01(7)** | A06-7: | **Description: Product Acid Tower** - Processes Crude Tower Bottoms to Acetic Acid<br>Maximum Processing Rate: 31,600 lbs/hr<br>**Control Device:** FLARE, BA-5000 (EP-F01)<br>**HON Maintenance Wastewater Stream** |
| **F01(7B)** | *A06-7A* | Product Acid Tower (A06-7A), DA-5309 |
| | *A06-7B* | Product Acid Tower Condenser (A06-7B), EA-5332<br>**HON Group 1 Continuous Process Vent** |
| | *A06-7C* | Product Acid Reflux Drum (A06-7C), FA-5328 (1,648 gallons) |
| | *A06-7D* | Sludge Still (A06-7D), FA-5319 |
| **A06** | A06 | **Description: Product Acid Tower Startups** |
| **A07** | A07 | Dilute Acid Tank Condenser, EA-5340 |
| **A07** | A07-01 | Dilute Acid Tank (A07-01), FA-5330 (10,000 gallons)<br>Maximum Throughput: 200,000 gallons/yr |
| **A08** | A08 | **Acetic Acid Rundown Tanks** (2)<br>Capacity: FA-5322B - 10,000 gal and FA-5322C - 10,000 gal<br>Maximum Throughput: 31,536,000 gallons/yr (total) |
| **A09** | A09 | **Equipment Leaks (AAR Process Unit Fugitives)**<br>Gas Vapor Valves: 499<br>Light Liquid Valves: 1,396<br>Light Liquid Pumps: 48<br>Connectors: 6,022<br>Agitators: 7<br>Instrumentation Systems: 404<br>Pressure Relief Devices<br>Gas/Vapor: 21<br>Light Liquid: 13 |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

The equipment leak component count for the AAR Area, listed above, as submitted in the application, reflects an accurate count of the equipment as of the date of issuance of this permit but is not intended to limit the permittee to the exact numbers specified. The permittee may add or remove equipment leak components without a permit revision as long as the components continue to comply with the applicable requirements listed below, and the changes do not: (1) cause a significant increase of emissions; or (2) result in the applicability of an additional standard that is not specified in this permit.

**APPLICABLE REGULATIONS:**

401 KAR 60:005, Section 2.(2)(bbb), 40 C.F.R. 60.480 to 60.489 (Subpart VV), Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006.

401 KAR 63:002, Section 2.(4)(a), 40 C.F.R. 63.100 through 63.107, Tables 1 through 4 (Subpart F), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry.

401 KAR 63:002, Section 2(4)(b), 40 C.F.R. 63.110 through 63.153, Tables 1 through 37 (Subpart G), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater.

401 KAR 63:002, Section 2.(4)(c), 40 C.F.R. 63.160 through 63.183, Tables 1 through 4 (Subpart H), National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.
*Note 1: Compliance with 40 CFR 63, Subpart H is deemed compliance with Subpart VV.*

*Note 2: 40 CF 60, Subpart VV has been updated as cited in 89 FR 43068-43070, dated May 16, 2024; & 40 CFR 63, Subpart F, G and H have been updated as cited in 89 FR 43153-43175; 89 FR 43175-43220; and 89 FR 43220-43234, dated May 16, 2024.*

**PRECLUDED REGULATIONS:**
Refer to **Section B, Group Requirements.**

**NON-APPLICABLE REGULATIONS:**
401 KAR 60:005, Section 2.(2)(r), 40 C.F.R. 60.110b through 60.117b (Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

401 KAR 60:005, Section 2.(2)(ppp), 40 C.F.R. 60.660 through 60.668 (Subpart NNN), Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

401 KAR 60:005, Section 2.(2)(ttt), 40 C.F.R. 60.700 through 60.708 (Subpart RRR), Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.

401 KAR 63:002, Section 2 (4)(a)(kkk), 40 C.F.R. 63.2330 through 63.2406, Tables 1 through 12 (Subpart EEEE), National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).

**1. Operating Limitations:**

a. Refer to 40 CFR 63.103(a)for general provisions.

Maintenance Wastewater Streams

b. For maintenance wastewaters containing organic HAPs listed in Table 9 of 40 CFR 63, Subpart G from the AAR Area units, the permittee shall properly manage the wastewater and control organic HAP emissions. [40 CFR 63.105(a)]

Continuous Process Vents and Closed Vent Systems

Note: The closed vent system is constructed of hard piping as defined by 40 CFR 63.981.

c. All Group 1 process vents from the AAR Area units; A01-2C, A02-3C, A03-4B, A04-5A & A06-7B shall be vented to a flare that complies with all applicable requirements of 40 CFR 63.11(b). [40 CFR 63.113(a)(1)]

Process Wastewater Streams

d. The permittee shall not discard liquid or solid organic materials with a concentration of greater than 10,000 parts per million of compounds in Table 9 of 40 CFR 63 Subpart G (as determined by analysis of the stream composition, engineering calculations, or process knowledge, according to the provisions of 40 CFR 63.144(b)) from a chemical manufacturing process unit to water or wastewater, unless the receiving stream is managed and treated as a Group 1 wastewater stream. This prohibition does not apply to materials from the following activities: [40 CFR 63.132(f)]
   (1) Equipment leaks; [40 CFR 63.132(f)(1)]
   (2) Except as specified in 40 CFR 63.132(f)(5), activities included in maintenance or SSMPs; [40 CFR 63.132(f)(2)]
   (3) Spills; or; [40 CFR 63.132(f)(3)]
   (4) Samples of a size not greater than reasonably necessary for the method of analysis that is used. [40 CFR 63.132(f)(4)]
   (5) For each source as defined in 40 CFR 63.101, on and after July 15, 2027, the phrase "or startup/shutdown/malfunction" in 40 CFR 63.132(f)(2) does not apply. [40 CFR 63.132(f)(5)]

Equipment Leaks

e. If a process unit subject to the provisions of 40 CFR 63, Subpart H has equipment to which 40 CFR 63, Subpart H does not apply, but which is subject to 40 CFR part 60, Subpart VV the permittee may elect to apply with 40 CFR 63, Subpart H to all such equipment in the process unit. If the permittee elects this method of compliance, all VOC in such equipment shall be considered, for purposes of applicability and compliance with

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

40 CFR 63, Subpart H as if it were organic hazardous air pollutant (HAP). Compliance with the provisions of 40 CFR 63, Subpart H in the manner described in this paragraph, shall be deemed to constitute compliance with 40 CFR part 60, Subpart VV. [40 CFR 63.160(c)]

f. For the equipment leaks in organic hazardous air pollutant service, the permittee shall implement an LDAR program containing the following elements: [40 CFR 63.162]
   (1) Each piece of equipment subject to 40 CFR 63 Subpart H shall be identified such that it can be distinguished readily from equipment that is not subject to 40 CFR 63 Subpart H. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, or by designation of process unit boundaries by some form of weatherproof identification. [40 CFR 63.162(c)]
   (2) When a leak is detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168; and 40 CFR 63:172 through 40 CFR 63.174, the permittee shall: [40 CFR 63.162(f)]
      (i) Clearly identify the leaking equipment. [40 CFR 63.162(f)(1)]
      (ii) The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 40 CFR 63.175(e)(7)(i)(D), and no leak has been detected during the follow-up monitoring. If the permittee elects to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored and no leak is detected during that monitoring. [40 CFR 63.162(f)(2)]
      (iii) The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that is subject to 40 CFR 63.174(c)(1)(i), may be removed after it is repaired. [40 CFR 63.162(f)(3)]

**Compliance Demonstration Method:**

a. Refer to **4. Specific Monitoring Requirements** for Maintenance wastewater, Continuous Process Vents.

Process Wastewater Streams

b. Total annual average concentration shall be determined according to the procedures specified in 40 CFR 63.144(b). Annual average flow rate shall be determined according to the procedures specified in 40 CFR 63.144(c). [40 CFR 63.132(c)]

c. For a Group 2 wastewater, the permittee shall re-determine group status for each Group 2 stream, as necessary, to determine whether the stream is Group 1 or Group 2 whenever process changes are made that could reasonably be expected to change the stream to a Group 1 stream. Examples of process changes include, but are not limited to, changes in production capacity, production rate, feedstock type, or whenever there is a replacement, removal, or addition of recovery or control equipment. For purposes of this paragraph, process changes do not include: Process upsets; unintentional, temporary process changes; and changes that are within the range on which the original determination was based. [40 CFR 63.132(c)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Equipment Leaks

d. Compliance shall be determined by review of the records required by 40 CFR 63.181 and the reports required by 40 CFR 63.182, review of performance test results, and by inspections. [40 CFR 63.162(a)]

**2. Emission Limitations:**

Equipment Leaks and Closed Vent Systems

a. The permittee shall comply with the fugitive equipment leak emissions standards in 40 CFR 63.160 through 40 CFR 63.182, as applicable:

(1) Standards for Pumps in light liquid service: [40 CFR 63.163]

| | |
|---|---|
| 40 CFR 63.163(a): | Implementation and compliance provisions |
| 40 CFR 63.163(b): | Monitoring requirements, Leak detection levels, frequency of monitoring |
| 40 CFR 63.163(c): | Repair procedures and time frames |
| 40 CFR 63.163(d): | Procedures to determine percent leaking pumps and quality improvement program requirements |
| 40 CFR 63.163(e)-(j): | Exemptions for specific types of pumps |

(2) Standards for Compressors: [to 40 CFR 63.164]

| | |
|---|---|
| 40 CFR 63.164(a)-(e): | Operational requirements |
| 40 CFR 63.164(f): | Criteria for Leak detection |
| 40 CFR 63.164(g): | Repair procedures and time frames |
| 40 CFR 63.164(h)-(i): | Exemptions for specific types of compressors |

(3) Standards for Pressure relief devices in gas/vapor service or light liquid service: [40 CFR 63.165]

| | |
|---|---|
| 40 CFR 63.165(a): | Operational requirements |
| 40 CFR 63.165(b): | Pressure release procedures |
| 40 CFR 63.165(c)-(d): | Exemptions for specific types of pressure relief devices |
| 40 CFR 63.165(e): | Pressure relief valves in organic HAP gas or vapor service |

Note: refer to 40 CFR 63.100(k)(10) for compliance dates with 40 CFR 63.165(e)

(4) Standards for Sampling Connection Systems: [40 CFR 63.166]

| | |
|---|---|
| 40 CFR 63.166(a)-(c): | Operational requirements |

(5) Standards for Open-ended valves or lines: [40 CFR 63.167]

| | |
|---|---|
| 40 CFR 63.167(a)-(c): | Operational requirements |
| 40 CFR 63.167(d)-(e): | Exemptions for specific types of valves |

(6) Standards for Valves in gas/vapor service and in light liquid service: [40 CFR 63.168]

| | |
|---|---|
| 40 CFR 63.168(a): | Operational requirements |
| 40 CFR 63.168(b)-(d): | Monitoring requirements and intervals |
| 40 CFR 63.168(e): | Procedures to determine percent leaking valves |
| 40 CFR 63.168(f): | Leak repair time frames |
| 40 CFR 63.168(g): | First attempt repair procedures |
| 40 CFR 63.168(h)-(i): | Exemptions for unsafe-to-monitor and difficult-to-monitor valves |
| 40 CFR 63.168(j) | 250 or fewer valve exemption |

(7) Standards for Instrumentation systems: [40 CFR 63.169]

| | |
|---|---|
| 40 CFR 63.169(a): | Monitoring frequency |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

40 CFR 63.169(b): Leak detection levels
40 CFR 63.169(c): Leak repair time frames

(8) Standards for Delay of repair: [40 CFR 63.171]
40 CFR 63.171 Allowances for delay of repair

(9) Standards for Closed-vent systems and control devices: [40 CFR 63.172]
40 CFR 63.172(a)-(b): Operational requirements
40 CFR 63.172(d),(m): Control device requirements
40 CFR 63.172(f)-(g): Monitoring requirements
40 CFR 63.172(h)-(i): Repair procedures and time frames
40 CFR 63.172 (j): Operational requirements for bypass lines (updated)
40 CFR 63.172(k)-(l): Exemptions for unsafe-to-inspect and difficult-to- inspect closed-vent systems

(10) Standards for Agitators in gas/vapor service and in light liquid service: [40 CFR 63.173]
40 CFR 63.173(a): Operational requirements
40 CFR 63.173(b): Monitoring requirements and intervals
40 CFR 63.173(c): Leak repair time frames
40 CFR 63.173(d)-(g): Exemptions for specific types of agitators
40 CFR 63.173(h)-(j): Exemptions for difficult-to-monitor, inaccessible or unsafe-to-monitor agitators

(11) Standards for Connectors in gas/vapor service and in light liquid service: [40 CFR 63.174]
40 CFR 63.174(a): Operational requirements
40 CFR 63.174(b): Monitoring requirements and intervals
40 CFR 63.174(c): Procedures for open connectors or connectors with broken seals
40 CFR 63.174(d): Leak repair time frames
40 CFR 63.174(e): Monitoring frequency for repaired connectors
40 CFR 63.174(f)-(h): Exemptions for unsafe-to-monitor, unsafe-to-repair, inaccessible, or ceramic connectors
40 CFR 63.174(i): Procedures to determine percent leaking connectors
40 CFR 63.174(j): Optional credit for removed connectors

(12) In Phase III, Quality improvement program for valves: the permittee may elect to implement the following quality improvement programs if the percent of leaking valves is equal to or exceeds 2 percent: [40 CFR 63.175 and 40 CFR 63.168(d)(1)(ii)]
40 CFR 63.175(a): Quality improvement program alternatives
40 CFR 63.175(b): Criteria for ending quality improvement programs
40 CFR 63.175(c): Alternatives following achievement of less than 2 percent leaking valves target
40 CFR 63.175(d): Quality improvement program to demonstrate further progress
40 CFR 63.175(e): Quality improvement program of technology review and improvement

(13) If in Phase III, Quality improvement program for pumps: calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in the AAR, Tank

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Farm, and Loading Areas that are part of the 40 CFR 63, Subpart H chemical manufacturing process unit (CMPU) or three pumps in the AAR area leak, the permittee shall implement the following quality improvement programs for pumps: [40 CFR 63.176 and 40 CFR 63.163(d)(2)]

40 CFR 63.176(a): Applicability criteria
40 CFR 63.176(b): Criteria for ending the quality improvement program
40 CFR 63.176(c): Criteria for resumption of the quality improvement program
40 CFR 63.176(d): Quality improvement program elements

**Compliance Demonstration Method:**
Equipment Leaks
Refer to **1. Operating Limitations** Compliance Demonstration Method d.

**3. Testing Requirements:**
Continuous Process Vents
a. Refer to **3. Testing Requirements** for the FLARE in **Section B,** EP-F01.

Equipment Leaks
b. The permittee shall comply with the following test methods and procedures requirements: [40 CFR 63.180(a)]
   (1) 40 CFR 63.180(b) Monitoring procedures, test methods, and calibration procedures
   (2) 40 CFR 63.180(c) Leak detection monitoring procedures
   (3) 40 CFR 63.180(d) Procedures for determining organic HAP service applicability
   (4) When a flare is used to comply with 40 CFR 63.172(d), the permittee shall comply with 40 CFR 63.180(e)(1 through 3) except as specified in 40 CFR 63.108(a). The permittee is not required to conduct a performance test to determine percent emission reduction or outlet organic HAP or TOC concentration: [40 CFR 63.180(e)]
      (i) Conduct a visible emission test using the techniques specified in 40 CFR 63.11(b)(4). [40 CFR 63.180(e)(1)]
      (ii) Determine the net heating value of the gas being combusted using the techniques in 40 CFR 63.11(b)(6). [40 CFR 63.180(e)(2)]
      (iii) Determine the exit velocity using the techniques specified in either 40 CFR 63.11(b)(7)(i and iii), where applicable). [40 CFR 63.180(e)(3)]

**4. Specific Monitoring Requirements**
Maintenance wastewater
a. The permittee shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance). The descriptions shall: [40 CFR 63.105(b)]
   (1) Specify the process equipment or maintenance tasks that are anticipated to create

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

wastewater during maintenance activities. [40 CFR 63.105(b)(1)]

(2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and [40 CFR 63.105(b)(2)]

(3) Specify the procedures to be followed when clearing materials from process equipment. [40 CFR 63.105(b)(3)]

b. The permittee shall modify and update the information required by 40 CFR 63.105(b) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure. [40 CFR 63.105(c)]

Continuous Process Vents

c. Refer to **4. Specific Monitoring Requirements** for the FLARE in **Section B,** EP-F01.

d. For any bypass line between the origin of the gas stream (i.e., at a distillation unit or reactor as defined in 40 CFR 63.107(b)) and the point where the gas stream reaches the process vent as described in 40 CFR 63.107, that could divert the gas stream directly to the atmosphere, except as specified in 40 CFR 63.114(d)(3)(ii), the permittee shall comply with one of the following requirements (equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to these requirements: [40 CFR 63.114(d)]

(1) Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. Records shall be generated as specified in 40 CFR 63.118(a)(3). The flow indicator shall be installed at the entrance to any bypass line that could divert the gas stream to the atmosphere; or; [40 CFR 63.114(d)(1)]

(2) Secure the bypass line valve in the non-diverting position with a car-seal. A visual inspection of the seal mechanism shall be performed at least once every month to ensure that the valve is maintained in the non-diverting position and the gas stream is not diverted through the bypass line. [40 CFR 63.114(d)(2)]

(3) For each source as defined in 40 CFR 63.101, beginning no later than the compliance dates specified in 40 CFR 63.100(k)(10): [40 CFR 63.114(d)(3)]

(i) The use of a bypass line at any time on a closed vent system to divert emissions (subject to the emission standards in 40 CFR 63.112) to the atmosphere or to a control device not meeting the requirements specified in this subpart is an emissions standards violation. [40 CFR 63.114(d)(3)(i)]

(ii) The last sentence in 40 CFR 63.114(d) no longer applies. Instead, the exemptions specified in 40 CFR 63.114(d)(3)(ii)(A) and (B) apply. [40 CFR 63.114(d)(3)(ii)]

(A) Except for pressure relief devices subject to 40 CFR 63.165(e)(4) of subpart H, equipment such as low leg drains and equipment subject to the requirements of subpart H of part 63 are not subject to 40 CFR 63.114(d). [40 CFR 63.114(d)(3)(ii)(A)]

(B) Open-ended valves or lines that use a cap, blind flange, plug, or second valve and follow the requirements specified in 40 CFR 60.482-6(a)(2), (b), and (c) or follow requirements codified in another regulation that are the same as 40 CFR 60.482-6(a)(2), (b), and (c) are not subject to 40 CFR 63.114(d). [40 CFR 63.114(d)(3)(ii)(B)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Equipment Leaks

e. Refer to **3. Testing Requirements**.

**5. Specific Recordkeeping Requirements:**

a. All records shall be kept in accordance with 40 CFR 63.103(c).

Maintenance wastewater

b. The permittee shall maintain a record of the information required by 40 CFR 63.105(b and c) as part of the start-up, shutdown, and malfunction plan required under 40 CFR 63.6(e)(3). [40 CFR 63.105(d)]

Continuous Process Vents

c. The permittee shall keep the following records up-to-date and readily accessible: [40 CFR 63.118(a)]
   (1) Hourly records of whether the flow indicator specified under 40 CFR 63.114(d)(1) was operating and whether a diversion was detected at any time during the hour, as well as records of the times and durations of all periods when the gas stream is diverted to the atmosphere or the monitor is not operating. [40 CFR 63.118(a)(3)]
   (2) Where a seal mechanism is used to comply with 40 CFR 63.114(d)(2), hourly records of flow are not required. In such cases, the permittee shall record that the monthly visual inspection of the seals or closure mechanism has been done, and shall record the duration of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has broken. [40 CFR 63.118(a)(4)]

Process Wastewater Streams

d. For the Group 2 wastewater streams, the permittee shall keep in a readily accessible location the following records: [40 CFR 63.147(b)(8) and 40 CFR 63.147(f)]
   (1) Process unit identification and description of the process unit. [63.147(b)(8)(i)]
   (2) Stream identification code. [63.147(b)(8)(ii)]
   (3) The concentration of the compound(s) in Tables 8 and 9 of 40 CFR 63, Subpart FFFF in parts per million, by weight, including documentation of the methodology used to determine concentration. [63.147(b)(8)(iii)]
   (4) Flow rate in liter per minute. [63.147(b)(8)(iv)]
   (5) If the permittee uses process knowledge to determine the annual average concentration of a wastewater stream as specified in 40 CFR 63.144(b)(3) and/or uses process knowledge to determine the annual average flow rate as specified in 40 CFR 63.144(c)(1), and determines that the wastewater stream is not a Group 1 wastewater stream, the permittee shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream. [40 CFR 63.147(f)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Equipment Leaks

e. The permittee may comply with the recordkeeping requirements for the equipment in the Polymerization, Saponification, Polyrectification, AAR, Tank Farm, and Loading Areas in one recordkeeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records required by 40 CFR 63.181 shall be maintained in a manner that can be readily accessed at the plant site. [40 CFR 63.181(a)]

f. Except as provided in 40 CFR 63.181(e), the following information pertaining to all equipment in each process unit subject to the requirements in 40 CFR 63.162 through 40 CFR 63.174 shall be recorded: [40 CFR 63.181(b)]
   (1) The permittee shall keep the following records: [40 CFR 63.181(b)(1)]
      (i) A list of identification numbers for equipment (except connectors exempt from monitoring and recordkeeping identified in 40 CFR 63.174 and instrumentation systems) subject to the requirements therein. Connectors need not be individually identified if all connectors in a designated area or length of pipe subject to the provisions of 40 CFR 63, Subpart H are identified as a group, and the number of connectors subject is indicated. With respect to connectors, the list shall be complete no later than the completion of the initial survey required by 40 CFR 63.174 (b)(1 or 2). [40 CFR 63.181(b)(1)(i)]
      (ii) A schedule by process unit for monitoring connectors subject to 40 CFR 63.174(a) and valves subject to 40 CFR 63.168(d). [40 CFR 63.181(b)(1)(ii)]
      (iii) Physical tagging of the equipment to indicate that it is in organic HAP service is not required. Equipment subject to the provisions of 40 CFR 63, Subpart H may be identified on a plant site plan, in log entries, or by other appropriate methods. [40 CFR 63.181(b)(1)(iii)]
   (2) The permittee shall keep the following records: [40 CFR 63.181(b)(2)]
      (i) A list of identification numbers for equipment that the permittee elects to equip with a closed-vent system and control device, under the provisions of 40 CFR 63.163(g), 40 CFR 63.164(h), 40 CFR 63.165(c), or 40 CFR 63.165(e)(4) or 40 CFR 63.173(f), as applicable. [40 CFR 63.181(b)(2)(i)]
      (ii) A list of identification numbers for compressors that the permittee elects to designate as operating with an instrument reading of less than 500 parts per million above background, under the provisions of 40 CFR 63.164(i). [40 CFR 63.181(b)(2)(ii)]
   (3) A list of identification numbers for pressure relief devices subject to 40 CFR 63.165(a) and for pressure relief devices equipped with rupture disks, under the provisions of 40 CFR 63.165(d), 40 CFR 63.165(e)(2)(ii), or 40 CFR 63.162(e)(2)(iii), as applicable. [40 CFR 63.181(b)(3)]
   (4) Identification of instrumentation systems. Individual components in an instrumentation system need not be identified. [40 CFR 63.181(b)(4)]
   (5) Identification of screwed connectors subject to 40 CFR 63.174(c)(2). Identification can be by area or grouping as long as the total number within each group or area is recorded. [40 CFR 63.181(b)(5)]
   (6) The following information shall be recorded for each dual mechanical seal system: [40 CFR 63.181(b)(6)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(i) Design criteria required in 40 CFR 63.163(e)(6)(i), 40 CFR 63.164(e)(2), and 40 CFR 63.173(d)(6)(i) and an explanation of the design criteria; and [40 CFR 63.181(b)(6)(i)]

(ii) Any changes to these criteria and the reasons for the changes. [40 CFR 63.181(b)(6)(ii)]

(7) The following information pertaining to all pumps subject to 40 CFR 63.163(j), valves subject to 40 CFR 63.168(h and i), agitators subject to 40 CFR 63.173(h through j), and connectors subject to 40 CFR 63.174(f and g) shall be recorded: [40 CFR 63.181(b)(7)]

(i) Identification of equipment designated as unsafe to monitor, difficult to monitor, or unsafe to inspect and the plan for monitoring or inspecting this equipment. [40 CFR 63.181(b)(7)(i)]

(ii) A list of identification numbers for the equipment that is designated as difficult to monitor, an explanation of why the equipment is difficult to monitor, and the planned schedule for monitoring this equipment. [40 CFR 63.181(b)(7)(ii)]

(iii) A list of identification numbers for connectors that are designated as unsafe to repair and an explanation why the connector is unsafe to repair. [40 CFR 63.181(b)(7)(iii)]

(8) The permittee shall keep the following records: [40 CFR 63.181(b)(8)]

(i) A list of valves removed from and added to the process unit, as described in 40 CFR 63.168(e)(1), if the net credits for removed valves is expected to be used. [40 CFR 63.181(b)(8)(i)]

(ii) A list of connectors removed from and added to the process unit, as described in 40 CFR 63.174(i)(1), and documentation of the integrity of the weld for any removed connectors, as required in 40 CFR 63.174(j). This is not required unless the net credits for removed connectors is expected to be used. [40 CFR 63.181(b)(8)(ii)]

(9) For any leaks detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168; and 40 CFR 63.172 through 40 CFR 63.174, a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. [40 CFR 63.181(b)(10)]

(10) For each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.165(e), the permittee must keep the records specified in 40 CFR 63.181(b)(11)(i) through (iii) in addition to the records specified in 40 CFR 63.181(f). [40 CFR 63.181(b)(11)]

(i) Records of the prevention measures implemented as required in 40 CFR 63.165(e)(3)(ii). [40 CFR 63.181(b)(11)(i)]
Note: Refer to 40 CFR 63. 100(k)(10) for compliance dates with 40 CFR 63.165(e).

(ii) Records of the number of releases during each calendar year. Keep these records for the current calendar year and the past 5 calendar years. 40 CFR 63.181(b)(11)(ii)]

(iii) For each release to the atmosphere, the permittee must keep the records specified in 40 CFR 63.181(b)(11)(iii)(A) through (D).

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(A) The start and end time and date of each pressure release to the atmosphere. [40 CFR 63.181(b)(11)(iii)(A)]
(B) Records of any data, assumptions, and calculations used to estimate of the mass quantity of each organic HAP released during the event. [40 CFR 63.181(b)(11)(iii)(B)]
(C) Records of the root cause analysis and corrective action analysis conducted as required in 40 CFR 63.165(e)(3)(iii), including an identification of the affected facility, a statement noting whether the event resulted from the same root cause(s) identified in a previous analysis and either a description of the recommended corrective action(s) or an explanation of why corrective action is not necessary under 40 CFR 63.165(e)(7)(i). [40 CFR 63.181(b)(11)(iii)(C)]
(D) For any corrective action analysis for which implementation of corrective actions are required in 40 CFR 63.165(e)(7), a description of the corrective action(s) completed within the first 45 days following the discharge and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates. [40 CFR 63.181(b)(11)(iii)(D)]

g. For visual inspections of equipment subject to the provisions of 40 CFR 63.163(b)(3) and 40 CFR 63.163(e)(4)(i), the permittee shall document that the inspection was conducted and the date of the inspection. The owner or operator shall maintain records as specified in 40 CFR 60.181(d) for leaking equipment identified in this inspection. These records shall be retained for 2 years. [40 CFR 63.181(c)]

h. When a leak is detected, the following information shall be recorded and kept for two years. [40 CFR 63.181(d)]
(1) The instrument and the equipment identification number and the operator name, initials, or identification number. [40 CFR 63.181(d)(1)]
(2) The date the leak was detected and the date of first attempt to repair the leak. [40 CFR 63.181(d)(2)]
(3) The date of successful repair of the leak. [40 CFR 63.181(d)(3)]
(4) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonrepairable. [40 CFR 63.181(d)(4)]
(5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. [40 CFR 63.181(d)(5)]
(i) The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the SSMP, required by 40 CFR 63.6(e)(3), for the source or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. For each source as defined in 40 CFR 63.101, and for each source as defined in 40 CFR 63.191, on and after July 15, 2027, the sentence "The written procedures may be included as part of the startup/shutdown/malfunction plan, required by 40 CFR 63.6(e)(3), for the

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

source or may be part of a separate document that is maintained at the plant site." in this paragraph no longer applies. [40 CFR 63.181(d)(5)(i)]

(ii) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion. [40 CFR 63.181(d)(5)(ii)]

(6) Dates of process unit shutdowns that occur while the equipment is unrepaired. [[40 CFR 63.181(d)(6)]

(7) The permittee shall comply with: [40 CFR 63.181(d)(7)]

(i) Identification, either by list, location (area or grouping), or tagging of connectors that have been opened or otherwise had the seal broken since the last monitoring period required in 40 CFR 63.174(b), as described in 40 CFR 63.174(c)(1), unless the permittee elects to comply with 40 CFR 63.174(c)(1)(ii). [40 CFR 63.181(d)(7)(i)]

(ii) The date and results of monitoring as required in 40 CFR 63.174(c). If identification of connectors that have been opened or otherwise had the seal broken is made by location under 40 CFR 63.181(d)(7)(i), then all connectors within the designated location shall be monitored. [40 CFR 63.181(d)(7)(ii)]

(8) Copies of the periodic reports as specified in 40 CFR 63.182(d), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.181(d)(9)]

i. The results of compliance tests required for compressors and the dates and results of monitoring following a pressure relief valve pressure release shall be recorded. The results shall include: [40 CFR 63.181(f)]

(1) The background level measured during each compliance test. [40 CFR 63.181(f)(1)]

(2) The maximum instrument reading measured at each piece of equipment during each compliance test. [40 CFR 63.181(f)(2)]

j. The permittee shall maintain records required for closed-vent systems and control devices subject to 40 CFR 63.172. [40 CFR 63.181(g)]

(1) The design specifications and performance demonstrations specified in 40 CFR 63.181(g)(1)(i through iv) shall be retained for the life of the equipment. [40 CFR 63.181(g)(1)]

(i) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams. [40 CFR 63.181(g)(1)(i)]

(ii) The dates and descriptions of any changes in the design specifications. [40 CFR 63.181(g)(1)(ii)]

(iii) Except as specified in 40 CFR 63.108(a), the flare design (i.e., steam-assisted, air-assisted, or non-assisted) and the results of the compliance demonstration required by 40 CFR 63.11(b). [40 CFR 63.181(g)(1)(iii)]

(iv) A description of the parameter or parameters monitored, as required in 40 CFR 63.172(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. [40 CFR 63.181(g)(1)(iv)]

(2) Records of operation of closed-vent systems and control devices, as specified in 40 CFR 63.181(g)(2)(i through iii) shall be retained for 2 years. [40 CFR 63.181(g)(2)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(i) Except as specified in 40 CFR 63.108(a), the dates and durations when the closed-vent systems and control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170 are not operated as designed as indicated by the monitored parameters, including periods when a flare pilot light system does not have a flame. [40 CFR 63.181(g)(2)(i)]

(ii) Dates and durations during which the monitoring system or monitoring device is inoperative. [40 CFR 63.181(g)(2)(ii)]

(iii) Dates and durations of start-ups and shutdowns of control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170. [40 CFR 63.181(g)(2)(iii)]

(3) Records of inspections of closed-vent systems subject to the provisions of 40 CFR 63.172, as specified in 40 CFR 63.181(g)(3)(i through iii) shall be retained for 2 years. [40 CFR 63.181(g)(3)]

(i) For each inspection conducted in accordance with the provisions of 40 CFR 63.172(f)(1) or (f)(2) during which no leaks were detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 63.181(g)(3)(i)]

(ii) For each inspection conducted in accordance with 40 CFR 63.172(f)(1) or (f)(2) during which leaks were detected, the information specified in 40 CFR 63.181(d) shall be recorded. [40 CFR 63.181(g)(3)(ii)]

(iii) For each source as defined in 40 CFR 63.101, and for each source as defined in 40 CFR 63.191, beginning no later than the compliance dates specified in 40 CFR 63.100(k)(10), the permittee must comply with 40 CFR 63.181(g)(3)(iii) in addition to the requirements in 40 CFR 63.181(g)(3)(i) and (ii). For each flow event from a bypass line subject to the requirements in 40 CFR 63.172(j), the permittee must maintain records sufficient to determine whether or not the detected flow included flow requiring control. For each flow event from a bypass line requiring control that is released either directly to the atmosphere or to a control device not meeting the requirements in this subpart, the owner or operator must include an estimate of the volume of gas, the concentration of organic HAP in the gas and the resulting emissions of organic HAP that bypassed the control device using process knowledge and engineering estimates. [40 CFR 63.181(g)(3)(iii)]

k. If the permittee implements any of the quality improvement programs required by 40 CFR 63.175 or 40 CFR 63.176, the records specified in 40 CFR 63.181(h)(1 through 9) shall be maintained for a period of the quality improvement plan for the process unit. [40 CFR 63.181(h)]

**6. Specific Reporting Requirements:**

a. All reports shall be submitted in accordance with 40 CFR 63.103(d).

b. For equipment subject to 40 CFR 63 Subparts F, G and H, the permittee shall submit the following reports:

(1) Periodic Reports - The permittee shall submit to the Division, semiannually, the information required by 40 CFR 63.182(d)(2). [40 CFR 63.182(a)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

c. Refer to **Section F.5.**

Continuous Process Vents

d. The permittee shall submit to the Division Periodic Reports of the information in **5. Specific Recordkeeping Requirements c.** according to the schedule in 40 CFR 63.152. [40 CFR 63.118(f)]

e. The permittee shall furnish reports as specified in **5. Specific Reporting Requirements** for the FLARE in **Section B,** EP F01.

**7. Specific Control Equipment Operating Conditions:**

Continuous Process Vents

The FLARE (EP-F01) shall be in operation at all times the emission units that vent to the FLARE are operating. Refer to **Section B**, EP-F01. [40 CFR 63.11(b)(3)]

**8. Alternate Operating Scenarios:**

40 CFR 63, Subparts A, for the occurrences of start-ups at EU-(A01-A06), the permittee shall follow the SSMP requirements of 40 CFR 63 Subparts A, F, G and H.

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## FLARE

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **F01** | F01: | **FLARE (non assited)**, BA-5000<br>**Description:** The FLARE is used to control hydrocarbon streams from EU: A01 2A-2D(East Methyl Acetate Extraction Tower-DA 5300- & associated process equipment (APE)), A02 3A-D(West Methyl Acetate Extraction Tower-DA5304 & APE), A03 4A-C(Aldehyde Tower-DA-5302 & APE), A04 5A-5C(Aldehyde Tower DA 5302 & APE), A06 7A-D(Product Acid Tower DA 5309 & APE), R03 9A-G(Vinyl Recovery Tower DA 5104 & APE), R03 10A-D(Vinyl Extraction Tower-DA 5110 & AEP), P01 11C, 11E, 11H, 12C, 12E, 13C, 14C, 14E, 15C(Six Polykettles and Three Paste Strippers & APE), T02 16A-D(Paste Storage Tanks North Nest #1-FB-5501, FB-5502, FB-5503 and FB-5504), T03 17A-17D(Paste Storage Tanks South Nest #2, FB-5505, FB-5506, FB-5507 and FB-5508, T04 18A&B(Paste Storage Tanks West Nest #3, FB-5509 and FB-5510), T10 19A-19B (Recovered Vinyl Acetate Rework Storage Tanks, FA-5522 and FB-5523.<br>Manufacturer: John Zinc<br>Model: EEF-QS-10 Utility Non-assisted Flare<br>Control Efficiency: 98.0% (VOC and organic HAP)<br>**Includes HON and MON Group 1 Continuous Process Vents**, **Group 2 Process Wastewater Streams** |
| | *F01-1A* | **AAR Knockout Pot**<br>Control Device: FLARE, BA-5000 |
| | *F01-1B* | **FLARE Knockout Drum**<br>Control Device: FLARE, BA-5000 |

## APPLICABLE REGULATIONS:

401 KAR 63:002, Section 2 (4)(lll), 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.

401 KAR 63:002, Section 2(4)(b), 40 C.F.R. 63.110 through 63.153, Tables 1 through 37 (Subpart G), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(ii), 40 C.F.R. 63.980 through 63.999 (Subpart SS), National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:015, Flares, applies to the opacity of the FLARE.

*Note:*
*40 CFR 63, Subpart G has been updated as cited in 89 FR 43175-43220, dated May 16, 2024;*
*40 CFR 63, Subpart FFFF has been updated as cited in 89 FR 23868-23873 dated April 4, 2024.*

1. **Operating Limitations:**
   a. The flare shall be operated at all times when emissions may be vented to it. [40 CFR 63.11(b)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

b. The flare shall be operated with a flame present at all times. [40 CFR 63.11(b)(5)]

c. The non-assisted flare shall be operated in accordance with the net heating value and exit velocity requirements, as specified in (1) through (3) below: [40 CFR 63.11(b)(6 and 7), 40 CFR 63.116(a)(2 and 3), 40 CFR 63.987(b), and 40 CFR 63.2450(f)(1)]

(1) The non-assisted flares shall be used only with the net heating value of the gas being combusted at 7.45M/scm (200 Btu/scf) or greater. The net heating value of the gas being combusted in a flare shall be calculated using the following equation: [40 CFR 63.11(b)(6)(ii) and 40 CFR 63.987(b)(3)(ii)]

$$H_T = K\sum_{i=1}^{n} C_i * H_i$$

Where:

$H_T$ = Net heating value of the sample, megajoules per standard cubic meter; where the net enthalpy per mole of offgas is based on combustion at 25 °C and 760 millimeters of mercury (30 inches of mercury), but the standard temperature for determining the volume corresponding to one mole is 20 °C;

$K_1$ = $1.740 \times 10^{-7}$ (parts per million by volume)$^{-1}$ (gram-mole per standard cubic meter) (megajoules per kilocalories), where the standard temperature for gram mole per standard cubic meter is 20 °C;

n = number of sample components;

$C_i$ = Concentration of sample component j, in parts per million by volume on a wet basis, as measured for organics by Method 18 of 40 CFR part 60, appendix A, or by American Society for Testing and Materials (ASTM) D6420–99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428–2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106) under the conditions specified in 63.997(e)(2)(iii)(D)(*1*) through (*3*). Hydrogen and carbon monoxide are measured by ASTM D1946–90; and

$H_j$ = Net heat of combustion of sample component j, kilocalories per gram mole at 25 °C and 760 millimeters of mercury (30 inches of mercury).

(2) The permittee shall design and operate the non-assisted flare with an exit velocity, as determined by the method specified in c(3) below, less than the velocity $V_{max}$ and less than 122m/sec (400 ft/sec). The maximum permitted velocity, $V_{max}$, shall be determined by the following equation: [40 CFR 63.11(b)(7)(iii)]

$$\text{Log}_{10}(V_{max}) = (H_T + 28.8)/31.7$$

Where:

$V_{max}$ = Maximum permitted velocity, m/sec;

28.8 = Constant

31.7 = Constant

$H_T$ = The net heating value as determined by c.(1) above.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(3) The actual exit velocity of the flare shall be determined by dividing by the volumetric flow rate of gas being combusted (in units of emission standard temperature and pressure), as determined by Test Method 2, 2A, 2C, or 2D in appendix A to 40 CFR 60, as appropriate, by the unobstructed (free) cross-sectional area of the flare tip. The net heating value of the gas being combusted in a flare shall be calculated using the equation in c.(1) above. [40 CFR 63.11(b)(6)(i)(B), 40 CFR 63.11(b)(7)(i) and 40 CFR 63.987(b)(3)(iii)]

d. Refer to 40 CFR 63.2540 and 40 CFR 63, Subpart FFFF, Table 12, for general provisions.

e. The permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements 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 source. [40 CFR 63.2450(u)]

**Compliance Demonstration Method:**

a. For compliance with the **1.a. and 1.b. Operating Limitations**, refer to **4. Specific Monitoring Requirements.**

b. For compliance with the **1. Operating Limitations**, **c.** compliance shall be determined by review of the Notification of Compliance Status Report and the semiannual Periodic and Compliance Reports required by 40 CFR 63, Subpart G and 40 CFR 63, Subpart FFFF.

**2. Emission Limitations:**

a. Visible emissions from the flare shall not exceed 20 percent opacity for more than three minutes in any one day. [401 KAR 63:015]

b. The flare shall be operated with be no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. [40 CFR 63.11(b)(4)]

**Compliance Demonstration Method:**

For compliance with 401 KAR 63:015 and 40 CFR 63.11(b)(4) standards, refer to **3. Testing Requirements**.

**3. Testing Requirements:**

The permittee shall conduct a visible emission test by EPA Test Method 22, with a 2 hour observation period. The test shall be performed annually (i.e. within 365 days of last test conducted). [40 CFR 63.116(a) and 40 CFR 63.11(b)(4)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**4. Specific Monitoring Requirements:**

a. Except as specified in 40 CFR 63.108(a), the permittee shall install, calibrate, maintain, and operate a device (including but not limited to a thermocouple, ultra-violet beam sensor, or infrared sensor) capable of continuously detecting the presence of a pilot flame. This shall be in accordance to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately. [40 CFR 63.114(2) and (a)(2)]

b. "Continuous record" means documentation, either in hard copy or computer readable form, of data values measured at least once every 15 minutes and recorded at the frequency specified in 40 CFR 63.998(b) except that periods of startup, shutdown, and malfunction shall not be excluded pursuant to 40 CFR 63.2450(e)(4)(vii). [40 CFR 63.101 and 40 CFR 63.981]

c. For the surge control vessels, fulfill all monitoring requirements per **2. Emission Limitations**.

**5. Specific Recordkeeping Requirements:**

a. The permittee shall keep an up-to-date, readily accessible record of the following data and, pursuant to 40 CFR 63.998(a)(1)(i), this data shall be included in the flare compliance assessment report as specified in 40 CFR 63.999(a)(2)(iii)(A).
   (1) Flare design (i.e., steam-assisted, air-assisted, or non-assisted); [40 CFR 998(a)(1)(i)(A)]
   (2) All visible emission readings, heat content determinations, flow rate measurements, and exit velocity determinations made during the compliance determination required by 40 CFR 63.116(a); and [40 CFR 998(a)(1)(i)(B)]
   (3) All periods during the flare compliance assessment when all pilot flames are absent or, if only the flare flame is monitored, all periods when the flare flame is absent. [40 CFR 998(a)(1)(i)(C)]

b. When complying with **Operating Limitations,** Compliance Demonstration Method a., the permittee must keep records of the flare diameter, hydrogen content, exit velocity, and maximum permitted velocity and must include these records in the flare compliance report required in 40 CFR 63.999(a)(2). [40 CFR 63.2450(f)(2)(ii)]

c. The permittee shall keep the following records up-to-date and readily accessible: [40 CFR 63.118(a) and 40 CFR 63.998(a)(1)(ii and iii)]
   (1) Hourly records of whether the monitor was continuously operating and whether the pilot flame was continuously present during each hour. [40 CFR 63.998(a)(1)(ii)]
   (2) Records of the times and duration of all periods during which the pilot flame is absent or the monitor is not operating for each operating day determined according to the procedures specified in 40 CFR 63.152(f). [40 CFR 63.998(a)(1)(iii)]

**6. Specific Reporting Requirements:**

a. The permittee shall submit to the Administrator, periodic reports of the following recorded information according to the schedule in 40 CFR 63.152.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) Reports of the duration (in hours) of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data as defined in 40 CFR 63.152(c)(2)(ii)(A) and 40 CFR 63.999(c)(6)(i). [40 CFR 63.118(f)(2)]

(2) Except as specified in 40 CFR 63.108(a), reports of the times and durations of all periods in which the pilot flame was absent, as recorded in **5. Specific Recordkeeping Requirements c.(2). [**40 CFR 63.118(f)(5)]

b. Refer to **Section F.**

**7. Specific Control Equipment Operating Conditions:**

The permittee must be in compliance with the emission limits and work practice standards in Tables 1 through 7 to 40 CFR 63, Subpart FFFF at all times, and the permittee must meet the requirements specified in 40 CFR 63.2455 through 40 CFR 63.2490 (or the alternative means of compliance in 40 CFR 63.2495, 40 CFR 63.2500, or 40 CFR 63.2505), except as specified in 40 CFR 63.2450(b through v). [40 CFR 63.2450]

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## TANK FARM

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **T01, T09** | T01, T09 | **Methyl Acetate/Methanol Storage Tanks**<br>Tank Description: Two (2) Internal Floating Roof Tanks with primary seal (vapor-mounted) and secondary seal (rim-mounted); Capacity: 110,000 gallons each; Maximum Throughput: 22,000,000 gallons/yr each<br>Construction Date: 1959<br>Maximum True Vapor Pressure: 3.081 psia<br>**HON Group 1 Storage Vessels** |
| **T01** | T01 | Methyl Acetate/Methanol Storage Tank, FB-1513 |
| **T09** | T09 | Methyl Acetate/Methanol Storage Tank, FB-5538 |
| **F01(16, 17)** | T02-16A through 16D<br>T03-17A through 17D | **Paste Storage Tanks Nests #1 and #2**<br>Tank Description: Eight (8) Fixed Roof Tanks<br>Capacity: 51,000 gallons each; Construction Date: 1959<br>Control Device: FLARE, BA-5000 (see Section B, EP-F01)<br>Operating Scenario #1: Fixed Roof Tanks for receipt of paste from the Polymerization Area and for feed for SAP Area<br>Maximum throughput: 60,000,000 gallons/yr as methanol each nest<br>Maximum True Vapor Pressure: 10.8542 psia<br>Operating Scenario #2: Fixed Roof Tanks for storing stripper overheads (primarily vinyl acetate and methanol) from the Paste Stripper Accumulators P01-11H, P04-13C, and P07-15C.<br>Maximum throughput: 355,200 gallons/yr total<br>Maximum True Vapor Pressure: 2.3622 psia<br>**MON Group 1 Storage Tanks** |
| **F01(16A-16D)** | T02 16A-16D | Paste Storage Tanks North Nest #1, FB-5501, FB-5502, FB-5503 & FB-5504 |
| **F01(17A-17D)** | T03 17A-17D | Paste Storage Tanks South Nest #2 , FB-5505, FB-5506, FB-5507 & FB-5508 |
| **F01(18A,18B)** | T04 18A, 18B | **Paste Storage Tanks West Nest #3**, FB-5509 and FB-5510<br>Tank Description: Fixed Roof Tanks<br>Capacity: 78,800 gallons each; Construction Date: 1984<br>Control Device: FLARE, BA-5000 (see Section B, EP-F01)<br>Operating Scenario #1: Fixed Roof Tanks for receipt of paste from the Polymerization Area and for feed for SAP Area<br>Maximum throughput: 60,000,000 gallons/yr as methanol total<br>Maximum True Vapor Pressure: 10.8542 psia<br>Operating Scenario #2: Fixed Roof Tanks for storing stripper overheads (primarily vinyl acetate and methanol) from the Paste Stripper Accumulators P01-11H, P04-13C, and P07-15C.<br>Maximum throughput: 355,200 gallons/yr total<br>Maximum True Vapor Pressure: 3.4610 psia<br>**MON Group 1 Storage Tanks** |
| **T05** | T05 | **Methanol Storage Tank**, FB-5531<br>Tank Description: Internal Floating Roof Tank with primary seal (Vapor-mounted) and secondary seal (Rim-mounted) storing “fresh” methanol (95%) and recovered methanol (5%) from the Polymethanol Tower, DA-5103<br>Capacity: 51,000 gallons; Construction Date: 1959<br>Maximum throughput: 3,120,000 gallons/yr<br>Maximum True Vapor Pressure: 1.3917 psia<br>**MON Group 1 Storage Tank** |

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **T06** | T06 | **Methanol Saponification Tank System (4)**, FB-5532, FB-5533, FB-5534 and FB-5535<br>Tank Description: Internal Floating Roof Tanks with primary seal (Vapor-mounted) primarily storing recovered methanol from the SAP Methanol Tower (DA-5303) and the Polymethanol Tower (DA-5103) and also storing Mother Liquor.<br>Tank Capacity: 51,000 gallons each; Construction Date: 1959<br>Maximum Throughput: 134,028,000 gallons/yr (total)<br>Maximum True Vapor Pressure: 2.619 psia<br>**HON Group 1 Storage Vessels** |
| **T07, T08** | T07,T08 | **Mother Liquor Storage Tanks**<br>Tank Description: Two (2) Internal Floating Roof Tank with Primary Seal (Vapor-mounted) and Secondary Seal (Rim-mounted)<br>Capacity: 215,000 gallons each; Construction Date: 1959<br>Maximum Throughput: 138,809,600 gallons/yr each<br>Maximum True Vapor Pressure: 1.9093 psia<br>**HON Group 1 Storage Vessels** |
| **T07** | T07 | N. Mother Liquor Storage Tank, FB-5536 |
| **T08** | T08 | S. Mother Liquor Storage Tank, FB-5537 |
| **F01(19A-19B)** | T10-19A-19B | **Recovered Vinyl Acetate Rework Storage Tanks (2)**, FA-5522 and FB-5523<br>Capacity: FA-5522 -30,400 gallons, FB-5523 - 15,220 gal<br>Construction Date: 2019 for FA-5522 and 2015 for FB-5523<br>Control Device: FLARE, BA-5000 (see Section B, EP-F01)<br>Operating Scenario #1: Fixed roof tanks storing recovered vinyl acetate from the Vinyl Re-distillation Tower (DA-5105) and/or fresh vinyl acetate from pump GA-5112 A/B.<br>Maximum throughput: 39,420,000 gallons/yr total<br>Maximum True Vapor Pressure: 2.2002 psia<br>Operating Scenario #2: Fixed roof tanks storing stripper overheads (primarily vinyl acetate and methanol) from the Paste Stripper Accumulators P01-11H, P04-13C, and P07-15C.<br>Maximum throughput: 355,200 gallons/yr total<br>Maximum True Vapor Pressure: 2.3622 psia<br>**MON Group 1 Storage Tanks** |
| **T11-1**<br>**T11-2** | T11 | **Acetic Acid Tanks (4)**<br>Tank Description: Fixed Roof Tanks<br>FB-1501-71,000 gal, FB-1502 - 110,000 gal, FB-1503-204,000 gal, FB-1517/FB-4517-450,000 gal<br>Operating Scenario #1: Acetic Acid Storage<br>Maximum Throughput: 31,536,000 gallons/yr total<br>Operating Scenario #2: Methyl Acetate storage in FB-1517/FB-4517<br>Maximum Throughput: 2,250,000 gallons/yr in FB-1517/FB-4517<br>Maximum True Vapor Pressure: 0.5998 psia<br>Construction Date: 1959 for FB-1501, FB-1502, FB-1503<br>Construction Date: 1978 for FB-1517/FB-4517 |
| **T14** | T14 | **Equipment Leaks (Tank Farm Fugitives)**<br>Light Liquid Valves: 625 Light Liquid Pumps: 28<br>Connectors: 2,479 Instrumentation Systems: 104<br>Pressure Relief Devices Light Liquid: 35 |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **T15** | T15 | **Maintenance Wastewater/Group 2 Wastewater Tanks , FT-1, FT-2, FT-3 and FT-4**<br>Capacity: 21,000 gallons each<br>Construction Date: January 9, 2014<br>Tank Description: Frac Tanks<br>Operating Scenario: Maintenance wastewater from 200/250/400/600 Line Boilouts<br>**MON Maintenance Wastewater Streams**<br>Maximum throughput: 84,000 gallons/yr total<br>Maximum True Vapor Pressure: 0.3064 psi |

The equipment leak component count for the Tank Farm, listed above, as submitted in the application, reflects an accurate count of the equipment as of the date of issuance of this permit but is not intended to limit the permittee to the exact numbers specified. The permittee may add or remove equipment leak components without a permit revision as long as the components continue to comply with the applicable requirements listed below, and the changes do not: (1) cause a significant increase of emissions; or (2) result in the applicability of an additional standard that is not specified in this permit.

**APPLICABLE REGULATIONS:**

401 KAR 60:005, Section 2.(2)(r), 40 C.F.R. 60.110b to 60.117b (Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. Pursuant to 40 CFR 63.2525(c), the source has elected to assign T04-(18A-18B) and T1—(19A/B) to a MCPU and to comply with the requirements for Group 1 storage tanks under 40 CFR 63, Subpart FFFF which also demonstrates compliance with the requirements of 40 CFR 60, Subpart Kb.

401 KAR 63:002, Section 2 (4)(lll), 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.

401 KAR 63:002, Section 2(4)(b), 40 C.F.R. 63.110 through 63.153, Tables 1 through 37 (Subpart G), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, applies to the storage vessels at EU-T01, T06, T07, T08, T09 and T15, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(c), 40 C.F.R. 63.160 through 63.183, Tables 1 through 4 (Subpart H), National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.; 40 CFR 63, Subpart H applies to the equipment leaks at EU T14 and the storage vessels at EU T01 and T06-T09, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(ii), 40 C.F.R. 63.980 through 63.999 (Subpart SS), National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process.; (40 CFR 63, Subpart SS), as referenced by 40 CFR 63, Subpart FFFF.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

401 KAR 63:002, Section 2.(4)(mm), 40 C.F.R. 63.1060 through 63.1067 (Subpart WW), National Emission Standards for Storage Vessels (Tanks) - Control Level 2. This regulation applies to tank EU-T05. (40 CFR 63, Subpart WW), as referenced by 40 CFR 63, Subpart FFFF.

*Note:*
*40 CFR 63, Subparts G and H have been updated as cited in 89 FR 43175-43220 and 89 FR 43220-43234, dated May 16, 2024; &*
*40 CFR 63, Subpart FFFF has been updated as cited in 89 FR 23868-23873 dated April 4, 2024.*

**PRECLUDED REGULATIONS**:
Refer to **Section B, Group Requirements.**

**NON-APPLICABLE REGULATIONS:**
401 KAR 59:050, New storage vessels for petroleum liquids.

401 KAR 60:005, Section 2.(2)(r), 40 C.F.R. 60.110b through 60.117b (Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

401 KAR 63:002, Section 2(4)(b), 40 C.F.R. 63.110 through 63.153, Tables 1 through 37 (Subpart G), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, is not applicable to the storage tanks at EU T02-(16A-16D), T03-(17A-17D), T04-(18A-18B) and T10-(19A-19B).

401 KAR 63:002, Section 2.(4)(c), 40 C.F.R. 63.160 through 63.183, Tables 1 through 4 (Subpart H), National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, is not applicable to the equipment leaks from the storage tanks at EU T02-(16A-16D), T03-(17A-17D), T04-(18A-18B) and T10(19A-19B).

401 KAR 63:002, Section 2 (4)(a)(kkk), 40 C.F.R. 63.2330 through 63.2406, Tables 1 through 12 (Subpart EEEE), National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).

1. **Operating Limitations:**
   a. If a 40 CFR 63, Subpart FFFF Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 requirements beginning on the date the switch occurs. An initial compliance demonstration as specified in 40 CFR 63, Subpart FFFF must be conducted within 150 days after the switch occurs. [40 CFR 63.2445(d)]

   b. Refer to 40 CFR 63.103(a) for general provisions.

   c. Refer to 40 CFR 63.2540 for general provisions.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

d. The permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements 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 source. [40 CFR 63.2450(u)]

Storage Vessels

e. For the Group 1 storage vessels at EU-T01 and T06-T09 storing a liquid for which the maximum true vapor pressure of the total organic hazardous air pollutants in the liquid is less than 76.6 kilopascals, the permittee shall reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof (IFR) in accordance with the requirements in 40 CFR 63.119(b), or equivalent as provided in 40 CFR 63.121. [40 CFR 63.119(a)(1)]

f. For the HON Group 1 storage vessels at EU-T01 and T06-T09, the permittee shall comply with the following requirements. [40 CFR 63.119(a)(1) and 40 CFR 63.119(b)]
   (1) The IFR shall be floating on the liquid surface at all times except when the floating roof must be supported by the leg supports during the following periods: [40 CFR 63.119(b)(1)]
      (i) During the initial fill. [40 CFR 63.119(b)(1)(i)]
      (ii) After the vessel has been completely emptied and degassed. [40 CFR 63.119(b)(1)(ii)]
      (iii) When the vessel is completely emptied before being subsequently refilled. [40 CFR 63.119(b)(1)(iii)]
   (2) When the floating roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as soon as practical. [40 CFR 63.119(b)(2)]

      Note: The intent of 40 CFR 63.119(b)(1 and 2), is to avoid having a vapor space between the floating roof and the stored liquid for extended periods. Storage vessels may be emptied for purposes such as routine storage vessel maintenance, inspections, petroleum liquid deliveries, or transfer operations. Storage vessels where liquid is left on walls, as bottom clingage, or in pools due to floor irregularity are considered completely empty.
   (3) Each IFR shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device shall consist of a liquid-mounted seal, a metallic shoe seal, or two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the IFR. The lower seal may be vapor-mounted, but both must be continuous seals. [40 CFR 63.119(b)(3)(iii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(4) Automatic bleeder vents are to be closed at all times when the roof is floating, except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 63.119(b)(4)]

(5) Each IFR shall meet the following specifications: [40 CFR 63.119(b)(5)]

(i) Each opening in a noncontact IFR except for automatic bleeder vents (vacuum breaker vents) and rim space vents is to provide a projection below the liquid surface. [40 CFR 63.119(b)(5)(i)]

(ii) Except as specified in 40 CFR 63.119(b)(5)(ix), each opening in the IFR except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover or lid. The cover or lid shall be equipped with a gasket. [40 CFR 63.119(b)(5)(ii)]

(iii) Each penetration of the IFR for the purposes of sampling shall be a sample well. Each sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 63.119(b)(5)(iii)]

(iv) Each automatic bleeder vent shall be gasketed. [40 CFR 63.119(b)(5)(iv)]

(v) Each rim space vent shall be gasketed. [40 CFR 63.119(b)(5)(v)]

(vi) Each penetration of the IFR that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 63.119(b)(5)(vi)]

(vii) Each penetration of the IFR that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 63.119(b)(5)(vii)]

(viii) For each source as defined in 40 CFR 63.101, beginning no later than the compliance dates specified in 40 CFR 63.100(k)(10), 40 CFR 63.119(b)(5)(i) no longer applies. Instead, each opening in the internal floating roof except those for automatic bleeder vents (vacuum breaker vents), rim space vents, leg sleeves, and deck drains shall be equipped with a deck cover. The deck cover shall be equipped with a gasket between the cover and the deck. [40 CFR 63.119(b)(5)(ix)]

(6) Each cover or lid on any opening in the IFR shall be closed (i.e., no visible gaps), except when the cover or lid must be open for access. Covers on each access hatch and each gauge float well shall be bolted or fastened so as to be air-tight when they are closed. Rim space vents are to be set to open only when the IFR is not floating or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting. [40 CFR 63.119(b)(6)]

g. For the MON Group 1 storage tanks at EU-T02-(16A-16D), T03-(17A-17D), T04-(18A&18B) and T10-(19A-19B) storing a liquid for which the maximum true vapor pressure of the total organic hazardous air pollutants in the liquid is less than 76.6 kilopascals, the permittee must reduce total organic HAP emissions by venting emissions through a closed vent system to a flare. [40 CFR 63.2470(a)]

h. For the MON Group 1 storage tank at EU-T05, equipped with an IFR and storing a liquid for which the maximum true vapor pressure of the total organic hazardous air pollutants in the liquid is less than 76.6 kilopascals, the permittee must comply with the requirements of 40 CFR 63 Subpart WW to operate and maintain an IFR, according to

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

the following design requirements: [40 CFR 63.2470(a)]

(1) For rim seals, the IFR shall be equipped with two seals mounted one above the other. The lower seal may be vapor-mounted. [40 CFR 63.1063(a)(1)(i)(C)]

(2) For deck fittings, the openings through the deck of the floating roof shall be equipped with the following: [40 CFR 63.1063(a)(2)(i through viii)]

(i) Each opening except those for automatic bleeder vents (vacuum breaker vents) and rim space vents shall have its lower edge below the surface of the stored liquid. [40 CFR 63.1063(a)(2)(i)]

(ii) Each opening except those for automatic bleeder vents (vacuum breaker vents), rim space vents, leg sleeves, and deck drains shall be equipped with a deck cover. The deck cover shall be equipped with a gasket between the cover and the deck. [40 CFR 63.1063(a)(2)(ii)]

(iii) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be equipped with a gasketed lid. [40 CFR 63.1063(a)(2)(iii)]

(iv) Each opening for a sample well or deck drain (that empties into the stored liquid) may be equipped with a slit fabric seal that covers at least 90 percent of the opening, instead of a deck cover. [40 CFR 63.1063(a)(2)(iv)]

(v) Each cover on access hatches and gauge float wells shall be designed to be bolted or fastened when closed. [40 CFR 63.1063(a)(2)(v)]

(vi) Each opening for an unslotted guidepole shall be equipped with a pole wiper, and each unslotted guidepole shall be equipped with a gasketed cap on the top of the guidepole. [40 CFR 63.1063(a)(2)(vi)]

(vii) Each opening for a slotted guidepole shall be equipped with one of the following control device configurations: [40 CFR 63.1063(a)(2)(vii)]

(A) A pole wiper and a pole float. The wiper or seal of the pole float shall be at or above the height of the pole wiper. [40 CFR 63.1063(a)(2)(vii)(A)]

(B) A pole wiper and a pole sleeve. [40 CFR 63.1063(a)(2)(vii)(B)]

(3) The floating roof shall float on the stored liquid surface at all times, except when the floating roof is supported by its leg supports or other support devices (e.g., hangers from the fixed roof). [40 CFR 63.1063(b)(1)]

(4) When the storage vessel is storing liquid, but the liquid depth is insufficient to float the floating roof, the process of filling to the point of refloating the floating roof shall be continuous and shall be performed as soon as practical. [40 CFR 63.1063(b)(2)]

(5) Each cover over an opening in the floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall be closed at all times, except when the cover must be open for access. [40 CFR 63.1063(b)(3)]

(6) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be closed at all times, except when required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer's design. [40 CFR 63.1063(b)(4)]

(7) Each unslotted guidepole cap shall be closed at all times except when gauging the liquid level or taking liquid samples. [40 CFR 63.1063(b)(5)]

i. For the MON Group 1 storage tanks at EU-T02-(16A-16D), T03-(17A-17D), T04-(18A&18B), T10-(19A-19B), and T05,:the permittee must comply with 40 CFR 63.2470(f)(1)-(3) during storage tank shutdown operations until the vapor space

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

concentration in the storage tank is less than 10 percent of the LEL using process instrumentation or portable measurement devices and follow procedures for calibration and maintenance according to manufacturer's specifications: [40 CFR 63.2470(f)]

(1) Remove liquids from storage tanks as much as practicable. [40 CFR 63.2470(f)(1)]

(2) Comply with one of the following: [40 CFR 63.2470(f)(2)]

(i) Reduce HAP emissions through closed vent system to flare. [40 CFR 63.2470(f)(2)(i)]

(ii) Reduce HAP by 95 wt% through closed vent system to any combination of non-flare control devices. 40 CFR 63.2470(f)(2)(ii)]

(iii) Route to a fuel gas system or process and meet the requirements specified in 40 CFR 63.982(d) and the applicable requirements in 40 CFR 63.2450(e)(4). 40 CFR 63.2470(f)(2)(iii)]

Closed Vent Systems

Note: The closed vent system is constructed of hard piping as defined by 40 CFR 63.981.

j. All MON Group 1 storage tanks at EU T02-(16A-16D), T03-(17A-17D), T04-(18A & 18B) and T10-(19A-19B) must be vented to a flare that complies with all applicable requirements of 40 CFR 63.2450(f). [40 CFR 63.2450(e)]

k. The permittee shall comply with the following provisions for the closed vent systems routing the vapors from the Group 1 storage tanks to the FLARE, EP-F01. [CFR 63.2450(e)(2), 40 CFR 63.983(a) and 40 CFR 63.982(b)]

(1) Closed vent systems shall be designed and operated to collect the regulated material vapors from the emission points, and to route the collected vapors to a control device. [40 CFR 63.983(a)(1)]

(2) Closed vent systems shall be operated at all times when emissions are vented to, or collected by, them. [40 CFR 63.983(a)(2)]

(3) The permittee shall comply with the provisions of either 40 CFR63.983(a)(3)(i or ii) of 40 CFR 63.983, for each closed vent system that contains bypass lines that could divert a vent stream to the atmosphere. [40 CFR 63.983(a)(3)]

(i) Properly install, maintain, and operate a flow indicator at the entrance to any bypass line that is capable of taking periodic readings. Records shall be generated as specified in 40 CFR 63.998(d)(1)(ii)(A). The flow indicator shall be installed at the entrance to any bypass line. [40 CFR 63.983(a)(3)(i)]

(ii) Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. [40 CFR 63.983(a)(3)(ii)]

(4) If there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(i)(B), the permittee shall comply with either of the following procedures. [40 CFR 63.983(d)(1)]

(i) Eliminate the leak. [40 CFR 63.983(d)(1)(i)]

(ii) Monitor the equipment according to the procedures therein. [40 CFR 63.983(c)]

(5) Leaks, as indicated by an instrument reading greater than 500 ppm by volume above background or by visual inspections, shall be repaired as soon as practical. [40 CFR 63.983(d)(2)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(i) A first attempt at repair shall be made no later than 5 days after the leak is detected. [40 CFR 63.983(d)(2)(i)]
(ii) Except as provided in 40 CFR 63.983(d)(3) for delay of repair, repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. [40 CFR 63.983(d)(2)(ii)]

l. For EU-T02-(16A-16D), T03-(17A-17D), T04-(18A&18B) and T10-(19A-19B), and except as provided by 40 CFR 63.2450(e)(4) per 40 CFR 63.2450(e)(6)(ii), the permittee shall comply with the provisions of either of the following for each closed vent system that contains bypass lines that could divert a vent stream to the atmosphere: [40 CFR 63.983(a)(3)]
(1) Properly install, maintain, and operate a flow indicator at the entrance to any bypass line that is capable of taking periodic readings. [40 CFR 63.983(a)(3)(i)]
(2) Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. [40 CFR 63.983(a)(3)(ii)]

m. The use of a bypass line at any time on a closed vent system to divert emissions subject to the requirements in Tables 1 through 7 to 40 CFR 63 Subpart FFFF to the atmosphere or to a control device not meeting the requirements specified in Tables 1 through 7 of 40 CFR 63, Subpart FFFF is an emissions standard deviation. [40 CFR 63.2450(e)(6)]

n. For EU-T02-(16A-16D), T03-(17A-17D), T04-(18A&18B) and T10-(19A-19B) if there are visible, audible, or olfactory indications of equipment leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(i)(B), the permittee shall comply with either of the following procedures. [40 CFR 63.983(d)(1)]
(1) Eliminate the leak. [40 CFR 63.983(d)(1)(i)]
(2) Monitor the equipment according to the procedures therein. [40 CFR 63.983(c)]

o. EU-T02-(16A-16D), T03-(17A-17D), T04-(18A&18B) and T10-(19A-19B), leaks, as indicated by an instrument reading greater than 500 ppm by volume above background or by visual inspections, shall be repaired as soon as practical. [40 CFR 63.983(d)(2)]
(1) A first attempt at repair shall be made no later than 5 days after the leak is detected. [40 CFR 63.983(d)(2)(i)]
(2) Except as provided in 40 CFR 63.983(d)(3) for delay of repair, repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. [40 CFR 63.983(d)(2)(ii)]

Equipment Leaks

p. For the equipment leaks in organic hazardous air pollutant service, the permittee shall implement an LDAR program in accordance with 40 CFR 63, Subpart H containing the following elements, except as provided in 40 CFR 63.2480(b)(7): [40 CFR 63.160, 40 CFR 63.2480(a) and 40 CFR 63, Subpart FFFF, Table 6]
(1) Each piece of equipment leaks subject to 40 CFR 63 Subpart H or 40 CFR 63, Subpart FFFF shall be identified such that it can be distinguished readily from

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

equipment that is not subject to 40 CFR 63, Subpart H or 40 CFR 63, Subpart FFFF. [40 CFR 63.162(c)]

(2) When a leak is detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168 and 40 CFR 63.169; and 40 CFR 63:172 through 40 CFR 63.174, the permittee shall: [40 CFR 63.162(f)]
   (i) Clearly identify the leaking equipment. [40 CFR 63.162(f)(1)]
   (ii) The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 40 CFR 63.175(e)(7)(i)(D), and no leak has been detected during the follow-up monitoring. If the permittee elects to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored and no leak is detected during that monitoring. [40 CFR 63.162(f)(2)]
   (iii) The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that is subject to 40 CFR 63.174(c)(1)(i), may be removed after it is repaired. [40 CFR 63.162(f)(3)]

(3) For each piece of equipment subject to 40 CFR 63, Subpart FFFF that is added to an affected source after December 17, 2019, or replaces equipment at an affected source after December 17, 2019, the permittee must initially monitor for leaks within 30 days after August 12, 2020, or initial startup of the equipment, whichever is later. Equipment that is designated as unsafe- or difficult-to-monitor is not subject to this requirement. [40 CFR 63.2480(b)(7)]

q. Except as specified in 40 CFR 63.2480(e)(4), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(1) and (2) for pressure relief devices, such as relief valves or rupture disks, in organic HAP gas or vapor service instead of the pressure relief device requirements of 40 CFR 63.165 of Subpart H. [40 CFR 63.2480(e)]

r. Except as specified in 40 CFR 63.2480(e)(4) and (5), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(3), (6), (7), and (8) for all pressure relief devices in organic HAP service. [40 CFR 63.2480(e)]
   (1) Implement the pressure release management requirements outlined in 40 CFR 63.2480(e)(3)(i) – (v). [40 CFR 63.2480(e)(3)]
   (2) A root cause analysis and corrective action analysis must be completed as soon as possible, but no later than 45 days after a release event. Special circumstances affecting the number of root cause analyses and/or corrective action analyses are provided in 40 CFR 63.2480(e)(6)(i) – (iii). [40 CFR 63.2480(e)(6)]
   (3) The permittee must implement the corrective action(s) identified in the corrective action analysis in accordance with the applicable requirements in 40 CFR 63.2480(e)(7)(i) – (iii). [40 CFR 63.2480(e)(7)]
   (4) The permittee is prohibited from installing any flowing pilot-operated pressure relief device or replace any pressure relief device with a flowing pilot-operated pressure relief device after August 12, 2023. [40 CFR 63.2480(e)(8)]

Maintenance Wastewater Streams

s. The permittee must comply with the requirements in 40 CFR 63.105(a) and the requirements referenced therein, except as specified in 40 CFR 63.2485, for the

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

maintenance wastewaters from Boilout of the Saponifiers and Slurry Tanks, Centrifuges and Filtrate Tanks, Turbo Dryers, and Post Dryers in the SAP Area containing organic HAPs listed in 40 CFR 63, Subpart FFFF, Tables 8 and 9. [40 CFR 63.2485(a) and 40 CFR 63, Subpart FFFF, Table 7, item 2]

**Compliance Demonstration Method:**

a. Refer to **4. Specific Monitoring Requirements** and **5. Specific Recordkeeping Requirements** for Closed Vent Systems Storage Vessels and Maintenance Wastewater Tanks.

b. For the equipment leaks, compliance shall be determined by review of the records required by 40 CFR 63.181 and the reports required by 40 CFR 63.182, review of performance test results, and by inspections. [40 CFR 63.162(a)]

**2. Emission Limitations:**

Equipment Leaks and Closed Vent Systems

a. For the equipment leaks, the permittee shall comply with the fugitive equipment leak emissions standards in 40 CFR 63.160 through 40 CFR 63.182, as applicable.

(1) Standards for Pumps in light liquid service: [40 CFR 63.163]

| | |
|---|---|
| 40 CFR 63.163(a): | Implementation and compliance provisions |
| 40 CFR 63.163(b): | Monitoring requirements, Leak detection levels, frequency of monitoring |
| 40 CFR 63.163(c): | Repair procedures and time frames [*except 40 CFR 63.163 (c)(3)*] |
| 40 CFR 63.163(d): | Procedures to determine percent leaking pumps and quality improvement program requirements |
| 40 CFR 63.163(e)-(j): | Exemptions for specific types of pumps |

(2) Standards for Compressors: [40 CFR 63.164]

| | |
|---|---|
| 40 CFR 63.164(a)-(e): | Operational requirements |
| 40 CFR 63.164(f): | Criteria for Leak detection |
| 40 CFR 63.164(g): | Repair procedures and time frames |
| 40 CFR 63.164(h)-(i): | Exemptions for specific types of compressors |

(3) Standards for Pressure relief devices in gas/vapor service: [40 CFR 63.2480(e)]

| | |
|---|---|
| 40 CFR 63.2480(e)(1): | Operational requirements |
| 40 CFR 63.2480(e)(2): | Pressure release procedures |
| 40 CFR 63.2480(e)(4): | Exemptions for specific types of pressure relief devices |

(4) Standards for Sampling Connection Systems: [40 CFR 63.166]

| | |
|---|---|
| 40 CFR 63.166(a)-(b): | Operational requirements |
| 40 CFR 63.166(c): | Exemptions for specific types of sampling connection systems |

(5) Standards for Open-ended valves or lines: [40 CFR 63.167]

| | |
|---|---|
| 40 CFR 63.167(a)-(c): | Operational requirements |
| 40 CFR 63.167(d)-(e): | Exemptions for specific types of valves |

(6) Standards for Valves in gas/vapor service and in light liquid service: [40 CFR 63.168]

| | |
|---|---|
| 40 CFR 63.168(a): | Operational requirements |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

40 CFR 63.168(b)-(d): Monitoring requirements and intervals
40 CFR 63.168(e): Procedures to determine percent leaking valves
40 CFR 63.168(f): Leak repair time frames
40 CFR 63.168(g): First attempt repair procedures
40 CFR 63.168(h): Exemptions for unsafe-to-monitor valves
40 CFR 63.168(i): Exemptions for difficult-to-monitor valves

(7) Standards for Instrumentation systems: [40 CFR 63.169]
40 CFR 63.169(a): Monitoring frequency
40 CFR 63.169(b): Leak detection levels
40 CFR 63.169(c): Leak repair time frames

(8) Standards for Delay of repair: [40 CFR 63.171]
40 CFR 63.171 Allowances for delay of repair

(9) Standards for Closed-vent systems and control devices: [40 CFR 63.172]
40 CFR 63.172(a)-(b): Operational requirements
40 CFR 63.172(d),(m): Control device requirements
40 CFR 63.172(f)-(g): Monitoring requirements
40 CFR 63.172(h)-(i): Repair procedures and time frames
40 CFR 63.172 (j): Operational requirements for bypass lines [*except 40 CFR 63.172(j)(3)*]
40 CFR 63.172(k)-(l): Exemptions for unsafe-to-inspect and difficult-to-inspect closed-vent systems

(10) Standards for Agitators in gas/vapor service and in light liquid service: [40 CFR 63.173]
40 CFR 63.173(a): Operational requirements
40 CFR 63.173(b): Monitoring requirements and intervals
40 CFR 63.173(c): Leak repair time frames
40 CFR 63.173(d)-(g): Exemptions for specific types of agitators
40 CFR 63.173(h)-(j): Exemptions for difficult-to-monitor, inaccessible or unsafe-to-monitor agitators

(11) Standards for connectors in gas/vapor service and in light liquid service: [40 CFR 63.174]
40 CFR 63.174(a): Operational requirements
40 CFR 63.174(b): Monitoring requirements and intervals
40 CFR 63.174(c): Procedures for open connectors or connectors with broken seals
40 CFR 63.174(d): Leak repair time frames
40 CFR 63.174(e): Monitoring frequency for repaired connectors
40 CFR 63.174(f)-(h): Exemptions for unsafe-to-monitor, unsafe-to-repair, inaccessible, or ceramic connectors
40 CFR 63.174(i): Procedures to determine percent leaking connectors
40 CFR 63.174(j): Optional credit for removed connectors

(12) In Phase III, Quality improvement program for valves: the permittee may elect to implement the following quality improvement programs if the percent of leaking valves is equal to or exceeds 2 percent: [40 CFR 63.175 and 40 CFR 63.168(d)(1)(ii)]
40 CFR 63.175(a): Quality improvement program alternatives

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

40 CFR 63.175(b): Criteria for ending quality improvement programs
40 CFR 63.175(c): Alternatives following achievement of less than 2 percent leaking valves target
40 CFR 63.175(d): Quality improvement program to demonstrate further progress
40 CFR 63.175(e): Quality improvement program of technology review and improvement

(13) If in Phase III, Quality improvement program for pumps: calculated on a 6-month rolling average, the greater of either 10 percent of the pumps or three pumps in the Polymerization, Saponification, Polyrectification, Tank Farm, and Loading Areas (that are part of the 40 CFR 63, Subpart FFFF MCPU) or in the AAR, Tank Farm, and Loading Areas (that are part of the 40 CFR 63, Subpart H CMPU) leak, the permittee shall implement the following quality improvement programs for pumps: [40 CFR 63.176 and 40 CFR 63.163(d)(2)]

40 CFR 63.176(a): Applicability criteria
40 CFR 63.176(b): Criteria for ending the quality improvement program
40 CFR 63.176(c): Criteria for resumption of the quality improvement program
40 CFR 63.176(d): Quality improvement program elements

**Compliance Demonstration Method:**
Refer to **1. Operating Limitations** Compliance Demonstration b.

**3. Testing Requirements:**

a. Refer to **3. Testing Requirements** for the FLARE in **Section B**, EP-F01.

b. For EU T05, IFRs shall be inspected as specified in 40 CFR 63.1063(d)(1) before the initial filling of the storage vessel. Subsequent inspections shall be performed as specified in 40 CFR 63.1063(c)(1)(i or ii): [40 CFR 63.1063(c)(1)]
   (1) At least once per year as specified in 40 CFR 63.1063(d)(2); and; [40 CFR 63.1063(c)(1)(i)(A)]
   (2) Each time the storage vessel is completely emptied and degassed, or every 10 years, whichever occurs first, the IFR shall be inspected as specified in 40 CFR 63.1063(d)(1) or; [40 CFR 63.1063(c)(1)(i)(B)]
   (3) IFRs with two rim seals may be inspected as specified in 40 CFR 63.1063(d)(1) each time the storage vessel is completely emptied and degassed, or every 5 years, whichever occurs first. [40 CFR 63.1063(c)(1)(ii)]

c. For the equipment leaks, the permittee shall comply with the following test methods and procedures requirements: [40 CFR 63.180(a through d)]
   (1) 40 CFR 63.180(b) Monitoring procedures, test methods, and calibration procedures
   (2) 40 CFR 63.180(c) Leak detection monitoring procedures [*replacing reference to 40 CFR 63.165(a) with 40 CFR 63.2480(e)(1)* )];
   (3) 40 CFR 63.180(d) Procedures for determining organic HAP service applicability

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(4) When a flare is used to comply with 40 CFR 63.172(d), the permittee shall comply with 40 CFR 63.180(e)(1 through 3). The permittee is not required to conduct a performance test to determine percent emission reduction or outlet organic HAP or TOC concentration. [40 CFR 63.180(e)]
   (i) Conduct a visible emission test using the techniques specified in 40 CFR 63.11(b)(4).
   (ii) Determine the net heating value of the gas being combusted using the techniques in 40 CFR 63.11(b)(6).
   (iii) Determine the exit velocity using the techniques specified in either 40 CFR 63.11(b)(7)(i) (and 40 CFR 63.11(b)(7)(iii), where applicable).

(5) The permittee must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1), if applicable. [40 CFR 63.2515(c)]

**4. Specific Monitoring Requirements:**

a. For the Group 1 storage vessels at EU-T01 and T06-T09, the permittee shall comply with the following requirements in accordance with 40 CFR 63.120(a): [40 CFR 63.119(b)]

(1) The permittee shall visually inspect the IFR, the primary seal, and the secondary seal, by performing either the inspection required by 40 CFR 63.120(a)(3)(i) or the inspections required by both CFR 63.120(a)(3)(ii and iii) as follows: [40 CFR 63.120(a)(3)]
   (i) Visually inspect the IFR, the primary seal, the secondary seal, gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed and at least once every 5 years; or [40 CFR 63.120(a)(3)(i)]
   (ii) Visually inspect the IFR and the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill, or at least once every 12 months, and; [40 CFR 63.120(a)(3)(ii)]
   (iii) Visually inspect the IFR, the primary seal, the secondary seal, gaskets, slotted membranes, and sleeve seals (if any) each time the vessel is emptied and degassed and at least once every 10 years. [[40 CFR 63.120(a)(3)(iii)]

(2) If during the inspections required by 40 CFR 63.120(a)(2)(i) or 40 CFR 63.120(a)(3)(ii), the IFR is not resting on the surface of the liquid inside the storage vessel and is not resting on the leg supports; or there is liquid on the floating roof; or the seal is detached; or there are holes or tears in the seal fabric; or there are visible gaps between the seal and the wall of the storage vessel, the permittee shall repair the items or empty and remove the storage vessel from service within 45 calendar days. If this failure cannot be repaired within 45 calendar days and if the vessel cannot be emptied within 45 calendar days, the permittee may utilize up to 2 extensions of up to 30 additional calendar days each. Documentation of a decision to utilize an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be emptied as soon as practical. [40 CFR 63.120(a)(4)]

(3) Except as provided in 40 CFR 63.120(a)(6), for all the inspections required by 40 CFR 63.120(a)(2)(ii), 40 CFR 63.120(a)(3)(i and iii), the permittee shall notify the Division in writing at least 30 calendar days prior to the refilling of each storage

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

vessel to afford the Division the opportunity to have an observer present. [40 CFR 63.120(a)(4)]

(4) If the inspection required by 40 CFR 63.120(a)(2)(ii), 40 CFR 63.120(a)(3)(i or iii) is not planned and the permittee could not have known about the inspection 30 calendar days in advance of refilling the vessel, the permittee shall notify the Division at least 7 calendar days prior to the refilling of the storage vessel. Notification may be made by telephone and immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, the notification including the written documentation may be made in writing and sent so that it is received by the Division at least 7 calendar days prior to refilling. [40 CFR 63.120(a)(6)]

(5) If during the inspections required by 40 CFR 63.120(a)(2)(ii), 40 CFR 63.120(a)(3)(i or iii), the IFR has defects; or the primary seal has holes, tears, or other openings in the seal or the seal fabric; or the secondary seal has holes, tears, or other openings in the seal or the seal fabric; or the gaskets no longer close off the liquid surface from the atmosphere; or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified exist before refilling the storage vessel with organic HAP. [40 CFR 63.120(a)(7)]

b. For EU-T02-(16A-16D), T03-(17A-17D), T04-(18A&18B) and T10-(19A-19B), refer to **4. Specific Monitoring Requirements** for the FLARE **Section B**, F01.

c. For EU-T05, inspections shall be conducted as specified in 40 CFR 63.1063(d)(1 through 3), as applicable. If the floating roof fails an inspection, the owner or operator shall comply with the repair requirements of 40 CFR 63.1063(e). [40 CFR 63.1063(d)]

(1) Floating roof inspections shall be conducted by visually inspecting the floating roof deck, deck fittings, and rim seals from within the storage vessel. The inspection may be performed entirely from the top side of the floating roof, as long as there is visual access to all deck components specified in 40 CFR 63.1063(a). [40 CFR 63.1063(d)(1)]

Any of the conditions described in 40 CFR 63.1063(d)(1) constitutes inspection failure.

(i) Stored liquid on the floating roof. 40 CFR 63.1063(d)(1)(i)]

(ii) Holes or tears in the primary or secondary seal. 40 CFR 63.1063(d)(1)(ii)]

(iii) Floating roof deck, deck fittings, or rim seals that are not functioning as designed (as specified in 40 CFR 63.1063(a)). 40 CFR 63.1063(d)(1)(iii)]

(iv) Failure to comply with the operational requirements of 40 CFR 63.1063(b). 40 CFR 63.1063(d)(1)(iv)]

(v) Gaps of more than 0.32 centimeters (1/8 inch) between any deck fitting gasket, seal, or wiper (required by 40 CFR 63.1063(a)) and any surface that it is intended to seal. 40 CFR 63.1063(d)(1)(v)]

(2) Tank-top inspections of the IFR shall be conducted by visually inspecting the floating roof deck, deck fittings, and rim seal through openings in the fixed roof. Any of the conditions described in 40 CFR 63.1063(d)(1)(i) through (d)(1)(iv) constitutes inspection failure. Identification of holes or tears in the rim seal is

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

required only for the seal that is visible from the top of the storage vessel. [40 CFR 63.1063(d)(2)]

(3) Conditions causing inspection failures under 40 CFR 63.1063(d) shall be repaired as specified: [40 CFR 63.1063(e)]

(i) If the inspection is performed while the storage vessel is not storing liquid, repairs shall be completed before the refilling of the storage vessel with liquid. [40 CFR 63.1063(e)(1)]

(ii) If the inspection is performed while the storage vessel is storing liquid, repairs shall be completed or the vessel removed from service within 45 days. If a repair cannot be completed and the vessel cannot be emptied within 45 days, the owner or operator may use up to 2 extensions of up to 30 additional days each. Documentation of a decision to use an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be completely emptied as soon as practical. [40 CFR 63.1063(e)(2)]

Continuous Process Vents and Closed Vent Systems

d. Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2 and 3), the permittee shall comply with the following requirements for each closed vent system: [40 CFR 63.983(b)(1)(i)]

(1) Conduct an initial inspection according to the procedures in 40 CFR 63.983(c); and [40 CFR 63.983(b)(1)(i)(A)]

(2) Conduct annual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 63.983(b)(1)(i)(B)]

e. For each bypass line, the permittee shall comply with either of the following requirements: [40 CFR 63.983(b)(4)]

(1) If a flow indicator is used, take a reading at least once every 15 minutes. [to 40 CFR 63.983(b)(4)(i)]

(2) If the bypass line valve is secured in the non-diverting position, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line. [to 40 CFR 63.983(b)(4)(ii)]

Equipment Leaks

f. Refer to **1. Operating Limitations** Compliance Demonstration Method b. and **3. Testing Requirements**.

Maintenance Wastewater

g. The permittee shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance turnaround)and during periods which are not shutdowns (i.e., routine maintenance). The descriptions shall: [40 CFR 63.105(b)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities; [40 CFR 63.105(b)(1)]
(2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and [40 CFR 63.105(b)(2)]
(3) The procedures to be followed when clearing materials from process equipment. [40 CFR 63.105(b)(3)]

h. The permittee shall modify and update the information required by 40 CFR 63.105(b) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure. [40 CFR 63.105(c)]

**5. Specific Recordkeeping Requirements:**

a. For the equipment subject to 40 CFR 63, Subparts F, G and H, all records shall be kept in accordance with 40 CFR 63.103(c).

b. All records shall be maintained in accordance with **Section F.2.**
c. For the storage tank at EU-T04-(18A & 18B), the permittee shall keep the following applicable records: [40 CFR 63.2525(b)]
(1) Except as specified in 40 CFR 63.2450(e)(4), 63.2480(f), and 63.2485(p) and (q) and 40 CFR 63.2525(t) and (u), each applicable record required by 40 CFR 63 Subpart A and in referenced subparts F, G, SS, and WW of 40 CFR Part 63. [40 CFR 63.2525(a)]
(2) Records of each operating scenario as specified: [40 CFR 63.2525(b)]
(i) An identification of storage tanks. [40 CFR 63.2525(b)(1) and (2)]
(ii) The applicable control requirements of 40 CFR 63, Subpart FFFF including the level of required control, and for vents, the level of control for each vent. [40 CFR 63.2525(b)(3)]
(iii) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. [40 CFR 63.2525(b)(4)]
(iv) The process vents, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s). [40 CFR 63.2525(b)(5)]
(v) The applicable monitoring requirements of 40 CFR 63, Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process. [40 CFR 63.2525(b)(6)]
(vi) Calculations and engineering analyses required to demonstrate compliance. [40 CFR 63.2525(b)(7)]
(vii) For reporting purposes, a change to any of these elements not previously reported, except for 40 CFR 63.2525(b)(5), constitutes a new operating scenario. : [40 CFR 63.2525(b)(8)]
(3) For each deviation from an emission limit, operating limit, or work practice standard, the permittee must keep a record of the information specified in 40 CFR 63.2525(l)(1) – (3). The records must be maintained as specified in 40 CFR 63.10(b)(1) of subpart A. In the event that an affected unit does not meet an applicable standard, record the number of deviations. [40 CFR 63.2525(l)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(i) For each deviation record the date, time, and duration of each deviation. [40 CFR 63.2525(l)(1)]
(ii) For each deviation from an applicable standard, record and retain a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions. [40 CFR 63.2525(l)(2)]
(iii) Record actions taken to minimize emissions in accordance with 40 CFR 63.2450(u) and any corrective actions taken to return the affected unit to its normal or usual manner of operation. [40 CFR 63.2525(l)93)]

Closed Vent Systems

d. The permittee shall keep records as specified in **5. Specific Recordkeeping Requirements** for the FLARE in **Section B**, EP-F01.

e. For the closed vent systems, the permittee shall record the following information. [40 CFR 63.998(d)(1)]
(1) The identification of all parts of the closed vent system that are designated as unsafe or difficult to inspect, an explanation of why the equipment is unsafe or difficult to inspect, and the plan for inspecting the equipment required by 40 CFR 63.983(b)(2)(ii) or (iii).
(2) The information specified in either 63.998(d)(1)(ii)(A) or (B), as applicable, for each closed vent system that contains bypass lines that could divert a vent stream away from the flare and to the atmosphere. [40 CFR 63.998(d)(1)(ii)]
(i) Hourly records of whether the flow indicator specified under 40 CFR 63.983(a)(3)(i) was operating and whether a diversion was detected at any time during the hour, as well as records of the times of all periods when the vent stream is diverted from the flare or the flow indicator is not operating; or 63.998(d)(1)(ii)(A)]
(ii) Where a seal mechanism is used to comply with 40 CFR 63.983(a)(3)(ii), hourly records of flow are not required. In such cases, the permittee shall record that the monthly visual inspection of the seals or closure mechanisms has been done, and shall record the occurrence of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has been broken. 63.998(d)(1)(ii)(B)]
(3) The following information, when a leak is detected as specified in 40 CFR 63.983(d)(2). These records shall be kept for 5 years. [40 CFR 63.998(d)(1)(iii)]
(i) The instrument and equipment identification number and the operator name, initials, or identification number. [40 CFR 63.998(d)(1)(iii)(A)]
(ii) The date the leak was detected and the date of the first attempt to repair the leak. [40 CFR 63.998(d)(1)(iii)(B)]
(iii) The date of successful repair of the leak. [40 CFR 63.998(d)(1)(iii)(C)]
(iv) The maximum instrument reading measured by the procedures in 40 CFR 63.983(c) after the leak is successfully repaired or determined to be nonrepairable. [40 CFR 63.998(d)(1)(iii)(D)]
(v) “Repair delayed” and the reason for the delay if a leak is not repaired within

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

15 days after discovery of the leak. The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. [40 CFR 63.998(d)(1)(iii)(E)]

(vi) Copies of the Periodic Reports as specified in 40 CFR 63.999(c), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.998(d)(1)(iii)(F)]

(4) For each instrumental or visual inspection conducted in accordance with 40 CFR 63.983(b)(1) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 63.998(d)(iv)]

f. For the storage vessels at EU-T01 and T06-T09, the permittee shall keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept as long as the storage vessel retains Group 1 or Group 2 status and is in operation. [40 CFR 63.123(a)]

g. For the storage tanks at EU-T01 and T06-T09, an owner or operator who elects to comply with 40 CFR 63.119(b) shall keep a record that each inspection required by 40 CFR 63.120(a) was performed. [40 CFR 63.123(c)]

h. For the storage tanks at EU-T01 and T06-T09, an owner or operator who elects to utilize an extension in emptying a storage vessel in accordance with 40 CFR 63.120(a)(4) shall keep in a readily accessible location, the documentation specified in 40 CFR 63.120(a)(4). [40 CFR 63.123(g)]

i. For the storage tanks at EU-T02-(16A-16D), T03-(17A-17D), T04-(18A & 18B) and T10-(19A-19B, a record shall be kept for as long as the liquid is stored of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored. [40 CFR 63.1065(a)]

j. For EU-T05, the permittee shall keep the following records for at least 5 years. [40 CFR 63.1065(a)]

(1) If the floating roof passes inspection, a record shall be kept that includes the information specified in 40 CFR 63.1065(b)(1)(i and ii). If the floating roof fails inspection, a record shall be kept that includes the information specified in 40 CFR 63.1065(b)(1)(i through v): [40 CFR 63.1065(b)(1)]

(i) Identification of the storage vessel that was inspected. [40 CFR 63.1065(b)(1)(i)]

(ii) The date of the inspection. [40 CFR 63.1065(b)(1)(ii)]

(iii) A description of all inspection failures. [40 CFR 63.1065(b)(1)(iii)]

(iv) A description of all repairs and the dates they were made. [40 CFR 63.1065(b)(1)(iv)]

(v) The date the storage vessel was removed from service, if applicable. [40 CFR 63.1065(b)(1)(v)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) The permittee shall keep a record of the date when a floating roof is set on its legs or other support devices. The permittee shall also keep a record of the date when the roof was refloated, and the record shall indicate whether the process of refloating was continuous. [40 CFR 63.1065(c)]

(3) An owner or operator who elects to use an extension in accordance with 40 CFR 63.1063(e)(2) or 40 CFR 63.1063(c)(2)(iv)(B) shall keep the documentation as required. [40 CFR 63.1065(d)]

k. For the equipment leaks, the permittee may comply with the recordkeeping requirements for the equipment in the Polymerization, Saponification, Polyrectification, AAR, Tank Farm, and Loading Areas in one recordkeeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records required by 40 CFR 63.181 shall be maintained in a manner that can be readily accessed at the plant site. [40 CFR 63.181(a)]

l. Except as provided in 40 CFR 63.181(e), and amended by 40 CFR 63.2480(f)(18), the following information pertaining to all equipment in each process unit subject to the requirements in 40 CFR 63.162 through 40 CFR 63.174 shall be recorded: [40 CFR 63.181(b)]

(1) The permittee shall keep the following records: [40 CFR 63.181(b)(i through iii)]

(i) A list of identification numbers for equipment (except instrumentation systems) subject to the requirements of 40 CFR 63, Subpart H. Pursuant to 40 CFR 63.2480(b)(3), as an existing source under 40 CFR 63, Subpart FFFF the permittee is not required to develop an initial list of identification numbers for connectors that are part of the MCPU as would otherwise be required under 40 CFR 63.181(b)(1)(i). [40 CFR 63.181(b)(i)]

(ii) A schedule by process unit for monitoring connectors subject to 40 CFR 63.174(a) and valves subject to 40 CFR 63.168(d). [40 CFR 63.181(b)(ii)]

(iii) Physical tagging of the equipment to indicate that it is in organic HAP service is not required. Equipment subject to the provisions of 40 CFR 63, Subpart H may be identified on a plant site plan, in log entries, or by other appropriate methods. [40 CFR 63.181(b)(iii)]

(2) The permittee shall keep the following records: [40 CFR 63.181(b)(2)(i and ii)]

(i) A list of identification numbers for equipment that the permittee elects to equip with a closed-vent system and control device, under the provisions of 40 CFR 63.163(g), 40 CFR 63.164(h), 40 CFR 63.2480(e)(4) or 40 CFR 63.165(e)(4), or 40 CFR 63.173(f), as applicable. [40 CFR 63.181(b)(2)(i)]

(ii) A list of identification numbers for compressors that the permittee elects to designate as operating with an instrument reading of less than 500 parts per million above background, under the provisions of 40 CFR 63.164(i). [40 CFR 63.181(b)(2)(ii)]

(3) A list of identification numbers for pressure relief devices subject to 40 CFR 63.2480(e)(1) and for pressure relief devices equipped with rupture disks, under the provisions of 40 CFR 63.2480(e)(ii) and (iii). [40 CFR 63.181(b)(3) and 40 CFR 63.2480(f)(10)(iii) and (iv)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(4) Individual components in an instrumentation system need not be identified. [40 CFR 63.181(b)(4)]

(5) Identification of screwed connectors subject to 40 CFR 63.174(c)(2). Identification can be by area or grouping as long as the total number within each group or area is recorded. [63.181(b)(5)]

(6) The following information shall be recorded for each dual mechanical seal system: [63.181(b)(6)]

(i) Design criteria required in 40 CFR 63.163(e)(6)(i), 40 CFR 63.164(e)(2), and 40 CFR 63.173(d)(6)(i) and an explanation of the design criteria; and [63.181(b)(6)(i)]

(ii) Any changes to these criteria and the reasons for the changes. [63.181(b)(6)(ii)]

(7) The following information pertaining to all pumps subject to 40 CFR 63.163(j), valves subject to 40 CFR 63.168(h and i), agitators subject to 40 CFR 63.173(h through j), and connectors subject to 40 CFR 63.174(f and g) shall be recorded: [63.181(b)(7)(i through iii)]

(i) Identification of equipment designated as unsafe to monitor, difficult to monitor, or unsafe to inspect and the plan for monitoring or inspecting this equipment. 63.181(b)(7)(i)]

(ii) A list of identification numbers for the equipment that is designated as difficult to monitor, an explanation of why the equipment is difficult to monitor, and the planned schedule for monitoring this equipment. 63.181(b)(7)(ii)]

(iii) A list of identification numbers for connectors that are designated as unsafe to repair and an explanation why the connector is unsafe to repair. 63.181(b)(7)(iii)]

(8) The permittee shall keep the following records: [40 CFR 63.181(b)(8)]

(i) A list of valves removed from and added to the process unit, as described in 40 CFR 63.168(e)(1), if the net credits for removed valves is expected to be used. [40 CFR 63.181(b)(8)(i)]

(ii) A list of connectors removed from and added to the process unit, as described in 40 CFR 63.174(i)(1), and documentation of the integrity of the weld for any removed connectors, as required in 40 CFR 63.174(j). This is not required unless the net credits for removed connectors is expected to be used. [40 CFR 63.181(b)(8)(ii)]

(9) For any leaks detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168 and 40 CFR 63.172 through 40 CFR 63.174, for any leaks detected as specified in, a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. [40 CFR 63.181(b)(10)]

(10) For each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.165(e), the permittee must keep the records specified in 40 CFR 63.181(b)(11)(i) through (iii) in addition to the records specified in 40 CFR 63.181(f). [40 CFR 63.181(b)(11)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

m. For visual inspections of equipment subject to the provisions of 40 CFR 63.163(b)(3) and 40 CFR 63.163(e)(4)(i), the permittee shall document that the inspection was conducted and the date of the inspection. The owner or operator shall maintain records as specified in 40 CFR 60.181(d) for leaking equipment identified in this inspection. These records shall be retained for 2 years. [40 CFR 63.181(c)]

n. When a leak is detected, the following information shall be recorded and kept for two years. [40 CFR 63.181(d)]
   (1) The instrument and the equipment identification number and the operator name, initials, or identification number. [40 CFR 63.181(d)(1)]
   (2) The date the leak was detected and the date of first attempt to repair the leak. [40 CFR 63.181(d)(2)]
   (3) The date of successful repair of the leak. [0 CFR 63.181(d)(23)]
   (4) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonrepairable. [40 CFR 63.181(d)(4)]
   (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. [40 CFR 63.181(d)(5)]
      (i) The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. For each source as defined in § 63.101, and for each source as defined in 40 CFR 63.191, on and after July 15, 2027, the sentence "The written procedures may be included as part of the startup/shutdown/malfunction plan, required by 40 CFR 63.6(e)(3), for the source or may be part of a separate document that is maintained at the plant site." in this paragraph no longer applies [40 CFR 63.181(d)(5)(i)]
      (ii) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion. [40 CFR 63.181(d)(5)(ii)]
   (6) Dates of process unit shutdowns that occur while the equipment is unrepaired. [40 CFR 63.181(d)(6)]
   (7) The permittee shall comply with the following: [40 CFR 63.181(d)(7)]
      (i) Identification, either by list, location (area or grouping), or tagging of connectors that have been opened or otherwise had the seal broken since the last monitoring period required in 40 CFR 63.174(b), as described in 40 CFR 63.174(c)(1), unless the permittee elects to comply with 40 CFR 63.174(c)(1)(ii). [40 CFR 63.181(d)(7)(i)]
      (ii) The date and results of monitoring as required in 40 CFR 63.174(c). If identification of connectors that have been opened or otherwise had the seal broken is made by location under 40 CFR 63.181(d)(7)(i), then all connectors within the designated location shall be monitored. [[40 CFR 63.181(d)(7)(ii)]
   (8) Copies of the periodic reports as specified in 40 CFR 63.182(d), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.181(d)(9)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

o. The results of compliance tests required for compressors and the dates and results of monitoring following a pressure relief valve pressure release subject to 40 CFR 63.2480(e)(1) and (2) must be recorded. The results must include: [40 CFR 63.181(f) and 40 CFR 63.2480(f)(18)(v)]
   (1) The background level measured during each compliance test. [40 CFR 63.181(f)(1)]
   (2) The maximum instrument reading measured at each piece of equipment during each compliance test. [40 CFR 63.181(f)(2)]

p. The permittee shall maintain records required for closed-vent systems and control devices subject to 40 CFR 63.172. [40 CFR 63.181(g)]
   (1) The design specifications and performance demonstrations specified in 40 CFR 63.181(g)(1)(i through iv) shall be retained for the life of the equipment. [40 CFR 63.181(g)(1)]
      (i) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams. [40 CFR 63.181(g)(1)(i)]
      (ii) The dates and descriptions of any changes in the design specifications. [40 CFR 63.181(g)(1)(ii)]
      (iii) Except as specified in 40 CFR 63.108(a), the flare design (i.e., steam-assisted, air-assisted, or non-assisted) and the results of the compliance demonstration required by 40 CFR 63.11(b) of 40 CFR 63 Subpart A. [40 CFR 63.181(g)(1)(iii)]
      (iv) A description of the parameter or parameters monitored, as required in 40 CFR 63.172(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. [40 CFR 63.181(g)(1)(iv)]
   (2) Records of operation of closed-vent systems and control devices shall be retained for 2 years. [40 CFR 63.181(g)(2)]
      (i) Except as specified in 40 CFR 63.108(a), the dates and durations when the closed-vent systems and control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170 are not operated as designed as indicated by the monitored parameters, including periods when a flare pilot light system does not have a flame. [40 CFR 63.181(g)(2)(i)]
      (ii) Dates and durations during which the monitoring system or monitoring device is inoperative. [40 CFR 63.181(g)(2)(ii)]
      (iii) Dates and durations of start-ups and shutdowns of control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170. [40 CFR 63.181(g)(2)(iii)]
   (3) Records of inspections of closed-vent systems subject to the provisions of 40 CFR 63.172, as specified in 40 CFR 63.181(g)(3)(i) through (iii), shall be retained for 2 years. [40 CFR 63.181(g)(3)]
      (i) For each inspection conducted in accordance with the provisions of 40 CFR 63.172(f)(1 or 2) during which no leaks were detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 63.181(g)(3)(i)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(ii) For each inspection conducted in accordance with 40 CFR 63.172(f)(1 or 2) during which leaks were detected, the information specified in 40 CFR 63.181(d) shall be recorded. [ 40 CFR 63.181(g)(3)(ii)]

(iii) For each source as defined in 40 CFR 63.101, and for each source as defined in 40 CFR 63.191, beginning no later than the compliance dates specified in 40 CFR 63.100(k)(10), the permittee must comply with 40 CFR 63.181(g)(3)(iii), in addition to the requirements in 40 CFR 63.181(g)(3)(i) and (ii). For each flow event from a bypass line subject to the requirements in 40 CFR 63.172(j), the permittee must maintain records sufficient to determine whether or not the detected flow included flow requiring control. For each flow event from a bypass line requiring control that is released either directly to the atmosphere or to a control device not meeting the requirements in this subpart, the owner or operator must include an estimate of the volume of gas, the concentration of organic HAP in the gas and the resulting emissions of organic HAP that bypassed the control device using process knowledge and engineering estimates. [ 40 CFR 63.181(g)(3)(iii)]

q. If the permittee implements any of the quality improvement programs, the records specified in 40 CFR 63.181(h) shall be maintained for a period of the quality improvement plan for the process unit. [40 CFR 63.175 or 40 CFR 63.176]

r. For each flow event from a bypass line subject to the requirements 63.2450(e)(6), the permittee must maintain records sufficient to determine whether or not the detected flow included flow requiring control. For each flow event from a bypass line requiring control that is released either directly to the atmosphere or to a control device not meeting the requirements specified in Tables 1 through 7 to 40 CFR 63, Subpart FFFF, the permittee must include an estimate of the volume of gas, the concentration of organic HAP in the gas and the resulting emissions of organic HAP that bypassed the control device using process knowledge and engineering estimates. [40 CFR 63.2525(n)]

s. For each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.2480(e), the permittee must keep the records specified in 40 CFR 63.2525(q)(1) through (3). [40 CFR 63.2525(q)]

(1) Records of the prevention measures implemented as required in 40 CFR 63.2480(e)(3)(ii). [40 CFR 63.2525(q)(1)]

(2) Records of the number of releases during each calendar year and, prior to June 3, 2024, the number of those releases for which the root cause was determined to be a force majeure event. Keep these records for the current calendar year and the past 5 calendar years. [40 CFR 63.2525(q)(2)]

(3) For each release to the atmosphere, you must keep the records specified in 40 CFR 63.2525(q)(3)(i) through (iv). [40 CFR 63.2525(q)(3)]

(i) The start and end time and date of each pressure release to the atmosphere. [40 CFR 63.2525(q)(3)(i)]

(ii) Records of any data, assumptions, and calculations used to estimate of the mass quantity of each organic HAP released during the event. [40 CFR 63.2525(q)(3)(ii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(iii) Records of the root cause analysis and corrective action analysis conducted as required in 40 CFR 63.2480(e)(3)(iii), including an identification of the affected facility, a statement noting whether the event resulted from the same root cause(s) identified in a previous analysis and either a description of the recommended corrective action(s) or an explanation of why corrective action is not necessary under 40 CFR 63.2480(e)(7)(i). [40 CFR 63.2525(q)(3)(iii)]

(iv) For any corrective action analysis for which implementation of corrective actions are required in 40 CFR 63.2480(e)(7), a description of the corrective action(s) completed within the first 45 days following the discharge and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates. [40 CFR 63.2525(q)(3)(iv)]

All Process Equipment

t. "Continuous record" means any documentation, either in hard copy or computer readable form, of data values measured at least once every 15 minutes and recorded at the frequency specified in 40 CFR 63.998(b), except that periods of startup, shutdown and malfunction shall not be excluded pursuant to 40 CFR 63.2450(e)(4)(vii). [40 CFR 63.981]

u. Values that are recorded and monitored at least once every 15 minutes meet the definition of "continuous records." [40 CFR 63.998(b)(1)]

Maintenance wastewater

v. The permittee shall maintain a record of the information required by 40 CFR 63.105(b and c). [40 CFR 63.105(e) and 40 CFR 63.24852(q)]

Storage Vessels

w. For MON group 1 Storage Tanks at EU-T02-(16A-16D), T03-(17A-17D), T04-(18A&18B), T10-(19A-19B) and T05, the permittee must maintain records necessary to demonstrate compliance with the requirements in 40 CFR 63.2450(u) including, if appropriate, records of existing standard site procedures used to empty and degas (deinventory) equipment for safety purposes. [40 CFR 63.2480(f)(3)]

**6. Specific Reporting Requirements:**

a. For equipment subject to 40 CFR 63, Subpart FFFF the permittee must submit a Compliance report containing the information specified in 40 CFR 63.2520(e)(1 through 10), semiannually. [40 CFR 63.2520(b) and 40 CFR 63, Subpart FFFF, Table 11]

b. The permittee must submit a precompliance report as specified in 40 CFR 63.2520(c)(1 through c) at least 6 months prior for new sources, with an application for approval of construction or reconstruction. [40 CFR 63.2520(b) and 40 CFR 63, Subpart FFFF, Table 11]

c. All reports shall be submitted in accordance with 40 CFR 63.103(d).

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

d. For equipment subject to 40 CFR 63 Subparts F, G and H the permittee shall submit the following reports:
   (1) Periodic Reports - The permittee shall submit to the Division, semiannually, the information required by 40 CFR 63.182(d)(2). [40 CFR 63.182(a)(3)]

e. The permittee shall furnish reports as specified in **5. Specific Recordkeeping Requirements**.

f. ***Compliance report.*** The compliance report must contain the information specified in 40 CFR 63.2520(e)(1) through (17). On and after August 12, 2023 or once the reporting template for this subpart has been available on the CEDRI website for 1 year, whichever date is later, you must submit all subsequent reports following the procedure specified in 40 CFR 63.9(k), except any medium submitted through mail must be sent to the attention of the Miscellaneous Organic Chemical Manufacturing Sector Lead. You must use the appropriate electronic report template on the CEDRI website (*https://www.epa.gov/electronic-reporting-air-emissions/cedri*) for this subpart. The date report templates become available will be listed on the CEDRI website. Unless the Administrator or delegated state agency or other authority has approved a different schedule for submission of reports under 40 CFR 63.9(i) and 40 CFR 63.10(a) of subpart A, the report must be submitted by the deadline specified in this subpart, regardless of the method in which the report is submitted. [40 CFR 63.2520(e)]

g. Refer to **Section F.5.**

Storage Vessels

h. For the storage vessels at EU-T01 and T06-T09, the permittee shall submit Periodic Reports as required by 40 CFR 63.152(c). [40 CFR 63.122(a)(4)]

i. For the storage vessels at EU-T01 and T06-T09, the permittee shall submit, as part of the Periodic Report required under 40 CFR 63.152(c), the results of each inspection conducted in accordance with 40 CFR 63.120(a) in which a failure is detected in the control equipment. [40 CFR 63.122(d)]
   (1) For vessels for which annual inspections are required under 40 CFR 63.120(a)(3)(ii), the following specifications and requirements apply: [40 CFR 63.122(d)(1)]
      (i) A failure is defined as any time in which the internal floating roof is not resting on the surface of the liquid inside the storage vessel and is not resting on the leg supports; or there is liquid on the floating roof; or the seal is detached from the internal floating roof; or there are holes, tears, or other openings in the seal or seal fabric; or there are visible gaps between the seal and the wall of the storage vessel. [40 CFR 63.122(d)(1)(i)]
      (ii) Except as provided in 40 CFR 63.122(d)(1)(iii), each Periodic Report shall include the date of the inspection, identification of each storage vessel in which a failure was detected, and a description of the failure. The Periodic Report shall also describe the nature of and date the repair was made or the date the storage vessel was emptied. [40 CFR 63.122(d)(1)(ii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(iii) If an extension is utilized in accordance with 40 CFR 63.120(a)(4), the permittee shall, in the next Periodic Report, identify the vessel; include the documentation specified in 40 CFR 63.120(a)(4); and describe the date the storage vessel was emptied and the nature of and date the repair was made. [40 CFR 63.122(d)(1)(iii)]

(2) For vessels for which inspections are required under 40 CFR 63.120(a)(3)(i or iii), the following specifications and requirements apply: [40 CFR 63.122(d)(2)]

(i) A failure is defined as any time in which the internal floating roof has defects; or the primary seal has holes, tears, or other openings in the seal or the seal fabric; or the secondary seal (if one has been installed) has holes, tears, or other openings in the seal or the seal fabric; or the gaskets no longer close off the liquid surface from the atmosphere; or the slotted membrane has more than 10 percent open area. [40 CFR 63.122(d)(2)(i)]

(ii) Each Periodic Report required under 40 CFR 63.152(c) shall include the date of the inspection, identification of each storage vessel in which a failure was detected, and a description of the failure. The Periodic Report shall also describe the nature of and date the repair was made. [40 CFR 63.122(d)(2)(ii)]

j. For the storage vessels at EU-T01 and T06-T09, the permittee who elects to comply with 63.119(b) shall submit the reports specified below: [40 CFR 63.122(h)]

(1) In order to afford the Administrator the opportunity to have an observer present, the owner or operator shall notify the Division of the refilling of a storage vessel that has been emptied and degassed. [40 CFR 63.122(h)(1)]

(2) The notification shall meet the requirements of either 40 CFR 63.120 (a)(5 or 6), as applicable. [40 CFR 63.122(h)(1)(i)]

k. For EU-T05, the permittee shall report, as applicable, in the periodic report specified in 40 CFR 63, Subpart FFFF. [40 CFR 63.1066(b)]

(1) To provide the Division the opportunity to have an observer present, the permittee shall notify the Division at least 30 days before an inspection required by 40 CFR 63.1063(d)(1 or 3). If an inspection is unplanned and the permittee could not have known about the inspection 30 days in advance, then the permittee shall notify the Division at least 7 days before the inspection. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, the notification including the written documentation may be made in writing and sent so that it is received by the Division at least 7 days before the inspection. [40 CFR 63.1066(b)(1)]

(2) The permittee shall submit a copy of the inspection record (required in 40 CFR 63.1065) when inspection failures occur. [40 CFR 63.1066(b)(2)]

(3) The permittee who elects to use an extension in accordance with 40 CFR 63.1063(e)(2) or 40 CFR 63.1063(c)(2)(iv)(B) shall submit the documentation required therein. [40 CFR 63.1066(b)(4)]

Closed Vent Systems

l. The permittee shall furnish reports as specified in **5. Specific Reporting Requirements** for the flare in **Section B**, EP-F01.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

m. The permittee shall submit Periodic reports that shall include the reporting period dates, the total source operating time for the reporting period, and, as applicable, all information specified in 40 CFR 63.999 and in 40 CFR 63, Subpart FFFF including reports of periods when monitored parameters are outside their established ranges. [40 CFR 63.999(c)(1)]

n. The permittee shall submit, as part of the periodic report: [40 CFR 63.999(c)(2)]
   (1) The information recorded in 40 CFR 63.998(d)(1)(iii)(B through E). [40 CFR 63.999(c)(2)(i)]
   (2) Reports of the times of all periods recorded under 40 CFR 63.998(d)(1)(ii)(A) when the vent stream is diverted from the flare through a bypass line; and [40 CFR 63.999(c)(2)(ii)]
   (3) Reports of all times recorded under 40 CFR 63.998(d)(1)(ii)(B) when maintenance is performed in car-sealed valves, when the seal is broken, when the bypass line valve position is changed, or the key for a lock-and-key type configuration has been checked out. [40 CFR 63.999(c)(2)(iii)]

o. For bypass lines subject to the requirements 40 CFR 63.2450(e)(6), the compliance report must include the start date, start time, duration in hours, estimate of the volume of gas in standard cubic feet, the concentration of organic HAP in the gas in parts per million by volume and the resulting mass emissions of organic HAP in pounds that bypass a control device. For periods when the flow indicator is not operating, report the start date, start time, and duration in hours. [40 CFR 63.2520(e)(12)]

Equipment Leaks

p. Compliance reports for pressure relief devices subject to the requirements 40 CFR 63.2480(e) must include the information specified in 40 CFR 63.2520(e)(15)(i) through (iii). [40 CFR 63.2520(e)(15)]
   (1) For pressure relief devices in organic HAP gas or vapor service, pursuant to 40 CFR 63.2480(e)(1), report the instrument readings and dates for all readings of 500 ppmv or greater. [40 CFR 63.2520(e)(15)(i)]
   (2) For pressure relief devices in organic HAP gas or vapor service subject to 40 CFR 63.2480(e)(2), report the instrument readings and dates of instrument monitoring conducted. [40 CFR 63.2520(e)(15)(ii)]
   (3) For pressure relief devices in organic HAP service subject to 40 CFR 63.2480(e)(3), report each pressure release to the atmosphere, including the start date, start time, and duration in minutes of the pressure release and an estimate of the mass quantity in pounds of each organic HAP released; the results of any root cause analysis and corrective action analysis completed during the reporting period, including the corrective actions implemented during the reporting period; and, if applicable, the implementation schedule for planned corrective actions to be implemented subsequent to the reporting period. [40 CFR 63.2520(e)(15)(iii)]

**7. Specific Control Equipment Operating Conditions:**

a. The FLARE (EP-F01) shall be in operation at all times the emission units that vent to the FLARE are operating. Refer to **Section B** for EP-F01. [40 CFR 63.11(b)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

b. The permittee must be in compliance with the emission limits and work practice standards in Tables 1 through 7 to 40 CFR 63, Subpart FFFF at all times, and the permittee must meet the requirements specified in 40 CFR 63.2455 through 63.2490 (or the alternative means of compliance in 40 CFR 63.2495, 40 CFR 63.2500, or 40 CFR 63.2505), except as specified in 40CFR 63.2450(b) through (v). The permittee must meet the notification, reporting, and recordkeeping requirements specified in 40 CFR 63.2515, 40 CFR 63.2520, and 40 CFR 63.2525. [40 CFR 63.2450]

**8. Alternate Operating Scenarios:**

a. For the equipment leaks subject to 40 CFR 63, Subpart FFFF, the permittee may comply with one of the following requirements: [40 CFR 63.2480(a) and Table 6 to 40 CFR 63, Subpart FFFF]

(1) 40 CFR 63, Subpart UU and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f);

(2) 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f); or

(3) 40 CFR 65, Subpart F and the requirements referenced therein, except as specified in 40 CFR 63.2480(c) and (d)-(f).

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## UNDERGROUND STORAGE TANK

| EP | Emission Unit/Point Description |
|---|---|
| M08 | 3,000 gallon Gasoline Underground Storage Tank (FB-0003) |

**APPLICABLE REGULATIONS:**
401 KAR 59:050, New storage vessels for petroleum liquids.

**STATE-ORIGIN REQUIREMENTS:**
401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances.

1. **Operating Limitations:**
   The tank shall be equipped with a permanent submerged fill pipe. [401 KAR 59:050, Section 3(2)]

   **Compliance Demonstration Method:**
   Visual inspection for presence of submerged fill pipe.

2. **Emission Limitations:**
   Refer to **Section D.4.** for 401 KAR 63:020 requirements.

3. **Testing Requirements:**
   Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1].

4. **Specific Monitoring Requirements:**
   None

5. **Specific Recordkeeping Requirements:**
   None

6. **Specific Reporting Requirements:**
   None

7. **Specific Control Equipment Operating Conditions:**
   None

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## LOADING AREA

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **M04** | M04 | **Acetic Acid Loading/Unloading, Methyl Acetate Loading/Unloading, and Vinyl Acetate Unloading Area – Railcar**<br>Operating Scenario #1: Loading/Unloading 15,000 gal/hr Acetic Acid (131,400,000 gal/year)<br>Operating Scenario #2: Loading 15,000 gal/hr Methyl Acetate (131,400,000 gal/year)<br>Unloading 15,000 gal/hr Methyl Acetate (4,320,000 gal/year)<br>Operating Scenario #3: Unloading 15,000 gal/hr Vinyl Acetate (131,400,000 gal/year)<br>Control Device: Vapor recovery system, 75% control efficiency<br>**HON Group 2 Transfer Rack** |
| **M05** | M05 | **Acetic Acid Loading/Unloading Area-Tank Truck**<br>Operating Scenario #1: 4,050 gal/hr Acetic Acid (35,478,000 gal/year)<br>Operating Scenario #2: Loading 4,050 gal/hr Methyl Acetate (35,478,000 gal/year)<br>Operating Scenario #3: Unloading 4,050 gal/hr Vinyl Acetate (35,478,000 gal/year)<br>**HON Group 2 Transfer Rack** |
| **M06** | M06 | **Methanol Loading/Unloading Area-Railcar**<br>Maximum Transfer Rate: 171,711 gallons/year<br>**MON Group 2 Transfer Rack** |
| **M12** | M12 | **MON Equipment Leaks (Loading Area Fugitives)**<br>Light Liquid Valves: 124<br>Light Liquid Pumps: 6<br>Connectors: 398 |

The equipment leak component count for the Loading Area, listed above, as submitted in the application, reflects an accurate count of the equipment as of the date of issuance of this permit but is not intended to limit the permittee to the exact numbers specified. The permittee may add or remove equipment leak components without a permit revision as long as the components continue to comply with the applicable requirements listed below, and the changes do not: (1) cause a significant increase of emissions; or (2) result in the applicability of an additional standard that is not specified in this permit.

**APPLICABLE REGULATIONS:**

401 KAR 63:002, Section 2 (4)(lll), 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.; (40 CFR 63, Subpart FFFF), applies to the transfer rack at EU M06. 40 CFR 63.2480 applies to the equipment leaks at EU M12.

401 KAR 63:002, Section 2(4)(b), 40 C.F.R. 63.110 through 63.153, Tables 1 through 37 (Subpart G), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, as referenced by 40 CFR 63, Subpart FFFF.

401 KAR 63:002, Section 2.(4)(c), 40 C.F.R. 63.160 through 63.183, Tables 1 through 4 (Subpart H), National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.; 40 CFR 63, Subpart H applies to the equipment leaks from the transfer operations at EU M04 and M05.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

*Note:*
*40 CFR 63, Subparts G and H have been updated as cited in 89 FR 43175-43220; and 89 FR 43220-43234, dated May 16, 2024; &*
*40 CFR 63, Subpart FFFF has been updated as cited in 89 FR 23868-23873 dated April 4, 2024.*

**NON-APPLICABLE REGULATIONS:**
401 KAR 63:002, Section 2 (4)(a)(kkk), 40 C.F.R. 63.2330 through 63.2406, Tables 1 through 12 (Subpart EEEE), National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)

1. **Operating Limitations:**
   a. If a 40 CFR 63, Subpart FFFF, Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 requirements beginning on the date the switch occurs. An initial compliance demonstration as specified in 40 CFR 63, Subpart FFFF must be conducted within 150 days after the switch occurs. [40 CFR 63.2445(d)]

   b. Refer to 40 CFR 63.103(a) for general provisions.

   c. Refer to 40 CFR 63.2540 and 40 CFR 63, Subpart FFFF, Table 12, for general provisions.

   d. The permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements 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 source. [40 CFR 63.2450(u)]

   Equipment Leaks
   e. The permittee must meet each requirement in 40 CFR 63, Subpart FFFF, Table 6, item 1.(b.). The permittee shall comply with the requirements of 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f). [40 CFR 63.2480(a)]
      (1) Each piece of equipment in a process unit to which 40 CFR 63, Subpart H applies shall be identified such that it can be distinguished readily from equipment that is not subject to its requirements. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, or by designation of process unit boundaries by some form of weatherproof identification. [40 CFR 63.162(c)]
      (2) When a leak is detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168 and 40 CFR 63.169; and 40 CFR 63.172 through 40 CFR 63.174, the permittee shall: [40 CFR 63.162(f)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(i) Clearly identify the leaking equipment. [40 CFR 63.162(f)(1)]

(ii) The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 40 CFR 63.175(e)(7)(i)(D), and no leak has been detected during the follow-up monitoring. If the permittee elects to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored and no leak is detected during that monitoring. [40 CFR 63.162(f)(2)]

(iii) The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that is subject to 40 CFR 63.174(c)(1)(i), may be removed after it is repaired. [40 CFR 63.162(f)(3)]

(3) For each piece of equipment subject to 40 CFR 63, Subpart FFFF that is added to an affected source after December 17, 2019, or replaces equipment at an affected source after December 17, 2019, the permittee must initially monitor for leaks within 30 days after August 12, 2020, or initial startup of the equipment, whichever is later. Equipment that is designated as unsafe- or difficult-to-monitor is not subject to this requirement. [40 CFR 63.2480(b)(7)]

f. Except as specified in 40 CFR 63.2480(e)(4), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(1) and (2) for pressure relief devices, such as relief valves or rupture disks, in organic HAP gas or vapor service instead of the pressure relief device requirements of 40 CFR 63.165 of Subpart H. [40 CFR 63.2480(e)]

g. Except as specified in 40 CFR 63.2480(e)(4) and (5), the permittee must comply with the requirements specified in 40 CFR 63.2480(e)(3), (6), (7), and (8) for all pressure relief devices in organic HAP service. [40 CFR 63.2480(e)]

(1) Implement the pressure release management requirements outlined in 40 CFR 63.2480(e)(3)(i) – (v). [40 CFR 63.2480(e)(3)]

(2) A root cause analysis and corrective action analysis must be completed as soon as possible, but no later than 45 days after a release event. Special circumstances affecting the number of root cause analyses and/or corrective action analyses are provided in 40 CFR 63.2480(e)(6)(i) – (iii). [40 CFR 63.2480(e)(6)]

(3) The permittee must implement the corrective action(s) identified in the corrective action analysis in accordance with the applicable requirements in 40 CFR 63.2480(e)(7)(i) – (iii). [40 CFR 63.2480(e)(7)]

(4) The permittee is prohibited from installing any flowing pilot-operated pressure relief device or replace any pressure relief device with a flowing pilot-operated pressure relief device after August 12, 2023. [40 CFR 63.2480(e)(8)]

**Compliance Demonstration Method:**
For the equipment leak, compliance shall be determined by review of the records required by 40 CFR 63.181 and the reports required by 40 CFR 63.182, review of performance test results, and by inspections. [40 CFR 63.162(a)]

**2. Emission Limitations:**
Equipment Leaks

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

a. The permittee must comply with the fugitive emissions standards of 40 CFR 63, Subpart H as applicable. [40 CFR 63.2480(a) and 40 CFR 63, Subpart FFFF, Table 6]

(1) Standards for Pumps in light liquid service: [40 CFR 63.163]

| | |
|---|---|
| 40 CFR 63.163(a): | Implementation and compliance provisions |
| 40 CFR 63.163(b): | Monitoring requirements, Leak detection levels, frequency of monitoring |
| 40 CFR 63.163(c): | Repair procedures and time frames [*except 40 CFR 63.163(c)(3)*] |
| 40 CFR 63.163(d): | Procedures to determine percent leaking pumps and quality improvement program requirements |
| 40 CFR 63.163(e)-(j): | Exemptions for specific types of pumps |

(2) Standards for Compressors: [40 CFR 63.164]

| | |
|---|---|
| 40 CFR 63.164(a)-(e): | Operational requirements |
| 40 CFR 63.164(f): | Criteria for Leak detection |
| 40 CFR 63.164(g): | Repair procedures and time frames |
| 40 CFR 63.164(h)-(i): | Exemptions for specific types of compressors |

(3) Standards for Pressure relief devices in gas/vapor service: [40 CFR 63.165 and 40 CFR 63.2480(e)]:

| | |
|---|---|
| 40 CFR 63.165(a) & 40 CFR 63.2480(e)(1): | Operational requirements |
| 40 CFR 63.165(b) & 40 CFR 63.2480(e)(2): | Pressure release procedures |
| 40 CFR 63.165(c)-(d) & 40 CFR 63.2480(e)(4): | Exemptions for specific types of pressure relief devices |
| 40 CFR 63.165(e): | Pressure relief valves in organic HAP gas or vapor service |

(4) Standards for Sampling Connection Systems: [40 CFR 63.166]

| | |
|---|---|
| 40 CFR 63.166(a)-(b): | Operational requirements |
| 40 CFR 63.166(c): | Exemptions for specific types of sampling connection systems |

(5) Standards for Open-ended valves or lines: [40 CFR 63.167]

| | |
|---|---|
| 40 CFR 63.167(a)-(c): | Operational requirements |
| 40 CFR 63.167(d)-(e): | Exemptions for specific types of valves |

(6) Standards for Valves in gas/vapor service and in light liquid service: [40 CFR 63.168]

| | |
|---|---|
| 40 CFR 63.168(a): | Operational requirements |
| 40 CFR 63.168(b)-(d): | Monitoring requirements and intervals |
| 40 CFR 63.168(e): | Procedures to determine percent leaking valves |
| 40 CFR 63.168(f): | Leak repair time frames |
| 40 CFR 63.168(g): | First attempt repair procedures |
| 40 CFR 63.168(h): | Exemptions for unsafe-to-monitor valves |
| 40 CFR 63.168(i): | Exemptions for difficult-to-monitor valves |

(7) Standards for Instrumentation systems: [40 CFR 63.169]

| | |
|---|---|
| 40 CFR 63.169(a): | Monitoring frequency |
| 40 CFR 63.169(b): | Leak detection levels |
| 40 CFR 63.169(c): | Leak repair time frames |

(8) Standards for Delay of repair: [40 CFR 63.171]

40 CFR 63.171 Allowances for delay of repair

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(9) Standards for Agitators in gas/vapor service and in light liquid service: [40 CFR 63.173]

| | |
|---|---|
| 40 CFR 63.173(a): | Operational requirements |
| 40 CFR 63.173(b): | Monitoring requirements and intervals |
| 40 CFR 63.173(c): | Leak repair time frames |
| 40 CFR 63.173(d)-(g): | Exemptions for specific types of agitators |
| 40 CFR 63.173(h)-(j): | Exemptions for difficult-to-monitor, inaccessible or unsafe-to-monitor agitators |

(10) Standards for connectors in gas/vapor service and in light liquid service: [40 CFR 63.174]

| | |
|---|---|
| 40 CFR 63.174(a): | Operational requirements |
| 40 CFR 63.174(b): | Monitoring requirements and intervals |
| 40 CFR 63.174(c): | Procedures for open connectors or connectors with broken seals |
| 40 CFR 63.174(d): | Leak repair time frames |
| 40 CFR 63.174(e): | Monitoring frequency for repaired connectors |
| 40 CFR 63.174(f)-(h): | Exemptions for unsafe-to-monitor, unsafe-to-repair, inaccessible, or ceramic connectors |
| 40 CFR 63.174(i): | Procedures to determine percent leaking connectors |
| 40 CFR 63.174(j): | Optional credit for removed connectors |

(11) Quality improvement program for valves: the permittee may elect to implement the following quality improvement programs if the percent of leaking valves is equal to or exceeds 2 percent: [40 CFR 63.175]

| | |
|---|---|
| 40 CFR 63.175(a): | Quality improvement program alternatives |
| 40 CFR 63.175(b): | Criteria for ending quality improvement programs |
| 40 CFR 63.175(c): | Alternatives following achievement of less than 2 percent leaking valves target |
| 40 CFR 63.175(d): | Quality improvement program to demonstrate further progress |
| 40 CFR 63.175(e): | Quality improvement program of technology review and improvement |

(12) If in Phase III, Quality improvement program for pumps: calculated on a 6-month rolling average, the greater of either 10 percent of the pumps or three pumps in the Polymerization, Saponification, Polyrectification, Tank Farm, and Loading Areas (that are part of the 40 CFR 63, Subpart FFFF MCPU) or in the AAR, Tank Farm, and Loading Areas (that are part of the 40 CFR 63, Subpart H CMPU) leak, the permittee shall implement the following quality improvement programs for pumps: [40 CFR 63.176 and 40 CFR 63.163(d)(2)]

| | |
|---|---|
| 40 CFR 63.176(a): | Applicability criteria |
| 40 CFR 63.176(b): | Criteria for ending the quality improvement program |
| 40 CFR 63.176(c): | Criteria for resumption of the quality improvement program |
| 40 CFR 63.176(d): | Quality improvement program elements |

(13) The requirements for pressure testing in 40 CFR 63.178(b) may be applied to all processes, not just batch processes, as stated in 40 CFR 63.2480(b)(1). The permittee may elect to use pressure testing of equipment to demonstrate compliance

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

by meeting the following requirements of 40 CFR 63.178(b). Compliance with the provisions of 40 CFR 63.178(b) exempts the permittee from the monitoring provisions of 40 CFR 63.163, 63.168 and 63.169, and 63.173 through 63.176. [40 CFR 63.2480(b)(1) and 40 CFR 63.178(b)]

(i) The permittee may switch among the alternatives provided the change is documented as specified in 40 CFR 63.181. [40 CFR 63.178(a)]

(ii) For the purposes of 40 CFR 63, Subpart FFFF pressure testing for leaks in accordance with 63.178(b) is not required after reconfiguration of an equipment train if flexible hose connections are the only disturbed equipment.

**Compliance Demonstration Method:**
Refer to **1. Operating Limitations** Compliance Demonstration

**3. Testing Requirements:**

a. For the equipment leaks, the permittee shall comply with the following test methods and procedures requirements: [40 CFR 63.180(a)]

| | | |
|---|---|---|
| (1) | 40 CFR 63.180(b) | Monitoring procedures, test methods, and calibration procedures |
| (2) | 40 CFR 63.180(c) | Leak detection monitoring procedures *replacing reference to 40 CFR 63.165(a) with 40 CFR 63.2480(e)(1*) |
| (3) | 40 CFR 63.180(d) | Procedures for determining organic HAP service applicability |

b. The permittee must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1), if applicable. [40 CFR 63.2515(c)]

c. Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1].

**4. Specific Monitoring Requirements:**
For the equipment leaks, refer to **3. Testing Requirements**.

**5. Specific Recordkeeping Requirements:**

a. All records shall be maintained in accordance with **Section F.2**.

b. The permittee shall comply with the recordkeeping requirements for the equipment in the Polymerization, Saponification, Polyrectification, AAR, Tank Farm, and Loading Areas in one recordkeeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records required by 40 CFR 63.181 shall be maintained in a manner that can be readily accessed at the plant site. [40 CFR 63.181(a)]

c. For the equipment subject to 40 CFR 63 Subparts F, G and H, all records shall be kept in accordance with 40 CFR 63.103(c).

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

d. For EU-M06 and M12, the permittee must keep the following records: [40 CFR 63.2525]
   (1) Except as specified in 40 CFR 63.2450(e)(4), 40 CFR 63.2480(f), 40 CFR 63.2485(p) and (q) and 40 CFR 63.2525(t) and (u), each applicable record required by 40 CFR 63 Subpart A and in referenced subparts F, G and SS of 40 CFR Part 63. [40 CFR 63.2525(a)]
   (2) Records of each operating scenario as specified: [40 CFR 63.2525(b)]
      (i) A description of the process and the type of process equipment used. [40 CFR 63.2525(b)(1)]
      (ii) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard in 40 CFR 63.2505; wastewater point of determination (POD); storage tanks; and transfer racks. [40 CFR 63.2525(b)(2)]
      (iii) The applicable control requirements of 40 CFR 63, Subpart FFFF including the level of required control, and for vents, the level of control for each vent. [40 CFR 63.2525(b)(3)]
      (iv) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. [40 CFR 63.2525(b)(4)]
      (v) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s). [40 CFR 63.2525(b)(5)]
      (vi) The applicable monitoring requirements of 40 CFR 63, Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process. [40 CFR 63.2525(b)(6)]
      (vii) Calculations and engineering analyses required to demonstrate compliance. [40 CFR 63.2525(b)(7)]
      (viii) For reporting purposes, a change to any of these elements not previously reported, except for 63.2525(b)(5), constitutes a new operating scenario. [40 CFR 63.2525(b)(8)]

   (3) For each deviation from an emission limit, operating limit, or work practice standard, the permittee must keep a record of the information specified in 40 CFR 63.2525(l)(1) – (3). The records must be maintained as specified in 40 CFR 63.10(b)(1) of subpart A. In the event that an affected unit does not meet an applicable standard, record the number of deviations. [40 CFR 63.2525(l)]
      (i) For each deviation record the date, time, and duration of each deviation. [40 CFR 63.2525(l)(1)]
      (ii) For each deviation from an applicable standard, record and retain a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions. [40 CFR 63.2525(l)(2)]
      (iii) Record actions taken to minimize emissions in accordance with 40 CFR 63.2450(u) and any corrective actions taken to return the affected unit to its normal or usual manner of operation [40 CFR 63.2525(l)(3)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

e. For the Group 2 transfer racks, the permittee shall record, update annually, and maintain the following information in a readily accessible location on site pursuant to 40 CFR 63.130(f). [40 CFR 63.126(c)]
   (1) An analysis demonstrating the design and actual annual throughput of the transfer rack; [40 CFR 63.130(f)(1)]
   (2) An analysis documenting the weight-percent organic HAPs in the liquid loaded. Examples of acceptable documentation include but are not limited to analyses of the material and engineering calculations; and [40 CFR 63.130(f)(2)]
   (3) An analysis documenting the annual rack weighted average HAP partial pressure of the transfer rack. [40 CFR 63.130(f)(3)]
      (i) For Group 2 transfer racks that are limited to transfer of organic HAPs with partial pressures less than 10.3 kilopascals, documentation is required of the organic HAPs (by compound) that are transferred. The rack weighted average partial pressure does not need to be calculated. 40 CFR 63.130(f)(3)(i)]
      (ii) For racks transferring one or more organic HAPs with partial pressures greater than 10.3 kilopascals, as well as one or more organic HAPs with partial pressures less than 10.3 kilopascals, a rack weighted partial pressure shall be documented. The rack weighted average HAP partial pressure shall be weighted by the annual throughput of each chemical transferred. 40 CFR 63.130(f)(3)(ii)]

Equipment Leaks

f. The permittee may comply with the recordkeeping requirements for the equipment in the Polymerization, Saponification, Polyrectification, AAR, Tank Farm, and Loading Areas in one recordkeeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records required by 40 CFR 63.181 shall be maintained in a manner that can be readily accessed at the plant site. [40 CFR 63.181(a)]

g. The permittee shall maintain all records pertaining to the equipment: [40 CFR 63.181(b)]
   (1) The permittee shall keep the following records: [40 CFR 63.181(b)(1)]
      (i) A list of identification numbers for equipment (except instrumentation systems) subject to the requirements of 40 CFR 63, Subpart H. Pursuant to 40 CFR 63.2480(b)(3), as an existing source under 40 CFR 63, Subpart FFFF the permittee is not required to develop an initial list of identification numbers for connectors that are part of the MCPU as would otherwise be required under 40 CFR 63.181(b)(1)(i). [40 CFR 63.181(b)(1)(i)]
      (ii) A schedule by process unit for monitoring connectors subject to 40 CFR 63.174(a) and valves subject to 40 CFR 63.168(d). [40 CFR 63.181(b)(1)(ii)]
      (iii) Physical tagging of the equipment to indicate that it is in organic HAP service is not required. Equipment subject to the provisions of 40 CFR 63, Subpart H may be identified on a plant site plan, in log entries, or by other appropriate methods. [40 CFR 63.181(b)(1)(iii)]
   (2) The permittee shall keep the following records: [40 CFR 63.181(b)(2)]
      (i) A list of identification numbers for equipment that the permittee elects to equip with a closed-vent system and control device, under the provisions of 40

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

CFR 63.163(g), 40 CFR 63.164(h), 40 CFR 63.165(c), or 40 CFR 63.173(f) as required by 40 CFR 63.181(b)(2)(i). [40 CFR 63.181(b)(2)(i)]

(ii) A list of identification numbers for compressors that the permittee elects to designate as operating with an instrument reading of less than 500 parts per million above background, under the provisions of 40 CFR 63.164(i). [40 CFR 63.181(b)(2)(ii)]

(3) A list of identification numbers for pressure relief devices subject to 40 CFR 63.2480(e)(1) and for pressure relief devices equipped with rupture disks, under the provisions of 40 CFR 63.2480(e)(2)(ii) and (iii). [40 CFR 63.181(b)(3) and 40 CFR 63.2480(f)(18)(iii) and (iv)]

(4) Individual components in an instrumentation system need not be identified. [40 CFR 63.181(b)(4)]

(5) Identification of screwed connectors subject to 40 CFR 63.174(c)(2). Identification can be by area or grouping as long as the total number within each group or area is recorded. [40 CFR 63.181(b)(5)]

(6) The following information shall be recorded for each dual mechanical seal system: [40 CFR 63.181(b)(6)]

(i) Design criteria required in 40 CFR 63.163(e)(6)(i), 40 CFR 63.164(e)(2), and 40 CFR 63.173(d)(6)(i) and an explanation of the design criteria; and [40 CFR 63.181(b)(6)(i)]

(ii) Any changes to these criteria and the reasons for the changes. [40 CFR 63.181(b)(6)(ii)]

(7) The following information pertaining to all pumps subject to 40 CFR 63.163(j), valves subject to 40 CFR 63.168(h and i), agitators subject to 40 CFR 63.173(h through j), and connectors subject to 40 CFR 63.174(f and g) shall be recorded: [40 CFR 63.181(b)(7)]

(i) Identification of equipment designated as unsafe to monitor, difficult to monitor, or unsafe to inspect and the plan for monitoring or inspecting this equipment. [40 CFR 63.181(b)(7)(i)]

(ii) A list of identification numbers for the equipment that is designated as difficult to monitor, an explanation of why the equipment is difficult to monitor, and the planned schedule for monitoring this equipment. [40 CFR 63.181(b)(7)(ii)]

(iii) A list of identification numbers for connectors that are designated as unsafe to repair and an explanation why the connector is unsafe to repair. [40 CFR 63.181(b)(7)(iii)]

(8) The permittee shall keep the following records: [40 CFR 63.181(b)(8)]

(i) A list of valves removed from and added to the process unit, as described in 40 CFR 63.168(e)(1), if the net credits for removed valves is expected to be used. [40 CFR 63.181(b)(8)(i)]

(ii) A list of connectors removed from and added to the process unit, as described in 40 CFR 63.174(i)(1), and documentation of the integrity of the weld for any removed connectors, as required in 40 CFR 63.174(j). This is not required unless the net credits for removed connectors is expected to be used. [40 CFR 63.181(b)(8)(ii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(9) For any leaks detected as specified in 40 CFR 63.163 and 40 CFR 63.164; 40 CFR 63.168; and 40 CFR 63.173 through 40 CFR 63.174, a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. [40 CFR 63.181(b)(10)]

(10) For each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.165(e), the permittee must keep the records specified in 40 CFR 63.181(b)(11)(i) through (iii) in addition to the records specified in 40 CFR 63.181(f). [40 CFR 63.181(b)(11)]

h. For visual inspections of equipment subject to the provisions of 40 CFR 63.163(b)(3) and 40 CFR 63.163(e)(4)(i), the permittee shall document that the inspection was conducted and the date of the inspection. The owner or operator shall maintain records as specified in 40 CFR 60.181(d) for leaking equipment identified in this inspection. These records shall be retained for 2 years. [40 CFR 63.181(c)]

i. When a leak is detected, the following information shall be recorded and kept for two years. [40 CFR 63.181(d)]

(1) The instrument and the equipment identification number and the operator name, initials, or identification number. [40 CFR 63.181(d)(1)]

(2) The date the leak was detected and the date of first attempt to repair the leak. [40 CFR 63.181(d)(2)]

(3) The date of successful repair of the leak. [40 CFR 63.181(d)(3)]

(4) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonrepairable. [40 CFR 63.181(d)(4)]

(5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. [40 CFR 63.181(d)(5)]

(i) The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.

(ii) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.

(6) Dates of process unit shutdowns that occur while the equipment is unrepaired. [40 CFR 63.181(d)(6)]

(7) The permittee shall maintain the following: [40 CFR 63.181(d)(7)]

(i) Identification, either by list, location (area or grouping), or tagging of connectors that have been opened or otherwise had the seal broken since the last monitoring period required in 40 CFR 63.174(b), as described in 40 CFR 63.174(c)(1), unless the permittee elects to comply with 40 CFR 63.174(c)(1)(ii). [40 CFR 63.181(d)(7)(i)]

(ii) The date and results of monitoring as required in 40 CFR 63.174(c). If identification of connectors that have been opened or otherwise had the seal broken is made by location under 40 CFR 63.181(d)(7)(i), then all connectors within the designated location shall be monitored. [40 CFR 63.181(d)(7)(ii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(8) Copies of the periodic reports as specified in 40 CFR 63.182(d), if records are not maintained on a computerized database capable of generating summary reports from the records. [40 CFR 63.181(d)(9)]

j. If the permittee elects to comply with the pressure testing requirements in accordance with **Emission Limitations**, **2.a.(13)** the permittee is exempt from the requirements of paragraphs f, g, h and j of this section. Instead, the permittee shall maintain records as specified in 40 CFR 63.181(e)(1through 6). [40 CFR 63.178(b)]

k. The dates and results of compliance tests required for compressors and the dates and results of monitoring following a pressure relief valve pressure release subject to 40 CFR 63.2480(e)(1) and (2) shall be recorded. The results shall include: [40 CFR 63.181(f) and 40 CFR 63.2480(f)(18)(v)]
   (1) The background level measured during each compliance test. [40 CFR 63.181(f)(1)]
   (2) The maximum instrument reading measured at each piece of equipment during each compliance test. [40 CFR 63.181(f)(2)]

l. The permittee shall maintain records required for closed-vent systems and control devices subject to 40 CFR 63.172. [40 CFR 63.181(g)]
   (1) The design specifications and performance demonstrations specified in 40 CFR 63.181(g)(1)(i through iv) shall be retained for the life of the equipment. [40 CFR 63.181(g)(1)]
      (i) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams. [40 CFR 63.181(g)(1)(i)]
      (ii) The dates and descriptions of any changes in the design specifications. [40 CFR 63.181(g)(1)(ii)]
      (iii) Except as specified in 40 CFR 63.108(a), the flare design (i.e., steam-assisted, air-assisted, or non-assisted) and the results of the compliance demonstration required by 40 CFR 63.11(b) of 40 CFR 63 Subpart A. [40 CFR 63.181(g)(1)(iii)]
      (iv) A description of the parameter or parameters monitored, as required in 40 CFR 63.172(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring. [40 CFR 63.181(g)(1)(iv)]
   (2) Records of operation of closed-vent systems and control devices, as specified in 40 CFR 63.181(g)(2)(i through iii) shall be retained for 2 years. [40 CFR 63.181(g)(2)]
      (i) Dates and durations when the closed-vent systems and control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170 are not operated as designed as indicated by the monitored parameters, including periods when a flare pilot light system does not have a flame. [40 CFR 63.181(g)(2)(i)]
      (ii) Dates and durations during which the monitoring system or monitoring device is inoperative. [40 CFR 63.181(g)(2)(ii)]
      (iii) Dates and durations of start-ups and shutdowns of control devices required in 40 CFR 63.163 through 40 CFR 63.166, and 40 CFR 63.170. [40 CFR 63.181(g)(2)(iii)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

m. If the permittee implements any of the quality improvement programs required by 40 CFR 63.175 or 40 CFR 63.176, the records specified in 40 CFR 63.181(h) shall be maintained for a period of the quality improvement plan for the process unit. [40 CFR 63.181(h)]

n. For each pressure relief device subject to the pressure release management work practice standards in 40 CFR 63.2480(e), the permittee must keep the records specified in 40 CFR 63.2525(q) (1) – (3). [40 CFR 63.2525(q)]
   (1) Records of the prevention measures implemented as required in 40 CFR 63.2480(e)(3)(ii).
   (2) Records of the number of releases during each calendar year and the number of those releases for which the root cause was determined to be a force majeure event. Keep these records for the current calendar year and the past 5 calendar years.
   (3) For each release to the atmosphere, the permittee must keep the records specified in 40 CFR 63.2525(q)(3)(i) – (iv).
      (i) The start and end time and date of each pressure release to the atmosphere; [40 CFR 63.2525(q)(3)(i)]
      (ii) Records of any data, assumptions, and calculations used to estimate of the mass quantity of each organic HAP released during the event; [40 CFR 63.2525(q)(3)(ii)]
      (iii) Records of the root cause analysis and corrective action analysis conducted as required in 40 CFR 63.2480(e)(3)(iii), including an identification of the affected facility, a statement noting whether the event resulted from the same root cause(s) identified in a previous analysis and either a description of the recommended corrective action(s) or an explanation of why corrective action is not necessary under 40 CFR 63.2480(e)(7)(i); [40 CFR 63.2525(q)(3)(iii)]
      (iv) For any corrective action analysis for which implementation of corrective actions are required in 40 CFR 63.2480(e)(7), a description of the corrective action(s) completed within the first 45 days following the discharge and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates. [40 CFR 63.2525(q)(3)(iv)]

**6. Specific Reporting Requirements:**

a. For the equipment subject to 40 CFR 63 Subparts F, G and H, all reports shall be submitted as required therein. [40 CFR 63.103(d)]

b. For equipment subject to 40 CFR 63, Subpart FFFF the permittee must submit the following report: [40 CFR 63.2520]
   (1) A Compliance report containing the information specified in 40 CFR 63.2520(e) semiannually according to the requirements in 40 CFR 63.2520(b).

c. ***Compliance report.*** The compliance report must contain the information specified in 40 CFR 63.2520(e)(1) through (17). On and after August 12, 2023 or once the reporting template for this subpart has been available on the CEDRI website for 1 year, whichever date is later, you must submit all subsequent reports following the procedure specified in 40 CFR 63.9(k), except any medium submitted through mail must be sent to the attention

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

of the Miscellaneous Organic Chemical Manufacturing Sector Lead. You must use the appropriate electronic report template on the CEDRI website (*https://www.epa.gov/electronic-reporting-air-emissions/cedri*) for this subpart. The date report templates become available will be listed on the CEDRI website. Unless the Administrator or delegated state agency or other authority has approved a different schedule for submission of reports under 40 CFR 63.9(i) and 40 CFR 63.10(a) of subpart A, the report must be submitted by the deadline specified in this subpart, regardless of the method in which the report is submitted. [40 CFR 63.2520(e)]

d. Refer to **Section F.5**.

**7. Specific Control Equipment Operating Conditions:**
None

**8. Alternate Operating Scenarios:**

a. For the equipment leaks subject to 40 CFR 63, Subpart FFFF, the permittee may comply with one of the following requirements: [40 CFR 63.2480(a) and Table 6 to 40 CFR 63, Subpart FFFF]
   (1) 40 CFR 63, Subpart UU and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f);
   (2) 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 40 CFR 63.2480(b) and (d)-(f); or
   (3) 40 CFR 65, Subpart F and the requirements referenced therein, except as specified in 40 CFR 63.2480(c) and (d)-(f).

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## COOLING TOWERS

| EP | EU | Emission Unit/Point Description |
|---|---|---|
| **CT** | CT-6<br>CT-7 | **Non-Contact Process Cooling Towers**, CT-6 and CT-7<br>Description: Provides cooling water to Polymerization, Polyrectification, SAP, and AAR Areas<br>Water Flow Rate: 33,000 gallons/minute total<br>**MON and HON Heat Exchange System** |

**APPLICABLE REGULATIONS:**
401 KAR 59:010, New process operations.

401 KAR 63:002, Section 2 (4)(lll), 40 C.F.R. 63.2430 through 63.2550, Tables 1 through 12 (Subpart FFFF), National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.

401 KAR 63:002, Section 2.(4)(a), 40 C.F.R. 63.100 through 63.107, Tables 1 through 4 (Subpart F), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, as referenced by 40 CFR 63, Subpart FFFF.

*Note:*
*40 CFR 63, Subpart F has been updated as cited in 89 FR 43153-43175 dated May 16, 2024; &*
*40 CFR 63, Subpart FFFF has been updated as cited in 89 FR 23868-23873 dated April 4, 2024.*

**PRECLUDED REGULATIONS**:
401 KAR 63:002, Section 2.(4)(j), 40 C.F.R. 63 63.400 through 63.407, Table 1 (Subpart Q), National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers.

**NON-APPLICABLE REGULATIONS:**
401 KAR 63:002, Section 2.(4)(a), 40 C.F.R. 63.100 through 63.107, Tables 1 through 4 (Subpart F), National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, is applicable as referenced by 40 CFR 63, Subpart FFFF and applies to the Cooling Towers. This regulation does not apply to EU-CT-6 as this cooling tower is not part of a chemical manufacturing processing unit that produces chemicals listed under Table 1 of 40 CFR 63, Subpart F as a primary product.

1. **Operating Limitations:**
   a. Refer to 40 CFR 63.103(a) for general provisions.

   b. Refer to 40 CFR 63.2540 for general provisions.

   c. The use of chromium based water treatment chemicals in the cooling towers is prohibited. [401 KAR 52:020, Section 10]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**2. Emission Limitations:**

a. Emission of particulate matter from a control device or stack of any affected facility up to a process rate of 1000 lbs/hr shall not exceed 2.34 lbs/hr. For processing rates greater than 1000 lbs/hr up to 60,000 lbs/hr, particulate emissions shall not exceed the emission rate calculated by the following equation: [to 401 KAR 59:010, Section 3(2)]

$$E = 3.59(P)^{0.62}$$

E = the PM emissions rate (pounds/hour)
P = the process rate (tons/hour)

**Compliance Demonstration Method:**

a. The permittee shall be assumed to be in compliance with the emission limitation based upon emissions information provided to the Division.

b. No person shall cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity. [to 401 KAR 59:010, Section 3(1)]

**Compliance Demonstration Method:**

Refer to **4. Specific Monitoring Requirements** and **5. Specific Recordkeeping Requirements** below.

**3. Testing Requirements:**

Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1].

**4. Specific Monitoring Requirements:**

a. For HON heat exchange systems, the permittee shall comply with the provisions in 40 CFR 63.104(b) by monitoring the cooling water for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system and complying with the following requirements specified in 40 CFR 63.104(b)(1 through 6). [40 CFR 63.104(b)]

(1) The cooling water shall be monitored monthly for the first 6 months and quarterly thereafter to detect leaks. [40 CFR 63.104(b)(1)]

(2) For recirculating heat exchange systems (cooling tower systems), the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in Table 4 of 40 CFR 63, Subpart F. For once-through heat exchange systems, the monitoring of speciated hazardous air pollutants or total hazardous air pollutants refers to the hazardous air pollutants listed in Table 9 of 40 CFR 63, Subpart G. [40 CFR 63.104(b)(2)(i) and (ii)]

(3) The concentration of the monitored substance(s) in the cooling water shall be determined using any EPA-approved method listed in 40 CFR 136 as long as the method is sensitive to concentrations as low as 10 parts per million and the same

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

method is used for both entrance and exit samples. Alternative methods may be used upon approval by the Administrator. [40 CFR 63.104(b)(3)]

(4) The samples shall be collected either at the entrance and exit of each heat exchange system or at locations where the cooling water enters and exits each heat exchanger or any combination of heat exchangers, according to the provisions of 40 CFR 63.104(b)(4)(i through iii). [40 CFR 63.104(b)(4)]

(5) A minimum of three sets of samples shall be taken at each entrance and exit as defined in 40 CFR 63.104(b)(4). The average entrance and exit concentrations shall then be calculated. The concentration shall be corrected for the addition of any makeup water or for any evaporative losses, as applicable. [40 CFR 63.104(b)(5)]

(6) A leak is detected if the exit mean concentration is found to be greater than the entrance mean using a one-sided statistical procedure at the 0.05 level of significance and the amount by which it is greater is at least 1 part per million or 10 percent of the entrance mean, whichever is greater. [40 CFR 63.104(b)(6)]

b. For MON heat exchange systems, perform monitoring to identify leaks of total strippable hydrocarbons from each heat exchange system subject to 40 CFR 63 Subpart FFFF, according to the procedures in 40 CFR 63.2490(d)(1)(i) – (v). [40 CFR 63.2490(d)(1)]

(1) Monitor each closed-loop recirculating system at the cooling tower return line or any representative riser within the cooling tower prior to exposure to air for each heat exchange system, or selected heat exchanger exit line(s), so that each heat exchanger or group of heat exchangers within a heat exchange system is covered by the selected monitoring location(s). [40 CFR 63.2490(d)(1)(i)(A) and (B)]

(2) The permittee must determine the total strippable hydrocarbon concentration in ppmv, as methane, at each monitoring location using the Air Stripping Method (Modified El Paso Method) for Determination of Volatile Organic Compound Emissions from Water Sources" (incorporated by reference – see 40 CFR 63.14) using a flame ionization detector (FID) analyzer for on-site determination as described in Section 6.1 of the Modified El Paso Method. [40 CFR 63.2490(d)(1)(iii)]

(3) The permittee shall conduct monitoring for each heat exchange system monthly for the first 6 months, and quarterly thereafter using a leak action level defined as a total strippable hydrocarbon concentration (as methane) in the stripping gas of 6.2 ppmv. If a leak is detected as specified in paragraph 40 CFR 63.2490(d)(1)(v), then the permittee shall monitor monthly until the leak has been repaired according to the requirements in 40 CFR 63.2490(d)(2) or (3). Once the leak has been repaired, quarterly monitoring for the heat exchange system may resume. [40 CFR 63.2490(d)(1)(iv)]

(4) A leak is detected if a measurement value of the sample taken from a location specified in 40 CFR 63.2490(d)(1)(i)(A) or (B) equals or exceeds the leak action level. [40 CFR 63.2490(d)(1)(v)(B)]

c. If a leak is detected according to the criteria of 40 CFR 63.104(b), the permittee shall comply with the following requirements in 40 CFR 63.104(d)(1 and 2), except as provided in 40 CFR 63.104(e). [40 CFR 63.104(d)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(1) The leak shall be repaired as soon as practical but not later than 45 calendar days after the owner or operator receives results of monitoring tests indicating a leak. The leak shall be repaired unless the owner or operator demonstrates that the results are due to a condition other than a leak. [40 CFR 63.104(d)(1)]
(2) Once the leak has been repaired, the owner or operator shall confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. [40 CFR 63.104(d)(2)]

d. If a leak is detected according to the criteria of 40 CFR 63.2490(d)(1), the permittee shall repair the leak to reduce the concentration or massemissions rate to below the applicable leak action level as soon as practicable, but no later than 45 days after identifying the leak, except as specified in 40 CFR 63.2490(d)(4). Repair must include re-monitoring at the monitoring location where the leak was identified according to the method specified in 40 CFR 63.2490(d)(1)(iii) to verify that the total strippable hydrocarbon concentration is below the applicable leak action level. Repair may also include performing the additional monitoring in 40 CFR 63.2490(d)(3). Actions that can be taken to achieve repair include but are not limited to: [40 CFR 63.2490(d)(2)]
(1) Physical modifications to the leaking heat exchanger, such as welding the leak or replacing a tube; [40 CFR 63.2490(d)(2)(i)]
(2) Blocking the leaking tube within the heat exchanger; [40 CFR 63.2490(d)(2)(ii)]
(3) Changing the pressure so that water flows into the process fluid; [40 CFR 63.2490(d)(2)(iii)]
(4) Replacing the heat exchanger or heat exchanger bundle; or [40 CFR 63.2490(d)(2)(iv)]
(5) Isolating, bypassing, or otherwise removing the leaking heat exchanger from service until it is otherwise repaired. [40 CFR 63.2490(d)(2)(v)]

e. If the permittee detects a leak when monitoring a cooling tower return line under paragraph 40 CFR 63.2490(d)(1)(i)(A), the permittee may conduct additional monitoring of each heat exchanger or group of heat exchangers associated with the heat exchange system for which the leak was detected, as provided in 40 CFR 63.2490(d)(1)(i)(B). If no leaks are detected, the heat exchange system is considered to have met the repair requirements through re-monitoring of the heat exchange system, as provided in 40 CFR 63.2490(d)(2). [40 CFR 63.2490(d)(3)]

f. Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in 40 CFR 63.104(e)(1) or 40 CFR 63.104(e)(2) is met. [40 CFR 63.104(e)]

g. The permittee may delay repair when one of the conditions in 40 CFR 63.2490(d)(4)(i) or (ii) is met and the leak is less than the delay of repair action level of 62 ppmv, as specified in 40 CFR 63.2490(d)(4)(iii). The permittee must determine if a delay of repair is necessary as soon as practicable, but no later than 45 days after first identifying the leak. If, during subsequent monitoring, the delay of repair action level is exceeded, then

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

the permittee must repair the leak within 30 days of the monitoring event in which the leak was equal to or exceeded the delay of repair action level. [40 CFR 63.2490(d)(4)]

(1) If the repair is technically infeasible without a shutdown and the total strippable hydrocarbon concentration is initially and remains less than the delay of repair action level for all monitoring periods during the delay of repair, then the permittee may delay repair until the next scheduled shutdown of the heat exchange system. [40 CFR 63.2490(d)(4)(i)]

(2) If the permittee demonstrates that the necessary equipment, parts, or personnel are not available and the total strippable hydrocarbon concentration is initially and remains less than the delay of repair action level for all monitoring periods during the delay of repair, then the permittee may delay the repair for a maximum of 120 calendar days. [40 CFR 63.2490(d)(4)(ii)]

h. The permittee shall perform a qualitative visual observation during daylight hours of the opacity of emissions at each stack on a monthly basis and maintaining a log of the observations. If visible emissions from the stacks are observed (not including condensed water in the plume), the permittee shall determine the opacity using U.S. EPA Reference Method 9. In lieu of determining the opacity using U.S. EPA Reference Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume). [401 KAR 52:020, Section 10]

**5. Specific Recordkeeping Requirements:**

a. All records shall be maintained in accordance with **Section F.2.**

b. The permittee must keep the following records: [40 CFR 63.2525]

(1) Except as specified in 40 CFR 63.2450(e)(4), 40 CFR 63.2480(f), 40 CFR 63.2485(p) and (q) and 40 CFR 63.2525(t) and (u), each applicable record required by 40 CFR 63 Subpart A and in referenced Subparts F, G and SS of 40 CFR 63. [40 CFR 63.2525(a)]

(2) Records of each operating scenario as specified: [40 CFR 63.2525(b)]

(i) A description of the process and the type of process equipment used. [40 CFR 63.2525(b)(1)]

(ii) An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard in 40 CFR 63.2505; wastewater point of determination (POD); storage tanks; and transfer racks. [40 CFR 63.2525(b)(2)]

(iii) The applicable control requirements of 40 CFR 63, Subpart FFFF including the level of required control, and for vents, the level of control for each vent. [40 CFR 63.2525(b)(3)]

(iv) The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. [40 CFR 63.2525(b)(4)]

(v) The process vents, wastewater POD, transfer racks, and storage tanks (including those from other processes) that are simultaneously routed to the control device or treatment process(s). [40 CFR 63.2525(b)(5)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(vi) The applicable monitoring requirements of 40 CFR 63, Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process. [40 CFR 63.2525(b)(6)]
(vii) Calculations and engineering analyses required to demonstrate compliance. [40 CFR 63.2525(b)(7)]
(viii) For reporting purposes, a change to any of these elements not previously reported, except for 63.2525(b)(5), constitutes a new operating scenario. [40 CFR 63.2525(b)(8)]

c. For the HON heat exchange systems, the permittee must retain the following records as specified in 40 CFR 63.103(c)(1). [40 CFR 63.104(f)(1)]
(1) Monitoring data required by **4. Specific Monitoring Requirements** indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination;
(2) The dates of efforts to repair leaks; and [40 CFR 63.104(f)(1)(iii)]
(3) The method or procedure used to confirm repair of a leak and the date repair was confirmed. [40 CFR 63.104(f)(1)(iv)]

d. For each MON heat exchange system, keep records in 40 CFR 63.2525(r)(1) through (4). [40 CFR 63.2525(r)]
(1) Monitoring data required by **4. Specific Monitoring Requirements** (40 CFR 63.2490(d)) that indicate a leak, the date the leak was detected, or, if applicable, the basis for determining there is no leak. [40 CFR 63.2525(r)(1)]
(2) The dates of efforts to repair leaks. [40 CFR 63.2525(r)(2)]
(3) The method or procedures used to confirm repair of a leak and the date the repair was confirmed. [40 CFR 63.2525(r)(3)]
(4) Documentation of delay of repair as specified in 40 CFR 63.2525(r)(4)(i) through (iv). [40 CFR 63.2525(r)(4)]
(i) The reason(s) for delaying repair. [40 CFR 63.2525(r)(4)(i)
(ii) A schedule for completing the repair as soon as practical. [40 CFR 63.2525(r)(4)(ii)]
(iii) The date and concentration or mass emissions rate of the leak as first identified and the results of all subsequent monitoring events during the delay of repair. [40 CFR 63.2525(r)(4)(iii)]
(iv) An estimate of the potential total hydrocarbon emissions from the leaking heat exchange system or heat exchanger for each required delay of repair monitoring interval following the procedures in 40 CFR 63.2525(r)(4)(iv)(A) through (C). [40 CFR 63.2525(r)(4)(iv)]

e. The permittee shall maintain a log of the qualitative visual observations made as specified in **4. Specific Monitoring Requirements h.** including the date, time, initials of observer, whether any emissions were observed (yes/no), and any Method 9 readings taken. [401 KAR 52:020, Section 10]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**6. Specific Reporting Requirements:**

a. For equipment subject to 40 CFR 63, Subpart FFFF the permittee must submit the following reports:
   (1) Compliance report containing the information specified in 40 CFR 63.2520(e) semiannually according to the requirements in 40 CFR 63.2520(b).
   (2) The permittee shall furnish reports as specified in **5. Specific Reporting Requirements**.
   (3) Refer to **Section F.5**.

b. The compliance report must include the information specified in 40 CFR 63.2520(e)(16)(i) through (v). [40 CFR 63.2520(e)(16)]
   (1) The number of heat exchange systems at the plantsite subject to the monitoring requirements in 40 CFR 63.2490(d) during the reporting period; [40 CFR 63.2520(e)(16)(i)]
   (2) The number of heat exchange systems subject to the monitoring requirements in 40 CFR 63.2490(d) at the plant site found to be leaking during the reporting period; [40 CFR 63.2520(e)(16)(ii)]
   (3) For each monitoring location where the total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate was determined to be equal to or greater than the applicable leak definitions specified in 40 CFR 63.2490(d)(1)(v) during the reporting period, identification of the monitoring location (e.g., unique monitoring location or heat exchange system ID number), the measured total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate, the date the leak was first identified, and, if applicable, the date the source of the leak was identified; [40 CFR 63.2520(e)(16)(iii)]
   (4) For leaks that were repaired during the reporting period (including delayed repairs), identification of the monitoring location associated with the repaired leak, the total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate measured during re-monitoring to verify repair, and the re-monitoring date (i.e., the effective date of repair); and [40 CFR 63.2520(e)(16)(iv)]
   (5) For each delayed repair, identification of the monitoring location associated with the leak for which repair is delayed, the date when the delay of repair began, the date the repair is expected to be completed (if the leak is not repaired during the reporting period), the total strippable hydrocarbon concentration or total hydrocarbon mass emissions rate and date of each monitoring event conducted on the delayed repair during the reporting period, and an estimate in pounds of the potential total hydrocarbon emissions over the reporting period associated with the delayed repair. [40 CFR 63.2520(e)(16)(v)]

c. If an owner or operator invokes the delay of repair provisions for a heat exchange system, the following information must be submitted in the next semi-annual periodic report required by 40 CFR 63.152(c) of 40 CFR 63, Subpart G. If the leak remains unrepaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported. [40 CFR 63.104(f)(2) and 40 CFR 63.2490(a)]
   (1) The presence of the leak and the date that the leak was detected. [40 CFR 63.104(f)(2)(i)]

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) Whether or not the leak has been repaired. [40 CFR 63.104(f)(2)(ii)]
(3) The reason(s) for delay of repair. If delay of repair is invoked due to the reasons described in 40 CFR 63.104(e)(2), documentation of emissions estimates must also be submitted. [40 CFR 63.104(f)(2)(iii)]
(4) The expected date of repair, if the leak remains unrepaired. [40 CFR 63.104(f)(2)(iv)]
(5) If the leak is repaired, the owner or operator shall report the date the leak was successfully repaired. [40 CFR 63.104(f)(2)(v)]

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## WAREHOUSE FUGITIVES

| EP | Emission Point Description |
|---|---|
| M10 | Warehouse Fugitives |

**APPLICABLE REGULATIONS:**

401 KAR 50:012, General application.

**STATE-ORIGIN REQUIREMENTS:**
401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances.

1. **Operating Limitations:**
   In the absence of a standard specified in 401 KAR 50 to 65, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical (RAP). [401 KAR 50:012 Section 1(2)]

   **Compliance Demonstration Method:**
   a. The facility shall load product containing 5 percent methanol or less, on a monthly basis.
   b. The permittee shall close each bulk bag immediately after loading process completes and maintain the closure throughout the storage period of each bulk bag.

2. **Emission Limitations:**
   Refer to **Section D.4** for 401 KAR 63:020 requirements.

3. **Testing Requirements:**
   Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1].

4. **Specific Monitoring Requirements:**
   The permittee shall monitor the methanol content of each product-lot load. [401 KAR 52:020, Section 10]

5. **Specific Recordkeeping Requirements:**
   The permittee shall certify in their compliance report that all product loaded contained 5 percent methanol or less, on a monthly basis. [401 KAR 52:020, Section 10]

6. **Specific Reporting Requirements:**
   None

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| EP | GROUP REQUIREMENTS |
|---|---|
| F01-(11C) | 50 Line PK5 Process Condenser |
| F01-(11E) | 50 Line PK6 Process Condenser |
| F01-(11H) | 50 Line Paste Stripper Accumulator |
| F01-(12C) | 100 Line PK1 Process Condenser |
| F01 (12E) | 100 Line PK2 Process Condenser |
| F01-(13C) | 100 Line Paste Stripper Accumulator |
| F01-(14C) | 150 Line PK3 Process Condenser |
| F01-(14E) | 150 Line PK4 Process Condenser |
| F01-(15H) | 150 Line PK4 Paste Stripper Accumulator |
| P02 | Polymerization Line 50 Catalyst Preparation Tanks |
| P05 | Polymerization Line 100 Catalyst Preparation Tanks |
| P08 | Polymerization Line 150 Catalyst Preparation Tanks |
| S01 | Saponification Process Unit |
| S02 | Saponification Process Unit Drying |
| S04 | 200 Saponification Line Product Transfer Collector |
| S08 | 250 Saponification Line Product Transfer Collector |
| S12 | 400 Saponification Line Product Transfer Collector |
| S16 | 600 Saponification Line Product Transfer Collector |
| W14-W25 | WEDCO Silos #1 - #4, #7 - #15 |
| W26-W28 | WEDCO Ground Silos #15 - #17 |
| W29 | WEDCO Bulk Loading |
| W33 | Bagging Operation: Filling - Sackmatic, PA-5716 |
| W34 | Bagging Hopper, FB-5723 |
| W36 | Bagging Area Fugitives |
| W37 | North Bulk Truck Loading Station |
| W38 | South Bulk Truck Loading Station |
| F01-(2C), A01 | East Methyl Acetate Extraction Tower Vent Condenser, EA-5341 |
| F01-(3C), A02 | West Methyl Acetate Extraction Tower Vent Condenser, EA-5339 |
| F01-(5A) | SAP Methanol Tower, DA-5303 |
| F01-(9C) | Vinyl Recovery Tower East Condenser, EA-5108 |
| R02 | Vinyl Recovery Tower Startups |
| F01-(10C) | Vinyl Extraction Tower Vent Absorber, DA-5108 |
| R03 | Vinyl Extraction Tower Startups |
| A07 | Dilute Acid Tank Condenser, EA-5340 |
| A08 | Two (2) Acetic Acid Rundown Tanks, FA-5322B&C |
| R04 | Inhibitor (BQ) Feed Tank, FA-5109 |
| F01-(18A-18B) | Paste Storage Tank West Nest #3 (2), FB 5509-10 |
| T01 | Methyl Acetate/Methanol Storage Tank, FB-1513 |
| T05 | Methanol Storage Tank, FB-5531 |
| T06 | Four (4) Methanol Saponification Tank System, FB 5532-35 |
| T07 | North Mother Liquor Storage Tank, FB-5536 |
| T08 | South Mother Liquor Storage Tank, FB-5537 |
| T09 | Methyl Acetate/Methanol Storage Tank, FB-5538 |

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

| | |
|---|---|
| F01-(19A-19B) | Recovered Vinyl Acetate Rework Storage Tanks (2), FA-5522 and FB-5523 |
| T11 | Four (4) Acetic Acid Tanks, FB-5101-03, 1517 |

**PRECLUDED REGULATIONS**:
This source has elected to accept annual limits in order to preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality (PSD) for volatile organic compounds and particulate matter.

The synthetic minor limits precluding the applicability of 401 KAR 51:017 were included in the following permits:

**Permits**
Permit No. VF-03-001, issued on September 5, 2003
Permit No. S-95-198R, issued on June 4, 1998
Permit No. S-97-054, issued on May 20, 1997
Permit No. C-86-172 (Revision 1), issued on September 26, 1995
Permit No. O-87-015, issued on March 27, 1987
Permit No. C-84-146, issued on August 21, 1984

1. **Operating Limitations:**
   The permittee shall comply with the operating limitations specified below. Compliance with these operating limitations and the source emission limitations of **2. Emission Limitations** shall preclude the applicability of the requirements of 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality: [401 KAR 52:020, Section 10]

   a. The loading rates of PVOH shall not exceed the following limitations: [VF-03-001, issued on September 5, 2003]
      (1) W29: 75,000 tons per year (tpy), on a twelve (12) consecutive month basis;
      (2) W33: 5,000 tpy, on a twelve (12) consecutive month basis;
      (3) W34: 63,022 tpy, on a twelve (12) consecutive month basis;
      (4) W37: 75,000 tpy, on a twelve (12) consecutive month basis; and
      (5) W38: 75,000 tpy, on a twelve (12) consecutive month basis.

   b. The production rates shall not exceed the following limitations: [Permit No. S-95-198R, issued on June 4, 1998 and Permit No. C-86-172 (Revision 1), issued on September 26, 1996]
      (1) A02-3A: 85,000 lbs/hr and 372,300 tpy, on a twelve (12) consecutive month basis;
      (2) R02-9A: 55,420 lbs/hr and 242,748 tpy, on a twelve (12) consecutive month basis; and;
      (3) R03-10A: 55,260 lbs/hr and 242,039 tpy, on a twelve (12) consecutive month basis.

   c. The production rates shall not exceed the following limitations determined on a twelve (12) consecutive month basis: [Permit No. S-95-198R, issued on June 4, 1998]
      (1) A01-2A: 53,000 lbs/hr; and

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) A04-5A: 100,000 lbs/hr.

**Compliance Demonstration Method:**

a. Refer to **4. Specific Monitoring Requirements**.

b. Refer to **7. Specific Control Equipment Operating Conditions**.

**2. Emission Limitations:**

To preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality, the permittee shall comply with the following emission limitations:

a. The total emissions of volatile organic compounds (VOC) from the summation of emissions from EP F01-2C, F01-5A, F01-9C, F01-10C, F01-11C, F01-11E, F01-11H, F01-12C, F01-12E, F01-13C, F01-(19A-19B), P08, S01, W14-W25, W29, A08, T05, T07, T08, F01-14C, F01-14E, F01-15C, R02, R03, S02, T01, P02, P05, F01-(18A & 18B), T06, and T11 shall not exceed 127 tpy. [Permit No. S-95-198R, issued on June 4, 1998]
NOTE: Methyl acetate is not a VOC as defined by 40 CFR 51.100(s)(1). Therefore, F01-2C and F01-3C have zero VOC emissions.

b. The total emissions of VOC from the summation of emissions from EP- T01, F01-11C, F01-11E, F01-11H, F01-12C, F01-12E, F01-13C, F01-(19A-19B), P08, S01, A08, T05, T07, T08, P02, P05, F01-14C, F01-14E, F01-15C, S02, A07, F01-(18A & 18B), T06, T09, and T11 shall not exceed 247 tpy. [Permit No. C-84-146, issued on August 21, 1984]

c. The total VOC emissions from EP-S01 and S02 shall not exceed 37.67 tons per consecutive twelve (12) month period. [Permit No. O-87-015, Condition 18, issued on March 27, 1987]

d. The total emissions of PM from the summation of emissions from EP-W14-W25, W26-W28, W29, S04, S08, S12 and S16 shall not exceed 25 tons per consecutive twelve (12) month period. [Permit No. C-84-146 issued on August 21, 1984]

e. The permittee shall also comply with the production limitations established in **1. Operating Limitations** for EU-A01-2A, A02-3A, A04-5A, R02-9A, R03-10A and W29.

**Compliance Demonstration Method:**

f. Calculate the VOC emissions from the emission units specified in each limit of **2. Emission Limitations** paragraphs 2.a, 2.b and 2.c, as follows:
   (1) Use of industry specific emissions calculation methodology and associated recordkeeping, or
   (2) Monthly Emission Rate =

$$\sum_{i=1}^{n} \text{[monthly production rate (tons) per emission unit]} \times EF \times (1 - CE/100)$$

Where: i = the emission unit

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

n = the number of emission units included in the emission limit
EF = emission factor (lbs/ton process weight, based on the most recent stack test, material balance, engineering estimates, or other factor approved by the Division or U.S. EPA)
CE = control efficiency (%)

Annual Emission Rate =

$\sum_{i=1}^{n}$ [VOC emitted this month + VOC emitted previous 11 consecutive months]

g. Calculate the PM emissions from the emission units specified in **2.c. Emission Limitations** as follows:

Monthly Emission Rate =

$\sum_{i=1}^{n}$ [monthly PVOH production rate (tons) per emission unit] x EF x (1 – CE/100)

Where: i = the emission unit
n = the number of emission units included in the emission limit
EF = emission factor (lbs PM / ton PVOH produced)
CE = control efficiency (%)

Annual Emission Rate =

$\sum_{i=1}^{n}$ [PM emitted this month + PM emitted previous 11 consecutive months]

h. Refer to **4. Specific Monitoring Requirements.**

i. Refer to **7. Specific Control Equipment Operating Conditions.**

**3. Testing Requirements:**

Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1].

**4. Specific Monitoring Requirements:**

a. The permittee shall monitor and maintain records of the following information, on a monthly and consecutive twelve (12) month basis:
   (1) The catalyst throughput for the Line 50 Catalyst Preparation Tanks EU-P02;
   (2) The feed rate and the paste throughput for Line 100 Stripper and Auxiliary Equipment EU-13;
   (3) The feed rate and paste throughput for Line 150 Stripper and Auxiliary Equipment EU-15;
   (4) The processing rate from each EU-S01-A, S01-B, S01-C, S01-D, SO2-A, S02-B, S02-C, and S02-D;
   (5) The production rate from each EU-A01-2A, A02-3A, A04-5A, R02-9A, and R03-10A;
   (6) The PVOH production rate from each EU-W14-W25, W26-W28, W29, S04, S08,

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

S12 and S16;
(7) The throughput for the Paste Storage Tanks West Nest #3 EU-T04-18A, 18B;
(8) The throughput for the Methanol Storage Tank EU-T05;
(9) The throughput for the Methanol Saponification Tank System EU-T06;
(10) The throughput for the N. Mother Liquor Storage Tank EU-T07;
(11) The throughput for the S. Mother Liquor Storage Tank EU-T08;
(12) The throughput for the Methyl Acetate/Methanol Storage Tank EU-T09;
(13) The throughput for the Recovered Vinyl Acetate Storage Tanks EU-T10, 19A-19B;
(14) The throughput for the Acetic Acid Tanks EU-T11;
(15) The throughput for the Dilute Acid Tank EU-A07;
(16) The throughput for the Acetic Acid Rundown Tanks EU-A08; and
(17) The throughput for the Inhibitor (BQ) Feed Tank EU R04
(18) The throughput for Methyl Acetate/Methanol Storage Tank, FB-1513 EP-T01,
(19) The number of startups for Vinyl Recovery Tower EU-R02,
(20) The number of startups for Vinyl Extraction Tower EU-R03,
(21) The throughput for Polymerization Line 100 Catalyst Preparation Tanks EU-P05.
(22) The throughput for Polymerization Line 150 Catalyst Preparation Tanks EU-P08.

b. The following parameters shall be continuously monitored for the Process Condensers of Polykettles PK1-PK6: EU-P01-11C, P01-11E, P03-12C, P03-12E, P06-14C and P06-14E.
(1) Pressure,
(2) Vent valve position, and
(3) Inlet coolant temperature.

**5. Specific Recordkeeping Requirements:**

a. Records shall be kept in accordance with **4. Specific Monitoring Requirements**.

b. Actual VOC and particulate matter emissions shall be determined and recorded on a monthly and consecutive 12-month basis in accordance with **2. Emission Limitations, Compliance Demonstration Method**.

c. The permittee shall maintain records of preventive maintenance and inspections of the control devices in accordance with **7. Specific Control Equipment Operating Conditions**.

d. All records shall be maintained in accordance with **Section F.2**.

**6. Specific Reporting Requirements:**

For the emission points in **2. Emission Limitations**, the permittee shall report to the Division in accordance with **Section F,** the consecutive 12-month totals of VOC and particulate matter emissions.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**7. Specific Control Equipment Operating Conditions:**

a. The process condensers at EU P01-11C, P01-11E, P03-12C, P03-12E, P06-14C and P06-14E shall be in operation at all times the emission units exhausting to these condensers are operating.

b. The permittee shall maintain the flow rate and temperature of the scrubbing liquid at the scrubbers at EU S01 and S02 within the range recommended by the manufacturer or the range based on process engineering assessments that result in normal operation of the equipment.

c. The 600 SAP Vent Scrubber at EU-S01 and the Main Vent Scrubber at EP S02 shall be in operation at all times when emissions are vented to them.

d. Refer to **7. Specific Control Equipment Operating Conditions** in **Section B, WEDCO Area**, for specific baghouse operating conditions.

e. Refer to **Section B**, EP-F01.

## SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

Description Generally Applicable Regulation

| Plant ID | Description | Generally Applicable Regulation |
|---|---|---|
| W31 | Vacuum Cleaning System (Bulk Area) and Baghouse (FD-5758) | 401 KAR 59:010<br>401 KAR 63:020 |
| W35 | Bagging Operation Vacuum Cleaning System (Bulk Area) and Baghouse (FD-5763) | 401 KAR 59:010<br>401 KAR 63:020 |
| W39 | Silo #13 and #14 Product Collector (FD-5775) | 401 KAR 59:010<br>401 KAR 63:020 |
| W40 | Silos # 11 and #12 Product Collector (FD-5777) | 401 KAR 59:010<br>401 KAR 63:020 |
| W41 | Silos # 9 and # 10 Product Collector (FD-57) | 401 KAR 59:010<br>401 KAR 63:020 |
| M09 | Diesel UST and Auxiliary Equipment, FB-0004 | None |
| M11 | Off-Spec/ Rework Pollution Control Trailers (Splash Loading from Processes), 390,000 gallons/yr Acetic Acid, 60,000 gallons/yr Mother Liquor, 30,000 gallons/yr Vinyl Acetate or 120,000 gallons/yr Methyl Acetate | None |
| M13 | Polymatech Thermal Gap Filler Production process with manual and ultrasonic cleaning and PWIS testing | 401 KAR 59:010 |
| W42 | Off-spec material bagging - 200 Line | 401 KAR 59:010 |
| W43 | Off-spec material bagging - 250 Line | 401 KAR 59:010 |
| W44 | Off-spec material bagging - 400 Line | 401 KAR 59:010 |
| W45 | Off-spec material bagging - 600 Line | 401 KAR 59:010 |

## SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

2. Volatile organic compound, hazardous air pollutant (HAP) and particulate emissions, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan shall not exceed the respective limitations specified herein.

3. In order to preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality (PSD), the permittee shall comply with **Section B, Group Requirements**.

4. 401 KAR 63:020, Potentially Hazardous Matter and Toxic Substances. Persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide the utmost care and consideration, in the handling of these materials, to the potentially harmful effects of the emissions resulting from such activities. No owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. Evaluation of such facilities as to adequacy of controls and/or procedures and emission potential will be made on an individual basis by the cabinet. The source is assumed to be in compliance with 401 KAR 63:020 based on the rates of emissions of airborne toxics provided in the application submitted by the source.

## SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

## SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b-IV-1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place as defined in this permit, and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five (5) years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b-IV-2 and 1a-8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. In accordance with the requirements of 401 KAR 52:020, Section 3(1)h, the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
   a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
   b. To access and copy any records required by the permit:
   c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

   Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Summary reports of any monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Sections 1b-V-1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

## SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020, Section 23. If continuous emission and opacity monitors are required by regulation or this permit, data shall be reported in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All deviations from permit requirements shall be clearly identified in the reports.

7. In accordance with the provisions of 401 KAR 50:055, Section 1, the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
   a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
   b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.

8. The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken shall be submitted to the Regional Office listed on the front of this permit. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement does not identify a specific time frame for reporting deviations, prompt reporting, as required by Sections 1b-V, 3 and 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, shall be defined as follows:
   a. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
   b. For emissions of any regulated air pollutant, excluding those listed in F.8.a., that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
   c. All deviations from permit requirements, including those previously reported, shall be included in the semiannual report required by F.6.

9. Pursuant to 401 KAR 52:020, Title V permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
   a. Identification of the term or condition;
   b. Compliance status of each term or condition of the permit;
   c. Whether compliance was continuous or intermittent;

## SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

d. The method used for determining the compliance status for the source, currently and over the reporting period.
e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
f. The certification shall be submitted by January 30th of each year. Annual compliance certifications shall be sent to the following addresses:

Division for Air Quality
Paducah Regional Office
130 Eagle Nest Drive
Paducah, KY 42003

U.S. EPA Region 4
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St. SW
Atlanta, GA 30303-8960

10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within 30 days of the date the Kentucky Emissions Inventory System (KYEIS) emissions survey is mailed to the permittee.

## SECTION G - GENERAL PROVISIONS

1. General Compliance Requirements

   a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020, Section 3(1)(b), and a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   b. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   c. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
      (1) If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
      (2) The Cabinet or the United States Environmental Protection Agency (U. S. EPA) determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
      (3) The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;
      (4) New requirements become applicable to a source subject to the Acid Rain Program.

      Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

   d. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Sections 1a- 7 and 8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   e. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:020, Section 3(1)(c)].

## SECTION G - GENERAL PROVISIONS (CONTINUED)

f. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

g. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

h. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

i. All emission limitations and standards contained in this permit shall be enforceable as a practical matter. All emission limitations and standards contained in this permit are enforceable by the U.S. EPA and citizens except for those specifically identified in this permit as state-origin requirements. [Section 1a-15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

j. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a-10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

k. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3) b].

l. This permit does not convey property rights or exclusive privileges [Section 1a-9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

m. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.

n. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3) d.].

o. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3) a.].

## SECTION G - GENERAL PROVISIONS (CONTINUED)

p. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

q. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
(1) Applicable requirements that are included and specifically identified in this permit; and
(2) Non-applicable requirements expressly identified in this permit.

2. Permit Expiration and Reapplication Requirements

a. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six (6) months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].

b. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020, Section 8(2)].

3. Permit Revisions

a. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the State Implementation Plan (SIP) or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).

b. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

4. Construction, Start-Up, and Initial Compliance Demonstration Requirements

No construction authorized by this permit (V-25-011).

## SECTION G - GENERAL PROVISIONS (CONTINUED)

5. Testing Requirements

   a. Pursuant to 401 KAR 50:045, Section 2, a source required to conduct a performance test shall submit a completed Compliance Test Protocol form, DEP form 6028, or a test protocol a source has developed for submission to other regulatory agencies, in a format approved by the cabinet, to the Division's Frankfort Central Office a minimum of sixty (60) days prior to the scheduled test date. Pursuant to 401 KAR 50:045, Section 7, the Division shall be notified of the actual test date at least thirty (30) days prior to the test.

   b. Pursuant to 401 KAR 50:045, Section 5, in order to demonstrate that a source is capable of complying with a standard at all times, any required performance test shall be conducted under normal conditions that are representative of the source's operations and create the highest rate of emissions. If [When] the maximum production rate represents a source's highest emissions rate and a performance test is conducted at less than the maximum production rate, a source shall be limited to a production rate of no greater than 110 percent of the average production rate during the performance tests. If and when the facility is capable of operation at the rate specified in the application, the source may retest to demonstrate compliance at the new production rate. The Division for Air Quality may waive these requirements on a case-by-case basis if the source demonstrates to the Division's satisfaction that the source is in compliance with all applicable requirements.

   c. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

6. Acid Rain Program Requirements

   a. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

   b. The permittee shall comply with all applicable requirements and conditions of the Acid Rain Permit and the Phase II permit application (including the Phase II NOx compliance plan and averaging plan, if applicable) incorporated into the Title V permit issued for this source. The source shall also comply with all requirements of any revised or future acid rain permit(s) issued to this source.

7. Emergency Provisions

   a. Pursuant to 401 KAR 52:020, Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
      (1) An emergency occurred and the permittee can identify the cause of the emergency;
      (2) The permitted facility was at the time being properly operated;

## SECTION G - GENERAL PROVISIONS (CONTINUED)

(3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
(4) Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.1-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
(5) This requirement does not relieve the source of other local, state or federal notification requirements.

b. Emergency conditions listed in General Condition G.7.a above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].

c. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

8. Ozone Depleting Substances

a. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
(1) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
(2) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
(3) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.155.
(5) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156 and 40 CFR 82.157.
(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

b. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

9. Risk Management Provisions

   a. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to U.S. EPA using the RMP* eSubmit software.

   b. If requested, submit additional relevant information to the Division or the U.S. EPA.

## SECTION H - ALTERNATE OPERATING SCENARIOS

The alternate operating scenarios set forth below have been approved by the Division based on information supplied with the application and during the application review process. The terms and conditions of each alternate operating scenario have been developed to ensure compliance with the applicable regulations. The permittee, when making a change from one operating scenario to another, shall record contemporaneously in a log at the permitted facility a record of the scenario under which the facility is operating. The permit shield, as provided in Section G shall extend to each alternate operating scenario set forth in this Section. All conditions not specified under an alternate operating scenario shall remain unchanged from their permit values or requirements.

For the equipment leaks in the Polymerization, Polyrectification, SAP, Tank Farm, and Loading Areas, subject to 40 CFR 63.2480(a) and Table 6 to 40 CFR 63, Subpart FFFF the permittee may comply with one of the following requirements.

a. 40 CFR 63, Subpart UU and the requirements referenced therein, except as specified in 63.2480(b) and (d)-(f);
b. 40 CFR 63, Subpart H and the requirements referenced therein, except as specified in 63.2480(b) and (d)-(f); or
c. 40 CFR 65, Subpart F and the requirements referenced therein, except as specified in 63.2480(c) and (d)-(f).

## SECTION I - COMPLIANCE SCHEDULE

None