

# MAJOR SOURCE OPERATING PERMIT

**PERMITTEE:** ARKEMA, INC.

**FACILITY NAME:**

**FACILITY/PERMIT NO.:** 503-5017

**LOCATION:** AXIS, MOBILE COUNTY, ALABAMA

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

**Issuance Date:** DRAFT

**Effective Date:** DRAFT

**Expiration Date:** DRAFT

## TABLE OF CONTENTS

<b>OPERATING PERMIT SUMMARY NO. 1 (20.9 MMBTU/HR BOILER)</b> .....	<b>1-1</b>
Section 1 – Applicability .....	1-2
Section 2 - Emission Standards.....	1-2
Section 3 - Compliance and Performance Test Methods and Procedures .....	1-3
Section 4 - Emission Monitoring .....	1-3
Section 5 - Recordkeeping and Reporting Requirements .....	1-4
<b>OPERATING PERMIT SUMMARY NO. 2 (20.9 MMBTU/HR BOILER)</b> .....	<b>2-1</b>
Section 1 – Applicability .....	2-2
Section 2 - Emission Standards.....	2-2
Section 3 - Compliance and Performance Test Methods and Procedures .....	2-3
Section 4 - Emission Monitoring .....	2-3
Section 5 - Recordkeeping and Reporting Requirements .....	2-4
<b>OPERATING PERMIT SUMMARY NO. 3 (33.48 MMBTU/HR BOILER)</b> .....	<b>3-1</b>
Section 1 – Applicability .....	3-2
Section 2 - Emission Standards.....	3-2
Section 3 - Compliance and Performance Test Methods and Procedures .....	3-3
Section 4 - Emission Monitoring .....	3-3
Section 5 - Recordkeeping and Reporting Requirements .....	3-4
<b>OPERATING PERMIT SUMMARY NO. 4 (IMPACT MODIFIER PHASE II UNIT)</b> ....	<b>4-1</b>
Section 1 – Applicability .....	4-2
Section 2 – Emission Standards.....	4-3
Section 3 – Compliance and Performance Test Methods and Procedures.....	4-5
Section 4 - Emission Monitoring .....	4-6
Section 5 - Recordkeeping and Reporting Requirements .....	4-8
<b>OPERATING PERMIT SUMMARY NO. 5 (DURASTRENGTH DRYER A UNIT)</b> .....	<b>5-1</b>
Section 1 – Applicability .....	5-2
Section 2 – Emission Standards.....	5-3
Section 3 – Compliance and Performance Test Methods and Procedures.....	5-5

Section 4 - Emission Monitoring .....	5-6
Section 5 - Recordkeeping and Reporting Requirements .....	5-8
<b>OPERATING PERMIT SUMMARY NO. 6 (DURASTRENGTH DRYER B UNIT).....</b>	<b>6-1</b>
Section 1 – Applicability .....	6-2
Section 2 – Emission Standards .....	6-3
Section 3 – Compliance and Performance Test Methods and Procedures.....	6-5
Section 4 – Emission Monitoring .....	6-6
Section 5 – Recordkeeping and Reporting Requirements .....	6-7
<b>OPERATING PERMIT SUMMARY NO. 7 (LATEX PRODUCTION UNIT) .....</b>	<b>7-1</b>
Section 1 – Applicability .....	7-2
Section 2 – Emission Standards .....	7-3
Section 3 – Compliance and Performance Test Methods and Procedures.....	7-5
Section 4 - Emission Monitoring .....	7-7
Section 5 - Recordkeeping and Reporting Requirements .....	7-9
<b>OPERATING PERMIT SUMMARY NO. 8 (IM / DURASTRENGTH TANKS) .....</b>	<b>8-1</b>
Section 1 – Applicability .....	8-2
Section 2 – Emission Standards .....	8-3
Section 3 – Compliance and Performance Test Methods and Procedures.....	8-5
Section 4 - Emission Monitoring .....	8-7
Section 5 - Recordkeeping and Reporting Requirements .....	8-9
<b>OPERATING PERMIT SUMMARY NO. 9 (GENERATORS &amp; FIREWATER PUMPS).....</b>	<b>9-1</b>
Section 1 – Applicability .....	9-2
Section 2 – Emission Standards .....	9-3
Section 3 – Compliance and Performance Test Methods and Procedures.....	9-5
Section 4 - Emission Monitoring .....	9-7
Section 5 - Recordkeeping and Reporting Requirements .....	9-9
<b>OPERATING PERMIT SUMMARY NO. 10 (PEKK PRODUCTION UNIT).....</b>	<b>10-1</b>
Section 1 – Applicability .....	10-2
Section 2 – Emission Standards .....	10-3

Section 3 – Compliance and Performance Test Methods and Procedures..... 10-4  
Section 4 – Emission Monitoring ..... 10-5  
Section 5 – Recordkeeping and Reporting Requirements ..... 10-6

**OPERATING PERMIT SUMMARY NO. 11 (PEKK STORAGE TANKS)..... 11-1**

Section 1 – Applicability ..... 11-3  
Section 2 – Emission Standards ..... 11-4  
Section 3 – Compliance and Performance Test Methods and Procedures..... 11-5  
Section 4 - Emission Monitoring ..... 11-6  
Section 5 - Recordkeeping and Reporting Requirements ..... 11-7

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## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>1. <b><u>Transfer</u></b></p> <p>This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-16-.13(1)(a)5.</p>	Rule 335-3-16-.02(6)
<p>2. <b><u>Renewals</u></b></p> <p>An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.</p> <p>The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.</p>	Rule 335-3-16-.12(2)
<p>3. <b><u>Severability Clause</u></b></p> <p>The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	Rule 335-3-16-.05(e)
<p>4. <b><u>Compliance</u></b></p> <p>(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	Rule 335-3-16-.05(f)  Rule 335-3-16-.05(g)

Federally Enforceable Provisos	Regulations
<p>5. <b><u>Termination for Cause</u></b></p> <p>This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.</p>	<p>Rule 335-3-16-.05(h)</p>
<p>6. <b><u>Property Rights</u></b></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	<p>Rule 335-3-16-.05(i)</p>
<p>7. <b><u>Submission of Information</u></b></p> <p>The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.</p>	<p>Rule 335-3-16-.05(j)</p>
<p>8. <b><u>Economic Incentives, Marketable Permits, and Emissions Trading</u></b></p> <p>No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p>	<p>Rule 335-3-16-.05(k)</p>
<p>9. <b><u>Certification of Truth, Accuracy, and Completeness:</u></b></p> <p>Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	<p>Rule 335-3-16-.07(a)</p>
<p>10. <b><u>Inspection and Entry</u></b></p> <p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p> <p>(a) Enter upon the permittee’s premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;</p>	<p>Rule 335-3-16-.07(b)</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</li> <li>(c) Inspect, at reasonable times, this facility’s equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;</li> <li>(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.</li> </ul>	
<p><b>11. <u>Compliance Provisions</u></b></p> <ul style="list-style-type: none"> <li>(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</li> <li>(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</li> </ul>	<p>Rule 335-3-16-.07(c)</p>
<p><b>12. <u>Compliance Certification</u></b></p> <p>A compliance certification shall be submitted annually by February 28<sup>th</sup>.</p> <ul style="list-style-type: none"> <li>(a) The compliance certification shall include the following: <ul style="list-style-type: none"> <li>(1) The identification of each term or condition of this permit that is the basis of the certification;</li> <li>(2) The compliance status;</li> <li>(3) The method(s) or other means used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recording Keeping Requirements);</li> <li>(4) Whether compliance has been continuous or intermittent;</li> <li>(5) Such other facts as the Department may require to determine the compliance status of the source;</li> </ul> </li> <li>(b) The compliance certification shall be submitted to: <p style="margin-left: 40px;">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p style="margin-left: 40px;">and to: EPA through the Compliance and Emissions Data Reporting Interface (CEDRI) located on EPA’s Central Data Exchange (CDX)</p> </li> </ul>	<p>Rule 335-3-16-.07(e)</p>

**Federally Enforceable Provisos**

**Regulations**

**13. Reopening for Cause**

Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:

- (a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.
- (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.
- (c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

Rule 335-3-16-.13(5)

**14. Additional Rules and Regulations**

This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

§22-28-16(d), Code of Alabama 1975, as amended

**15. Equipment Maintenance or Breakdown**

- (a) In case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:
  - (1) Identification of the specific facility to be taken out of service as well as its location and permit number;
  - (2) The expected length of time that the air pollution control equipment will be out of service;

Rule 335-3-1-.07(1), (2)



Federally Enforceable Provisos	Regulations
<p>(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;</p> <p>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</p> <p>(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.</p> <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director will be notified when the breakdown has been corrected.</p>	
<p><b>16. <u>Operation of Capture and Control Devices</u></b></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p>	<p>§22-28-16(d), Code of Alabama 1975, as amended</p>
<p><b>17. <u>Obnoxious Odors</u></b></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.</p>	<p>Rule 335-3-1-.08</p>
<p><b>18. <u>Fugitive Dust</u></b></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne:</p>	<p>Rule 335-3-4-.02</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic; or</li> <li>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created; or</li> <li>(3) By paving; or</li> <li>(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or</li> <li>(5) By any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.</li> </ul>	
<p><b>19. <u>Additions and Revisions</u></b></p> <p>Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.</p>	<p>Rule 335-3-16-.13 and .14</p>
<p><b>20. <u>Recordkeeping Requirements</u></b></p> <ul style="list-style-type: none"> <li>(a) Records of required monitoring information of the source shall include the following: <ul style="list-style-type: none"> <li>(1) The date, place, and time of all sampling or measurements;</li> <li>(2) The date analyses were performed;</li> <li>(3) The company or entity that performed the analyses;</li> <li>(4) The analytical techniques or methods used;</li> <li>(5) The results of all analyses; and</li> <li>(6) The operating conditions that existed at the time of sampling or measurement.</li> </ul> </li> <li>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit</li> </ul>	<p>335-3-16-.05(c)2.</p>

Federally Enforceable Provisos	Regulations
<p><b>21. <u>Reporting Requirements</u></b></p> <p>(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months by February 28<sup>th</sup>, and August 31<sup>st</sup> of each year. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9).</p> <p>(b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p>	<p>Rule 335-3-16-.05(c)(3)</p>
<p><b>22. <u>Emission Testing Requirements</u></b></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department’s air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <p>(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.</p> <p>(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).</p> <p>(c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.</p>	<p>Rule 335-3-1-.05(3) and Rule 335-3-1-.04(1)</p> <p>Rule 335-3-1-.04</p>

Federally Enforceable Provisos	Regulations
<p>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances</p> <p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p> <p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	<p>Rule 335-3-1-.04</p>
<p>23. <b><u>Payment of Emission Fees</u></b></p> <p>Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.</p>	<p>Rule 335-1-7-.04</p>
<p>24. <b><u>Other Reporting and Testing Requirements</u></b></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	<p>Rule 335-3-1-.04(1)</p>
<p>25. <b><u>Title VI Requirements (Refrigerants)</u></b></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	<p>335-3-16-.05(a)</p>

Federally Enforceable Provisos	Regulations
<p><b>26. <u>Chemical Accidental Prevention Provisions</u></b></p> <p>If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <p>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</p> <p>(b) The owner or operator shall submit one of the following:</p> <p>(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,</p> <p>(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.</p>	<p>40 CFR Part 68</p>
<p><b>27. <u>Display of Permit</u></b></p> <p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will make the permit readily available for inspection by any or all persons who may request to see it.</p>	<p>Rule 335-3-14-.01(1)(d)</p>
<p><b>28. <u>Circumvention</u></b></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	<p>Rule 335-3-1-.10</p>
<p><b>29. <u>Visible Emissions</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	<p>Rule 335-3-4-.01(1)</p>
<p><b>30. <u>Fuel-Burning Equipment</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.</p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.</p>	<p>Rule 335-3-4-.03</p> <p>Rule 335-3-5-.01</p>

Federally Enforceable Provisos	Regulations
<p><b>31. <u>Process Industries – General</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.</p>	<p>Rule 335-3-4-.04</p>
<p><b>32. <u>Averaging Time for Emission Limits</u></b></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	<p>Rule 335-3-1-.05</p>
<p><b>33. <u>Permit Shield</u></b></p> <p>A permit shield exists under this operating permit in accordance with ADEM Administrative Code R. 335-3-16-.10 in that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance. The permit shield is based on the accuracy of the information supplied in Section 11 of the application for this permit. Under this shield, it has been determined that requirements listed as non-applicable in such section are not applicable to this source.</p>	<p>Rule 335-3-16-.10</p>
<p><b>34. <u>Compliance Assurance Monitoring (CAM)</u></b></p> <p>Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.</p> <p>(a) Operation of Approved Monitoring</p> <p>(1) <i>Commencement of operation.</i> The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).</p> <p>(2) <i>Proper maintenance.</i> At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.</p> <p>(3) <i>Continued operation.</i> Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required</p>	<p>40 CFR 64.7</p>

intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

- (4) *Response to excursions or exceedances.* (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (5) *Documentation of need for improved monitoring.* After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to

**Federally Enforceable Provisos****Regulations**

modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

**(b) Quality Improvement Plan (QIP) Requirements**

40 CFR 64.8

(1) Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

**(2) Elements of a QIP:**

(a) The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

(b) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(i) Improved preventive maintenance practices.

(ii) Process operation changes.

(iii) Appropriate improvements to control methods.

(iv) Other steps appropriate to correct control performance.

(v) More frequent or improved monitoring (only in conjunction with one or more steps under



**Federally Enforceable Provisos**

**Regulations**

paragraphs (2)(b)(i) through (iv) above).

- (3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:
  - (a) Failed to address the cause of the control device performance problems; or
  - (b) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(c) Reporting and Recordkeeping Requirements

40 CFR 64.9

(1) *General reporting requirements*

- (a) On and after the date specified in Section 34(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code R. 335-3-16-.05(c)3.
- (b) A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code R. 335-3-16-.05(c)3. and the following information, as applicable:
  - (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for

**Federally Enforceable Provisos****Regulations**

monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

- (iii) A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(2) *General recordkeeping requirements.*

- (a) The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code R. 335-3-16-.05(c)2.. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

(d) Savings Provisions

40 CFR 64.10

(1) Nothing in this part shall:

- (a) Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed

**Federally Enforceable Provisos****Regulations**

under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.

- (b) Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.
- (c) Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

DRAFT

## Operating Permit Summary No. 1 (20.9 MMBTU/hr Boiler)

**Emission Unit(s):** 001  
**Company:** ARKEMA Inc.  
**Description:** 20.9 MMBTU/hr Process Boiler  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Emission Point #	Point Description	Pollutant	Emission Limit	Standard
B501	Boiler Stack	PM	0.16 lb/hr when burning natural gas	Rule 335-3-14-.04 & Rule 335-3-4-.03
		SO <sub>2</sub>	0.10 lb/hr when burning natural gas	Rule 335-3-14-.04 & 335-3-5-.01
		Opacity	See General Proviso #29	Rule 335-3-4-.01
	Boiler	-	Subpart DDDDD	Rule 335-3-11-.06(107)

## 20.9 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
Section 1 – Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. This source is subject to Synthetic Minor PSD limitations for particulates and sulfur dioxide (SO <sub>2</sub> ).	ADEM Admin. Code R. 335-3-14-.04
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin. Code R. 335-3-4-.01
4. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.03 for particulates.	ADEM Admin. Code R. 335-3-4-.03
5. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-5-.01 for SO <sub>2</sub> .	ADEM Admin. Code R. 335-3-5-.01
6. This source is subject to 40 CFR Part 63, Subpart DDDDD – Emission Standards for Hazardous Air Pollutants for Major Sources: Commercial, Industrial, and Institutional Boilers and Process Heaters as a Gas 1 Boiler.	ADEM Admin. Code R. 335-3-11-.06(107)
7. This source is subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart DDDDD.	ADEM Admin. Code R. 335-3-11-.06(1)
Section 2 - Emission Standards	
1. The particulate emission rate shall not exceed 0.16 lb/hr when burning natural gas.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.03
2. The SO <sub>2</sub> emission rate shall not exceed 0.10 lb/hr when burning natural gas.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-5-.01
3. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.	ADEM Admin. Code R. 335-3-4-.01(1)

## 20.9 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
<p>Section 3 - Compliance and Performance Test Methods and Procedures</p> <ol style="list-style-type: none"> <li>1. Compliance with the SO<sub>2</sub> emission rates of this unit shall be determined by Reference Method 6 or 6C in Appendix A of 40 CFR Part 60.</li> <li>2. Compliance with the particulate matter (PM) emission rates of this unit shall be determined by Reference Method 5 or 17 in Appendix A of 40 CFR Part 60.</li> <li>3. Compliance with the opacity requirements of this unit shall be determined by Reference Method 9 in Appendix A of 40 CFR Part 60.</li> </ol>	<p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin. Code R. 335-3-10-.03(1)</p>
<p>Section 4 - Emission Monitoring</p> <ol style="list-style-type: none"> <li>1. For each day that the boiler is burning a Non-Gas 1 fuel, a person familiar with Method 9, shall conduct a visual inspection of that boiler stack for visible emissions. If visible emissions are noted, the facility must investigate and take appropriate corrective action within 24 hours and must conduct an additional observation to confirm that no visible emissions are observed.</li> <li>2. The facility shall maintain the supplier certification of the sulfur content of each shipment of Non-Gas 1 fuel utilized by Boilers 001, 007, and 024.</li> <li>3. This source shall meet the energy assessment and tune-up requirements found in Table 3 of 40 CFR Part 63, Subpart DDDDD as referenced in 40 CFR 63.7540(a).</li> </ol>	<p>ADEM Admin Code R 335-3-16-.05(c)(1)(ii)</p> <p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p>

## 20.9 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
<p>Section 5 - Recordkeeping and Reporting Requirements</p> <ol style="list-style-type: none"> <li>1. A logbook shall be maintained certifying the daily visual inspection of each boiler each day the unit is firing a Non-Gas 1 fuel. The presence of visible emissions shall be recorded and should include the corrective action taken to reduce the visible emissions. These records shall be maintained for a minimum of five years.</li> <li>2. This source shall maintain the records required under 40 CFR 63.7555(a) and (h) concerning initial notifications and Non-Gas 1 fuel usage during curtailments.</li> <li>3. Should this source be required to burn a Non-Gas 1 fuel as a result of a natural gas curtailment, the facility shall submit a notification within 48 hours as required in 40 CFR 63.7545(f).</li> <li>4. All reports are required to be submitted to EPA utilizing EPA's Electronic Reporting Tool the Compliance and Emissions Data Reporting Interface (CEDRI) as required in §63.7550(h)(3).</li> </ol>	<p>ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p>

## Operating Permit Summary No. 2 (20.9 MMBTU/hr Boiler)

**Emission Unit(s):** 007  
**Company:** ARKEMA Inc.  
**Description:** 20.9 MMBTU/hr Process Boiler  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Emission Point #	Point Description	Pollutant	Emission Limit	Standard
B501-01	Boiler Stack	PM	0.16 lb/hr when burning natural gas	Rule 335-3-14-.04 & Rule 335-3-4-.03
		SO <sub>2</sub>	0.10 lb/hr when burning natural gas	Rule 335-3-14-.04 & Rule 335-3-5-.01
		Opacity	See General Proviso #29	Rule 335-3-4-.01
	Boiler	-	Subpart DDDDD	Rule 335-3-11-.06(107)



## 20.9 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
Section 1 – Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. This source is subject to Synthetic Minor PSD limitations for particulates and sulfur dioxide (SO <sub>2</sub> ).	ADEM Admin. Code R. 335-3-14-.04
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin. Code R. 335-3-4-.01
4. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.03 for particulates.	ADEM Admin. Code R. 335-3-4-.03
5. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-5-.01 for SO <sub>2</sub> .	ADEM Admin. Code R. 335-3-5-.01
6. This source is subject to 40 CFR Part 63, Subpart DDDDD – Emission Standards for Hazardous Air Pollutants for Major Sources: Commercial, Industrial, and Institutional Boilers and Process Heaters as a Gas 1 Boiler.	ADEM Admin. Code R. 335-3-11-.06(107)
7. This source is subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart DDDDD.	ADEM Admin. Code R. 335-3-11-.06(1)
Section 2 - Emission Standards	
1. The particulate emission rate shall not exceed 0.16 lb/hr when burning natural gas.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.03
2. The SO <sub>2</sub> emission rate shall not exceed 0.10 lb/hr when burning natural gas.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-5-.01
3. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.	ADEM Admin. Code R. 335-3-4-.01(1)

## 20.9 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
<p>Section 3 - Compliance and Performance Test Methods and Procedures</p> <ol style="list-style-type: none"> <li>1. Compliance with the SO<sub>2</sub> emission rates of this unit shall be determined by Reference Method 6 or 6C in Appendix A of 40 CFR Part 60.</li> <li>2. Compliance with the particulate matter (PM) emission rates of this unit shall be determined by Reference Method 5 or 17 in Appendix A of 40 CFR Part 60.</li> <li>3. Compliance with the opacity requirements of this unit shall be determined by Reference Method 9 in Appendix A of 40 CFR Part 60.</li> </ol> <p>Section 4 - Emission Monitoring</p> <ol style="list-style-type: none"> <li>1. For each day that the boiler is burning a Non-Gas 1 fuel, a person familiar with Method 9, shall conduct a visual inspection of that boiler stack for visible emissions. If visible emissions are noted, the facility must investigate and take appropriate corrective action within 24 hours and must conduct an additional observation to confirm that no visible emissions are observed.</li> <li>2. The facility shall maintain the supplier certification of the sulfur content of each shipment of Non-Gas 1 fuel utilized by Boilers 001, 007, and 024.</li> <li>3. This source shall meet the energy assessment and tune-up requirements found in Table 3 of 40 CFR Part 63, Subpart DDDDD as referenced in 40 CFR 63.7540(a).</li> </ol>	<p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin Code R 335-3-16-.05 (c)(1)(ii)</p> <p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p>

## 20.9 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
<p>Section 5 - Recordkeeping and Reporting Requirements</p> <ol style="list-style-type: none"> <li>1. A logbook shall be maintained certifying the daily visual inspection of each boiler each day the unit is firing a Non-Gas 1 fuel. The presence of visible emissions shall be recorded and should include the corrective action taken to reduce the visible emissions. These records shall be maintained for a minimum of five years.</li> <li>2. This source shall maintain the records required under 40 CFR 63.7555(a) and (h) concerning initial notifications and fuel oil usage during curtailments.</li> <li>3. Should this source be required to burn a Non-Gas 1 fuel as a result of a natural gas curtailment, the facility shall submit a notification within 48 hours as required in 40 CFR 63.7545(f).</li> <li>4. All reports are required to be submitted to EPA utilizing EPA's Electronic Reporting Tool the Compliance and Emissions Data Reporting Interface (CEDRI) as required in §63.7550(h)(3).</li> </ol>	<p>ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p>

## Operating Permit Summary No. 3 (33.48 MMBTU/hr Boiler)

**Emission Unit(s):** 024  
**Company:** ARKEMA Inc.  
**Description:** 33.48 MMBTU/hr Process Boiler  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Emission Point #	Point Description	Pollutant	Emission Limit	Standard
M920-B	Boiler Stack	PM	0.25 lb/hr when burning natural gas	Rule 335-3-14-.04 & Rule 335-3-4-.03
		SO <sub>2</sub>	0.10 lb/hr when burning natural gas	Rule 335-3-14-.04 & Rule 335-3-5-.01
		Opacity	See General Proviso #29	Rule 335-3-4-.01
	Boiler	-	Subpart DDDDD	Rule 335-3-11-.06(107)

### 33.48 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
Section 1 – Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. This unit is subject to Synthetic Minor PSD limitations found in ADEM Admin Code 335-3-14-.04 for particulates, sulfur dioxide (SO <sub>2</sub> ), and volatile organic compounds (VOCs).	ADEM Admin. Code R. 335-3-14-.04
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin. Code R. 335-3-4-.01
4. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.03 for particulates.	ADEM Admin. Code R. 335-3-4-.03
5. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-5-.01 for SO <sub>2</sub> .	ADEM Admin. Code R. 335-3-5-.01
6. This source is subject to 40 CFR Part 63, Subpart DDDDD – Emission Standards for Hazardous Air Pollutants for Major Sources: Commercial, Industrial, and Institutional Boilers and Process Heaters as a Gas 1 Boiler.	ADEM Admin. Code R. 335-3-11-.06(107)
7. This source is subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart DDDDD.	ADEM Admin. Code R. 335-3-11-.06(1)
Section 2 - Emission Standards	
1. The particulate emission rate shall not exceed 0.25 lb/hr when burning natural gas.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.03
2. The SO <sub>2</sub> emission rate shall not exceed 0.10 lb/hr when burning natural gas.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-5-.01
3. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.	ADEM Admin. Code R. 335-3-4-.01(1)

### 33.48 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
<p>Section 3 - Compliance and Performance Test Methods and Procedures</p> <ol style="list-style-type: none"> <li>1. Compliance with the SO<sub>2</sub> emission rates of this unit shall be determined by Reference Method 6 or 6C in Appendix A of 40 CFR Part 60.</li> <li>2. Compliance with the particulate matter (PM) emission rates of this unit shall be determined by Reference Method 5 or 17 in Appendix A of 40 CFR Part 60.</li> <li>3. Compliance with the opacity requirements of this unit shall be determined by Reference Method 9 in Appendix A of 40 CFR Part 60.</li> </ol> <p>Section 4 - Emission Monitoring</p> <ol style="list-style-type: none"> <li>1. For each day that the boiler is burning a Non-Gas 1 fuel, a person familiar with Method 9, shall conduct a visual inspection of that boiler stack for visible emissions. If visible emissions are noted, the facility must investigate and take appropriate corrective action within 24 hours and must conduct an additional observation to confirm that no visible emissions are observed.</li> <li>2. The facility shall maintain the supplier certification of the sulfur content of each shipment of Non-Gas 1 fuel utilized by Boilers 001, 007, and 024.</li> <li>3. This source shall meet the energy assessment and tune-up requirements found in Table 3 of 40 CFR Part 63, Subpart DDDDD as referenced in 40 CFR 63.7540(a).</li> </ol>	<p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin Code R 335-3-16-.05(c)(1)(ii)</p> <p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p>

### 33.48 MMBTU/hr Boiler

Federally Enforceable Provisos	Regulations
<p>Section 5 - Recordkeeping and Reporting Requirements</p> <ol style="list-style-type: none"> <li>1. A logbook shall be maintained certifying the daily visual inspection of each boiler each day the unit is firing a Non-Gas 1 fuel. The presence of visible emissions shall be recorded and should include the corrective action taken to reduce the visible emissions. These records shall be maintained for a minimum of five years.</li> <li>2. This source shall maintain the records required under 40 CFR 63.7555(a) and (h) concerning initial notifications and fuel oil usage during curtailments.</li> <li>3. Should this source be required to burn a Non-Gas 1 fuel as a result of a natural gas curtailment, the facility shall submit a notification within 48 hours as required in 40 CFR 63.7545(f).</li> <li>4. All reports are required to be submitted to EPA utilizing EPA's Electronic Reporting Tool the Compliance and Emissions Data Reporting Interface (CEDRI) as required in §63.7550(h)(3).</li> </ol>	<p>ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p> <p>ADEM Admin. Code R. 335-3-11-.06(107)</p>

## Operating Permit Summary No. 4 (Impact Modifier Phase II Unit)

**Emission Unit(s):** 023  
**Company:** ARKEMA Inc.  
**Description:** Impact Modifier Phase II Unit  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Emission Point #	Point Description	Pollutant	Emission Limit	Standard
-	Phase II Unit	VOC	All pumps in light liquid service as defined in 63.161 shall be equipped with dual mechanical seals or equivalent control	Rule 335-3-14-.04
		HAP	Subpart JJJ	Rule 335-3-11-.06(61)
		VOC/OHAP	Subpart H	Rule 335-3-11-.06(7) & 335-3-14-.04
IM-5	Flare	VOC	The flare for this unit shall comply with the requirements for flares as specified in 40 CFR 63.11(b)	Rule 335-3-11-.06(61)
		Opacity	See General Proviso #29	Rule 335-3-4-.01
IM-3	Phase II Dryer	VOC	19.9 lb/hr and 7.9 lbs VOC / ton of product produced Production based on an emission rate of 15.1 lbs VOC / ton of product produced	Rule 335-3-14-.04
		PM	3.55 lb/hr or 0.015 gr/dscf	Rule 335-3-14-.04 & 335-3-4-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
IM-9	Product Dust Collector	PM	0.19 lb/hr	Rule 335-3-14-.04 & 335-3-4-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
IM-7	Dryer B Area Fume Exhaust	VOC	19.2 lb/hr and 7.6 lbs VOC / ton of product produced	Rule 335-3-14-.04
		VOC	Production based on an emission rate of 14.6 lbs VOC / ton of product produced	Rule 335-3-14-.04



## Impact Modifier Phase II Unit

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
Section 1 – Applicability	
1. This unit is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. This unit is subject to PSD requirements for volatile organic compounds (VOCs) and particulates.	ADEM Admin. Code R. 335-3-14-.04
3. This unit is subject to the requirements of the Hazardous Organic NESHAP, as specified in 40 CFR Part 63, Subpart H.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
4. This unit is subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart JJJ.	ADEM Admin Code R. 335-3-11-.06(1)
5. This unit is subject to the requirements of 40 CFR Part 63, Subpart JJJ - National Emissions Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.	ADEM Admin Code R. 335-3-11-.06(61)
6. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin Code R. 335-3-4-.01
7. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.04 for particulates.	ADEM Admin Code R. 335-3-4-.04

## Impact Modifier Phase II Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards	
1. All pumps in light liquid service as defined in 40 CFR 63.161 shall have double mechanical seals or equivalent leak control.	ADEM Admin. Code R. 335-3-14-.04
2. The flare for this unit shall comply with the requirements for flares as specified in 40 CFR 63.11(b).	ADEM Admin. Code R. 335-3-14-.04
3. The standards for the leak detection and repair program of 40 CFR Part 63, Subpart H, as listed in §63.162 - 63.180, shall be met for all HAP and non-HAP VOC components as referenced in §63.160(c).	ADEM Admin. Code R. 335-3-14-.04 and 335-3-14-.06(61)
4. Except as provided in Proviso No. 6 below, the VOC emission rate from Phase II Dryer (IM-3) shall not exceed 19.9 lb/hr and 7.9 lbs VOC / ton of product produced.	ADEM Admin. Code R. 335-3-14-.04
5. Except as provided in Proviso No. 6 below, the VOC emission rate from Dryer B Area Fume Exhaust (IM-7) shall not exceed 19.2 lb/hr and 7.6 lbs VOC / ton of product produced.	ADEM Admin. Code R. 335-3-14-.04
6. Any product produced in this unit that exceeds the lbs VOC / ton of product produced for IM-3 or IM-7 shall be limited in its daily production rate so as not to exceed the lb/hr limits for in Proviso Nos. 4 and 5.	ADEM Admin. Code R. 335-3-14-.04
7. No product shall be produced in this unit that exceeds 15.1 lb VOC / ton of product produced for IM-3.	ADEM Admin. Code R. 335-3-14-.04
8. No product shall be produced in this unit that exceeds 14.6 lb VOC / ton of product produced for IM-7.	ADEM Admin. Code R. 335-3-14-.06(61)
9. The particulate emission rate from IM-3 shall not exceed 3.55 lb/hr or 0.015 gr/dscf.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.04
10. The particulate emission rate from Product Dust Collector (IM-9) shall not exceed 0.19 lb/hr.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.04
11. For the purpose of this unit “in VOC service” shall mean that a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 5 percent VOC by weight.	ADEM Admin. Code R. 335-3-14-.04

## Impact Modifier Phase II Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
12. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.	ADEM Admin. Code R. 335-3-4-.01 (1)
13. The facility shall comply with the requirements of §63.1322(g)(4) for all Group 1 batch process vents as applicable.	ADEM Admin. Code R. 335-3-11-.06(61)
14. The facility shall comply with the requirements of §63.1322(g)(1) for all Group 2 batch process vents as applicable.	ADEM Admin. Code R. 335-3-11-.06(61)
15. The facility shall comply with the requirements of §63.113 as referenced in §63.1315 as applicable with the differences noted in §63.1315(a)(1) - (18).	ADEM Admin. Code R. 335-3-11-.06(61)
16. The facility shall comply with the requirements of §63.104 as referenced in §63.1328 for all heat exchange systems as applicable with the differences noted in §63.1328(c) - (h).	ADEM Admin. Code R. 335-3-11-.06(61)
17. Liquid or solid organic materials with a concentration of greater than 10,000 ppm of Table 9 compounds may not be discharged to a water or wastewater, unless the receiving stream is managed and treated as a Group 1 wastewater stream as indicated in §63.132(f), as referenced in §63.1330(a), with the differences noted in §63.1330(b).	ADEM Admin. Code R. 335-3-11-.06(61)
18. All process wastewater streams in this unit have been classified as Group 2 wastewater streams and as such are only subject to the recordkeeping and reporting requirements.	ADEM Admin. Code R. 335-3-11-.06(61)
19. The maintenance wastewater requirements of §63.105 shall be followed as applicable, as referenced in §63.1330(a) with the differences noted in §63.1330(c).	ADEM Admin. Code R. 335-3-11-.06(61)

## Impact Modifier Phase II Unit

Federally Enforceable Provisos	Regulations
Section 3 – Compliance and Performance Test Methods and Procedures	
1. Compliance with the VOC emission rate for IM-3 and IM-7 shall be determined by Reference Method 25A in Appendix A of 40 CFR Part 60 as methane with a response factor approved by the Department.	ADEM Admin. Code R. 335-3-10-.03(1)
2. Compliance with the particulate emission rate for emission point IM-3 and IM-9 shall be determined by Reference Method 5 or 17 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
3. The test methods and procedures for the leak detection and repair program as listed in §63.180 of Subpart H of the HON shall be followed.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
4. Compliance with the visible emissions requirements for IM-5 shall be determined by reference Method 22 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
5. The continuous opacity monitor associated with IM-3 shall comply with Performance Specification 1 of 40 CFR Part 60, Appendix B.	ADEM Admin. Code R. 335-3-10-.03(2)
6. The test methods and procedures for determining batch process vent group determinations as specified in §63.1323 shall be followed as applicable.	ADEM Admin. Code R. 335-3-11-.06(61)
7. The test methods and procedures for determining continuous process vent group determinations as specified in §63.115 as referenced in §63.1315 shall be followed as applicable with the differences noted in §63.1315(a)(1) - (a)(18).	ADEM Admin. Code R. 335-3-11-.06(61)
8. The test methods and procedures for determining wastewater group determinations as listed in §63.132(c) as referenced in §63.1330(a) shall be followed as applicable with the differences noted in §63.1330(b).	ADEM Admin. Code R. 335-3-11-.06(61)

## Impact Modifier Phase II Unit

Federally Enforceable Provisos	Regulations
Section 3 – Compliance and Performance Test Methods and Procedures (cont.)	
9. The performance test methods for batch process vents as listed in §63.1325 shall be followed.	ADEM Admin. Code R. 335-3-11-.06(61)
10. The performance test methods and procedures for continuous process vents as listed in §63.116 as referenced in §63.1315 shall be followed as applicable with the differences noted in §63.1315(a)(1) - (18).	ADEM Admin. Code R. 335-3-11-.06(61)
11. Performance testing as indicated under §63.1333 of Subpart JJJ shall be followed as applicable.	ADEM Admin. Code R. 335-3-11-.06(61)
12. Compliance with the opacity requirements for emission points IM-3 and IM-9 shall be determined by Reference Method 9 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-4-.01
Section 4 - Emission Monitoring	
1. The facility shall install, calibrate, maintain, and operate, a continuous monitoring system for measuring and recording the opacity of the emissions from IM-3. An equivalent system for monitoring the performance of the air pollution control equipment may be approved by the chief of the Air Division.	ADEM Admin Code R 335-3-14-.04
2. The leak detection monitoring requirements of 40 CFR Part 63, Subpart H, as listed in §63.162 – 63.180, shall be followed for all subject equipment.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
3. VOC emission testing for IM-3 and IM-7 shall be performed annually not to exceed one year following the date of initial compliance testing while the unit is in operation.	ADEM Admin Code R 335-3-14-.04

## Impact Modifier Phase II Unit

Federally Enforceable Provisos	Regulations
Section 4 - Emission Monitoring (cont.)	
4. Particulate emission testing for IM-3 shall be performed annually not to exceed one year following the date of initial compliance testing.	ADEM Admin Code R 335-3-14-.04
5. While the Metablens II Unit is shutdown, VOC emission testing for IM-7 shall be performed once every five years following the date of initial compliance testing.	ADEM Admin Code R 335-3-14-.04
6. Should the opacity monitor associated with IM-3 read opacity greater than 10% computed on a rolling six minute average while the unit is operating, the facility must investigate and take appropriate corrective action within 4 hours.	ADEM Admin Code R 335-3-14-.04
7. Once per week during packaging of material, a person familiar with Method 9, shall observe the IM-9 for visible emissions. Should visible emissions be noted, the system must cease operations and appropriate corrective action must be taken to correct the problem. Personnel must then conduct an additional observation to confirm that the emissions are reduced to normal.	ADEM Admin Code R 335-3-14-.04
8. A device capable of analyzing BTUs shall be installed, calibrated, maintained, and properly operated in association with IM-5. Should a BTU reading of less than 300 be observed for a period greater than 5 minutes, the facility must investigate and take appropriate corrective action to restore the minimum heat input or cease venting to the flare.	ADEM Admin Code R 335-3-14-.04
9. A thermocouple to monitor for the presence of a flame shall be maintained. Should the thermocouple determine that no flame is present, verify that the thermocouple is operating correctly, and if so, the facility shall cease venting until the pilot is relit.	ADEM Admin Code R 335-3-14-.04
10. The venturi scrubber associated with emission point IM-3 shall be measured on a continuous basis and maintain a flowrate of 78 gpm calculated on a 3-hour rolling average. The facility shall also maintain the scrubber differential pressure at 7.00 in. w.c. measured on a continuous basis and calculated on a 3-hour rolling average.	ADEM Admin Code R 335-3-14-.04

## Impact Modifier Phase II Unit

Federally Enforceable Provisos	Regulations
<p>Section 5 - Recordkeeping and Reporting Requirements</p> <ol style="list-style-type: none"> <li>1. Records of opacity shall be maintained in a permanent form suitable for inspection. These records shall be maintained for a minimum of 5 years.</li> <li>2. A written report of the excess opacity, as defined below, will be submitted to the Department for each calendar quarter within the month following the end of the quarter. The reports will include the following information:               <ol style="list-style-type: none"> <li>a. The magnitude of excess emissions over 10% computed from six-minute averages.                   <p style="margin-left: 40px;">NOTE: Data recorded during periods of system breakdowns repairs, adjustments, and calibration checks shall not be included in any of the above data averages.</p> </li> <li>b. The date and time of commencement and completion of each time period of excess emissions.</li> <li>c. The nature and cause of the excess emissions (if known) and the corrective action taken or preventative measures adopted.</li> <li>d. The date and time identifying each period during which the monitoring systems were inoperative (except for zero and span checks) and the nature of the system repairs or adjustments.</li> <li>e. When no excess emissions have occurred and the monitoring systems were not inoperative or did not require repairs or adjustments, such information will be stated in the report.</li> </ol> </li> <li>3. The recordkeeping and reporting requirements in §63.181 and §63.182 of Subpart H of the HON shall be followed, as applicable.</li> </ol>	<p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04</p>

## Impact Modifier Phase II Unit

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements (cont.)	
4. Records shall be maintained of the daily production rate and estimated lb/ton emission rate of each product whose emission rate exceeds the lbs VOC / ton of product produced threshold set in Proviso Nos. 4 and 5 in Section 2 for this unit. These records shall be maintained in a permanent form suitable for inspection. These records shall be maintained for a minimum of 5 years.	ADEM Admin Code R. 335-3-14-.04
5. A logbook of all times when visible emissions were observed from IM-9 shall be maintained in a permanent form suitable for inspection for a minimum of 5 years. The log entry should include the time and duration of the event and any corrective action taken during the episode.	ADEM Admin. Code R. 335-3-11-.06(61)
6. The reporting and recordkeeping requirements for continuous process vents shall be followed as specified in §63.117 and §63.118 as applicable as referenced in §63.1315 with the differences noted in §63.1315(a)(1) - (18).	ADEM Admin. Code R. 335-3-11-.06(61)
7. The reporting and recordkeeping requirements for Group 2 batch process vents shall be followed as specified in §63.1322(h).	ADEM Admin. Code R. 335-3-11-.06(61)
8. The reporting and recordkeeping provisions specified in §63.1326 and §63.1327 shall be followed as applicable.	ADEM Admin. Code R. 335-3-11-.06(61)
9. The heat exchange systems reporting and recordkeeping provisions as specified in §63.104 as applicable as referenced in §63.1328 with the differences noted in §63.1328(c) - (h).	ADEM Admin. Code R. 335-3-11-.06(61)
10. The process wastewater reporting provisions as specified in §63.146 shall be followed as applicable, as referenced in §63.1330(a) with the differences noted in §63.1330(b).	ADEM Admin. Code R. 335-3-11-.06(61)



## Impact Modifier Phase II Unit

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
Section 5 - Recordkeeping and Reporting Requirements (cont.)	
11. The process wastewater recordkeeping provisions as specified in §63.147 shall be followed as applicable, as referenced in §63.1330(a) with the differences noted in §63.1330(b).	ADEM Admin. Code R. 335-3-11-.06(61)
12. The general recordkeeping and reporting provisions of §63.1335 of Subpart JJJ shall be followed as applicable.	ADEM Admin. Code R. 335-3-11-.06(61)
13. The facility shall maintain records of the hourly averages for the flowrate and the differential pressure associated with emission point IM-3. The records, which may be in the form of a log or a checklist, shall be kept up-to-date, readily accessible, and in a form suitable for inspection for 5 years.	ADEM Admin Code R 335-3-14-.04
14. The facility shall keep a log of anytime that the 3-hour rolling average for flowrate or differential pressure fall below the standards set in the provisos above while the unit is in operation. A record shall be maintained of the reason and duration for the deviation and shall be kept in a form suitable for inspection for a period of 5 years.	ADEM Admin Code R 335-3-14-.04

## Operating Permit Summary No. 5 (Durastrength Dryer A Unit)

**Emission Unit(s):** 011  
**Company:** ARKEMA Inc.  
**Description:** Durastrength Dryer A Unit (D-200A)  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Emission Point #	Point Description	Pollutant	Emission Limit	Standard
-	Dryer A Unit	VOC	All pumps in light liquid service as defined in §63.161 shall be equipped with dual mechanical seals or equivalent control	Rule 335-3-14-.04
		OHAP/VOC	Subpart H	Rule 335-3-11-.06(7) & 335-3-14-.04
		HAP	Subpart FFFF	Rule 335-3-11-.06(83)
IM-5	Flare	VOC	The flare for this unit shall comply with the requirements for flares as specified in 40 CFR 63.11(b)	Rule 335-3-14-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
IM-1	Dryer A	VOC	52.3 lb/hr and 18.6 lbs VOC / ton of product produced	Rule 335-3-14-.04
		PM	10.8 lb/hr or 0.028 gr/dscf	Rule 335-3-14-.04 & 335-3-4-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
IM-6	Dryer A Area Fume Exhaust	VOC	20.0 lb/hr and 12.1 lbs VOC / ton of product produced	Rule 335-3-14-.04
		VOC	Production based on an emission rate of 16.2 lbs VOC / ton of product produced	Rule 335-3-14-.04
V-204	Thermal Oxidizer	VOC	Minimum DRE of 98% or 20 ppmv for VOCs	Rule 335-3-14-.04 & 335-3-11-.06(83)
		VOC	1400 °F	
		VOC	2.22 lb/hr	Rule 335-3-14-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01

## Durastrength Dryer A Unit

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
Section 1 – Applicability	
1. This unit subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. This unit is subject to PSD requirements for volatile organic compounds (VOCs) and particulates.	ADEM Admin. Code R. 335-3-14-.04
3. This unit is subject to the requirements of the Hazardous Organic NESHAP, as specified in 40 CFR Part 63, Subpart H.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
4. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin. Code R. 335-3-4-.01
5. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.04 for particulates.	ADEM Admin. Code R. 335-3-4-.04
6. This source is subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(1)
7. This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, as specified in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)

## Durastrength Dryer A Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards	
1. All pumps in light liquid service as defined in 40 CFR 63.161 shall have double mechanical seals or equivalent leak control.	ADEM Admin. Code R. 335-3-14-.04
2. The flare (IM-5) for this unit shall comply with the requirements for flares as specified in 40 CFR 63.11(b).	ADEM Admin. Code R. 335-3-14-.04
3. The standards for the leak detection and repair program of 40 CFR Part 63, Subpart H, as listed in §63.162 - 63.180, shall be met for all HAP and non-HAP VOC components as referenced in §63.160(c).	ADEM Admin. Code R. 335-3-14-.06(7) and 335-3-14-.04
4. The VOC emission rate from Dryer A (IM-1) shall not exceed 52.3 lb/hr and 18.6 lbs VOC / ton of product produced.	ADEM Admin. Code R. 335-3-14-.04
5. The particulate emission rate from IM-1 shall not exceed 10.8 lb/hr or 0.028 gr/dscf.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.04
6. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.	ADEM Admin. Code R. 335-3-4-.01(1)
7. For the purpose of this unit “in VOC service” shall mean that a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 5 percent VOCs by weight.	ADEM Admin. Code R. 335-3-14-.04
8. All MON Group 1 batch process vents in this unit must comply with the requirements outlined in §63.2460 and Table 2 of 40 CFR Part 63, Subpart FFFF, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
9. This unit must develop, implement, and maintain a startup, shutdown, and malfunction plan meeting the requirements of §63.6(e)(3)(i),(ii), and (v) – (viii) of Subpart A for all Group 1 regulated MON emission points, as detailed and maintained in the Notice of Compliance Status (NOCS) required in §63.2520(d), as referenced in §63.2525(j) of 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)

## Durastrength Dryer A Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
10. All MON regulated closed vent systems within this unit must comply with the requirements for closed vent systems in §63.983 of Subpart SS as referenced by §63.2450(e) of Subpart FFFF and §63.982(b) or §63.982(c) of Subpart SS, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
11. Except as provided in the following proviso, the VOC emission rate from Dryer A Area Fume Exhaust (IM-6) shall not exceed 20.0 lb/hr and 12.1 lbs VOC / ton of product produced.	ADEM Admin. Code R. 335-3-14-.04
12. Any product produced in this unit that exceeds the lbs VOC / ton of product produced for IM-6 shall be limited in its daily production rate so as not to exceed the lb/hr limit in Proviso No. 4.	ADEM Admin. Code R. 335-3-14-.04
13. No product shall be produced in this unit that exceeds 16.2 lb VOC / ton of product produced for IM-6.	ADEM Admin. Code R. 335-3-14-.04
14. Vacuum Pump IM-15 shall be routed to the thermal oxidizer (V-204) for control.	ADEM Admin. Code R. 335-3-11-.06(83)
15. The minimum firing temperature of V-204 shall be 1400 °F based on a 3-hour rolling average.	ADEM Admin. Code R. 335-3-14-.04
16. The VOC emission rate from V-204 shall not exceed 2.22 lb/hr.	ADEM Admin. Code R. 335-3-14-.04
17. V-204 shall maintain either a minimum destruction efficiency of 98% or a maximum outlet concentration of 20 ppmv as TOC for all VOCs. Subpart FFFF compliance can also be demonstrated by 98% DRE or 20 ppmv for total HAPs only.	ADEM Admin. Code R. 335-3-11-.06(83)
18. Upon publication in the Federal Register, this unit shall comply with the applicable emission standards listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) of Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)

## Durastrength Dryer A Unit

Federally Enforceable Provisos	Regulations
Section 3 – Compliance and Performance Test Methods and Procedures	
1. Compliance with the VOC emission rate for Dryer A (IM-1) shall be determined by Reference Method 25A in Appendix A of 40 CFR Part 60 as methane with a response factor of 3.85.	ADEM Admin. Code R. 335-3-10-.03(1)
2. Compliance with the particulate emission rate for emission point IM-1 shall be determined by Reference Method 5 or 17 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
3. The test methods and procedures for the leak detection and repair program as listed in §63.180 of Subpart H of the HON shall be followed.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
4. Compliance with the visible emissions requirements for the flare (IM-5) shall be determined by reference Method 22 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
5. The continuous opacity monitor associated with IM-1 shall comply with Performance Specification 1 of 40 CFR Part 60, Appendix B.	ADEM Admin. Code R. 335-3-10-.03(2)
6. Compliance with the opacity requirements for IM-1 shall be determined by Reference Method 9 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
7. Compliance with the Batch Process Vent Provisions of 40 CFR Part 63, Subpart FFFF shall be determined according to the procedures outlined in §63.997, as referenced in §63.2450(g).	ADEM Admin. Code R. 335-3-11-.06(83)
8. Initial compliance with the closed vent system provisions shall be determined according to the procedures outlined in §63.983(b)(1)(i)(B).	ADEM Admin. Code R. 335-3-11-.06(44)
9. Compliance with the VOC emission rate for Dryer A Area Fume Exhaust (IM-6) shall be determined by Reference Method 25A in Appendix A of 40 CFR Part 60 as methane with a response factor approved by the Department.	ADEM Admin. Code R. 335-3-10-.03(1)

## Durastrength Dryer A Unit

Federally Enforceable Provisos	Regulations
Section 3 – Compliance and Performance Test Methods and Procedures (cont.)	
10. Compliance with the VOC emission rate for the thermal oxidizer (V-204) shall be determined by Reference Method 18 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
Section 4 - Emission Monitoring	
1. The facility shall install, calibrate, maintain, and operate, a continuous monitoring system for measuring and recording the opacity of the emissions from IM-1. An equivalent system for monitoring the performance of the air pollution control equipment may be approved by the chief of the Air Division.	ADEM Admin Code R 335-3-14-.04
2. The leak detection monitoring requirements of 40 CFR Part 63, Subpart H, as listed in §63.162 – 63.180, shall be followed for all subject equipment.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
3. VOC emission testing for IM-1 shall be performed annually, not to exceed one year following the date of initial compliance testing.	ADEM Admin Code R 335-3-14-.04
4. Particulate emission testing for IM-1 shall be performed annually, not to exceed one year following the date of initial compliance testing.	ADEM Admin Code R 335-3-14-.04
5. Should the opacity monitor associated with IM-1 read opacity greater than 2.5% computed on a rolling six-minute average while the unit is operating, the facility must investigate and take appropriate corrective action within 4 hours.	ADEM Admin Code R 335-3-14-.04
6. A device capable of analyzing BTUs shall be installed, calibrated, maintained, and properly operated in association with IM-5. Should a BTU reading of less than 300 be observed for greater than 5 minutes, the facility must investigate and take appropriate corrective action to restore the minimum heat input or cease venting to the flare.	ADEM Admin Code R 335-3-14-.04

## Durastrength Dryer A Unit

Federally Enforceable Provisos	Regulations
Section 4 - Emission Monitoring (cont.)	
7. A thermocouple to monitor for the presence of a flame shall be maintained. Should the thermocouple determine that no flame is present, verify that the thermocouple is operating correctly, and if so, cease venting until the pilot is relit.	ADEM Admin Code R 335-3-14-.04
8. For each MON regulated closed vent system, as detailed and maintained in the Dryer A Production Unit's Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF, perform initial and annual monitoring as outlined in §63.983(b)(1)(i)(A) and (B).	ADEM Admin. Code R. 335-3-11-.06(83)
9. VOC emission testing for IM-6 shall be performed once every 5 years following the date of initial compliance testing.	ADEM Admin Code R 335-3-14-.04
10. In order to ensure that V-204 is in compliance with its respective emission limits, the facility shall continuously monitor the temperature and record a measurement at least once every 15 minutes to ensure that it is maintained above 1400°F as calculated on a 3-hour rolling average.	ADEM Admin Code R 335-3-14-.04
11. VOC emission testing for V-204 shall be performed annually not to exceed one year following the date of initial compliance testing.	ADEM Admin Code R 335-3-14-.04
12. Upon publication in the Federal Register, this unit shall comply with the applicable monitoring requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)



## Durastrength Dryer A Unit

Federally Enforceable Provisos	Regulations
<p>Section 5 - Recordkeeping and Reporting Requirements</p> <p>1. Records of opacity shall be maintained in a permanent form suitable for inspection. These records shall be maintained for a minimum of 5 years.</p> <p>2. A written report of the excess opacity, as defined below, will be submitted to the Department for each calendar quarter within the month following the end of the quarter. The reports will include the following information:</p> <ul style="list-style-type: none"> <li>a. The magnitude of excess emissions over 2.5% computed from six-minute averages.</li> </ul> <p style="margin-left: 40px;">NOTE: Data recorded during periods of system breakdowns repairs, adjustments, and calibration checks shall not be included in any of the above data averages.</p> <ul style="list-style-type: none"> <li>b. The date and time of commencement and completion of each time period of excess emissions.</li> <li>c. The nature and cause of the excess emissions (if known) and the corrective action taken or preventative measures adopted.</li> <li>d. The date and time identifying each period during which the monitoring systems were inoperative (except for zero and span checks) and the nature of the system repairs or adjustments.</li> <li>e. When no excess emissions have occurred and the monitoring systems were not inoperative or did not require repairs or adjustments, such information will be stated in the report.</li> </ul> <p>3. The recordkeeping and reporting requirements in §63.181 and §63.182 of Subpart H of the HON shall be followed, as applicable.</p>	<p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04</p>

## Durastrength Dryer A Unit

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements (cont.)	
4. D-200A Production Unit shall maintain records of all data used to determine MON applicability as outlined in §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
5. The Notice of Compliance Status (NOCS) shall be submitted as required by §63.2520(d)(1), and this report must contain the information outlined in §63.2520(d)(2) of Subpart FFFF. Any changes to information submitted in the NOCS must be revised and the NOCS resubmitted with the next Subpart FFFF Periodic Compliance Report, as required by §63.2520(e)(10). For any NOCS changes outlined in §63.2520(e)(10)(ii), the NOCS must be resubmitted a minimum of sixty days prior to implementation.	ADEM Admin. Code R. 335-3-11-.06(83)
6. D-200A shall submit Semiannual Compliance Reports containing the information outlined in §63.2520(e) of Subpart FFFF. In accordance with §63.2520(b), these reports will be submitted in conjunction with the Semiannual Title V Monitoring Report. The report periods will be January 1 <sup>st</sup> through June 30 <sup>th</sup> and July 1 <sup>st</sup> through December 31 <sup>st</sup> of each calendar year.	ADEM Admin. Code R. 335-3-11-.06(83)
7. Records of the V-204 temperature shall be maintained in a permanent form suitable for inspection. These records shall be maintained for a minimum of 5 years.	ADEM Admin. Code R. 335-3-14-.04
8. Upon publication in the Federal Register, this unit shall comply with the applicable recordkeeping and reporting requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)

## Operating Permit Summary No. 6 (Durastrength Dryer B Unit)

**Emission Unit(s):** 027  
**Company:** ARKEMA Inc.  
**Description:** Durastrength Dryer B Unit (D-200B)  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Emission Point #	Point Description	Pollutant	Emission Limit	Standard
-	Dryer B Unit	VOC	All pumps in light liquid service as defined in 63.161 shall be equipped with dual mechanical seals or equivalent control	Rule 335-3-14-.04
		OHAP/VOC	Subpart H	Rule 335-3-11-.06(7) & 335-3-14-.04
		HAPs	Subpart FFFF	Rule 335-3-11-.06(83)
IM-5	Flare	VOC	The flare for this unit shall comply with the requirements for flares as specified in 40 CFR 63.11(b)	Rule 335-3-14-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
IM-2	Dryer B	VOC	61.6 lb/hr and 17.1 lbs VOC / ton of product produced	Rule 335-3-14-.04
			Production based on an emission rate of 37.0 lbs VOC / ton of product produced	Rule 335-3-14-.04
		PM	10.4 lb/hr or 0.022 gr/dscf	Rule 335-3-14-.04 & 335-3-4-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
IM-7	Dryer B Area Fume Exhaust	VOC	19.2 lb/hr and 7.6 lbs VOC / ton of product produced	Rule 335-3-14-.04
			Production based on an emission rate of 14.6 lbs VOC / ton of product produced	Rule 335-3-14-.04
V-204	Thermal Oxidizer	VOC	Minimum DRE of 98% or 20 ppmv for VOCs	Rule 335-3-14-.04 & 335-3-11-.06(83)
			1400 °F	
		Opacity	2.22 lb/hr	Rule 335-3-14-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01

## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
Section 1 – Applicability	
1. This unit subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. This unit is subject to PSD requirements for volatile organic compounds (VOCs) and particulates.	ADEM Admin. Code R. 335-3-14-.04
3. This unit is subject to the requirements of the Hazardous Organic NESHAP, as specified in 40 CFR Part 63, Subpart H.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
4. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin. Code R. 335-3-4-.01
5. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.04 for particulates.	ADEM Admin. Code R. 335-3-4-.04
6. This source is subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(1)
7. This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, as specified in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)

## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards	
1. All pumps in light liquid service as defined in 40 CFR 63.161 shall have double mechanical seals or equivalent leak control.	ADEM Admin. Code R. 335-3-14-.04
2. The flare (IM-5) for this unit shall comply with the requirements for flares as specified in 40 CFR 63.11(b).	ADEM Admin. Code R. 335-3-14-.04
3. The standards for the leak detection and repair program of 40 CFR Part 63, Subpart H, as listed in §63.162 - 63.180, shall be met for all HAP and non-HAP VOC components as referenced in §63.160(c).	ADEM Admin. Code R. 335-3-14-.06(7) and 335-3-14-.04
4. The VOC emission rate from Dryer B (IM-2) shall not exceed 61.6 lb/hr and 17.1 lbs VOC / ton of product produced.	ADEM Admin. Code R. 335-3-14-.04
5. Any product produced in this unit that exceeds the lbs VOC / ton of product produced for IM-2 shall be limited in its daily production rate so as not to exceed the lb/hr limits for Proviso No. 4.	ADEM Admin. Code R. 335-3-14-.04
6. No product shall be produced in this unit that exceeds 37.0 lb VOC / ton of product produced for IM-2.	ADEM Admin. Code R. 335-3-14-.04
7. The particulate emission rate from IM-2 shall not exceed 10.4 lb/hr or 0.022 gr/dscf.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.04
8. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.	ADEM Admin. Code R. 335-3-4-.01(1)
9. For the purpose of this unit “in VOC service” shall mean that a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 5 percent VOC by weight.	ADEM Admin. Code R. 335-3-14-.04

## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
10. All MON Group 1 batch process vents within this unit must comply with the requirements outlined in §63.2460 and Table 2 of 40 CFR Part 63, Subpart FFFF as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
11. This unit must develop, implement, and maintain a startup, shutdown, and malfunction plan meeting the requirements of §63.6(e)(3)(i),(ii) and (v) – (viii) of Subpart A for all Group 1 regulated MON emission points, as is detailed and maintained in the Notice of Compliance Status (NOCS) required in §63.2520(d), as referenced in §63.2525(j) of 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
12. All MON regulated closed vent systems within this unit must comply with the requirements for closed vent systems in §63.983 of Subpart SS as referenced by §63.2450(e) of Subpart FFFF and §63.982(b) or §63.982(c) of Subpart SS, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
13. Except as provided in the provisos below, the VOC emission rate from Dryer B Area Fume Exhaust (IM-7) shall not exceed 19.2 lb/hr and 7.6 lbs VOC / ton of product produced.	ADEM Admin. Code R. 335-3-14-.04
14. Any product produced in this unit that exceeds the lbs VOC / ton of product produced for IM-7 shall be limited in its daily production rate so as not to exceed the lb/hr limits in Proviso No. 13.	ADEM Admin. Code R. 335-3-14-.04
15. No product shall be produced in this unit that exceeds 14.6 lb VOC / ton of product produced for IM-7.	ADEM Admin. Code R. 335-3-14-.04
16. Upon publication in the Federal Register, this unit shall comply with the applicable emission standards listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)

## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
17. Vacuum Pump IM-15 shall be routed to the thermal oxidizer (V-204) for control.	ADEM Admin. Code R. 335-3-11-.06(83)
18. The minimum firing temperature of V-204 shall be 1400 °F based on a 3-hour rolling average.	ADEM Admin. Code R. 335-3-14-.04
19. The VOC emission rate from V-204 shall not exceed 2.22 lb/hr.	ADEM Admin. Code R. 335-3-14-.04
20. V-204 shall maintain either a minimum destruction efficiency of 98% or a maximum outlet concentration of 20 ppmv as TOC for all VOCs. Subpart FFFF compliance can also be demonstrated by 98% DRE or 20 ppmv for total HAPs only.	ADEM Admin. Code R. 335-3-11-.06(83)

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## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
Section 3 – Compliance and Performance Test Methods and Procedures	
1. Compliance with the VOC emission rate for Dryer B (IM-2) shall be determined by Reference Method 25A in Appendix A of 40 CFR Part 60 as methane with a response factor of 3.85.	ADEM Admin. Code R. 335-3-10-.03(1)
2. Compliance with the particulate emission rate for IM-2 shall be determined by Reference Method 5 or 17 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
3. The test methods and procedures for the leak detection and repair program as listed in §63.180 of Subpart H of the HON shall be followed.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
4. Compliance with the visible emissions requirements for the flare (IM-5) shall be determined by reference Method 22 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
5. The continuous opacity monitor associated with IM-2 shall comply with Performance Specification 1 of 40 CFR Part 60, Appendix B.	ADEM Admin. Code R. 335-3-10-.03(2)
6. Compliance with the opacity requirements for IM-2 shall be determined by Reference Method 9 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
7. Compliance with the Batch Process Vent Provisions of 40 CFR Part 63, Subpart FFFF shall be determined according to the procedures outlined in §63.997, as referenced in §63.2450(g).	ADEM Admin. Code R. 335-3-11-.06(83)
8. Initial compliance with the closed vent system provisions shall be determined according to the procedures outlined in §63.983(b)(1)(i)(B).	ADEM Admin. Code R. 335-3-11-.06(44)
9. Compliance with the VOC emission rate for Dryer B Area Fume Exhaust (IM-7) shall be determined by Reference Method 25A in Appendix A of 40 CFR Part 60 as methane with a response factor approved by the Department.	ADEM Admin. Code R. 335-3-10-.03(1)



## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
Section 3 – Compliance and Performance Test Methods and Procedures (cont.)	
10. Compliance with the VOC emission rate for the thermal oxidizer (V-204) shall be determined by Reference Method 18 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
Section 4 - Emission Monitoring	
1. The facility shall install, calibrate, maintain, and operate, a continuous monitoring system for measuring and recording the opacity of the emissions from IM-2. An equivalent system for monitoring the performance of the air pollution control equipment may be approved by the chief of the Air Division.	ADEM Admin Code R 335-3-14-.04
2. The leak detection monitoring requirements of 40 CFR Part 63, Subpart H, as listed in §63.162 – 63.180, shall be followed for all subject equipment.	ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04
3. VOC emission testing for IM-2 shall be performed annually not to exceed one year following the date of initial compliance testing.	ADEM Admin Code R 335-3-14-.04
4. Particulate emission testing for IM-2 shall be performed annually not to exceed one year following the date of initial compliance testing.	ADEM Admin Code R 335-3-14-.04
5. Should the opacity monitor associated with IM-2 read opacity greater than 2.5% computed on a rolling six minute average while the unit is operating, the facility must investigate and take appropriate corrective action within 4 hours.	ADEM Admin Code R 335-3-14-.04
6. A device capable of analyzing BTUs shall be installed, calibrated, maintained, and properly operated in association with IM-5. Should a BTU reading of less than 300 be observed for greater than 5 minutes, the facility must investigate and take appropriate corrective action to restore the minimum heat input or cease venting to the flare.	ADEM Admin Code R 335-3-14-.04

## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
Section 4 - Emission Monitoring (cont.)	
<p>7. A thermocouple to monitor for the presence of a flame shall be maintained. Should the thermocouple determine that no flame is present, verify that the thermocouple is operating correctly, and if so, the facility shall cease venting until the pilot is relit.</p>	<p>ADEM Admin Code R 335-3-14-.04</p>
<p>8. For each MON Regulated Closed Vent System, as detailed and maintained in the Dryer B Production Unit's Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF, perform initial and annual monitoring as outlined in §63.983(b)(1)(i)(A) and (B).</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>
<p>9. While the Metablens II Unit is shutdown, VOC emission testing for IM-7 shall be performed once every five years following the date of initial compliance testing.</p>	<p>ADEM Admin Code R 335-3-14-.04</p>
<p>10. Upon publication in the Federal Register, this unit shall comply with the applicable monitoring requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>
<p>11. In order to ensure that V-204 is in compliance with its respective emission limits, the facility shall continuously monitor the temperature and record a measurement at least once every 15 minutes to ensure that it is maintained above 1400°F as calculated on a 3-hour rolling average.</p>	<p>ADEM Admin Code R 335-3-14-.04</p>
<p>12. VOC emission testing for V-204 shall be performed annually not to exceed one year following the date of initial compliance testing.</p>	<p>ADEM Admin Code R 335-3-14-.04</p>

## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
<p>Section 5 - Recordkeeping and Reporting Requirements</p> <ol style="list-style-type: none"><li>1. Records of opacity shall be maintained in a permanent form suitable for inspection. These records shall be maintained for a minimum of 5 years.</li><li>2. A written report of the excess opacity, as defined below, will be submitted to the Department for each calendar quarter within the month following the end of the quarter. The reports will include the following information:<ol style="list-style-type: none"><li>a. The magnitude of excess emissions over 2.5% computed from six-minute averages.  NOTE: Data recorded during periods of system breakdowns repairs, adjustments, and calibration checks shall not be included in any of the above data averages.</li><li>b. The date and time of commencement and completion of each time period of excess emissions.</li><li>c. The nature and cause of the excess emissions (if known) and the corrective action taken or preventative measures adopted.</li><li>d. The date and time identifying each period during which the monitoring systems were inoperative (except for zero and span checks) and the nature of the system repairs or adjustments.</li><li>e. When no excess emissions have occurred and the monitoring systems were not inoperative or did not require repairs or adjustments, such information will be stated in the report.</li></ol></li><li>3. The recordkeeping and reporting requirements in §63.181 and §63.182 of Subpart H of the HON shall be followed, as applicable.</li></ol>	<p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin Code R 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(7) and 335-3-14-.04</p>

## Durastrength Dryer B Unit

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements (cont.)	
<p>4. Records shall be maintained of the daily production rate and estimated lb/ton emission rate of each product whose emission rate exceeds the lbs VOC / ton of product produced threshold set in the provisos listed in Section 2 for IM-2 and IM-7. These records shall be maintained in a permanent form suitable for inspection. These records shall be maintained for a minimum of 5 years.</p>	ADEM Admin Code R 335-3-14-.04
<p>5. D-200B Production Unit shall maintain records of all data used to determine MON applicability as outlined in §63.2520(d) of Subpart FFFF.</p>	ADEM Admin. Code R. 335-3-11-.06(83)
<p>6. The Notice of Compliance Status (NOCS) Report shall be submitted as required by §63.2520(d)(1) and this report must contain the information outlined in §63.2520(d)(2) of Subpart FFFF. Any changes to information submitted in the NOCS must be revised and the NOCS resubmitted with the next Subpart FFFF Periodic Compliance Report, as required by §63.2520(e)(10). For any NOCS changes outlined in §63.2520(e)(10)(ii), the NOCS must be resubmitted a minimum of sixty (60) days prior to implementation.</p>	ADEM Admin. Code R. 335-3-11-.06(83)
<p>7. D-200B shall submit Semiannual Compliance Reports containing the information outlined in §63.2520(e) of Subpart FFFF. In accordance with §63.2520(b), these reports will be submitted in conjunction with the Semiannual Title V Monitoring Report. The report periods will be January 1<sup>st</sup> through June 30<sup>th</sup> and July 1<sup>st</sup> through December 31<sup>st</sup> of each calendar year.</p>	ADEM Admin. Code R. 335-3-11-.06(83)
<p>8. Upon publication in the Federal Register, this unit shall comply with the applicable recordkeeping and reporting requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.</p>	ADEM Admin. Code R. 335-3-11-.06(83)
<p>9. Records of the V-204 temperature shall be maintained in a permanent form suitable for inspection. These records shall be maintained for a minimum of 5 years.</p>	ADEM Admin. Code R. 335-3-14-.04

## Operating Permit Summary No. 7 (Latex Unit)

**Emission Unit(s):** 043  
**Company:** ARKEMA Inc.  
**Description:** Latex Unit  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Emission Point #	Point Description	Pollutant	Emission Limit	Standard
-	Latex Unit	VOC	All pumps in light liquid service as defined in §63.161 shall be equipped with dual mechanical seals or equivalent control Subpart H	Rule 335-3-14-.04
		HAP	Subpart FFFF	Rule 335-3-11-.06(83)
IM-5	Flare	VOC	The flare for this unit shall comply with the requirements for flares as specified in 40 CFR 63.11(b)	Rule 335-3-14-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
IM-6	Dryer A Area Fume Exhaust	VOC	20.0 lb/hr or 12.1 lbs VOC / ton of product produced	Rule 335-3-14-.04
			Production based on an emission rate of 16.2 lbs VOC / ton of product produced	

## Latex Production Unit

Federally Enforceable Provisos	Regulations
Section 1 – Applicability	
1. This unit subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. This source is subject to the applicable requirements found in the Hazardous Organic NESHAP, as specified in 40 CFR Part 63, Subpart H.	ADEM Admin. Code R. 335-3-11-.06(7)
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin. Code R. 335-3-4-.01
4. This source is subject to the applicable requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(1)
5. This source is subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, as specified in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)

## Latex Production Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards	
1. Standards for the leak detection and repair program required under 40 CFR Part 63, Subpart H, as listed in §63.162 - 63.180, shall be met for all HAP and non-HAP VOC components as referenced in §63.160(c).	ADEM Admin. Code R. 335-3-11-.06(7)
2. For the purpose of this unit “in VOC service” shall mean that a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 5 percent VOC by weight.	ADEM Admin. Code R. 335-3-14-.04
3. The flare (IM-5) for this unit shall comply with the requirements for flares as specified in 40 CFR 63.11(b).	ADEM Admin. Code R. 335-3-11-.06(83)
4. All pumps in light liquid service as defined in 40 CFR 63.161 shall have double mechanical seals or equivalent leak control.	ADEM Admin. Code R. 335-3-14-.04
5. All MON Group 1 batch process vents within this unit must comply with the requirements outlined in §63.2460 and Table 2 of 40 CFR Part 63, Subpart FFFF as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
6. This unit must develop, implement, and maintain a startup, shutdown, and malfunction plan meeting the requirements of §63.6(e)(3)(i), (ii), and (v) – (viii) of Subpart A for all Group 1 regulated MON emission points, as is detailed and maintained in the Notice of Compliance Status (NOCS) required in §63.2520(d), as referenced in §63.2525(j) of 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
7. All MON regulated closed vent systems within this unit must comply with the requirements for closed vent systems in §63.983 of Subpart SS as referenced by §63.2450(e) of Subpart FFFF and §63.982(b) or §63.982(c) of Subpart SS, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)

## Latex Production Unit

Federally Enforceable Provisos	Regulations
<p>Section 2 – Emission Standards (cont.)</p> <p>8. Upon publication in the Federal Register, this unit shall comply with the applicable emission standards listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.</p> <p>9. Except as provided in the following proviso, the VOC emission rate from Dryer A Area Fume Exhaust (IM-6) shall not exceed 20.0 lb/hr and 12.1 lbs VOC / ton of product produced.</p> <p>10. Any product produced in this unit that exceeds the lbs VOC / ton of product produced for IM-6 shall be limited in its daily production rate so as not to exceed the lb/hr limit in Proviso No. 9.</p> <p>11. No product shall be produced in this unit that exceeds 16.2 lb VOC / ton of product produced for IM-6.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p> <p>ADEM Admin. Code R. 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-14-.04</p>
<p>Section 3 – Compliance and Performance Test Methods and Procedures</p> <p>1. Test methods and procedures for the leak detection and repair program found in §63.180 of Subpart H of the HON shall be followed.</p> <p>2. Compliance with the visible emissions requirements for IM-5 shall be determined by reference Method 22 in Appendix A of 40 CFR Part 60.</p> <p>3. Compliance with the Batch Process Vent Provisions of 40 CFR Part 63, Subpart FFFF shall be determined according to the procedures outlined in §63.997, as referenced in §63.2450(g).</p> <p>4. Compliance with the VOC emission rate for IM-6 shall be determined by Reference Method 25A in Appendix A of 40 CFR Part 60 as methane with a response factor approved by the Department.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(7)</p> <p>ADEM Admin. Code R. 335-3-10-.03(1)</p> <p>ADEM Admin. Code R. 335-3-11-.06(83)</p> <p>ADEM Admin. Code R. 335-3-10-.03(1)</p>



## Latex Production Unit

Federally Enforceable Provisos	Regulations
<p>Section 4 - Emission Monitoring</p> <ol style="list-style-type: none"> <li>1. Leak detection monitoring requirements as listed in §63.162 - 63.180, shall be followed for all subject equipment.</li> <li>2. A device capable of analyzing BTUs shall be installed, calibrated, maintained, and properly operated in association with IM-5. Should a BTU reading of less than 300 be observed for greater than 5 minutes, the facility must investigate and take appropriate corrective action to restore the minimum heat input or cease venting to the flare.</li> <li>3. A thermocouple to monitor for the presence of a flame shall be maintained. Should the thermocouple determine that no flame is present, verify that the thermocouple is operating correctly, and if so, the facility shall cease venting until the pilot is relit.</li> <li>4. For each MON regulated closed vent system, as detailed and maintained in the Latex Production Unit's Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF, perform initial and annual monitoring as outlined in §63.983(b)(1)(i)(A) and (B).</li> <li>5. Upon publication in the Federal Register, this unit shall comply with the applicable monitoring requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.</li> <li>6. VOC emission testing for IM-6 shall be performed once every 5 years following the date of initial compliance testing.</li> </ol>	<p>ADEM Admin. Code R. 335-3-11-.06(7)</p> <p>ADEM Admin. Code R. 335-3-11-.06(83) and 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(83) and 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(83) and 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(83)</p> <p>ADEM Admin Code R 335-3-14-.04</p>

## Latex Production Unit

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements	
1. Recordkeeping and reporting requirements referenced in §63.181 and §63.182 of Subpart H of the HON shall be followed, as applicable.	ADEM Admin. Code R. 335-3-11-.06(7)
2. The latex production unit shall maintain records of all data used to determine MON applicability as outlined in §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
3. The Notice of Compliance Status (NOCS) Report shall be submitted as required by §63.2520(d)(1) and this report must contain the information outlined in §63.2520(d)(2) of Subpart FFFF. Any changes to information submitted in the NOCS must be revised and the NOCS resubmitted with the next Subpart FFFF Periodic Compliance Report, as required by §63.2520(e)(10). For any NOCS changes outlined in §63.2520(e)(10)(ii), the NOCS must be resubmitted a minimum of sixty (60) days prior to implementation.	ADEM Admin. Code R. 335-3-11-.06(83)
4. The Latex Production Unit shall submit Semiannual Compliance Reports containing the information outlined in §63.2520(e) of Subpart FFFF. In accordance with §63.2520(b), these reports will be submitted in conjunction with the Semiannual Title V Monitoring Report. The report periods will be January 1 <sup>st</sup> through June 30 <sup>th</sup> and July 1 <sup>st</sup> through December 31 <sup>st</sup> of each calendar year	ADEM Admin. Code R. 335-3-11-.06(83)
5. The Latex Production Unit must modify and update the procedures included in the Startup, Shutdown and Malfunction Plan (SSMP), as needed. Records of all procedures included in the SSMP, including all previous versions, must be maintained a minimum of five (5) years, all in accordance with the requirements outlined in 40 CFR 63.6(e)(3) of Subpart A.	ADEM Admin. Code R. 335-3-11-.06(83)
6. The facility shall submit semiannual compliance reports containing the information outlined in 40 CFR 63.182 of Subpart H.	ADEM Admin. Code R. 335-3-11-.06(7)

## Latex Production Unit

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p>Section 5 - Recordkeeping and Reporting Requirements (cont.)</p> <p>7. Upon publication in the Federal Register, this unit shall comply with the applicable recordkeeping and reporting requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>

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## Operating Permit Summary No. 8 (IM / Durastrength Tanks)

**Emission Unit(s):** 013-018, 030  
**Company:** ARKEMA Inc.  
**Description:** IM / Durastrength Storage Tanks  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Tank #	Emission Unit #	Tank Size (gal)	Pollutant	Material Stored	Standard
111	013	61,100	VOC	Styrene	Rule 335-3-11-.06(83) and 335-3-14-.04
121-A	014	61,100	VOC	Butyl Acrylate	Rule 335-3-14-.04
121-B	015	61,100	VOC	Butyl Acrylate	Rule 335-3-14-.04
131-A	016	61,100	HAP/VOC	Methyl Methacrylate	Rule 335-3-11-.06(83)
131-B	017	61,100	HAP/VOC	Methyl Methacrylate	Rule 335-3-11-.06(83)
141	018	18,500	HAP/VOC	Ethyl Acrylate	Rule 335-3-11-.06(83)
M135-V	030	18,500	VOC	n-Butyl Methacrylate	Rule 335-3-14-.04

## IM / Durastrength Tanks

Federally Enforceable Provisos	Regulations
<p>Section 1 – Applicability</p> <ol style="list-style-type: none"> <li>1. These tanks are subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”</li> <li>2. These tanks are subject to the PSD requirements found in ADEM Admin Code 335-3-14-.04 for volatile organic compounds (VOCs).</li> <li>3. Tanks T-131-A, T-131-B, and T-141 are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins as listed in 40 CFR Part 63, Subpart JJJ when the Metablens II Unit is in operation.</li> <li>4. Tanks T-131-A, T-131-B, and T-141 are subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart JJJ when the Metablens II Unit is in operation.</li> <li>5. Tanks T-111, T-131-A, T-131-B, and T-141 are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, as specified in 40 CFR Part 63, Subpart FFFF when the Metablens II Unit is not in operation.</li> <li>6. Tank T-111, T-131-A, T-131-B, and T-141 are subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart FFFF when the Metablens II Unit is not in operation.</li> </ol>	<p>ADEM Admin. Code R. 335-3-16</p> <p>ADEM Admin. Code R. 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(61)</p> <p>ADEM Admin Code R. 335-3-11-.06(1)</p> <p>ADEM Admin. Code R. 335-3-11-.06(83)</p> <p>ADEM Admin. Code R. 335-3-11-.06(1)</p>

## IM / Durastrength Tanks

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards	
1. Tanks T-131-A, T-131-B, and T-141 shall comply with the requirements of §63.119 as referenced in §63.1314 as applicable with the differences noted in §63.1314(a)(1) - (17) when the Metablens II Unit is in operation.	ADEM Admin. Code R. 335-3-11-.06(61)
2. These tanks shall vent only through two carbon canisters in series or an equivalent control device.	ADEM Admin. Code R. 335-3-14-.04
3. All materials brought into these tanks by railcar or truck shall be unloaded by a closed loop system.	ADEM Admin. Code R. 335-3-14-.04
4. Tanks T-131-A, T-131-B, and T-141 have been classified as Group 2 storage tanks and as such are only subject to the recordkeeping and reporting requirements when the Metablens II Unit is in operation.	ADEM Admin. Code R. 335-3-11-.06(83)
5. Tanks T-111, T-131-A, T-131-B, and T-141 are classified as Group 2 storage vessels and shall comply with the reporting and recordkeeping requirements outlined in §63.2520(d) of Subpart FFFF when the Metablens II Unit is not in operation.	ADEM Admin. Code R. 335-3-11-.06(83)
6. Upon publication in the Federal Register, these tanks shall comply with the applicable emission standards listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)

## IM / Durastrength Tanks

Federally Enforceable Provisos	Regulations
<p>Section 3 – Compliance and Performance Test Methods and Procedures</p> <p>1. Determination of breakthrough on the second carbon canister in series associated with these tanks shall be determined by Reference Method 21 in Appendix A of 40 CFR Part 60.</p>	<p>ADEM Admin. Code R. 335-3-10-.03(1)</p>
<p>Section 4 – Emission Monitoring</p> <p>1. The carbon canisters associated with these tanks shall be monitored monthly to detect breakthrough. Should breakthrough on the second carbon canister be detected, the carbon canister shall be replaced within 24 hours.</p> <p>2. Upon publication in the Federal Register, these tanks shall comply with the applicable monitoring requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.</p>	<p>ADEM Admin. Code R. 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(83)</p>

## IM / Durastrength Tanks

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
Section 5 – Recordkeeping and Reporting Requirements	
1. Records of monitoring and replacement of carbon canisters shall be maintained and made readily available upon request. These records shall be maintained for a minimum of 5 years.	ADEM Admin. Code R. 335-3-14-.04
2. Tanks T-131-A, T-131-B, and T-141 shall comply with the reporting and recordkeeping requirements of §63.122 and §63.123 as referenced in §63.1314 as applicable with the differences noted in §63.1314(a)(1) - (17) when the Metablens II Unit is in operation.	ADEM Admin. Code R. 335-3-11-.06(61)
3. Tanks T-131-A, T-131-B, and T-141 shall comply with the reporting and recordkeeping requirements of §63.1335 as applicable when the Metablens II Unit is in operation.	ADEM Admin. Code R. 335-3-11-.06(61)
4. All recordkeeping and reporting requirements found in §63.2520 and §63.2525 of the MON, 40 CFR Part 63, Subpart FFFF shall be followed, as applicable when the Metablens II Unit is not in operation.	ADEM Admin. Code R. 335-3-11-.06(83)
5. The Notice of Compliance Status (NOCS) Report shall be submitted no later than October 10, 2008 as required by §63.2520(d)(1), and this report must contain the information outlined in §63.2520(d)(2) of Subpart FFFF. Any changes to information submitted in the NOCS must be revised and the NOCS resubmitted with the next Subpart FFFF Periodic Compliance Report, as required by §63.2520(e)(10). For any NOCS changes outlined in §63.2520(e)(10)(ii), the NOCS must be resubmitted a minimum of sixty (60) days prior to implementation.	ADEM Admin. Code R. 335-3-11-.06(83)
6. Upon publication in the Federal Register, these tanks shall comply with the applicable recordkeeping and reporting requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)



# Operating Permit Summary No. 9 (RICE MACT Generators & Firewater Pumps)

**Description: Generators Y-501-04 and PEKK, Firewater Pumps P-802A, 50109-P, 50110-P, and P802B**

**Emission Unit No: X099**

**Installation Date:**

Y-501-04	1984
P-802A	1980
50109-P	1985
50110-P	1985
P-802B	1981
PEKK	2017

**Operating Capacity:**

Y-501-04	1400 HP
P-802A	340 HP
50109-P	300 HP
50110-P	300 HP
P-802B	300 HP
PEKK	150 kW

**Operating Schedule:**

	<b>Calendar Year Limit</b>	<b>Non-Emergency Use</b>
Y-501-04	100 hours/year	50 hours/year
P-802A	100 hours/year	50 hours/year
50109-P	100 hours/year	50 hours/year
50110-P	100 hours/year	50 hours/year
P-802B	100 hours/year	50 hours/year
PEKK	100 hours/year	50 hours/year

These units contain equipment that is subject to the following NSPSs, NESHAPs, or MACTs:  
**40 CFR Part 63 Subpart ZZZZ, 40 CFR Part 60 Subpart JJJJ**

Pollutants Emitted

<b>Emission Point Description</b>	<b>Pollutant</b>	<b>Emission Limit</b>	<b>Standard</b>
Y-501-04	Opacity	≤ 20% as determined by six-minute average, with one six-minute period up to 40% in any one hour period.	Rule 335-3-4-.01
	HAP	No specific requirements	
P-802A	Opacity	≤ 20% as determined by six-minute average, with one six-minute period up to 40% in any one hour period.	Rule 335-3-4-.01
	HAP	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,000 hours of	Rule 335-3-11-.06(103)

		operation or annually, whichever comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	
50109-P	Opacity	$\leq 20\%$ as determined by six-minute average, with one six-minute period up to 40% in any one hour period.	Rule 335-3-4-.01
	HAP	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Rule 335-3-11-.06(103)
50110-P	Opacity	$< 20\%$ as determined by six-minute average, with one six-minute period up to 40% in any one hour period.	Rule 335-3-4-.01
	HAP	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Rule 335-3-11-.06(103)
P-802B	Opacity	$\leq 20\%$ as determined by six-minute average, with one six-minute period up to 40% in any one hour period.	Rule 335-3-4-.01
	HAP	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Rule 335-3-11-.06(103)
PEKK	Opacity	$\leq 20\%$ as determined by six-minute average, with one six-minute period up to 40% in any one hour period.	Rule 335-3-4-.01
	NO <sub>x</sub> + NMHC	Subpart JJJ Table 1	Rule 335-3-10-.02 (88)
	CO	Subpart JJJ Table 1	Rule 335-3-10-.02 (88)
	PM	Subpart JJJ Table 1	Rule 335-3-10-.02 (88)

## Generators and Firewater Pumps

Federally Enforceable Provisos	Regulations
Section 1 – Applicability	
1. This unit subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin. Code R. 335-3-4-.01
3. These sources are subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart ZZZZ.	ADEM Admin. Code R. 335-3-11-.06(1)
4. These sources are subject to the requirements of National Emission Standards for Hazardous Pollutants General Provisions as provided for in 40 CFR Part 63, Subpart ZZZZ as referenced in ADEM Admin. Code 335-3-11-.06(103).	ADEM Admin. Code R. 335-3-11-.06(103)
5. The PEKK Emergency Generator is subject to the requirements of the Federal New Source Performance Standards as provided for in 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines as referenced in ADEM Admin. Code 335-3-10-.02(88).	ADEM Admin. Code R. 335-3-10-.02(88)
6. The PEKK Emergency Generator is subject to the requirements of the General Provisions as indicated in 40 CFR Part 60, Subpart A, unless otherwise stated in Subpart JJJJ.	ADEM Admin. Code R. 335-3-10-.02(1)
7. The PEKK Emergency Generator is subject to the National Emission Standards for Hazardous Pollutants as provided for in 40 CFR Part 63, Subpart ZZZZ. Compliance with 40 CFR Part 60, Subpart JJJJ shall constitute compliance with this requirement.	ADEM Admin. Code R. 335-3-10-.02(103)

## Generators and Firewater Pumps

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards	
<p>1. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.</p>	ADEM Admin. Code R. 335-3-4-.01 (1)
<p>2. All listed firewater pumps shall comply with the emission limitations in Table 2c (1) of 40 CFR Part 63, Subpart ZZZZ.</p>	ADEM Admin. Code R. 335-3-11-.06(103)
<p>3. All listed firewater pumps shall be operated according to the requirements in §63.6640(f)(2)(i) - (iii).</p>	ADEM Admin. Code R. 335-3-11-.06(103)
<p>4. All listed firewater pumps must minimize engine time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.</p>	ADEM Admin. Code R. 335-3-11-.06(103)
<p>5. In accordance with §60.4243(d), the unit shall only operate as specified below:</p> <ul style="list-style-type: none"> <li>• Emergency situations.</li> <li>• Maintenance checks and readiness testing not to exceed 100 hours per year.</li> <li>• Non-emergency situations, not to exceed 50 hours per year (these 50 hours count toward the 100 hours per year allowed for maintenance check and readiness testing). The 50 Hours per year for non-emergency situation cannot be used for peak shaving or to generate income for the facility to supply power to an electric grid or otherwise supply power to as part of a financial arrangement with another entity.</li> </ul>	ADEM Admin. Code R. 335-3-10-.02(88)
<p>6. In accordance with §60.4233(e), the PEKK Emergency Generator must comply with the emission limitations in Table 1 of 40 CFR 60, Subpart JJJJ.</p>	ADEM Admin. Code R. 335-3-10-.02(88)

## Generators and Firewater Pumps

Federally Enforceable Provisos	Regulations
<p>Section 3 – Compliance and Performance Test Methods and Procedures</p> <ol style="list-style-type: none"> <li>1. All listed firewater pumps must demonstrate continuous compliance with the operating limitations in Table 2c according to the methods specified in Table 6 (9) of 40 CFR Part 63, Subpart ZZZZ for all units.</li> <li>2. The PEKK Emergency Generator shall be operated and maintained according to the manufacturer’s written instructions in accordance with §60.4234 and §60.4243(d).</li> </ol>	<p>ADEM Admin. Code R. 335-3-11-.06(103)</p> <p>ADEM Admin. Code R. 335-3-10-.02(88)</p>
<p>Section 4 - Emission Monitoring</p> <ol style="list-style-type: none"> <li>1. All listed firewater pumps must install a non-resettable hour meter and monitor all units according to the requirements of §63.6625(f) and §63.6635.</li> <li>2. All listed firewater pumps shall monitor and collect data according to the requirements of §63.6635.</li> <li>3. In accordance with §60.4237, the PEKK Emergency Generator must install a non-resettable hour meter.</li> </ol>	<p>ADEM Admin. Code R. 335-3-11-.06(103)</p> <p>ADEM Admin. Code R. 335-3-11-.06(103)</p> <p>ADEM Admin. Code R. 335-3-10-.02(88)</p>

## Generators and Firewater Pumps

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements	
1. All listed firewater pumps shall keep records of the operation of the engine in emergency and non-emergency service, which is recorded through the non-resettable hour meter. The owner shall record the time of operation of the engine and the reason the engine was in operation during that time. These records shall be retained onsite for inspection purposes for a period of at least 5 years.	ADEM Admin. Code R. 335-3-11-.06(103)
2. All listed firewater pumps shall keep records in accordance with §63.6655.	ADEM Admin. Code R. 335-3-11-.06(103)
3. In accordance with §63.6640, the facility shall report, for all listed firewater pumps, each instance in which it did not meet each operating limitation in Table 2c. These instances are deviations from the operating limitation, and they must be reported according to the requirements in §63.6650(d) and (f).	ADEM Admin. Code R. 335-3-11-.06(103)
4. In accordance with §60.4245, the facility must maintain records of the time and reason for operation of the PEKK Emergency Generator for all hours it is in operation. These records shall be retained onsite for inspection purposes for a period of at least 5 years.	ADEM Admin. Code R. 335-3-10-.02(88)

## Operating Permit Summary No. 10 (PEKK Production Unit)

**Emission Unit(s):** 044  
**Company:** ARKEMA Inc.  
**Description:** PEKK Production Unit  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Emission Point #	Point Description	Pollutant	Emission Limit	Standard
300-1	F-301-02 (Drying Baghouse)	Particulate	0.23 lb/hr	Rule 335-3-14-.04 & 335-3-4-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
300-4	F360 (Loading Baghouse)	Particulate	1.0 lb/hr	Rule 335-3-14-.04 & 335-3-4-.04
		Opacity	See General Proviso #29	Rule 335-3-4-.01
V-204	Thermal Oxidizer	VOC	Minimum DRE of 99.58% for VOCs	Rule 335-3-14-.04 & 335-3-11-.06(83)
			Minimum daily average temperature based on performance testing	
		Opacity	See General Proviso #29	Rule 335-3-4-.01
S-379/C-310	Scrubbers	HCl	Minimum DRE of 99.9% for HCl	
S-152-01	Recovery Scrubber	VOC	Operate while recovery unit is in operation	Rule 335-3-14-.04
-	Intermediate Packaging	Particulate	200 hr/yr	Rule 335-3-14-.04
-	PEKK Unit	VOC	All pumps in light liquid service as defined in 63.161 shall be equipped with dual mechanical seals or equivalent control	Rule 335-3-14-.04
			OHAP/VOC	Subpart H/Subpart UU
		OHAP	Subpart FFFF	Rule 335-3-11-.06(83)

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 1 – Applicability	
1. This unit subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. This unit is subject to Synthetic Minor PSD limitations for volatile organic compounds (VOCs) and particulates.	ADEM Admin. Code R. 335-3-14-.04
3. This source is subject to the requirements found in the Hazardous Organic NESHAP, as specified in 40 CFR Part 63, Subpart H.	ADEM Admin. Code R. 335-3-11-.06(7)
4. This source is subject to 40 CFR Part 63, Subpart UU — National Emissions Standards for Equipment Leaks – Control Level 2.	ADEM Admin. Code R. 335-3-11-.06(46)
5. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.01 for opacity.	ADEM Admin. Code R. 335-3-4-.01
6. This source is subject to the applicable requirements of ADEM Admin Code 335-3-4-.04 for Process Industries – General for particulate emissions.	ADEM Admin. Code R. 335-3-4-.04
7. This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, as specified in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
8. This source is subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subparts FFFF, H, and UU.	ADEM Admin. Code R. 335-3-11-.06(1)



## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards	
1. This unit shall meet the standards for the leak detection and repair program found in 40 CFR Part 63, Subpart H for all HAP and non-HAP VOCs, as listed in §63.162 - 63.180 as referenced and modified by §63.2480(b) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(7)
2. This unit shall comply with the standards for the leak detection and repair program listed in the standards listed in 40 CFR Part 63, Subpart UU as referenced in §63.1021-63.1037. Compliance with Subpart H shall constitute compliance with this requirement.	ADEM Admin. Code R. 335-3-11-.06(46)
3. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.	ADEM Admin. Code R. 335-3-4-.01
4. The particulate emission rate from emission point F-301-02 (300-1) shall not exceed 0.23 lb/hr.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.04
5. The particulate emission rate from emission point F360 (300-4) shall not exceed 1.0 lb/hr.	ADEM Admin. Code R. 335-3-14-.04 and 335-3-4-.04
6. The thermal oxidizer (V-204) shall maintain a minimum destruction efficiency of 99.58% for all VOCs.	ADEM Admin. Code R. 335-3-11-.06(83) and 335-3-14-.04
7. Scrubber System S-379/C-310 shall maintain a minimum destruction efficiency of 99.9% for HCl.	ADEM Admin. Code R. 335-3-11-.06(83)
8. Scrubber S-152-01 shall be in operation at all times that the raw material recovery unit is in operation.	ADEM Admin. Code R. 335-3-14-.04

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
9. The vent line associated with the intermediate packaging system routed to the thermal oxidizer (V-204) shall utilize an in-line particulate filter and a HEPA Filter for control.	ADEM Admin. Code R. 335-3-14-.04
10. The vent line associated with the intermediate packaging system routed to Scrubber C-310 shall utilize an in-line particulate filter for control.	ADEM Admin. Code R. 335-3-14-.04
11. The intermediate packaging system shall not operate greater than 200 hr/yr based on a 12-month rolling total.	ADEM Admin. Code R. 335-3-14-.04
12. As an indicator of compliance, V-204 shall establish a minimum daily average operating temperature based on performance testing. The proposed temperature shall be submitted with the required test report and must be approved by the Department. The facility shall provide supporting data (manufacturer’s guarantee or testing) as a basis for the established parameter.	ADEM Admin. Code R. 335-3-11-.06(83)
13. All MON Group 1 batch process vents in this unit must comply with the requirements outlined in §63.2460 and Table 2 of 40 CFR Part 63, Subpart FFFF, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
14. All MON Group 1 continuous process vents in this unit must comply with the requirements outlined in §63.2455 and Table 1 of 40 CFR Part 63, Subpart FFFF, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
15. This source must develop, implement, and maintain a startup, shutdown, malfunction plan meeting the requirements of §.6(e)(3)(i)(ii) and (v)-(viii) of Subpart A for all Group 1 regulated MON emission points, as is detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d), as referenced by §64.2525(j) of 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
16. This source must develop, implement, and maintain a maintenance wastewater plan meeting the requirements of §63.105, as outlined in §63.2485 of 40 CFR Part 63, Subpart FFFF for all regulated MON maintenance wastewaters.	ADEM Admin. Code R. 335-3-11-.06(83)
17. All MON regulated closed vent systems within this unit must comply with the requirements for closed vent systems in §63.983 and §63.994 of Subpart SS as referenced by §63.2450(e)(1) and (3) of Subpart FFFF and §63.982(c) of Subpart SS, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(44)
18. All heat exchange systems within this unit, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d), shall comply with the monitoring requirements of §63.104, as applicable, as referenced by §63.2490 of 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(5)
19. Equipment necessary for routine repairs of the continuous parameter monitoring system (CPMS) for V-204 must be kept on hand as required by §63.996(b)(2)(i) of Subpart SS, as referenced by 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(44)
20. As an indicator of compliance, Scrubber S-379 shall establish a minimum scrubber flowrate based on a daily average and record a measurement at least once every 15 minutes. S-379 shall also establish a minimum caustic concentration measured on a daily basis. The proposed parameters shall be submitted with the initial test report required for this permit and must be approved by the Department. The facility shall provide supporting data (manufacturer’s guarantee or testing) as a basis for the established parameter.	ADEM Admin. Code R. 335-3-11-.06(83)
21. As an indicator of compliance, Scrubber C-310 shall establish a minimum scrubber flowrate based on a daily average and record a measurement at least once every 15 minutes.	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
22. Upon publication in the Federal Register, this unit shall comply with the applicable emission standards listed in §63.2445(g) by the referenced compliance dates. Any changes required under 6§3.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)
Section 3 – Compliance and Performance Test Methods and Procedures	
1. Compliance with the opacity requirements of this unit shall be determined by Reference Method 9 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
2. Test methods and procedures for the leak detection and repair program found in §63.180 of Subpart H of the HON shall be followed.	ADEM Admin. Code R. 335-3-11-.06(7)
3. Compliance with the particulate emission standard for this unit shall be determined by 40 CFR Part 51, Appendix M Method 202 and 40 CFR Part 60, Method 5.	ADEM Admin. Code R. 335-3-10-.03(1)
4. Compliance with the HCl emission rates of this unit shall be determined by Reference Method 26 or 26A in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
5. Compliance with the VOC destruction efficiency for this unit shall be determined by Reference Method 25A or Method 18 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
6. Initial compliance with the closed vent system provisions shall be determined according to the procedures outlined in §63.983(b)(1)(i) of 40 CFR Part 63, Subpart SS.	ADEM Admin. Code R. 335-3-11-.06(44)
7. Compliance with the Batch Process Vent Provisions of 40 CFR Part 63, Subpart FFFF shall be determined according to the procedures outlined in §63.997, as referenced by §63.2450(g).	ADEM Admin. Code R. 335-3-11-.06(44)

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 3 - Compliance and Performance Test Methods and Procedures (cont.)	
8. Compliance with the Continuous Process Vent Provisions of 40 CFR Part 63, Subpart FFFF shall be determined according to the procedures outlined in §63.997, as referenced in §63.2450(g).	ADEM Admin. Code R. 335-3-11-.06(44)
Section 4 - Emission Monitoring	
1. Leak detection monitoring requirements as listed in §63.162 – 63.180 of Subpart H, shall be followed for all subject equipment.	ADEM Admin. Code R. 335-3-11-.06(7)
2. Once per day, while the conveying system is in operation, a person familiar with Method 9, shall conduct a visual inspection of emission point 300-1 (F-301-02) for visible emissions. If visible emissions are observed, the conveying system must cease operations and appropriate corrective action must be taken to correct the problem. Personnel must then conduct an additional observation to confirm that no visible emissions are observed.	ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)
3. Once per day, while the packaging station is in operation, a person familiar with Method 9, shall conduct a visual inspection of emission point 300-4 (F360) for visible emissions. If visible emissions are observed, the packaging station must cease operations and appropriate corrective action must be taken to correct the problem. Personnel must then conduct an additional observation to confirm that no visible emissions are observed.	ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)
4. At any time, should visible emissions be observed from either emission point 300-1 or 300-4 by plant personnel or a representative of the Department, action to correct this problem should be initiated within 4 hours. Records of each occurrence of observed visible emissions shall be maintained in a logbook suitable for inspection by the Department and should include the findings of the incident and what action was taken to correct the problem.	ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 4 - Emission Monitoring (cont.)	
5. In order to ensure that V-204 is in compliance with its respective emission limits, the facility shall continuously monitor the established firebox temperature and record a measurement at least once every 15 minutes as calculated on a 3-hour rolling average.	ADEM Admin. Code R. 335-3-11-.06(83)
6. To ensure compliance with emission standards for hydrogen halide and halogen HAP (HCl/Cl <sub>2</sub> ) for Scrubber S-379, the total liquid influent flow shall be measured on a continuous basis. All values are calculated on a daily average value as outlined in §63.2450(k) of 40 CFR Part 63, Subpart FFFF and §63.998(c) and §63.996 of Subpart SS.	ADEM Admin. Code R. 335-3-11-.06(83)
7. To ensure compliance with emission standards for hydrogen halide and halogen HAP (HCl/Cl <sub>2</sub> ) for Scrubber S-379, the caustic concentration shall be measured on a daily basis.	ADEM Admin. Code R. 335-3-11-.06(83)
8. To ensure compliance with emission standards for hydrogen halide and halogen HAP (HCl/Cl <sub>2</sub> ) for Scrubber C-310, the total liquid influent flow shall be measured on a continuous basis. All values are calculated on a daily average value as outlined in §63.2450(k) of 40 CFR Part 63, Subpart FFFF and §63.998(c) and §63.996 of Subpart SS.	ADEM Admin. Code R. 335-3-11-.06(83)
9. The facility shall perform initial and annual monitoring as outlined in §63.983(b)(1)(i)(A) and (B) for each MON regulated closed vent system, as detailed and maintained in the PEKK Production Unit's Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
10. Upon publication in the Federal Register, this unit shall comply with the applicable monitoring requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements	
1. Recordkeeping and reporting requirements referenced in §63.181 and §63.182 of Subpart H of the HON shall be followed, as applicable.	ADEM Admin. Code R. 335-3-11-.06(7)
2. The facility shall maintain records of its daily visual inspections of emission points 300-1 and 300-4. The records which may be in the form of a log or checklist, shall be kept in a form suitable for inspection for 5 years. The facility shall keep records of the corrective action taken in the event visible emissions are observed.	ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)
3. Records of each occurrence of observed visible emissions shall be maintained in a logbook suitable for inspection by the Department and should include the findings of the incident and what action was taken to correct the problem.	ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)
4. This unit shall maintain records of all data used to determine MON applicability as outlined in §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
5. The Notice of Compliance Status (NOCS) Report shall be submitted as required by §63.2520(d)(1) and this report must contain the information outlined in §63.2520(d)(2) of Subpart FFFF. Any changes to information submitted in the NOCS must be revised and the NOCS resubmitted with the next Subpart FFFF Periodic Compliance Report, as required by §63.2520(e)(10). For any NOCS changes outlined in §63.2520(e)(10)(ii), the NOCS must be resubmitted a minimum of sixty (60) days prior to implementation.	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements (cont.)	
<p>6. This unit shall submit Semiannual Compliance Reports containing the information outlined in §63.2520(e) of Subpart FFFF. In accordance with §63.2520(b), these reports will be submitted in conjunction with the Semiannual Title V Monitoring Report. The report periods will be January 1<sup>st</sup> through June 30<sup>th</sup> and July 1<sup>st</sup> through December 31<sup>st</sup> of each calendar year</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>
<p>7. This unit must modify and update the procedures included in the Startup, Shutdown and Malfunction Plan (SSMP), as needed. Records of all procedures included in the SSMP, including all previous versions, must be maintained a minimum of 5 years, all in accordance with the requirements outlined in §63.6(e)(3) of Subpart A.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>
<p>8. The facility shall submit semiannual compliance reports containing the information outlined in §63.182 of Subpart H.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(7)</p>
<p>9. The facility shall maintain records of the hourly and 3-hour rolling average values and the three (3) most recent hours of continuous data for the thermal oxidizer (V-204) firebox temperature, as outlined in §63.998(b) of Subpart SS as referenced by §63.2450(e)(1). The records, which may be in the form of a log or a checklist, shall be kept up-to-date, readily accessible, and in a form suitable for inspection for five years.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>
<p>10. The facility shall maintain records of anytime that the 3-hour rolling average values for firebox temperature falls below the established temperature, while V-204 is in operation. A record shall be maintained of the reason and duration of the deviation and whether or not the SSMP was followed. The records shall be kept in a form suitable for inspection for a period of 5 years.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>



## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements (cont.)	
<p>11. The facility shall maintain records of the hourly and daily average values and the three (3) most recent hours of continuous data for the S-379 for influent liquid flow, as outlined in §63.994 of 40 CFR Part 63, Subpart SS as referenced by §63.2450(e)(3). The records which may be in the form of a log or a checklist, shall be kept up-to-date readily accessible, and in a form suitable for inspection for 5 years.</p>	ADEM Admin. Code R. 335-3-11-.06(83)
<p>12. The facility shall keep a log of anytime that the daily average for the S-379 influent liquid flow falls below the standards set in the emissions standards above while the unit is in operation. A record shall be maintained of the reason and duration for the deviation, whether or not the SSMP was followed, and shall be kept in a form suitable for inspection for a period of 5 years.</p>	ADEM Admin. Code R. 335-3-11-.06(83)
<p>13. The facility shall maintain records of the daily caustic concentration for the S-379 as requested and approved in §63.2520(c)(1). The records which may be in the form of a log or a checklist, shall be kept up-to-date readily accessible, and in a form suitable for inspection for 5 years.</p>	ADEM Admin. Code R. 335-3-11-.06(83)
<p>14. The facility shall keep a log of anytime that the daily caustic concentration for S-379 falls below the standards set in the emissions standards above while the unit is in operation. A record shall be maintained of the reason and duration for the deviation, whether or not the SSMP was followed, and shall be kept in a form suitable for inspection for a period of 5 years.</p>	ADEM Admin. Code R. 335-3-11-.06(83)
<p>15. The facility shall maintain records of the hourly and daily average values and the three (3) most recent hours of continuous data for the C-310 for influent liquid flow, as outlined in §63.994 of 40 CFR Part 63, Subpart SS as referenced by §63.2450(e)(3). The records which may be in the form of a log or a checklist, shall be kept up-to-date readily accessible, and in a form suitable for inspection for 5 years.</p>	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Production Unit

Federally Enforceable Provisos	Regulations
Section 5 - Recordkeeping and Reporting Requirements (cont.)	
<p>16. The facility shall keep a log of anytime that the daily average for the C-310 influent liquid flow falls below the standards set in the emissions standards above while the unit is in operation. A record shall be maintained of the reason and duration for the deviation, whether or not the SSMP was followed, and shall be kept in a form suitable for inspection for a period of 5 years.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>
<p>17. For each MON Regulated closed vent system (CVS), this unit shall maintain records of each initial and annual inspection performed as outlined in §63.998(d)(1). If no leaks are detected, record that the inspection was performed, the date of the inspection and that no leaks were found. If leaks are detected, the leak repair records shall include the following information; monitoring instrument identification, leaking equipment identification, operator identification, date of leak detection, date of first successful repair attempts, post repair re-monitoring date and monitored value. These records must be maintained a minimum of 5 years.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>
<p>18. Records of the hours of operation of the intermediate packaging system shall be maintained in a form suitable for inspection and made readily available to the Department upon request. These records must be maintained for a minimum of 5 years.</p>	<p>ADEM Admin Code R. 335-3-16-.05(c)(1)(ii)</p>
<p>19. Upon publication in the Federal Register, this unit shall comply with the applicable recordkeeping and reporting requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p>

## Operating Permit Summary No. 11 (PEKK Storage Tanks)

**Emission Unit(s):** 045  
**Company:** ARKEMA Inc.  
**Description:** PEKK Storage Tanks  
**Operating Schedule:** 8760 hours/year

### Pollutants Emitted

Tank #	Tank Size (gal)	Pollutant	Material Stored	Standard
V-331	5,158	VOC	Aromatic Chloride Monomer	Rule 335-3-14-.04
T-404	7,000	VOC	Organic Waste	Rule 335-3-14-.04
T-412-01A	10,000	VOC	OHAP	Rule 335-3-11-.06(83)
T-422-03A	20,000	VOC	Chlorinated Aromatic	Rule 335-3-14-.04
T-422-03B	20,000	VOC	Chlorinated Aromatic	Rule 335-3-14-.04
T-152-03A	1,500	VOC	Chlorinated Aromatic	Rule 335-3-14-.04
T-152-03B	1,500	VOC	Chlorinated Aromatic	Rule 335-3-14-.04
T-152-03C	1,500	VOC	Chlorinated Aromatic	Rule 335-3-14-.04
T-481	10,000	VOC	Aromatic Ether	Rule 335-3-14-.04
T-405	22,840	HAP	HCl	Rule 335-3-11-.06(83)
T-312	10,000	VOC	Recycle Wash Water	Rule 335-3-14-.04
V-328	3,000	VOC	Process Wastewater	Rule 335-3-14-.04
-	PEKK Unit	OHAP	Subpart FFFF	Rule 335-3-11-.06(83)
		OHAP/VOC	Subpart H/UU	Rule 335-3-11-.06(7) & 335-3-11-.06(46)

## PEKK Storage Tanks

Federally Enforceable Provisos	Regulations
Section 1 – Applicability	
1. These tanks are subject to the applicable requirements of ADEM Admin. Code R. 335-3-16, “Major Source Operating Permits.”	ADEM Admin. Code R. 335-3-16
2. Tanks V-331, T-404, T-152-03A-C, T-312, and V-328 are subject to Synthetic Minor PSD limitations for volatile organic compounds (VOCs).	ADEM Admin. Code R. 335-3-14-.04
3. Tank T-412-01A is subject to the requirements of the ADEM Administrative Code 335-3-6-.03 for Loading and Storage of VOC.	ADEM Admin. Code R. 335-3-6-.03
4. These tanks, with the exception of T-405, are subject to the requirements found in the Hazardous Organic NESHAP, as specified in 40 CFR Part 63, Subpart H.	ADEM Admin. Code R. 335-3-11-.06(7)
5. These tanks are subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart H.	ADEM Admin. Code R. 335-3-11-.06(1)
6. Tanks T-412-01A and T-405 are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, as specified in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
7. Tanks T-412-01A and T-405 are subject to the requirements of the General Provisions as indicated in 40 CFR Part 63, Subpart A, unless otherwise stated in 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(1)

## PEKK Storage Tanks

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards	
1. This unit shall meet the standards for the leak detection and repair program found in 40 CFR Part 63, Subpart H for all HAP and non-HAP VOCs, as listed in §63.162 - 63.180 as referenced and modified by §63.2480(b) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(7)
2. This unit shall comply with the standards for the leak detection and repair program listed in the standards listed in 40 CFR Part 63, Subpart UU as referenced in §63.1021-63.1037. Compliance with Subpart H shall constitute compliance with this requirement.	ADEM Admin. Code R. 335-3-11-.06(46)
3. Tank T-412-01A shall be routed to the thermal oxidizer (V-204) for control.	ADEM Admin. Code R. 335-3-11-.06(83)
4. Tanks T-404 and V-328 shall be routed to V-204 for control.	ADEM Admin. Code R. 335-3-14-.04
5. Tank T-412-01A is classified as a Group 1 Storage Vessel and shall comply with the requirements outlined in §63.2470(a) and Table 4(1)(b)(ii) and be routed to V-204, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
6. V-204 shall maintain a minimum destruction efficiency of 99.58% for all VOCs.	ADEM Admin. Code R. 335-3-11-.06(83) and 335-3-14-.04
7. Tank T-405 shall be routed to Scrubber S-403 for control.	ADEM Admin. Code R. 335-3-11-.06(83)
8. Tank T-405 has been classified as a Group 1 Storage Vessel and shall comply with the requirements outlined in §63.2465 and Table 3 of Subpart FFFF, as detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Storage Tanks

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
9. This unit must develop, implement, and maintain a startup, shutdown, malfunction plan meeting the requirements of §63.6(e)(3)(i)(ii) and (v)-(viii) of Subpart A for all Group 1 regulated MON emission points, as is detailed and maintained in the Notice of Compliance Status (NOCS) required by §63.2520(d), as referenced by §64.2525(j) of 40 CFR Part 63, Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
10. S-403 shall achieve either a 99% DRE for HCl emissions or a maximum outlet concentration of 20 ppmv for HCl.	ADEM Admin. Code R. 335-3-11-.06(83)
11. The facility shall maintain a caustic concentration in S-403 of at least 10% prior to loading T-405.	ADEM Admin. Code R. 335-3-11-.06(83)
12. The minimum caustic concentration in S-403 shall not fall below a daily concentration of 4%.	ADEM Admin. Code R. 335-3-11-.06(83)
13. The facility shall maintain a scrubber recirculation rate of 10 gallons per minute.	ADEM Admin. Code R. 335-3-11-.06(83)
14. The facility shall not exceed a fill rate for T-405 of 200 gallons per minute.	ADEM Admin. Code R. 335-3-11-.06(83)
15. Only one HCl truck shall be unloaded at a time.	ADEM Admin. Code R. 335-3-11-.06(83)
16. Tanks T-152-03A, T-152-03B, and T-152-03C shall be routed to canisters for control.	ADEM Admin. Code R. 335-3-14-.04
17. Tanks V-331 and T-312 shall be routed to Scrubber C-310 for control.	ADEM Admin. Code R. 335-3-14-.04
18. Upon publication in the Federal Register, these tanks shall comply with the applicable emission standards listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)
19. Scrubber C-310 shall maintain a minimum destruction efficiency of 99.9% for HCl.	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Storage Tanks

Federally Enforceable Provisos	Regulations
Section 2 – Emission Standards (cont.)	
20. As an indicator of compliance, Scrubber C-310 shall establish a minimum scrubber flowrate based on a daily average and record a measurement at least once every 15 minutes.	ADEM Admin. Code R. 335-3-11-.06(83)
21. As an indicator of compliance, V-204 shall establish a minimum daily average operating temperature based on performance testing. The proposed temperature shall be submitted with the required test report and must be approved by the Department. The facility shall provide supporting data (manufacturer’s guarantee or testing) as a basis for the established parameter.	ADEM Admin. Code R. 335-3-11-.06(83)
Section 3 – Compliance and Performance Test Methods and Procedures	
1. Compliance with the VOC destruction efficiency for V-204 shall be determined by Reference Method 25A or Method 18 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)
2. Compliance with the HCl emission rate from S-403 shall be determined by Reference Method 26 or 26A in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-11-.06(83)
3. Compliance with the Storage Tank Vent Provisions of 40 CFR Part 63, Subpart FFFF shall be determined according to the procedures outlined in §63.997, as referenced by §63.2450(g).	ADEM Admin. Code R. 335-3-11-.06(83)
4. Test methods and procedures for the leak detection and repair program found in §63.180 of Subpart H of the HON shall be followed.	ADEM Admin. Code R. 335-3-11-.06(7)
5. Initial compliance with the Closed Vent System Provisions shall be determined according to the procedures outlined in §63.983(b)(1)(i) of 40 CFR Part 63, Subpart SS.	ADEM Admin. Code R. 335-3-11-.06(44)
6. Determination of breakthrough on the carbon canisters associated with T-152-03A - C shall be determined by Reference Method 21 in Appendix A of 40 CFR Part 60.	ADEM Admin. Code R. 335-3-10-.03(1)

## PEKK Storage Tanks

Federally Enforceable Provisos	Regulations
Section 4 – Emission Monitoring	
1. In order to ensure that the thermal oxidizer (V-204) is in compliance with its respective emission limits, the facility shall continuously monitor the established firebox temperature and record a measurement at least once every 15 minutes as calculated on a daily average.	ADEM Admin. Code R. 335-3-11-.06(83) and 335-3-14-.04
2. VOC emission testing for V-204 shall be performed annually not to exceed one year following the date of initial compliance testing.	ADEM Admin. Code R. 335-3-14-.04
3. In order to ensure that S-403 is in compliance with its required control efficiency, the facility shall monitor the fill rate of T-405 during the unloading of all tank trucks. A reading shall be taken at least once every 5 minutes.	ADEM Admin. Code R. 335-3-11-.06(83)
4. In order to ensure that S-403 is in compliance with its required control efficiency, the facility shall monitor caustic concentration and record a measurement at least once every 15 minutes.	ADEM Admin. Code R. 335-3-11-.06(83)
5. In order to ensure that S-403 is in compliance with its required control efficiency, the facility shall monitor scrubber recirculation rate and record a measurement at least once every 15 minutes.	ADEM Admin. Code R. 335-3-11-.06(83)
6. The monitoring requirements of §63.994, as referenced in §63.2465, shall be followed for the batch process vent from T-405. Alternate monitoring as approved under §63.994(c)(ii)(D) may be utilized in lieu of §63.2465 where applicable.	ADEM Admin. Code R. 335-3-11-.06(44)
7. Leak detection monitoring requirements as listed in §63.162 – 63.180 of Subpart H, shall be followed for all subject equipment.	ADEM Admin. Code R. 335-3-11-.06(44)
8. The carbon canisters associated with T-152-03A - C shall be monitored monthly to detect breakthrough. Should breakthrough be detected, the carbon canister shall be replaced within 24 hours.	ADEM Admin. Code R. 335-3-14-.04



## PEKK Storage Tanks

Federally Enforceable Provisos	Regulations
<p>Section 4 – Emission Monitoring (cont.)</p> <p>9. Upon publication in the Federal Register, these tanks shall comply with the applicable monitoring requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.</p> <p>10. To ensure compliance with emission standards for hydrogen halide and halogen HAP (HCl/Cl<sub>2</sub>) for Scrubber C-310, the total liquid influent flow shall be measured on a continuous basis. All values are calculated on a daily average value as outlined in §63.2450(k) of 40 CFR Part 63, Subpart FFFF and §63.998(c) and §63.996 of Subpart SS.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(83)</p> <p>ADEM Admin. Code R. 335-3-11-.06(83)</p>
<p>Section 5 – Recordkeeping and Reporting Requirements</p> <p>1. Recordkeeping and reporting requirements referenced in §63.181 and §63.182 of Subpart H of the HON shall be followed, as applicable.</p> <p>2. The facility shall maintain records of the hourly and daily average values and the three (3) most recent hours of continuous data for the V-204 firebox temperature, as outlined in §63.998(b) of Subpart SS, as referenced by §63.2450(e)(1). The records, which may be in the form of a log or a checklist, shall be kept up-to-date, readily accessible, and in a form suitable for inspection for 5 years.</p> <p>3. The facility shall maintain records of anytime that the daily average values for firebox temperature falls below the established temperature, while V-204 is in operation. A record shall be maintained of the reason and duration of the deviation and whether or not the SSMP was followed. The records shall be kept in a form suitable for inspection for a period of 5 years.</p> <p>4. All recordkeeping and reporting requirements found in §63.2520 and §63.2525 of the MON, 40 CFR Part 63, Subpart FFFF shall be followed, as applicable.</p>	<p>ADEM Admin. Code R. 335-3-11-.06(7)</p> <p>ADEM Admin. Code R. 335-3-11-.06(83)</p> <p>ADEM Admin. Code R. 335-3-11-.06(83)</p> <p>ADEM Admin. Code R. 335-3-11-.06(83)</p>

## PEKK Storage Tanks

Federally Enforceable Provisos	Regulations
Section 5 – Recordkeeping and Reporting Requirements (cont.)	
5. This unit shall maintain records of all data used to determine MON applicability as outlined in §63.2520(d) of Subpart FFFF.	ADEM Admin. Code R. 335-3-11-.06(83)
6. The Notice of Compliance Status (NOCS) Report shall be submitted as required by §63.2520(d)(1) and this report must contain the information outlined in §63.2520(d)(2) of Subpart FFFF. Any changes to information submitted in the NOCS must be revised and the NOCS resubmitted with the next Subpart FFFF Periodic Compliance Report, as required by §63.2520(e)(10). For any NOCS changes outlined in §63.2520(e)(10)(ii), the NOCS must be resubmitted a minimum of sixty (60) days prior to implementation.	ADEM Admin. Code R. 335-3-11-.06(83)
7. This unit shall submit Semiannual Compliance Reports containing the information outlined in §63.2520(e) of Subpart FFFF. In accordance with §63.2520(b), these reports will be submitted in conjunction with the Semiannual Title V Monitoring Report. The report periods will be January 1 <sup>st</sup> through June 30 <sup>th</sup> and July 1 <sup>st</sup> through December 31 <sup>st</sup> of each calendar year	ADEM Admin. Code R. 335-3-11-.06(83)
8. This unit must modify and update the procedures included in the Startup, Shutdown and Malfunction Plan (SSMP), as needed. Records of all procedures included in the SSMP, including all previous versions, must be maintained a minimum of 5 years, all in accordance with the requirements outlined in §63.6(e)(3) of Subpart A.	ADEM Admin. Code R. 335-3-11-.06(83)
9. The facility shall maintain records of T-405 fill rates. Records shall be maintained in a permanent form suitable for inspection for 5 years.	ADEM Admin. Code R. 335-3-11-.06(83)
10. The facility shall maintain records of hourly and daily caustic concentrations in S-403. Records shall be maintained in a permanent form suitable for inspection for 5 years.	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Storage Tanks

Federally Enforceable Provisos	Regulations
Section 5 – Recordkeeping and Reporting Requirements (cont.)	
11. The facility shall maintain records of the hourly and daily scrubber recirculation rate in S-403. Records shall be maintained in a permanent form suitable for inspection for 5 years.	ADEM Admin. Code R. 335-3-11-.06(83)
12. Records of monitoring and replacement of carbon canisters shall be maintained and made readily available upon request. These records shall be maintained for a minimum of 5 years.	ADEM Admin. Code R. 335-3-14-.04
13. For each MON regulated closed vent system (CVS), this unit shall maintain records of each initial and annual inspection performed as outlined in §63.998(d)(1). If no leaks are detected, record that the inspection was performed, the date of the inspection and that no leaks were found. If leaks are detected, the leak repair records shall include the following information; monitoring instrument identification, leaking equipment identification, operator identification, date of leak detection, date of first successful repair attempts, post repair re-monitoring date and monitored value. These records must be maintained a minimum of 5 years.	ADEM Admin. Code R. 335-3-11-.06(44)
14. Upon publication in the Federal Register, these tanks shall comply with the applicable recordkeeping and reporting requirements listed in §63.2445(g) by the referenced compliance dates. Any changes required under §63.2445(g) to Subpart FFFF or any other referenced subpart shall supersede any specific requirement listed in the requirements for this emission unit.	ADEM Admin. Code R. 335-3-11-.06(83)
15. The facility shall maintain records of the hourly and daily average values and the three (3) most recent hours of continuous data for the C-310 for influent liquid flow, as outlined in §63.994 of 40 CFR Part 63, Subpart SS as referenced by §63.2450(e)(3). The records which may be in the form of a log or a checklist, shall be kept up-to-date readily accessible, and in a form suitable for inspection for 5 years.	ADEM Admin. Code R. 335-3-11-.06(83)

## PEKK Storage Tanks

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
Section 5 – Recordkeeping and Reporting Requirements (cont.)  16. The facility shall keep a log of anytime that the daily average for the C-310 influent liquid flow falls below the standards set in the emissions standards above while the unit is in operation. A record shall be maintained of the reason and duration for the deviation, whether or not the SSMP was followed, and shall be kept in a form suitable for inspection for a period of 5 years.	ADEM Admin. Code R. 335-3-11-.06(83)

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