



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: SNF – Riceboro
Facility Address: Chemical Plant Road
Riceboro, Georgia 31323 Liberty County
Mailing Address: PO Box 250
Riceboro, Georgia 31323
Parent/Holding Company: SNF Holding Company
Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

Construction and operation of a new chloromethylation process line; various miscellaneous revisions for consistency with facility operations.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2899-179-0011-V-04-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 748202 dated May 24, 2023; any other applications upon which this Amendment or Permit No. 2899-179-0011-V-04-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **11** pages.



Jeffrey W. Cown, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.1 Site Determination

[THIS SECTION REPLACED IN FULL]

This Part 70 operating permit amendment is for the operations of Chemtall Incorporated, Flocryl LLC Chloromethylation Plant, Flocryl LLC Acrylates Plant, and Flocryl LLC Acrylamide Plant, which are neighboring facilities under common control. The parent company is called SNF Holding Corporation and the combined facility is known as SNF – Riceboro.

1.2 Previous and/or Other Names

[THIS SECTION REPLACED IN FULL]

Flocryl LLC Acrylates Plant and Flocryl LLC Acrylamide Plant were previously known as Flocryl, Inc., Bio-Flocryl, Inc. (Flocryl Acrylamide), and NCF Manufacturing, Inc. The Flocryl LLC Chloromethylation Plant was previously under the responsibility of Chemtall Incorporated. Chemtall Incorporated was previously known as Riceboro Chemical Company. The collective Part 70 site has been called SNF – Riceboro since the issuance of the initial Title V permit.

1.3 Process Description of Modification

With this application, SNF proposes to install and operate an additional chloromethylation (CM) plant line (QT4) at Flocryl. In addition, SNF is requesting to make various miscellaneous revisions for consistency with facility nomenclature and operations.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1 Revised Emission Units

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|--|--|--|--|--|
| ID No. | Description | | ID No. | Description |
| FLOCRYL ACRYLATES CONTINUOUS PLANT | | | | |
| FLOC – Flocryl Acrylates Continuous. Plant (South) | | | | |
| T-27 T-28B | Recycle Catalyst Surge Control Vessel Catalyst Make-Up Surge Control Vessel | 40 CFR 63 Subpart FFFF ⁴ | CT01 CT02 | Thermal Oxidizer |
| T-28B | Catalyst Make-Up Surge Control Vessel | 40 CFR 63 Subpart FFFF | None | None |
| FLOCRYL CHLOROMETHYLATION (CM) PLANT | | | | |
| R1CM1 R2CM2 | Chloromethylation Lines 1 and 2 (Batch) | 40 CFR 63 Subpart FFFF ¹ 391-3-1-.02(2)(b) 391-3-1-.02(e) | CC01 CC02 CMI2 CMS2 CMI1 CMS1 | Cryogenic Condenser Recovery Unit** Cryogenic Condenser Recovery Unit Incinerator Scrubber Incinerator*** Scrubber*** |
| R5CM3 | Chloromethylation Line 3 5 (Batch) | 40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(e) | None | None |
| QT1CM6 QT2CM7 QT3CM8 QT4 | Chloromethylation Lines 6, 7, and 8 QT1 through QT4 (Continuous) | 40 CFR 63 Subpart FFFF ¹ 391-3-1-.02(2)(b) 391-3-1-.02(e) | CC01 CC02 CMI2 CMS2 CMI1 CMS1 | Cryogenic Condenser Recovery Unit** Cryogenic Condenser Recovery Unit Incinerator Scrubber Incinerator*** Scrubber*** |

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| CHEMTALL PLANT | | | | |
|---|--|--|------------------------|--|
| SOLMAN – Solutions Mannich Plant | | | | |
| SOL | Solutions Plant | 40 CFR 63 Subpart FFFF ² | SC2 | Packed-Bed Scrubber |
| MAN2 | Liquids Product Reactor 2 | | | |
| MAN4 | Liquids Product Reactor 4 | | | |
| MPT1 | Liquids Product Prep Tank PT1 | | | |
| WSB1 | Mannich/Liquids Reactor WSB1 | | | |
| WSB2 | Mannich/Liquids Reactor WSB2 | | | |
| WSB3 | Emulsion Reactor WSB3 | | | |
| MAN7 | Liquids Reactor MAN7 | | | |
| MAN8 | Liquids Reactor MAN8 | | | |
| MT03 | Emulsion Mix Tank (MT03) | | | |
| N/a | Cooling Tower System | 40 CFR 63 Subpart FFFF | None | None |
| RNMA – NMA Production | | | | |
| RNMA | NMA Reactor | 40 CFR 63 Subpart FFFF ² | SC2 | Packed Bed Scrubber |
| OTHER | | | | |
| Other | | | | |
| TDMS | Dimethyl Sulfate Tank | 40 CFR 63 Subpart FFFF ² | None CB1 | None Activated Carbon Adsorber |
| BLRS5 – Boilers | | | | |
| B360A203 | Flocryl Boiler 203 360A | 40 CFR 63 Subpart DDDDD | None | None |
| B360B204 | Flocryl Boiler 204 360B | 40 CFR 60 Subpart Dc | | |
| B360C205 | Flocryl Boiler 205 360C | 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) | | |

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

¹Group 1 source. ²Group 2 source. ³Group 1 source for MMA. Group 2 source for MA, but controlled at all times. ⁴Not subject to 40 CFR 63 Subpart FFFF emission controls, but voluntarily controlled at all times. ⁵If decanter bottoms are transferred offsite for disposal, the decanter bottoms will be considered a Group 1 process wastewater and the trailers, along with T300, T620, and/or T22 will be defined as MON Rule wastewater containers.

**Offline backup to Cryogenic Condenser Recovery Unit CC02.

*** CMI1/CMS1 will be removed once Cryogenic Condenser Recovery Unit CC02 is installed.

BOLDED Text – new names based on consistency with plant terminology or new equipment.

3.2 Equipment Emission Caps and Operating Limits

MODIFIED CONDITION

- 3.2.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the Chloromethylation Lines ~~1 through 3 and 6 through 8~~ (Source Codes ~~CM1 through CM3 and CM6 through CM8~~ **R1, R2, R5, QT1, QT2, QT3, and QT4**) emissions of VOC in an amount exceeding 41.5 tons during any consecutive 12-month period. The emission limit includes fugitive process emissions.
[Avoidance of 40 CFR Part 52.21]

3.3 Equipment Federal Rule Standards

MODIFIED CONDITION

3.3.37 The Permittee shall control organic HAP emissions as required by 40 CFR 63 Subpart FFFF from the Chloromethylation Plant Lines ~~1, 2, and 6 through 8~~ (Source Codes ~~CMI, CM2, and CM6 through CM8~~ R1, R2, R5, QT1, QT2, QT3, and QT4) by following either paragraph a or b of this condition, as applicable.

a. – b. [no changes]

MODIFIED CONDITION

3.3.38 The Permittee shall control hydrogen halide and halogen HAP emissions as required by 40 CFR 63 Subpart FFFF from the Chloromethylation Plant Lines ~~1, 2, and 6 through 8~~ (Source Codes ~~CMI, CM2, and CM6 through CM8~~ R1, R2, R5, QT1, QT2, QT3, and QT4) when using the CM Incinerator/Scrubber System (Source Code CMI2/CMS2) or the offline backup CM Incinerator/Scrubber System (Source Code CMI1/CMS1) as follows:

a. – c. [no changes]

3.3.43 [deleted]

PART 4.0 REQUIREMENTS FOR TESTING**4.2 Specific Testing Requirements****FLOCRYL CHLOROMETHYLATION PLANT****MODIFIED CONDITION**

- 4.2.3 The Permittee shall conduct performance testing as stated for the Chloromethylation Plant Lines ~~1, 2, and 6 through 8~~ (Source Codes ~~CM1, CM2, and CM6 through CM8~~ R1, R2, R5, QT1, QT2, QT3, and QT4) process vents in accordance with the provisions of 40 CFR 63.2450(g), 40 CFR 63.2460(c), 40 CFR 63 Subpart SS, and any other applicable provisions of 40 CFR 63 Subpart FFFF. The Permittee shall conduct subsequent performance tests if there is a change in the worst-case emission profile.
[40 CFR 63.2450(g) and 63.2460(c)]

a. – d. [no changes]

BOILERS**MODIFIED CONDITION**

- 4.2.19 The Permittee must demonstrate initial compliance with the emission limitations in Permit Condition No. 3.3.84 within 180 days after startup of any boiler in Equipment Group BLRS5 that meets the requirement of Permit Condition 4.2.18.a. The Permittee shall meet the following requirements:
- a. Conduct performance tests according to 40 CFR 63.7520 and Table 5 of 40 CFR 63 Subpart DDDDD for CO emissions. As part of this testing requirement, the Permittee must establish the minimum oxygen level and maximum operating load ~~(MMBtu/hr)~~ according to 40 CFR 63.7520.
[40 CFR 63.7510(a), 40 CFR 63.7510(c), 40 CFR 63.7530(a), and Option Nos. 4 and 5 of Table 7 in 40 CFR 63 Subpart DDDDD]
- b. – e. [no changes]

MODIFIED CONDITION

- 4.2.21 The Permittee must conduct subsequent performance testing for boilers in Equipment Group BLRS5 according to the following: as specified in Permit Condition No. 4.2.19 according to 40 CFR 63.7520 on an annual basis, except as specified in 40 CFR 63.7515(b) through (e), (g), and (h). Annual performance tests must be completed no more than 13 months after the previous performance test, except as specified in 40 CFR 63.7515(b) through (e), (g), and (h).
- a. The Permittee must conduct all applicable performance tests as specified in Permit Condition No. 4.2.19 according to 40 CFR 63.7520 on an annual basis, except as specified in 40 CFR 63.7515(b) through (c), (g), and (h) and Condition No. 4.2.21.b. Annual performance tests must be completed no more than 13 months after the previous performance test, except as specified in 40 CFR 63.7515(b) through (c), (g), and (h).
[40 CFR 63.7515(a)]

- b. Subsequent annual performance tests must be completed on at least one boiler for each annual test (i.e., not all boilers need to be tested each year). Each subsequent performance test should be completed on a different boiler than the boiler that was tested during the previous compliance demonstration (i.e., rotate the representative boiler tested each year). If a boiler has not been co-firing natural gas and alcohol co-product since the previous demonstration, testing on the boiler is not required. However, once the boiler begins co-firing natural gas and alcohol co-product, a performance test on the boiler will be completed during the next compliance demonstration if the boiler was not tested during the previous two compliance demonstrations.
[Performance Test Waiver approved per 40 CFR 63.7(e)(2)(iv) and 63.7(h)(2)]

MODIFIED CONDITION

- 4.2.22 The Permittee must report the results of performance tests for boilers in Equipment Group BLRS5 within 60 days after the completion of the performance tests. This report must also verify that the operating limits for ~~each boiler~~ the boiler(s) tested have not changed or provide documentation of revised operating limits established according to 40 CFR 63.7530 and Table 7 of 40 CFR 63 Subpart DDDDD, as applicable. The reports for all subsequent performance tests must include all applicable information required in 40 CFR 63.7550.
[40 CFR 63.7515(f)]

MODIFIED CONDITION

- 4.2.23 If the Permittee has not operated any of the applicable boilers in Equipment Group BLRS5 while co-firing natural gas and alcohol co-product since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the Permittee must comply with Permit Condition No. 4.2.19 no later than 180 days after the re-start of the applicable boiler on natural gas and alcohol co-product according to the applicable provisions in 40 CFR 63.7(a)(2) as cited in Table 10 of 40 CFR 63 Subpart DDDDD. Subsequent performance testing is only required on one of the boilers per Condition No. 4.2.21.b; therefore, the requirement to re-test within 180 days is not applicable if at least one boiler was co-firing natural gas and alcohol co-product since the previous compliance demonstration.
[40 CFR 63.7515(g) and Performance Test Waiver approved per 40 CFR 63.7(e)(2)(iv) and 63.7(h)(2)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements****MODIFIED CONDITION**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. [no changes]
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

CHEMTALL PLANT/FLOCRYL CHLOROMETHYLATION PLANT

- i. Any 12-month rolling total period during which VOC emissions from the Chloromethylation Lines ~~1 through 3 and 6 through 8~~ (Source Codes ~~CM1 through CM3 and CM6 through CM8~~ R1, R2, R5, QT1, QT2, QT3, and QT4), calculated in accordance with Condition 6.2.20, are in excess of the limit in Condition 3.2.1.
[Avoidance of 40 CFR 52.21]
- ii. – xiv. [no changes]
- c. [no changes]
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

CHEMTALL PLANT/FLOCRYL CHLOROMETHYLATION PLANT

- i. A report of the 12-month rolling totals for VOC emissions from the Chloromethylation Lines ~~1 through 3 and 6 through 8~~ (Source Codes ~~CM1 through CM3 and CM6 through CM8~~ R1, R2, R5, QT1, QT2, QT3, and QT4), as calculated per Condition 6.2.20, for each month in the reporting period.
- ii. – vi. [no changes]

6.2 Specific Record Keeping and Reporting Requirements

MODIFIED CONDITION

6.2.9 Prior to August 12, 2023, the Permittee shall comply with the following requirements for the operation of cooling tower water systems subject to the provisions of 40 CFR 63 Subpart FFFF at the Flocryl Acrylates Continuous South Plant and the Flocryl Acrylates Batch Plant, ~~the Flocryl Chloromethylation Plant, and the Chemtall Plant~~. Beginning August 12, 2023 for the Flocryl Acrylates Continuous AD6 and South Plants and the Flocryl Acrylates Batch Plant, ~~Flocryl Chloromethylation Plant (if applicable), and the Chemtall Plant (if applicable)~~, comply with the requirements in 40 CFR 63.2490(d). At any time before August 12, 2023, the Permittee may choose to comply with the requirements of 40 CFR 63.2490(d).
[40 CFR 63.2490; 40 CFR 63.104]

a. – d. [no changes]

FLOCRYL CHOROMETHYLATION PLANT

MODIFIED CONDITION

6.2.20 The Permittee shall maintain monthly records of the types and amounts (in tons) of product produced in the Chloromethylation Lines ~~1 through 3 and 6 through 8~~ (Source Codes ~~CM1 through CM3 and CM6 through CM8~~ R1, R2, R5, QT1, QT2, QT3, and QT4). The Permittee shall use the production records and either the emission factor data collected during performance testing or emission factors based on the methods used to estimate potential-to-emit in the permit application, whichever is the higher factor, to calculate monthly VOC emissions. The facility shall also use appropriate emission factors to determine the monthly VOC emissions from fugitive process sources. The monthly totals shall be used to calculate 12-month rolling total VOC emissions and shall be used to demonstrate compliance with Condition 3.2.1.
[Avoidance of 40 CFR Part 52.21]

BOILERS

MODIFIED CONDITION

6.2.42 Within 90 days before the expected startup date of Flocryl Boiler ~~203 360A~~ (Source Code ~~B203 360A~~), Flocryl Boiler ~~204 360B~~ (Source Code ~~B204 360B~~), Flocryl Boiler ~~205 360C~~ (Source Code ~~B205 360C~~), Chemtall Boiler 7 (Source Code B7), and Chemtall Boiler 8 (Source Code B8), the Permittee shall submit a compliance plan to demonstrate initial and continuous compliance with the work practice standards for 40 CFR 63 Subpart DDDDD for each boiler to the Division for approval.
[40 CFR 63 Subpart DDDDD]

MODIFIED CONDITION

6.2.43 The Permittee shall submit Initial Notifications to the Division not later than 15 days after the actual dates of startup of Flocryl Boiler ~~203 360A~~ (Source Code ~~B203 360A~~), Flocryl Boiler ~~204 360B~~ (Source Code ~~B204 360B~~), Flocryl Boiler ~~205 360C~~ (Source Code ~~B205 360C~~), Chemtall Boiler 7 (Source Code B7), and Chemtall Boiler 8 (Source Code B8) as required by 40 CFR 63 Subpart DDDDD.
[40 CFR 63.9(b)(5)(ii); 40 CFR 63.7545(c)]

MODIFIED CONDITION

- 6.2.50 The Permittee shall submit notification of the date of commencement of construction and actual startup date Flocryl Boiler ~~203~~ 360A (Source Code ~~B203~~ 360A), Flocryl Boiler ~~204~~ 360B (Source Code ~~B204~~ 360B), Flocryl Boiler ~~205~~ 360C (Source Code ~~B205~~ 360C), Chemtall Boiler 7 (Source Code B7), and Chemtall Boiler 8 (Source Code B8), as provided by 40 CFR 60.7 within 15 days of such date, each. This notification shall include all items specified in 40 CFR 60.48c(a). The boilers are exempt from the notification requirements if the boilers are pre-packaged or skid-mounted boilers (40 CFR 60.7(a)(1)).
[40 CFR 60.48c(a)]

PART 7.0 OTHER SPECIFIC REQUIREMENTS**7.2 Off-Permit Changes Associated with this Amendment**

The following off permit changes have been incorporated into this amendment:

| Application No. | Plant | Source Code | Description | Approved by EPD |
|-----------------|---|--------------------------------|--|-------------------|
| TV-28461 | Flocryl Acrylamide Plant Process and Chemtall Solutions Plant | V1 V2 V3 SOL | Request to install three new 53-gallon propionaldehyde/butyraldehyde (PA) storage tanks at the Flocryl Acrylamide Plant. Request to install one new reactor (WSR3) at the Solutions Plant. | August 8, 2022 |
| TV-28517 | Flocryl Acrylates Batch and Continuous Plants | N/A | Request to install cryogenic condenser recovery units directly upstream of existing thermal oxidizers TO01, CT01, and CT02, which are associated with the Flocryl Acrylates Batch (North) and Continuous (South and AD6) plants. | September 6, 2022 |
| TV-28732 | Flocryl Acrylates Continuous (AD6) Plant | T50A T50B T040A T040B | Request to vent emissions from the MA and DMOH railcar depressurization to the MA and DMOH storage tanks, respectively. | March 2, 2023 |

Attachments

- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

| Category | Description of Insignificant Activity/Unit | Quantity |
|---|--|---|
| Mobile Sources | 1. Cleaning and sweeping of streets and paved surfaces | |
| Combustion Equipment | 1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel. | <u>5</u> |
| | 2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a “designated facility” as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows: | |
| | i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste. | |
| | ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste. | |
| | iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types) | |
| | 3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5). | |
| | 4. Stationary engines burning: | <u>25</u> <u>28</u> |
| Trade Operations | i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7 | |
| | ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year. | |
| | iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year. | |
| | iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year. | |
| Trade Operations | 1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year. | Plant-wide as needed |
| Maintenance, Cleaning, and Housekeeping | 1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively. | |
| | 2. Portable blast-cleaning equipment. | |
| | 3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes. | |
| | 4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent. | 2 |
| | 5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning. | <u>All Tanks</u> <u>Various</u> <u>Tanks/</u> <u>Equipment</u> |
| | 6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners. | |
| | 7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners. | |

Title V Permit Amendment

SNF – Riceboro

Permit No.: 2899-179-0011-V-04-3

INSIGNIFICANT ACTIVITIES CHECKLIST

| Category | Description of Insignificant Activity/Unit | Quantity |
|---------------------------------|--|----------------------|
| Laboratories and Testing | 1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis. | 45 |
| | 2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility. | 3 |
| Pollution Control | 1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | 1 |
| | 2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| Industrial Operations | 1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year. | |
| | 2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour: | Plant-wide as needed |
| | i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts. | |
| | ii) Porcelain enameling furnaces or porcelain enameling drying ovens. | |
| | iii) Kilns for firing ceramic ware. | |
| | iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds. | |
| | v) Bakery ovens and confection cookers. | |
| | vi) Feed mill ovens. | |
| | vii) Surface coating drying ovens | |
| | 3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: | Plant-wide as needed |
| | i) Activity is performed indoors; & | |
| | ii) No significant fugitive particulate emissions enter the environment; & | |
| | iii) No visible emissions enter the outdoor atmosphere. | |
| | 4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche). | |
| | 5. Grain, food, or mineral extrusion processes | |
| | 6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds. | |
| | 7. Equipment for the mining and screening of uncrushed native sand and gravel. | |
| | 8. Ozonization process or process equipment. | |
| | 9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system. | |
| | 10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year. | |
| | 11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures. | |
| | 12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year. | |
| | 13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year. | |

Title V Permit Amendment

SNF – Riceboro

Permit No.: 2899-179-0011-V-04-3

INSIGNIFICANT ACTIVITIES CHECKLIST

| Category | Description of Insignificant Activity/Unit | Quantity |
|------------------------------------|---|----------------------------|
| Storage Tanks and Equipment | 1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored. | 56 62 |
| | 2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid. | Plant-wide as needed |
| | 4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons. | Plant-wide as needed |
| | 7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia). | 433 |

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

| Description of Emission Units / Activities | Quantity |
|---|-----------|
| Chemtall – Tannin process in Reactor R5 at Solutions Plant | 1 |
| Chemtall – Wet Strength product reactors WSR1 (R6), WSR2, and WSR3 at the Solutions Plant | 3 |
| Chemtall – Liquids Plant product lines associated with Scrubber CE10 | 1 |
| Chemtall – Cooling Tower Water Systems | 27 |
| Flocryl Acrylamide Plant – Propionaldehyde/butyraldehyde (PA) storage tanks (AM1-CS-PLD, AM2-CS-PLD, AM3-CS-PLD) | 3 |
| Flocryl Acrylamide Plant – Cooling Tower Water Systems | 3 |
| Flocryl Acrylates (North) Batch Plant – Cryogenic unit directly upstream of TO01 | 1 |
| Flocryl Acrylates (North) Continuous Plant – Cooling Tower Water System CT31 | 1 |
| Flocryl Acrylates (South) Continuous Plant – Cooling Tower Water System CT25 | |
| Flocryl Acrylates Continuous (South and AD6) Plant – Cryogenic units directly upstream of CT01 and CT02 | 2 |
| Flocryl CM Plant – Methyl chloride pressurized storage tank (MCL1, MCL2, MCL3, MCL4) | 4 |
| Flocryl CM Plant – Inhibitor preparation tank (QT4_CP1-IB) | 1 |