PERMIT AMENDMENT NO. 2899-179-0011-V-03-B
ISSUANCE DATE: 03/18/2021

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:	**P.O. 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:
Re-permit the Flocryl Acrylates AD6 Batch Plant as a continuous plant, the Flocryl Acrylates AD6 Continuous Plant (AD6 plant). In addition, the facility proposes to modify equipment at the AD6 plant.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division.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-03-0.** 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 App No. 503345 dated **October 13, 2020**; any other applications upon which this Amendment or Permit No. **2899-179-0011-V-03-0** 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 **22** pages.

STATE OF GEORGIA
CONSTITUTION
WISDOM JUSTICE MODERATION
1776

Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

The facility proposes the following new and modified sources:

- Re-permit the Flocryl Acrylates AD6 Batch Plant as a continuous plant, the Flocryl Acrylates AD6 Continuous Plant (AD6 plant).
- Modify the permitted capacity for thermal oxidizer TO02, which is permitted to control emissions from the AD6 plant, and change the designation to CT02.
- Modify the number and capacities for raw material, process, and product storage tanks, previously permitted as part of the batch AD6 plant.
- Modify the permitted capacity for AD6 plant boilers B203, B204, and B205.
- Increase the product production capacity of the existing Flocryl Acrylates Continuous (South) Plant.
- Permit trailer loading operations for the existing Flocryl Acrylates Batch (North) and Continuous (South) Plants.
- Remove two permitted filtration operations for the Flocryl Acrylamide Plant lines.
- Remove Emulsion Plant Phase I lines and associated scrubber CE5, which are being permanently removed from operation. The throughput for some raw material storage tanks associated with the Phase I lines will decrease.
- Group production for lines venting to each permitted Emulsion Plant scrubber as one source and group production for lines venting to atmosphere as one source.
- Permit Emulsion Plant Line 32 (EM32) to produce only emulsion products and change the designation for scrubber CE8A/B to CE3A/B to be consistent with plant terminology.
- Modify performance testing requirements for Emulsion Phase III Scrubber SE3A/B and Liquids Phase IV Scrubber CE4A/B.
- Remove fines dryers and associated dust collectors installed as part of Powder Plants P8 (UH) and P9 (UJ).
- Modify, install, and remove various insignificant activities and equipment.

In addition, the facility proposes to incorporate off-permit changes since the last permit modification.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

None applicable.

2.2 Facility Wide Federal Rule Standards

None applicable.

2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

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.B Updated Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
FLOCRYL ACRYLATES CONTINUOUS PLANT					
FLOCAD6 – Flocryl Acrylates Continuous Plant (AD6)					
AD6 M3	Continuous Transesterification/Distillation/ Catalyst Recovery Process No. 3 Alcohol Co-Product Purification Process	40 CFR 63 Subpart FFFF[1] 40 CFR 60 Subpart RRR 40 CFR 60 Subpart NNN	3.3.9 through 3.3.12, 3.3.15, 3.3.17, 3.3.43, 4.2.1, 4.2.14, 5.2.1, 5.2.6, 6.1.7, 6.2.10 through 6.2.13, and 6.2.15 through 6.2.19*	CT02	Thermal Oxidizer
T10A T10B T175	Alcohol Co-Product Tank Alcohol Co-Product Tank Recycle Reactant Tank	40 CFR 63 Subpart FFFF[1]	3.3.11, 3.3.12, 3.3.15, 3.3.17, 3.3.43, 4.2.1, 4.2.14, 5.2.1, 5.2.6, 6.1.7, 6.2.10 through 6.2.13, and 6.2.15 through 6.2.19*	CT02	Thermal Oxidizer
T020	Hexane Storage Tank	40 CFR 63 Subpart FFFF[1]	3.3.11, 3.3.12, 3.3.16, 3.3.17, 3.3.43, 4.2.1, 4.2.14, 5.2.1, 5.2.6, 6.1.7, 6.2.10 through 6.2.13, and 6.2.15 through 6.2.19*	CT02	Thermal Oxidizer
T50A T50B	Methyl Acrylate Storage Tanks	40 CFR 60 Subpart Kb	5.2.13, 5.2.14, 6.2.64*	CT02	Thermal Oxidizer
T151	Evaporator Bottoms Tank	40 CFR 63 Subpart FFFF[4]	3.3.11, 3.3.12, 3.3.17, 3.3.43, 4.2.1, 4.2.14, 5.2.1, 5.2.6, 6.1.7, 6.2.10 through 6.2.13, and 6.2.15 through 6.2.19*	CT02	Thermal Oxidizer
T290 T291	Shutdown Tanks	40 CFR 63 Subpart FFFF[4]	3.3.11, 3.3.12, 3.3.17, 3.3.43, 4.2.1, 4.2.14, 5.2.1, 5.2.6, 6.1.7, 6.2.10 through 6.2.13, and 6.2.15 through 6.2.19*	CT02	Thermal Oxidizer
FUGAD6 – Fugitive Emissions from Equipment Leaks for Flocryl Acrylates Continuous Plant (AD6)					
FALA FFLA FFOA PRLA FPLA FPOA FVLA FVOA	Agitators Flanges Flanges Pressure Relief Devices Pumps Pumps Valves Valves	40 CFR 63 Subpart FFFF 40 CFR 63 Subpart UU 40 CFR 60 Subpart VVa	3.3.11 through 3.3.13, 3.3.19, 3.3.56 through 3.3.69, 4.2.16, 6.2.10 through 6.2.13, and 6.2.37 through 6.2.41*	None	None
Other (South and AD6)					
N/A	Alcohol Co-Product Transfer Operations	40 CFR 63 Subpart FFFF[1]	3.3.11, 3.3.12, 3.3.18, and 6.2.10 through 6.2.12*	None	Vapor Balance System
N/A	Process Wastewater	40 CFR 63 Subpart FFFF[2,5]	3.3.11, 3.3.12, 3.3.20, 6.2.7, and 6.2.10 through 6.2.12*	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
N/A	Maintenance Wastewater	40 CFR 63 Subpart FFFF	3.3.11, 3.3.12, 3.3.21, ~~and~~ 6.2.8, and 6.2.10 through 6.2.12*	None	None
N/A	Cooling Tower System	40 CFR 63 Subpart FFFF	3.3.11, 3.3.12, 3.3.22, 5.2.7, and 6.2.9 through 6.2.12*	None	None
FLOCRYL ACRYLATES BATCH PLANT					
~~FLOB - Flocryl Acrylates Batch Process (AD6)~~					
~~R6~~ ~~D6~~ ~~RC6~~ ~~M3~~ ~~T307~~ ~~T622~~ ~~T623~~ ~~TSD1~~	~~Batch Reactor Process R6~~ ~~Product Distillation Process D6~~ ~~Catalyst Recovery Process RC6~~ ~~No. 3 Alcohol Co-Product Purification Process~~ ~~Alcohol Co-Product Wash Tank~~ ~~Alcohol Co-Product Water Tank~~ ~~Alcohol Co-Product Water Tank~~ ~~Shutdown Tank~~	~~40 CFR 63 Subpart FFFF~~[1]	~~3.3.23, 3.3.24, 3.3.26, 3.3.28, 3.3.43, 4.2.2, 4.2.14, 5.2.1, 5.2.6, 6.1.7, 6.2.10 through6.2.13, 6.2.15 through 6.2.19, and 6.2.63*~~	~~TO02~~	~~Thermal Oxidizer~~
~~T222~~ ~~T223~~	~~Alcohol Co-Product Storage Tank~~ ~~Alcohol Co-Product Storage Tank~~	~~40 CFR 63 Subpart FFFF~~[1]	~~3.3.23, 3.3.24, 3.3.27, 3.3.28, 3.3.43, 4.2.2, 4.2.14, 5.2.1, 5.2.6, 6.1.7, 6.2.10 through 6.2.13, 6.2.15 through6.2.19, and 6.2.63*~~	~~TO02~~	~~Thermal Oxidizer~~
~~THX1~~	~~Hexane Storage Tank~~	~~40 CFR 63 Subpart FFFF~~[1]	~~3.3.23, 3.3.24, 3.3.27, 3.3.28, 3.3.43, 4.2.2, 4.2.14, 5.2.1, 5.2.6, 6.1.7, 6.2.10 through 6.2.13, 6.2.15 through 6.2.19, and 6.2.63*~~	~~TO02~~	~~Thermal Oxidizer~~
~~V551~~	~~Catalyst Residue Tank~~	~~40 CFR 63 Subpart FFFF~~[2]	~~3.3.23, 6.2.10 through 6.2.13, and 6.2.63*~~	~~None~~	~~None~~
~~TMA1~~ ~~TMA2~~	~~Methyl Acrylate Storage Tanks~~	~~40 CFR 60 Subpart Kb~~	~~5.2.1, 6.1.7, and 6.2.63*~~	~~TO02~~	~~Thermal Oxidizer~~
FUGB - Fugitive Emissions from Equipment Leaks for Flocryl Acrylates Batch Plant (North ~~and AD6~~)					
FAL FFL FFO FPL FPO FRL FVL FVO	Agitators Flanges Flanges Pumps Pumps Pressure Relief Devices Valves Valves	~~North and AD6 Plants~~ 40 CFR 63 Subpart FFFF 40 CFR 63 Subpart UU ~~North Plant~~ 40 CFR 60 Subpart VV ~~AD6 Plant~~ ~~40 CFR 60 Subpart VVa~~	3.3.23 through 3.3.25, 3.3.30, 3.3.56 through 3.3.69, 4.2.16, 6.2.10 through 6.2.12, and 6.2.37 through 6.2.41*	None	None
Other (North ~~and AD6~~)					
N/A	Alcohol Co-Product Transfer Operations	40 CFR 63 Subpart FFFF[1]	3.3.23, 3.3.24, 3.3.29~~39~~, and 6.2.10 through 6.2.12~~13~~*	None	Vapor Balance System
N/A	Process Wastewater	40 CFR 63 Subpart FFFF[2,5]	3.3.23, 3.3.24, 3.3.31, 6.2.7, and 6.2.10 through 6.2.~~13~~	None	None
N/A	Maintenance Wastewater	40 CFR 63 Subpart FFFF	3.3.23, 3.3.24, 3.3.32, 5.2.7, and ~~6.2.9~~ 6.2.10 through 6.2.~~13~~12*	None	None
N/A	Cooling Tower System	40 CFR 63 Subpart FFFF	3.3.23, 3.3.24, 3.3.33, 5.2.7, and 6.2.9 through 6.2.~~13~~12*	None	None
FLOCRYL ACRYLATES BATCH (NORTH) AND CONTINUOUS (SOUTH) PLANTS					
Other – (North and South)					
DTLO	Decanter Bottoms Trailer Loading Operations	40 CFR 63 Subpart FFFF[5]	3.3.11, 3.3.12, 3.3.20, 3.3.23, 3.3.24, 3.3.31, 6.2.10, and 6.2.12*	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
CHEMTALL PLANT					
PP – Powder Plant					
PPRL	Powder Plant Railcar Loading Station	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.4, 5.2.5, and 6.1.7*	CPRC	Dust Collector
EM – Emulsion Plant					
~~EM1~~ ~~EM1A~~ ~~EM2~~ ~~EM4~~ ~~EM5~~ ~~EM8~~ ~~EM11~~ ~~EM12~~ ~~EM14 through EM16~~	~~Emulsion Plant Phase I Lines 1, 1A, 2, 4, 5, 8, 11, 12, and 14-16~~	~~40 CFR 63 Subpart FFFF~~[2]	~~3.3.34 and 6.2.10 through 6.2.12*~~	~~None~~	~~None~~
~~EM6~~ ~~EM7~~ ~~EM9~~ ~~EM10~~	~~Emulsion Plant Phase I Lines 6, 7, 9, and 10~~	~~40 CFR 63 Subpart FFFF~~[2]	~~3.2.7, 3.3.34, 5.2.2, 6.1.7, 6.2.10 through 6.2.12, 6.2.23, and 6.2.24*~~	~~CE5~~	~~Packed-Bed Scrubber~~
EM32	Emulsion Plant Phase II Line 32	40 CFR 63 Subpart FFFF[2]	3.3.34, 5.2.2, 6.1.7, and 6.2.10 through 6.2.12*, ~~6.2.62*~~	~~CE8A~~ CE3A ~~CE8B~~ CE3B	Packed-Bed Scrubber

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

[1]Group 1 source. [2]Group 2 source. [3]Group 1 source ~~for~~ when using MMA/Group 2 source ~~for~~ when using MA but controlled at all times. ~~[4]Not subject to regulation but controlled at all times.~~ ~~[4]Not subject to regulation but controlled at all times.~~ [4]These tanks will vent to the thermal oxidizer at all times to demonstrate compliance with 40 CFR 63 Subpart FFFF. [5]If 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.

3.2 Equipment Emission Caps and Operating Limits

CHEMTALL PLANT

3.2.7 DELETED.

~~The Permittee shall not discharge or cause the discharge into the atmosphere from Emulsion Plant Lines 6, 7, 9, and 10 (Source Code EM6, EM7, EM9, and EM10) through Stack SE53 any gases which:~~

~~[Toxic Guideline 391-3-1-.02(2)(a)1]~~

~~a. Contain acrylamide in excess of 28.2 pounds during any consecutive 12-month period.~~

~~b. Contain acrylic acid in excess of 21.3 pounds duing any consecutive 12-month period.~~

3.3 Equipment Federal Rule Standards

MODIFIED CONDITION

3.3.11 The Permittee shall comply with all applicable provisions of the National Emission Standard for Hazardous Air Pollutants (NESHAP) as found in 40 CFR Part 63 Subpart A – "General Provisions" and 40 CFR 63 Subpart FFFF – "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing" for the operation of the Flocryl Acrylates Continuous Plant. The Permittee shall comply with the provisions of 40 CFR 63.2450(v) for applicable maintenance vents at the Flocryl Acrylates Continuous Plants. [40 CFR 63 Subpart FFFF]

FLOCRYL ACRYLATES CONTINUOUS PLANTS (SOUTH AND AD6 PLANTS)

MODIFIED CONDITION

3.3.12 The Permittee shall develop, implement, and maintain written startup, shutdown, and malfunction plans in accordance with 40 CFR 63.6(e)(3) for the Flocryl Acrylates Continuous (South) Plant as subject to 40 CFR 63 Subpart FFFF. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan maintained in accordance with 40 CFR 63.6(e)(3). See Condition 6.2.11.h for equipment/sources not required to be included in the SSMP. Prior to August 12, 2023, for the Flocryl Acrylates Continuous (AD6) Plant, the permittee may choose to comply with the requirements in this permit condition. As of August 12, 2023, this condition is no longer applicable for the South or AD6 Plants.
[40 CFR 63.6(e)(1)(ii), and 40 CFR 63.6(e)(3), and 40 CFR 63 Subpart FFFF 63.2445(a)]

MODIFIED CONDITION

3.3.13 The Permittee shall comply with the following conditions:

a. The Permittee shall comply with all applicable provisions of the New Performance Standards (NSPS) as found in 40 CFR 60 Subpart A – "General Provisions" and 40 CFR 60 Subpart VV – "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006" for the operation of the Flocryl Acrylates Continuous ~~Process~~ (South) Plant. [40 CFR 60 Subpart VV]

b. The Permittee shall comply with all applicable provisions of the New Performance Standards (NSPS) as found in 40 CFR 60 Subpart A – "General Provisions" and 40 CFR 60 Subpart VVa – "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006" for the operation of the Flocryl Acrylates Continuous (AD6) Plant.
[40 CFR 60 Subpart VVa]

MODIFIED CONDITION

3.3.15 The Permittee shall control organic HAP emissions from the Flocryl Acrylates Continuous Plant Group 1 process vents using the Flocryl Acrylates Continuous ~~Process~~ Plant Thermal Oxidizer (Source Code CT01 for the South Plant and Source Code CT02 for the AD6 Plant) as follows:
[40 CFR 63.2455(a) and 40 CFR 63.2535(h)]

a. reduce emissions of total organic HAP by at least 98 percent by weight by venting emissions through a closed-vent system to the control device; or

b. reduce emissions to an outlet concentration less than or equal to 20 ppmv as organic HAP or TOC by venting emissions through a closed-vent system to the control device.

For equipment subject to 40 CFR 60 Subpart NNN or RRR, the Permittee must consider all total organic compounds, minus methane and ethane, in such equipment for the purposes of compliance with 40 CFR 63 Subpart FFFF as if they were organic HAP. Compliance with the provisions of 40 CFR 63 Subpart FFFF as described in 40 CFR 63.2535(h) constitutes compliance with 40 CFR 60 Subparts NNN and RRR.

MODIFIED CONDITION

3.3.16 The Permittee shall reduce total HAP emissions from Group 1 storage tanks at the Flocryl Acrylates Continuous Plant by a minimum of 98 percent by weight or to a concentration of 20 ppm or less as TOC or total organic HAP by venting the emissions through a closed vent system to each respective Flocryl Acrylates Continuous ~~Process~~ Plant Thermal Oxidizer (Source Code CT01 for the South Plant and Source Code CT02 for the AD6 Plant). The emission limit for tanks does not apply during periods of planned routine maintenance. Periods of planned routine maintenance of each control device, during which the control device does not meet the emission limit, must not exceed 240 hours per year.
[40 CFR 63.2470(a) and (d); 40 CFR 63.2450(c)(2)(ii); 391-3-1-.03(2)(c)]

MODIFIED CONDITION

3.3.19 The Permittee shall comply with the provisions of 40 CFR 63 Subpart UU for equipment leads at the Flocryl Acrylates Continuous Plant as described in Conditions 3.3.56 through 3.3.69, 4.2.16, and 6.2.37 through 6.2.41 as required under 40 CFR 63 Subpart FFFF. For equipment subject to 40 CFR 60 Subpart VV or 40 CFR 60 Subpart VVa for which the Permittee has elected to comply with 40 CFR 63 Subpart UU, the Permittee must consider all total organic compounds, minus methane and ethane, in such equipment for purposes of compliance with 40 CFR 63 Subpart UU as if they were organic HAP.
[40 CFR 63.2480(a) and 40 CFR63.2535(k)]

MODIFIED CONDITION

3.3.20 The Permittee shall comply with the record keeping and reporting requirements specified in Condition 6.2.7 for Group 1 and Group 2 process wastewater streams subject to 40 CFR 63 Subpart FFFF at the Flocryl Acrylates Continuous Plants.
[40 CFR 63.2485]

FLOCRYL ACRYLATES BATCH PLANT (NORTH ~~AND AD6 PROCESSES~~)

MODIFIED CONDITION

3.3.25 ~~The Permittee shall comply with the following conditions:~~

~~a.~~ The Permittee shall comply with all applicable provisions of the New Performance Standards (NSPS) as found in 40 CFR 60 Subpart A – "General Provisions" and 40 CFR 60 Subpart VV – "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006" for the operation of the Flocryl Acrylates Batch Plant (North). [40 CFR 60 Subpart VV]

~~b. The Permittee shall comply with all applicable provisions of the New Performance Standards (NSPS) as found in 40 CFR 60 Subpart A "General Provisions" and 40 CFR 60 Subpart VVa "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006" for the operation of the Flocryl Acrylates Batch Plant (AD6). [40 CFR 60 Subpart VVa]~~

MODIFIED CONDITION

3.3.26 The Permittee shall control organic HAP emissions from the Flocryl Acrylates Batch ~~Process~~ Plant Group 1 process vents subject to 40 CFR 63 Subpart FFFF using the Flocryl Acrylates Batch Plant Thermal Oxidizer (Source Code TO01 ~~and Source Code TO02 for the AD6 Process~~) as follows:

a. Reduce collective uncontrolled organic HAP emissions (as TOC or total organic HAP) from the sum of all batch process vents by at least 98 percent by weight by venting emissions from a sufficient number of vents through a closed vent system to the control device; or
[40 CFR 63.2460(a), Table 2 Option 1.a. of 40 CFR 63 Subpart FFFF]

b. Reduce uncontrolled organic HAP emissions from one or more batch process vents to an outlet concentration less than or equal to 20 ppmv as TOC or total organic HAP by venting through a closed vent system to the control device. For all other batch process vents, the Permittee shall reduce collective organic HAP emissions as specified in paragraph a. of this condition.
[40 CFR 63.2460(a), Table 2 Option 1.c. of 40 CFR 63 Subpart FFFF]

MODIFIED CONDITION

3.3.27 The Permittee shall reduce total HAP emissions from Group 1 storage tanks at the Flocryl Acrylates Batch ~~Process~~ Plant subject to 40 CFR 63 Subpart FFFF using the applicable Thermal Oxidizer (Source Code TO01 ~~for the North Plant and Source Code TO02 for the AD6 Plant~~) as follows:

a. Reduce total HAP emissions by a minimum 98 percent by weight; or
[40 CFR 63.2450(c)(2), 40 CFR 63.2470(a), Table 4 Option 1. a. or Option 1.b.ii of 40 CFR 63 Subpart FFFF]

b. Reduce total HAP emissions to a concentration of 20 ppmv or less as TOC or organic HAP
[40 CFR 63.2450(c)(2), 40 CFR 63.2470(a), Table 4 Option 1. a. or Option 1.b.ii of 40 CFR 63 Subpart FFFF]

c. The emission limits in paragraph a. and b. do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of each control device, during which the control device does not meet the emission limit, must not exceed 240 hours per year.
[40 CFR 63.2470(d), Table 4 Option 1. a. or Option 1.b.ii of 40 CFR 63 Subpart FFFF]

MODIFIED CONDITION

3.3.30 The Permittee shall comply with the provisions of 40 CFR 63 Subpart UU for equipment leaks at the Flocryl Acrylates Batch Plant (Equipment Group FUGB) as described in Conditions 3.3.56 through 3.3.69, 4.2.16, and 6.2.37 through 6.2.41 as required under 40 CFR 63 Subpart FFFF. The Permittee may elect to comply with the provisions of 40 CFR 63.2480(b)(1) through (5) as an alternative to the provisions of Subpart UU. The provisions of 40 CFR 63.2480(b)(4) and (5) as follows:
[40 CFR 63.2480(a) and (b); 40 CFR 63.2535(k)]

a. For connectors in gas/vapor and light liquid service at an existing source, the Permittee may elect to comply with the requirements in Condition 3.3.65 for connectors in heavy liquid service, including all associated recordkeeping and reporting requirements, rather than the requirements Condition 3.3.63. [40 CFR 63.2480(b)(4)]

b. For pumps in light liquid service in an MCPU that has no continuous process vents and is part of an existing source, the Permittee may elect to consider the leak definition that defines a leak to be 10,000 parts per million (ppm) or greater as an alternative to the values specified in Condition 3.3.62.a.ii.
[40 CFR 63.2480(b)(5)]

For equipment subject to 40 CFR 60 Subpart VV ~~or 40 CFR 60 Subpart VVa~~ for which the Permittee has elected to comply with 40 CFR 63 Subpart UU, the Permittee must consider all total organic compounds, minus methane and ethane, in such equipment for purposes of compliance with 40 CFR 63 Subpart UU as if they were organic HAP.

MODIFIED CONDITION

3.3.31 The Permittee shall comply with the record keeping and reporting requirements specified in Condition 6.2.7 for Group 1 and Group 2 process wastewater streams subject to 40 CFR 63 Subpart FFFF at the Flocryl Acrylates Batch Plant.
[40 CFR 63.2485]

MODIFIED CONDITION

3.3.81 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A – "General Provisions" and 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984" as applicable to the Flocryl ~~Batch~~ Continuous (AD6) Plant.
[40 CFR 60 Subparts A and Kb]

MODIFIED CONDITION

3.3.82 The Permittee shall equip storage vessels ~~TMA1~~ T50A and ~~TMA2~~ T50B (associated with Flocryl Acrylates ~~Batch~~ Continuous (AD6) Plant) with a closed vent system and control device meeting the following specification:

a. A closed vent system designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in 40 CFR 60.485(b).
[40 CFR 60.112b(a)(3)(i)]

b. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater.
[40 CFR 60.112b(a)(3)(ii)]

PART 4.0 REQUIREMENTS FOR TESTING

4.2 Specific Testing Requirements

FLOCRYL ACRYLATES CONTINUOUS (AD6) PLANT

MODIFIED CONDITION

4.2.1 ~~[Reserved]~~
Within 150 days of the startup of the Flocryl Acrylates Continuous AD6 Plant, the facility shall conduct performance testing for applicable Flocryl Acrylates Continuous (AD6) Plant process vents and storage tanks venting to the thermal oxidizer (Source code CT02). The performance test shall be conducted in accordance with the provisions of 40 CFR 63.2450(g), 40 CFR 63 Subpart SS, and any other applicable provisions of 40 CFR 63 Subpart FFFF. The Permittee shall establish operating limits for the thermal oxidizer.
40 CFR 63.2450(g); 391-3-1-.02(3) and 391-3-1-.03(2)(c)

FLOCRYL ACRYLATES BATCH PLANT

MODIFIED CONDITION

4.2.2 Performance testing for the Flocryl Acrylates ~~Batch Plant shall be conducted in accordance with the following:~~

~~a.~~ ~~For the~~ Batch Plant (North) process vents and storage tanks shall be conducted 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 following a change in the worst case emissions profile. The Permittee shall establish operating limits for the Flocryl Acrylates Batch Plant (North) Thermal Oxidizer (Source Code TO01).

~~b.~~ ~~Within 150 days of the date of startup of the Flocryl Acrylates Batch AD6 Plant, the facility shall conduct performance testing for Flocryl Acrylates Batch AD6 Plant process vents and storage tanks. The performance test shall be conducted in accordance with the provisions of 40 CFR 63.2450(g), 40 CFR 63.2460(c), 40 CFR 63 Subpart SS, an any other applicable provisions of 40 CFR 63 Subpart FFFF. The Permittee shall establish operating limits for the Flocryl Acrylates Batch AD6 Plant Thermal Oxidizer (Source Code TO02).~~
~~[40 CFR 63 Subpart FFFF; 40 CFR 63.2450(g) and 63.2460(c)]~~

CHEMTALL PLANT

MODIFIED CONDITION

4.2.12 For the purposes of Conditions 4.2.7 through 4.2.~~10~~9, if the Permittee constructs and starts up permitted production lines in phases, performance testing is required for the startup of each phase if there will be a change to the operating conditions from those that occurred during a previous compliance test that would result in a new worst case emissions scenario. A phase means the startup of one or more lines but not all permitted lines. The test shall be conducted within 60 days after achieving the maximum production rate for the new phase of line(s), but no later than 180 days after startup of the new phase of line(s).

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

MODIFIED CONDITION

5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

FLOCRYL ACRYLATES CONTINUOUS ~~PROCESS~~ PLANTS

a. Monitoring shall be conducted as follows:

i. Temperature for the Flocryl Acrylates Continuous ~~Process~~ (South) Plant Thermal Oxidizer (Source Code CT01) at the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. The temperature monitor shall be operated and maintained in accordance with 40 CFR 63.2450(k) and 40 CFR 63 Subpart SS. The temperature data shall be maintained in accordance with Conditions 6.2.16 and 6.2.17.
[40 CFR 63.2450(k) and 40 CFR 63.988(c)(1)]

ii. Temperature for the Flocryl Acrylates Continuous (AD6) Plant Thermal Oxidizer (Source Code CT02) at the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. The temperature monitor shall be operated and maintained in accordance with 40 CFR 63.2450(k) and 40 CFR 63 Subpart SS. The temperature data shall be maintained in accordance with Conditions 6.2.16 and 6.2.17.
[40 CFR 63.2450(k) and 40 CFR 63.988(c)(1)]

FLOCRYL ACRYLATES BATCH ~~PROCESS~~ PLANT

b. ~~Monitoring shall be conducted as follows:~~

i. Temperature for the Flocryl Acrylates Batch ~~Process~~ (North) Plant Thermal Oxidizer (Source Code TO01) at the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. The temperature monitor shall be operated and maintained in accordance with 40 CFR 63.2450(k) and 40 CFR 63 Subpart SS. The temperature data shall be maintained in accordance with Conditions 6.2.16 and 6.2.17.
[40 CFR 63.2450(k) and 40 CFR 63.988(c)(1)]

~~ii. Temperature for the Flocryl Acrylates Batch Process (AD6) Thermal Oxidizer (Source Code TO02) at the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. The temperature monitor shall be operated and maintained in accordance with 40 CFR 63.2450(k) and 40 CFR 63 Subpart SS. The temperature data shall be maintained in accordance with Conditions 6.2.16 and 6.2.17.
[40 CFR 63.2450(k) and 40 CFR 63.988(c)(1)]~~

5.2.1.c and 5.2.1.f – No Changes

MODIFIED CONDITION

5.2.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

5.2.2.a and 5.2.2.b – No Changes

CHEMTALL PLANT

c. DELETED.
~~Pressure drop, scrubbant flow rate, and scrubbant pH for Scrubber CE5. Data shall be recorded once per shift of operation.~~
~~[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]~~

5.2.2.d through 5.2.2.s – No Changes

t. Pressure drop (stages A and B combined), scrubbant flow rate (stages A and B combined), and scrubbant pH (for each stage) for Scrubber ~~CE8A/CE8B~~ CE3A/CE3B ~~when producing emulsion products that contain acrylamide and/or acrylic acid~~.

MODIFIED CONDITION

5.2.13 The Permittee shall submit for approval by the Division an operating plan, for the closed vent system and control device through which storage tanks ~~TMA1~~ T50A and ~~TMA2~~ T50B exhaust, that contains the information specified in 40 CFR 60.113b(c)(1). The Permittee shall submit the operating plan to the Division within 30 days of startup of either storage tank ~~TMA1~~ T50A and ~~TMA2~~ T50B.
[40 CFR 60.7(a) and 40 CFR 60.113b(c)(1)]

MODIFIED CONDTION

5.2.14 The Permittee shall operate the closed vent system and control device (thermal oxidizer ~~TO02~~CT02) through which storage tanks ~~TMA1~~ T50A and ~~TMA2~~ T50B exhaust and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Division in accordance with 40 CFR 60.113(b)(c)(1).
[40 CFR 60.113b(c)(2)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

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)]

6.1.7.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)

6.1.7.b.i – No Changes

CHEMTALL PLANT

ii. DELETED.
~~Any 12-month rolling period during which the acrylamide or acrylic acid emissions from Emulsion Plant Lines 6, 7, 9, and 10 (Source Codes EM6, EM7, EM9, and EM10), calculated in accordance with Condition 6.2.24, is in excess of the limit in Condition 3.2.7.~~
~~[Toxic Guideline – 391-3-1-.02(2)(a)1]~~

6.1.7.b.iii through 6.1.7.b.xv – No Changes

c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

6.1.7.c.i and 6.1.7.c.ii – No Changes

FLOCRYL ACRYLATES CONTINUOUS PLANTS (SOUTH AND AD6)

iii. With regard to the Flocryl Acrylates Continuous Plant:

(A) Any daily average temperature for the Flocryl Acrylates Continuous ~~Process~~ (South) Plant Thermal Oxidizer (Source Code CT01), measured and recorded in accordance with Condition 5.2.1.a.i, that is less than 1407 degrees Fahrenheit or the minimum established through subsequent performance testing. For the purposes of this condition, a "daily average" is defined as the 24-hour period from 12 am to 12 am (or other 24-hour period agreed upon by the Permittee and the Division).
[40 CFR 63.2455(a) and 63.2470(a); 40 CFR 63.997(e)(1), 40 CFR 63.998(b)(6)(i)]

(B) Any daily average temperature for the Flocryl Acrylates Continuous (AD6) Plant Thermal Oxidizer (Source Code CT02), measured and recorded in accordance with Condition 5.2.1.a.ii, that is less than the minimum temperature established through performance testing. For the purposes of this condition, a "daily average" is defined as the 24-hour period from 12 am to 12 am (or other 24-hour period agreed upon by the Permittee and the Division).
[40 CFR 63.2455(a) and 63.2470(a); 40 CFR 63.997(e)(1), 40 CFR 63.998(b)(6)(i)]

FLOCRYL ACRYLATES BATCH (NORTH) PLANT

iv. ~~With regard to the Flocryl Acrylates Batch Plant:~~

~~(A)~~ Any daily average temperature for the Flocryl Acrylates Batch (North) ~~Process~~ Plant Thermal Oxidizer (Source Code TO01), measured and recorded in accordance with Condition 5.2.1.b~~.i~~, that is less than 1406 degrees Fahrenheit or the minimum temperature established through subsequent performance testing. For the purposes of this condition, a "daily average" is defined as the 24-hour period from 12 am to 12 am (or other 24-hour period agreed upon by the Permittee and the Division).
[40 CFR 63.2460(a) and 63.2470(a); 40 CFR 63.998(b)(6)(i)]

~~(B) Any daily average temperature for the Flocryl Acrylates Batch Process (AD6) Thermal Oxidizer (Source Code TO02), measured and recorded in accordance with Condition 5.2.1.b.ii, that is less than the minimum temperature established through performance testing. For the purposes of this condition, a "daily average" is defined as the 24-hour period from 12 am to 12 am (or other 24-hour period agreed upon by the Permittee and the Division).~~
~~[40 CFR 63.2460(a) and 63.2470(a); 40 CFR 63.998(b)(6)(i)]~~

6.1.7.c.v through 6.1.7.c.x – No Changes

CHEMTALL

xi. DELETED
~~Any three consecutive readings during which an operating parameter for Scrubber CE5, measured and recorded in accordance with Condition 5.2.2.e, is outside the following range of values:~~
~~[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]~~

~~(A) Scrubbant pH: 5.0 to 9.0.~~

~~(B) Pressure drop: 1.0 to 9.0 inches of water.~~

~~(C) Minimum scrubbant flow rate: 11 gpm.~~

6.1.7.c.xii through 6.1.7.c.xxix – No Changes

xxx. Any three consecutive readings during which an operating parameter for Scrubber ~~CE8A/B~~ CE3A/CE3B, measured and recorded in accordance with Condition 5.2.2.t, is outside the following range of values:

6.1.7.d – No Changes

6.2 Specific Record Keeping and Reporting Requirements

GROUP 1 AND GROUP 2 PROCESS WASTEWATER STREAMS SUBJECT TO 40 CFR 63 SUBPART FFFF

MODIFIED CONDITION

6.2.7 The Permittee shall:

a. For Group 2 wastewater streams complying with the provisions of 40 CFR 63.146 and 63.147 for the Flocryl Acrylates Continuous and Batch Plants and the Chemtall Plant, the Permittee shall keep the records below in a readily accessible location. The information shall also be submitted in any Notification of Compliance Status report required for the applicable equipment.
[40 CFR 63.2485, 40 CFR 63.146(b)(1) and 63.147(b)(8)]

~~a~~i. Process unit identification and description of the process unit.

~~b~~ ii. Stream identification code.

~~e~~iii. For existing sources, concentration of Table 9 (40 CFR 63 Subpart G) compound(s) in parts per million, by weight. For new sources, concentration of Table 8 and/or Table 9 (40 CFR 63 Subpart G) compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration.

~~d~~iv. Flow rate in liters per minute.

b. For Group 1 wastewater streams in the Flocryl Acrylates Continuous (South) and Batch (North) Plants and the Chemtall Plant, comply with applicable provisions of 40 CFR 63.2485, 63.146, and 63.147.

For the purposes of 40 CFR 63 Subpart FFFF, the compounds in Tables 8 and 9 of 40 CFR 63 Subpart FFFF apply rather than those in Table 9 of 40 CFR 63 Subpart G.

MODIFIED CONDITION

6.2.13 The Permittee shall submit a notification of compliance status report, no later than 150 days after startup of the Flocryl Acrylates ~~Batch~~ Continuous (AD6) Plant, as required by 40 CFR 63.2520(d).
[40 CFR 63.2520(d)]

CHEMTALL

MODIFIED CONDITION

6.2.23 The Permittee shall maintain monthly records of the types and amounts (in tons) of product produced in the Emulsion Plant Lines listed in Conditions ~~3.2.7~~ 3.2.8 ~~through~~ and 3.2.9.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

MODIFIED CONDITION

6.2.24 The Permittee shall use the emission factor data collected in accordance with performance testing and the production records required by Condition 6.2.23 to calculate monthly acrylamide and acrylic acid emissions from the Emulsion Plant Lines listed in Condition ~~3.2.7~~ 3.2.8 ~~through~~ and 3.2.9. The Permittee shall use the worst-case emission factor for each product unless additional testing has been conducted to establish specific factors for a particular product. The monthly totals shall be used to calculate 12-month rolling totals to demonstrate compliance with the limits in Conditions ~~3.2.7~~ 3.2.8 ~~through~~ and 3.2.9. For any month during which emissions exceed one twelfth of the applicable limit, the facility shall provide written notice to the Division. This written notice shall be submitted by the 30th of the month following the month that the total production exceeded the notification level. The written notification shall include the following:
[Toxic Guideline – 391-3-1-.02(2)(a)1]

a. The month in which the notification level was exceeded.

b. The total emissions for the month for the applicable pollutant.

c. The facility's plan to ensure that the applicable emission limit is not exceeded.

MODIFIED CONDITION

6.2.56 The Permittee shall furnish the Division written notification as follows for the operations at the Chemtall Plant. For the purpose of this Permit, "startup" shall mean the setting in operation of a source for its intended purpose.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. The actual date of the initial startup of Emulsion Plant Lines 41 and 42 (Source Codes EM41 and EM42) and Liquids Plant Lines 7 through 10 (Source Codes LQ07 through LQ10) within 15 days after such date.

b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the application for the equipment.

c. If performance testing following the startup of the new line(s) will not be required based on the scenario described in Permit Condition 4.2.12 where the worst case emissions scenario is not changing, a statement indicating as such shall be included in the notification.

NOTIFICATIONS

6.2.62 DELETED.
~~The Permittee shall maintain the following records when using Scrubber CE8A/CE8B as required in Condition 5.2.2.t for Emulsion Line EM32. The records shall be included with the report required by Condition 6.1.4.~~
~~[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]~~

~~a. The date and time of the change to using Scrubber CE8A/CE8B as required in Condition 5.2.2.t.~~

~~b. The number of hours of operation of Scrubber CE8A/CE8B as required in Condition 5.2.2.t.~~

MODIFIED CONDITION

6.2.63 The Permittee shall furnish the Division with written notification of the startup of the Flocryl Acrylates Continuous (AD6) Plant with associated control equipment (Source Code CT~~O~~02). The notification shall be postmarked within 15 days of such date.
[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]

MODIFIED CONDITION

6.2.64 The Permittee shall maintain the following records per 40 CFR Subpart Kb:

a. Maintain a copy of the operating plan required by Permit Condition 5.2.13 and a record of the measured values of the parameters monitored in accordance with Permit Condition 5.2.14.
[40 CFR 60.115b(c)]

b. Maintain readily accessible records showing the dimensions of storage vessels ~~TMA1~~ T50A and ~~TMA2~~ T50B and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)]

PART 7.0 OTHER SPECIFIC REQUIREMENTS

7.2 Off-Permit Changes Associated with this Amendment

App No.	Plant	Source Code	Description	Approved by EPD
27298	Chemtall Powder Plant	PPRL	Request to install a new Powder Plant railcar loading station to transfer product from bulk bags to railcars.	December 6, 2019
27357	Acrylamide Product Filtration Operations	AM2_C1_RG AM2_C2_RG	Request to modify Flocryl Acrylamide Plant filtration operations to include a filter drying step.	January 14, 2020
27392	Chemtall Mannich Plant	LQ15 LQ16	Request to install two new reactors at the Mannich plant.	February 7, 2020
27483	Chemtall Liquids Plant (Phase IV)	LQ11 LQ12	Request to modify product formulations and batch procedures for "Product G" produced in Liquids Lines 11 and 12.	April 20, 2020

7.4 Insignificant Activities Associated with this Amendment

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

Insignificant Activities Associated with this Amendment				
Source Code	**Capacity (gallons)**	**Contents**	**Installation Date**	**True Vapor Pressure (psia)**
T32*	Insignificant Activity	ADAM/MADAM	2004	$\leq$ 0.19 psia
T33*	Insignificant Activity	ADAM/MADAM	2004	$\leq$ 0.19 psia
T030A*	Insignificant Activity	ADAM	Proposed	$\leq$ 0.19 psia
T030B*	Insignificant Activity	ADAM	Proposed	$\leq$ 0.19 psia
T040A*	Insignificant Activity	DMOH	Proposed	$\leq$ 0.19 psia
T040B*	Insignificant Activity	DMOH	Proposed	$\leq$ 0.19 psia
AM2_C1-EL	Insignificant Activity	Washing water	Proposed	$\leq$ 0.19 psia
AM2_C2-EL	Insignificant Activity	Washing water	Proposed	$\leq$ 0.19 psia
AM2_C1-EP	Insignificant Activity	Recovery water	Proposed	$\leq$ 0.19 psia
AM2_C2-EP	Insignificant Activity	Recovery water	Proposed	< 0.19 psia
B01-C1-GE1	Insignificant Activity	Diesel fuel	2016	$\leq$ 0.5 psia

B06-C1-GE1*	Insignificant Activity	Diesel fuel	2020	≤ 0.5 psia
B07-C1-GE1*	Insignificant Activity	Diesel fuel	2020	≤ 0.5 psia
B14-C1-GE1*	Insignificant Activity	Diesel fuel	2016	≤ 0.5 psia
MP-C4-GAL	Insignificant Activity	Diesel fuel	Proposed	≤ 0.5 psia
MP-C5-GAL	Insignificant Activity	Diesel fuel	Proposed	≤ 0.5 psia
GT01*	Insignificant Activity	Diesel fuel	2016	≤ 0.5 psia
GT04*	Insignificant Activity	Diesel fuel	2020	≤ 0.5 psia
GT08*	Insignificant Activity	Diesel fuel	2020	≤ 0.5 psia
GT22	Insignificant Activity	Diesel fuel	2016	≤ 0.5 psia

*This equipment was included as an insignificant activity in previous permit applications. Equipment is requested to be modified or replaced. Since the emission increases for emergency generators not listed in this table are the result of a change to the calculation method and not from a physical change or change in the method of operation, those emission units were not included in this table. These emission units are included in the totals for stationary engines on the Insignificant Activities Checklist in Appendix B.

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.	
	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: 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	25
	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.	
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.	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	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.	

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.	
	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.	
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.	
	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: 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: 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.	

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.	~~53~~ 56
	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.	
	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.	
	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).	~~421~~ 422

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Chemtall – Chloromethylation (CM) Plant Inhibitor preparation tank (QT3_CP1-IB)	1
~~Chemtall – Concentrated Emulsions in Emulsion Plant Line 32~~	~~1~~
Chemtall – Liquids Plant reactors (LQ15, LQ16)	2
Flocryl Acrylates Continuous (AD6) Plant – ADAM product check tanks (T204A, T204B)	2
Flocryl Acrylates Continuous (AD6) Plant – Recycle catalyst tank (T085)	1
Flocryl Acrylates Continuous (AD6) Plant – Liquids catalyst mix tank (T400)	1
Flocryl Acrylates Continuous (AD6) Plant – Liquids catalyst day tank (T080)	1
Flocryl Acrylates Continuous (AD6) Plant – Inhibitor day tanks (T060, T070)	2
Flocryl Acrylates Continuous (AD6) Plant – Inhibitor mix tanks (T410, T420)	2
Flocryl Acrylates Continuous (AD6) Plant – Recycle water tank (T250)	1
Flocryl Acrylates Continuous (AD6) Plant – Catalyst residue tank (T090)	1
Flocryl Acrylamide Plant – Diatomaceous earth prep tanks (B02_CP1-DIA, B02_CP2-DIA)	2
Flocryl Acrylamide Plant – Diatomaceous earth hoppers (B02_TRE1-DIA, B02_TRE2-DIA)	2
Flocryl Acrylamide Plant – Filtration process collection tanks (AM2_C1-RG, AM2_C2-RG)	2

ATTACHMENT B (continued)

GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
~~ATBS/AMPS Solids Handling Operations in Emulsion Line 32 (Source Code AS32)~~	~~1~~	~~Yes~~	~~Yes~~	~~No~~

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d).Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	