Facility Name: **Trinseo LLC**
City: Dalton
County: Whitfield
AIRS #: 04-13-313-00054

Application #: TV-510046
Date Application Received: November 6, 2020
Permit No: 2822-313-0054-V-06-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name:Trinseo

2. Parent/Holding Company Name: Trinseo LLC

3. Previous and/or Other Name(s)

Styron, LLC
The Dow Chemical Company – Latex Plant
Dow Chemical, USA

4. Facility Location: 1468 Prosser Drive South East, Dalton, Georgia

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2822-313-0054-V-05-0	May 6, 2016	Title V Renewal Permit
2822-313-0054-V-05-1	December 29, 2016	Removal of non-applicable Subpart VVVVVV permit requirements.
Off Permit Change	November 2019	Partial replacement of heat removal equipment.

D. Process Description

1. SIC Codes(s)

2822 – Synthetic Rubber (Vulcanizable Elastomers)

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures latex to be used as an adhesive and polystyrene foam boardstock insulation.

3. Overall Facility Process Description

Trinseo LLC produces different emulsion polymers using styrene and 1,3-butadiene as the primary monomers. Other monomers are used to vary the characteristics of the polymer. The manufacturing process consists of the monomer and aqueous feeds to the reactor. Unreacted raw materials and diluents are then removed from the products via stripping and controlled with a thermal oxidizer.

Latex Plant
Aqueous raw materials are reacted with monomers to produce latex. The latex is refined, filtered, and screened before going to the storage area. Process emissions are vented to a thermal oxidizer followed by a caustic scrubber.

Storage Tank Farm
Volatile organic liquids are stored in bulk storage tanks. Pressurization and vapor balancing are used to minimize emissions.

Boiler
A boiler fired primarily on landfill gas or natural gas is used to produce plant steam. Distillate oil can be fired in the event gas fuel is not available.

Wastewater Treatment
Vapors emitted from the latex manufacturing process are hard piped to a recovery scrubber, which captures the volatile organic compounds (VOC) that are then sent back to the process for reuse. Excess water from recovery is sent to the wastewater treatment facility prior to discharge of effluent.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is classified as non-major with respect to PSD/NSR regulations. However, the Latex Plant is subject to a PSD threshold of 100 tpy because it is one of the 28 named PSD source categories (chemical process plants). The potential to emit of all pollutants from the plant are less than 100 tpy based on a combination of controls and operational limits.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM_{10}	✓			✓
$PM_{2.5}$	✓			✓
SO_2	✓			✓
VOC	✓			✓
NO_x	✓			✓
CO	✓			✓
TRS	✓			✓
H_2S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

40 CFR 63 Subpart U – *National Emissions Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins*

40 CFR 63 Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

40 CFR 63 Subpart VVVVVV – *National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Areas Sources*

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

The facility has taken synthetic minor limits for HAP to avoid being subject to 40 CFR 63 Subparts FFFF and DDDDD.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

The facility certified compliance with all applicable requirements with the submittal of Application No. 510046. No Compliance Plans were submitted.

D. Permit Conditions

Condition 2.1.1 limits the facility emissions of any single HAP or any combination of HAPs to 10 tons and 25 tons, respectively, per any consecutive twelve-month period.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
LATEX PLANT				
L001	Latex Process Line	391-3-1-.02(2)(a)1 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart U – Group 1 40 CFR 63 Subpart VVVVVV	T001 T002	Thermal Oxidizer Caustic Scrubber
L002	Pressure Vessels (V-700, V-8131)	40 CFR 63 Subpart U 40 CFR 63 Subpart VVVVVV	None	None
L003	Wastewater Treatment Operations	40 CFR 63 Subpart U [Group 2 Process Wastewater (D515A – Excess Recycle Water) and Maintenance Wastewater] 40 CFR 63 Subpart VVVVVV	None	None
L004	Routine Maintenance Process Operations	None	None	None
L005	Fugitive Leaks from Equipment (agitators, compressors, connectors, pressure relief devices, pumps, and valves)	40 CFR 63 Subpart U [40 CFR 63 Subpart H] 40 CFR 63 Subpart VVVVVV	None	None
L006	Small Monomer Storage Tanks (D-110, D-145, D-155)	40 CFR 63 Subpart U – Group 2 40 CFR 63 Subpart VVVVVV	None	None
L009	Subpart Kb Storage Tanks (D-120, V-100)	40 CFR 60 Subpart Kb 40 CFR 63 Subpart U 40 CFR 63 Subpart VVVVVV	None	None
L010	Heat Exchange Process Equipment	40 CFR 63 Subpart U 40 CFR 63 Subpart VVVVVV	None	None
ENGINES				
L011	Emergency Engines (Firewater Pumps and Emergency Generator)	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart ZZZZ	None	None
BOILER				
B003	Process Boiler No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 60 Subpart Dc	None	None

* 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.

The following changes were made to Table 3.1:

- **L002**: The description was changed from "Styrene Tank Farm and Transfer" to "Pressure Vessels (V-700, V-8131). Subparts U and VVVVVV were added to the applicable standards. The Thermal Oxidizer Caustic Scrubber (T001, T002) was removed as an air pollution control device.

- **L006**: The description was changed from "Acrylic Acid Storage Tank" to "Small Monomer Storage Tanks (D-110, D-145, D-155). 40 CFR 63 Subpart VVVVVV was added to the applicable standards.

- **L009**: The description was changed from "Acrylonitrile Storage Tank" to "Subpart Kb Storage Tanks (D-120, V-100). Georgia Rules 391-3-1-.02(2)(a)1, (b), and (g) were removed and 40 CFR 63 Subparts U and VVVVVV were added to the applicable standards. The Thermal Oxidizer Caustic Scrubber (T001, T002) was removed as an air pollution control device.

- **Storage Tank Farm**: This unit was removed. Tanks V002 through V006 currently only store latex and wastewater. Per 40 CFR 60.110b(b), 40 CFR 60 Subpart Kb does not apply to storage vessels storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa).

- **Engines**: Source Code L011 – Emergency Engines (Firewater Pumps and Emergency Generator) was added to the table, along with Georgia Rules 391-3-1-.02(2)(b) and (g) and 40 CFR 63 Subpart ZZZZ as applicable standards.

B. Equipment & Rule Applicability

Latex Plant

The Latex Plant has a number of emission points that are subject to 40 CFR 63 Subpart U. In addition to the specific requirements listed below, Subpart U requires the facility to conduct monitoring, maintain records, and submit reports that are used to demonstrate compliance.

Latex Process Line (Source Code L001) Process Vents

The Group 1 vents (continuous frontend process vents and aggregate batch vent streams) are required to be controlled to reduce total organic HAP by 98 weight-percent or to a concentration of 20 ppm and to reduce hydrogen halides / halogens by 95% or a rate less than 0.45 kg/hr. The vents are routed to a Thermal Oxidizer / Caustic Scrubber System.

Wastewater Operations (Source Code L003)

The Latex Plant produces maintenance wastewater and a Group 2 Process Wastewater Stream (D515A – Excess Recycle Water). The sources do not require add-on controls; however, the facility is required to comply with a number of record keeping requirements.

Fugitive Leaks from Equipment (Source Code L005)

40 CFR 63 Subpart U requires the facility to comply with 40 CFR 63 Subpart H for equipment leaks.

Heat Exchange Process Equipment (Source Code L010)

The facility is required to monitor the source for leaks. The Latex Plant is also subject to 40 CFR 63 Subpart VVVVVV, which requires the facility to reduce any uncontrolled emissions from all chemical manufacturing process units (CMPUs). The facility is also required to comply with several monitoring and record keeping requirements.

The Thermal Oxidizer / Caustic Scrubber System (Source Codes T001 and T002) associated with the Latex Plant is subject to the following rules and regulations:

Georgia Rule 391-3-1-.02(2)(a)1 – The system is subject to limits under a Toxic Impact Assessment;

Georgia Rule 391-3-1-.02(2)(b) – The opacity from the system is limited to less than 40 percent; and

Georgia Rule 391-3-1-.02(2)(g) – The sulfur content of the fuel burned in the thermal oxidizer is limited to less than 2.5 percent by weight.

Process Boiler No. 3 (Source Code B003)

The Process Boiler is subject to 40 CFR 60 Subpart Dc, which limits opacity to less than 20 percent and limits the sulfur content of fuel oil to 0.5 percent by weight. The unit is also subject to Georgia Rule 391-3-1-.02(2)(b) for opacity and particulate matter and Georgia Rule 391-3-1-.02(2)(g) for the sulfur content of fuel oil.

Storage Tanks

The table below lists each storage tank currently in use at the facility. For Subparts U and VVVVVV, the tanks are only subject to the recordkeeping requirements.

Emission Unit	Tank ID	Description	Regulation	Exemption Basis
L002	V-700	1,3-Butadiene Storage Vessel	Subpart U Subpart VVVVVV	Subpart U & VVVVVV: Per §63.482(b) and §63.11502(b), pressure vessels designed to operate in excess of 204.9 kilopascals (kPa) and without emissions to the atmosphere are not considered storage tanks.
L002	V-8131	Vinylidene Chloride Storage Vessel	Subpart U Subpart VVVVVV	Subpart U & VVVVVV: Per §63.482(b) and §63.11502(b), pressure vessels designed to operate in excess of 204.9 kilopascals (kPa) and without emissions to the atmosphere are not considered storage tanks. Subpart VVVVVV: Per Subpart VVVVVV Table 5, there are no control requirements for storage tanks that do not store HAPs listed in Table 1.
L006	D-110	Acrylic Acid	Subpart U Subpart VVVVVV	Subpart U: D-110 has a capacity of 10,000 gallons. Per 40 CFR 63 Subpart G Table 5 (via §63.484(a)), there are no control requirements for storage tanks smaller than 19,812.9 gallons. Subpart VVVVVV: Per 40 CFR 63 Subpart VVVVVV Table 5, there are no control requirements for storage tanks that do not store HAPs listed in Table 1 and there are no control requirements for storage tanks smaller than 20,000 gallons.

L006	D-145	Methyl Methacrylate, Butyl Acrylate, Acrylonitrile*	Subpart U Subpart VVVVVV	Subpart U: D-145 has a capacity of 7,135 gallons. Per 40 CFR 63 Subpart G Table 5 (via §63.484(a)), there are no control requirements for storage tanks smaller than 19,812.9 gallons. Subpart VVVVVV: Per 40 CFR 63 Subpart VVVVVV Table 5, there are no control requirements for storage tanks that do not store HAPs listed in Table 1 and there are no control requirements for storage tanks smaller than 20,000 gallons.
L006	D-155	Methyl Methacrylate, Butyl Acrylate, Acrylonitrile*	Subpart U Subpart VVVVVV	Subpart U: D-145 has a capacity of 7,135 gallons. Per 40 CFR 63 Subpart G Table 5 (via §63.484(a)), there are no control requirements for storage tanks smaller than 19,812.9 gallons. Subpart VVVVVV: Per 40 CFR 63 Subpart VVVVVV Table 5, there are no control requirements for storage tanks that do not store HAPs listed in Table 1 and there are no control requirements for storage tanks smaller than 20,000 gallons.
L009	D-120	Methyl Methacrylate, Butyl Acrylate, Acrylonitrile, Styrene	Subpart U Subpart VVVVVV Subpart Kb	Subpart U, VVVVVV and Kb: Per §63.482(b), §63.11502(b) and §60.110b(d)(2), pressure vessels designed to operate in excess of 204.9 kilopascals (kPa) and without emissions to the atmosphere are not considered storage tanks. Subpart VVVVVV: Per Subpart VVVVVV Table 5, there are no control requirements for storage tanks that do not store HAPs listed in Table 1. Subpart Kb: Per §60.110b(b), Subpart Kb does not apply to storage vessels storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa).
L009	V-100	Styrene Storage Vessel	Subpart U Subpart VVVVVV Subpart Kb	Subpart U: Per §63.484(b), storage vessels storing styrene are exempt from the storage vessel requirements. Subpart VVVVVV: Per Subpart VVVVVV Table 5, there are no control requirements for storage tanks that do not store HAPs listed in Table 1. Subpart Kb: Per §60.110b(b), Subpart Kb does not apply to storage vessels storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa).
L	V002-V006**	Storage Tanks	Subpart Kb	Subpart Kb: Per §60.110b(b), Subpart Kb does not apply to storage vessels storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa).

*The facility is requesting the flexibility to store Acrylonitrile in these tanks however, there are no current plans to bring Acrylonitrile on-site.

**Tanks were originally built for a different process. The tanks currently store latex and wastewater only.

C. Permit Conditions

The following table lists the changes made to conditions that appear in Section 3.0 of Permit No. 2822-313-0054-V-05-0. All conditions unchanged were held over from the previous permit and subsequent amendments.

Permit Condition	Original Condition		Notes
	Number	Permit	
3.2.1 – 3.2.2	3.2.1 – 3.2.2	V-05-0	No changes. These conditions contain specific emission limits for the Latex Plant Thermal Oxidizer/Caustic Scrubber System (T001 & T002) per the Toxic Guideline requirements.
3.2.3	3.2.3	V-05-0	No change. This is a 40 CFR 52.21 avoidance condition that limits fuel burned in Process Boiler No. 3 (B003).
3.3.1	3.3.1	V-05-0	No change. This condition requires the facility to comply with all applicable provisions of 40 CFR 63 Subpart U.
3.3.2	3.3.2	V-05-0	No change. This condition requires the facility to comply with all applicable provisions of 40 CFR 63 Subpart H.

Permit Condition	Original Condition		Notes
	Number	Permit	
3.3.3	3.3.3	V-05-0	No change. This condition requires the facility to comply with all applicable provisions of 40 CFR 63 Subpart A.
3.3.4	3.3.4	V-05-0	No change. This condition list specific compliance requirements per 40 CFR 63 Subpart U for the Latex Plant
3.3.5 – 3.3.25	3.3.5 – 3.3.25	V-05-0	No change. These conditions outline specific compliance requirements per 40 CFR 63 Subparts U and H for the Latex Plant for process vents, wastewater, and equipment leaks (pumps in light liquid service, compressors, pressure relief devices in gas/vapor service, sampling connection systems, open-ended valves or lines, valves in gas/vapor service and light liquid service, pressure relief devices in light liquid service, delay of repair, closed vent systems and control devices, agitators in light liquid service, connectors in gas/vapor service and light liquid service, quality improvement program for valves and pumps).,
3.3.26	3.3.26	V-05-0	No change. This condition requires the facility to comply with recordkeeping requirements per 40 CFR 63 Subpart U for the small monomer storage tanks (L006).
3.3.27	3.3.27	V-05-0	No change. This condition requires the facility to comply with 40 CFR Subpart U provisions for heat exchange systems (L010).
--	3.3.28	V-05-0	Deleted. Storage Tanks V002 through V006 currently only store latex and wastewater. Per 40 CFR 60.110b, Subpart Kb does not apply to storage vessels storing a liquid with a maximum true vapor pressure of less than 3.5 kPa. These tanks have been moved to the Insignificant Activities list in Attachment B of the permit.
3.3.28 – 3.3.30	3.3.29 – 3.3.31	V-05-0	No changes. These are 40 CFR 60 Subpart Dc requirements for Process Boiler No. 3 (B003).
3.3.31	--	V-06-0	This condition was added requiring only natural gas to be fired in Boiler No. 3 (B003) and limits the use of liquid fuels to specific times in order to avoid being subject to 40 CFR 63 Subpart JJJJJJ.
3.3.32 – 3.3.33	3.3.32 – 3.3.33	V-05-0	These conditions contain specific requirements for the Latex Plant storage tanks (L009) per 40 CFR 60 Subpart Kb. The description was changed from “Acrylonitrile” to “Subpart Kb.”
3.3.34	3.3.34	V-05-0	No change. This condition outlines emission standards requirements per 40 CFR 63 Subpart U for the Latex Plant.
3.3.35	3.3.35	V-05-0	No change. This condition requires the facility to comply with applicable provisions of 40 CFR 63 Subpart ZZZZ for the firewater pumps (L011).
3.3.36	3.3.36	V-05-0	No change. This condition requires the facility to comply with applicable provisions of 40 CFR 63 Subparts A and VVVVVV.
--	3.3.37 – 3.3.38	V-05-1	Deleted. These condition were removed under Amendment No. V-05-1 as they were no longer applicable.
3.3.37	3.3.39	V-05-0	No change. This condition outlines management practices per 40 CFR 63 Subpart VVVVVV.
--	3.3.40 – 3.3.42	V-05-1	Deleted. These condition were removed under Amendment No. V-05-1 as they were no longer applicable.
3.3.38	3.3.43	V-05-0	No change. This condition requires compliance with wastewater discharge and recordkeeping requirements per 40 CFR 63 Subpart VVVVVV.
3.4.1 – 3.4.2	3.4.1 – 3.4.2	V-05-0	No changes. These conditions limit the type of gas and visible emission and opacity from gases burned in the Latex Plant thermal oxidizer/caustic scrubber system (T001 & T002), respectively.
3.4.3	3.4.3	V-05-0	No change. This condition limits PM emissions from Process Boiler No. 3 (B003) to the calculated rate per the provided equation.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

The following table lists the changes made to conditions that appear in Section 4.0 of Permit No. 2822-313-0054-V-05-0. All conditions unchanged were held over from the previous permit and subsequent amendments.

Permit Condition	Original Condition		Notes
	Number	Permit	
4.2.1 – 4.2.5	4.2.1 – 4.2.5	V-05-0	No changes. These conditions outline testing requirements for process vents per 40 CFR 63 Subpart U.
4.2.6	4.2.6	V-05-0	No change. This condition outlines testing requirements for equipment leaks per 40 CFR 63 Subpart U.
4.2.7 – 4.2.12	4.2.7 – 4.2.12	V-05-0	No changes. These conditions outline testing requirements for leak inspections per 40 CFR 63 Subpart U.
4.2.13	4.2.13	V-05-0	No change. This condition lists 40 CFR 63 Subpart Dc testing requirements for Process Boiler No. 3 (B003).

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

The following table lists the changes made to conditions that appear in Section 5.0 of Permit No. 2822-313-0054-V-05-0. All conditions unchanged were held over from the previous permit and subsequent amendments.

Permit Condition	Original Condition		Notes
	Number	Permit	
5.2.1	5.2.1	V-05-0	No change. This condition lists specific monitoring parameters for the Latex Plant in accordance with 40 CFR 63 Subpart U requirements.
5.2.2	5.2.2	V-05-0	No change. This condition lists specific monitoring parameters for the Latex Plant and Process Boiler No. 3 (B003).
5.2.3 – 5.2.4	5.2.3 – 5.2.4	V-05-0	No changes. These conditions outline specific monitoring requirements per 40 CFR 63 Subpart U for the Latex Plant thermal oxidizer and caustic scrubber (T001 and T002), and heat exchange systems (L010), respectively.
5.2.5 – 5.2.6	5.2.5 – 5.2.6	V-05-0	No changes. These conditions are 40 CFR 60 Subpart Dc requirements for Process Boiler No. 3 (B003).
5.2.7	5.2.7	V-05-0	No change. This condition outlines inspection requirements for applicable CMPUs per 40 CFR 63 Subpart VVVVVV.
--	5.2.8 – 5.2.10	V-05-1	Deleted. These condition were removed under Amendment No. V-05-1 as they were no longer applicable.

C. Compliance Assurance Monitoring (CAM)

Not applicable.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

The following table lists the changes made to conditions that appear in Section 6.0 of Permit No. 2822-313-0054-V-05-0. All conditions unchanged were held over from the previous permit and subsequent amendments.

Permit Condition	Original Condition		Notes
	Number	Permit	
6.1.7	6.1.7	V-05-1	No changes. This condition lists excess emissions, exceedances, excursions that are to be included with the report required by Condition 6.1.4. Paragraph c.vi. was removed under Amendment No. 2822-313-0054-V-05-1.
6.2.1 – 6.2.2	6.2.1 – 6.2.2	V-05-0	No changes. These conditions contain specific record keeping and reporting requirements per the avoidance of 40 CFR 63 Subparts FFFF and DDDDD.
6.2.3 – 6.2.4	6.2.3 – 6.2.4	V-05-0	No changes. These conditions contain specific recordkeeping and reporting requirements for the Latex Plant.
6.2.5 – 6.2.8	6.2.5 – 6.2.8	V-05-0	No changes. These conditions contain specific recordkeeping and reporting requirements for the Latex Plant per the provisions of 40 CFR 63 Subpart U.
6.2.9 – 6.2.22	6.2.9 – 6.2.22	V-05-0	No changes. These conditions contain specific recordkeeping and reporting requirements for the Latex Plant Process Vents per the provisions of 40 CFR 63 Subpart U. They also contain requirements for equipment leaks per Subparts U and H.
6.2.23	6.2.23	V-05-0	No change. This condition contain specific recordkeeping and reporting requirements for the Latex Plant wastewater streams per the provisions of 40 CFR 63 Subpart U.
6.2.24	6.2.24	V-05-0	No change. This condition contain specific recordkeeping and reporting requirements for the Acrylic Acid Storage Tank (L006) per the provisions of 40 CFR 63 Subpart U.
6.2.25	6.2.25	V-05-0	No change. This condition contain specific recordkeeping and reporting requirements for the Latex Plant heat exchange systems (L010) per the provisions of 40 CFR 63 Subpart U.
--	6.2.26 – 6.2.27	V-05-0	Deleted. Storage Tanks V002 through V006 currently only store latex and wastewater. Per 40 CFR 60.110b, Subpart Kb does not apply to storage vessels storing a liquid with a maximum true vapor pressure of less than 3.5 kPa. These tanks have been moved to the Insignificant Activities list in Attachment B of the permit.
6.2.26 – 6.2.28	6.2.28 – 6.2.30	V-05-0	No changes, These condition outline specific records to be kept in accordance with 40 CFR 60 Subpart Dc requirements for Process Boiler No. 3 (B003).
6.2.29	6.2.40	V-05-0	No changes, This condition outlines specific records to be kept in accordance with 40 CFR 60 Subpart Dc requirements for Process Boiler No. 3 (B003).
6.2.30	6.2.31	V-05-0	No change. This condition requires the facility to determine fuel usage totals and notify the Division if usage exceeds the given limit per avoidance of 40 CFR 52.21.

Permit Condition	Original Condition		Notes
	Number	Permit	
6.2.31	6.2.32	V-05-0	No change. This condition requires the facility to determine monthly individual and total combined HAP emissions from Process Boiler No. 3 (B003) using specified records, per avoidance of 40 CFR 63 Subparts FFFF and DDDDD. The reference to Application No. 17903 was removed.
6.2.32	6.2.39	V-05-0	No change. This condition requires the facility to submit visible emissions observations conducted in accordance with Conditions 5.2.6 and 5.2.7.
6.2.33	--	V-06-0	This condition was added requiring the facility to keep records of all instances fuel oil is used in Process Boiler No. 3 (B003) in order to avoid being subject to 40 CFR 63 Subpart JJJJJJ.
6.2.34 – 6.2.39	6.2.33 – 6.2.38	V-05-0	No changes. These are specific recordkeeping requirements per 40 CFR 63 Subpart U.
6.2.40 – 6.2.43	6.2.41 – 6.2.44	V-05-0	No changes. These are specific recordkeeping requirements per 40 CFR 63 Subpart VVVVVV.
--	6.2.45 – 6.2.47	V-05-1	Deleted. These condition were removed under Amendment No. V-05-1 as they were no longer applicable.
6.2.44	6.2.48	V-05-0	No change. This condition outlines specific recordkeeping and reporting requirements for closed vent systems per 40 CFR 63 Subpart VVVVVV.
--	6.2.49	V-05-1	Deleted. This condition was removed under Amendment No. V-05-1 as it was no longer applicable.

VII. Specific Requirements

A. Operational Flexibility: The facility has requested the flexibility to store Acrylonitrile in Tanks D-145 and D-155 (Source Code L006); however, there are no current plans to bring Acrylonitrile on-site. Condition 7.1.2 was added allowing this flexibility.

B. Alternative Requirements: No changes. Conditions 7.3.1 through 7.3.21 apply to the Storage Tank Farm (Tanks V002 through V006).

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources: None applicable.

E. Short-Term Activities: None applicable.

F. Compliance Schedule/Progress Reports: None applicable.

G. Emissions Trading: Not applicable.

H. Acid Rain Requirements: None applicable.

I. Stratospheric Ozone Protection Requirements: None applicable.

J. Pollution Prevention: Not applicable.

K. Specific Conditions: None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.