Division of Air Resources

Permit Review Report

Permit ID: 4-0122-00007/00719
Renewal Number: 2
10/29/2020

Facility Identification Data
Name: SABIC INNOVATIVE PLASTICS US LLC
Address: 1 NORYL AVE
SELKIRK, NY 12158

Owner/Firm
Name: SHPP US LLC
Address: 1 Noryl Ave
Selkirk, NY 12158, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: ANGELIKA R STEWART
Address: NYSDEC - REGION 4
1130 N WESTCOTT RD
SCHENECTADY, NY 12306
Phone:5183572069

Division of Air Resources:
Name: DONALD A WELSTED
Address: NYSDEC - REGION 4
1130 N WESTCOTT RD
SCHENECTADY, NY 12306

Air Permitting Contact:
Name: JAMES J CASCIONE
Address: SABIC INNOVATIVE PLASTICS
1 NORYL AVE
SELKIRK, NY 12158
Phone:5184753596

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
This is the Air Title V Renewal for SABIC Innovative Plastics US, LLC.

SABIC is applying for a source specific Reasonably Available Control Technology (RACT) determination for emission point 01305-01 for RM-606 mix/run tank. The facility has applied for this determination in

accordance with DAR-20: Economic and Technical Analysis for RACT. The facility determined that the cost per ton of reduction was well above the threshold of $5,500.00 per ton removed for the contaminant, toluene. The Department reviewed this RACT analysis and determined that it was not sufficient and not technologically feasible to install th etechnologies listed. Therefore, the facility is not required to implement any additional control technology for this source specific RACT determination.

Attainment Status
SABIC INNOVATIVE PLASTICS US LLC is located in the town of BETHLEHEM in the county of ALBANY.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
SABIC operates a plastic resin facility (SIC 2821) located in Albany County, New York, in the Hamlet of Selkirk, New York. The facility is approximately eight miles southwest of Albany, New York. The facility is on a 700-acre site, of which 60 acres are industrilaized. Monomer is either produced (SIC 2869) from raw material or purchased. The monomers are polymerized to form plastic resins. Manufactured and purchased resins are compounded at the facility by adding colorants and other ingredients to provide desired properties. The facility includes continuous and batch processes, a packaging operation, process heaters, and waste water treatment plant. The facility operates 24 hours per day, seven days a week.

Permit Structure and Description of Operations
The Title V permit for SABIC INNOVATIVE PLASTICS US LLC

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

SABIC INNOVATIVE PLASTICS US LLC is defined by the following emission unit(s):

Emission unit CXPRSS - COLORXPRESS processes plastic for internal and external use.

Emission unit CXPRSS is associated with the following emission points (EP):
05000, 05004, 05005, 05007
Process: CBT is located at Building COLORXPRES - Operation of Sand Bath used to clean die plates and similiar equipment in Color Express.

Process: CXP COLORXPRESS processes.

Emission unit HIPSBG - HIPS produces plastic materials.

Emission unit HIPSBG is associated with the following emission points (EP):
03002, 03003, 03004, 03005, 03009, 03010, 03011, 03012, 03013, 03014, 03022, 03023, 03032, 03033, 03039, 03041, 03045
Process: HEX is located at HIPS, Building HIPS - Die hoods and slurry tank.

Process: HFE is located at HIPS, Building HIPS - LDAR (Leak Detection and Repair), process wastewater, maintenance wastewater and heat exchanger systems.

Process: HPV is located at HIPS, Building HIPS - DEVOL, distillation, feed preparation and extrusion.

Process: HSH is located at HIPS, Building HIPS - Stabilizer, vacuum cleaning system.

Process: HT2 is located at HIPS, Building HIPS - Non VOC (Volatile Organic Compounds) RACT (Reasonable Available Control Technology) tanks.

Process: HT3 is located at HIPS, Building HIPS - VOC (Volatile Organic Compounds) RACT

(Reasonable Available Control Technology) tanks.

Process: HT4 is located at HIPS, Building HIPS - Tanks without carbon canisters.

Emission unit RESBLG - RESIN produces plastic resins.

Emission unit RESBLG is associated with the following emission points (EP):
00306, 00310, 00312, 00313, 00314, 00337, 00341, 00343, 00344, 00367, 00368, 00369, 00370, 00381, 00401, 00419, 00437, 00459, 00460, 00461, 01305, 01355, 01356, 01357, 01358, 01359, 01365, 01366, 01378, 01379, 01392, 01395, 01396
Process: RFE is located at RESIN, Building RESIN - This process is for Resin Plant fugitive emissions. This process ID "RFE" includes the following emission sources:
1) RLDAR for MON MACT equipment leaks (Leak Detection and Repair),
2) R-PWW for MON MACT Process Wastewater,
3) R-HES for the MON MACT Heat Exchange Systems (Areas 3 and 8 cooling tower systems), and
4) R-MWW for MON MACT Maintenance Wastewater.

Process: RPH A natural gas fired hot oil furnace (a "process heater") heats heat transfer oil to provide process heating.

Process: RPV is located at RESIN, Building RESIN - HBR and IVS vents.

Process: RRX Resin reactors.

Process: RSH is located at RESIN, Building RESIN - Catalyst, mini bins, supersacking.

Process: RT1 is located at RESIN, Building RESIN - VOL (Volatile Organic Liquid) storage RACT (Reasonable Available Control Technology) tanks.

Process: RT2 is located at RESIN, Building RESIN - VOC (Volatile Organic Compounds) RACT (Reasonable Available Control Technology) tanks.

Process: RT3 is located at RESIN, Building RESIN - Non RACT (Reasonable Available Control Technology) tanks.

Process: RT4 is located at RESIN - RESIN tank truck used for transfer of evaporator bottoms off-site.

Process: RT5 is located at RESIN, Building RESIN - MON MACT (40 CFR 63 Subpart FFFF) Tanks, Distillation Columns and, Area 8 Scrubber System.

Process: RT6 is located at RESIN, Building RESIN - MON Group 1 Storage Tanks that vent to the process.

Process: RWS RESIN water scrubbers.

Emission unit SFSBLG - SFS is a compounding facility.

Emission unit SFSBLG is associated with the following emission points (EP):
00511, 00519, 00520, 00526, 00531, 00534, 00539, 00540, 00541, 00542, 00543, 00544, 00546, 00553, 00555, 00560, 00561, 00567, 00568, 00569, 00570, 00571, 00572, 00573, 00575, 00576, 00577, 00578, 00579, 00580, 00581, 00582, 00583, 00597, 00603, 00606, 00610, 01500, 01501, 01502, 01503, 01504, 01505, 01506, 01507, 01508, 01509, 01511, 01517, 01518, 01519, 01520, 01521, 01522, 01525, 01527, 01528, 01530, 01531, 01532, 01533, 01534, 01535, 01537, 01543, 01544, 01549, 01550, 01551, 01552, 01553, 01555, 01571, 01572, 01583, 01584, 01586, 01587, 01588, 01591, 01592, 01593, 01594, 01595, 01596, 01597, 01598, 01599, 02500, 02512, 02513, 02514, 02517, 02521, 02523, 02526, 02527, 02532, 02533, 02537, 02538, 02540, 02541, 02542, 02543, 02544, 02545, 02546, 02547, 02550, 02551, 02552, 02581, 02582, 02583, 02584, 02585, 02586, 02587, 02588, 02589, 02590, 02591, 02592, 02593, 02596, 02600, 02601, 02602, 02603, 02604, 02605, 02607, 02608, 02609, 02611, 02613, 02614, 02615, 02616, 02617, 02618, 02619, 02702, 02704, 02705, 02706, 02707, 02708, 02709, 02710, 02711, 02712, 02713, 02714, 02715, 02716, 02717, 02718, 02719, 02720, 02721, 02722, 02725, 02726, 02727, 02728, 02729, 02730, 02731, 02732, 02733, 02734, 02735, 02736, 02737, 02738, 02739, 02740, 02741, 02742, 02743, 02744, 02745, 02746, 02747, 02748, 02749, 02750, 02751, 02752, 02754, 02756, 02758, 02759, 02763, 02764, 02765, 02768, 02769, 02770, 02771, 02772, 02773, 02774, 02775, 02776, 02777, 02778, 02779, 02780, 02782, 02783, 02784, 02785, 02786, 02787, 02788, 02789, 02790, 02791, 02792, 02793, 02794, 02796, 02797, 02798, 02799, 02800, 02801, 02802, 02803
Process: FEX is located at SFS, Building SFS - Carbon beds, HEAF, thermal oxidizer, vents from extrusion and labs.

Process: FPM Finishing solids handling equipment - insignificant emissions

Process: FPV is located at SFS, Building SFS - Thermal oxidizer combustion byproducts.

Process: FSH is located at SFS, Building SFS - Pneumatic conveyance systems, dust collection and finishing solids handing equipment.

Process: FT1 is located at SFS, Building SFS - VOL (Volatile Organic Liquid) storage RACT (Reasonable Available Control Technology) tanks and finishing tanks.

Process: FT2 is located at SFS, Building SFS - Non RACT (Reasonable Available Contol Technology) tanks.

Process: SBT Operation of Sand Bath used to clean die plates and similiar equipment in SFS.

Emission unit WTAREA - WWTP is the plant site waste water treatment facility.

Emission unit WTAREA is associated with the following emission points (EP):
00709, 00717, 00718, 00727
Process: WPV is located at WWTP, Building WWTP - WW vessels, drum washer / hot box, FBI, LF.

Process: WT1 is located at WWTP, Building WWTP - Waste oil tank.

Emission unit APAREA - AP AREA manufactures phenolics for internal and external use.

Emission unit APAREA is associated with the following emission points (EP):
00282, 00284, 00295, 00704, 01208, 01209, 01212, 01235, 01236, 01240, 01241, 01247, 01252, 01266,

01268
Process: AFE is located at AP, Building AP - LDAR (Leak Detection and Repair) , Process wastewater, maintenance wastewater and heat exchanger systems.

Process: AMP is located at AP, Building AP - AP Miscellaneous process vents.

Process: APV is located at AP, Building AP - Process sources.

Process: ARV AP Reactor Regeneration Vents

Process: ASH is located at AP, Building AP - AP catalyst building.

Process: AT1 is located at AP, Building AP - Emissions from VOL (Volatile Organic Liquid) RACT (Reasonable Available Control Technology) tanks less than 20,000 gallons.

Process: AT2 is located at AP, Building AP - Hot Oil Expansion Tank

Process: AT3 is located at AP, Building AP - Recycle methanol tank.

Process: AT4 is located at AP, Building AP - Methanol storage tank MF-150.

Process: AT5 HON (Hazardous Organic NESHAP (National Emission Standards Hazardous Air Pollutants)) Group 2 storage vessels.

Process: AT6 AP Tank Farm tanks vented to AS-2290

Process: HOF is located at AP, Building AP - AP Process 212 VOC(Volatile Organic Compounds) / NOx RACT (Reasonable Available Control Technology)

Title V/Major Source Status
SABIC INNOVATIVE PLASTICS US LLC is subject to Title V requirements. This determination is based on the following information:
This facility is major for both Volatile Organic Compounds (VOC's) and Hazardous Air Pollutants (HAP).

Program Applicability
The following chart summarizes the applicability of SABIC INNOVATIVE PLASTICS US LLC with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	YES
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO

TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the

CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2821	PLASTICS MATERIALS AND RESINS
2869	INDUSTRIAL ORGANIC CHEMICALS,NEC

SCC Codes
SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-01-006-02	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - NATURAL GAS Boilers < 100 MBtu/Hr except Tangential
3-01-018-05	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Phenolic Resins
3-01-018-17	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION General
3-01-018-19	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Solvent Recovery
3-01-018-21	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Extruding/Pelletizing/Conveying/Storage
3-01-018-40	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION RESIN STORAGE TANK ** (USE 6-45-200-23 OR 6-45-210-23)
3-01-018-90	CHEMICAL MANUFACTURING

	CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION: CATALYST PREPARATION
3-01-018-91	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION: REACTOR VENTS
3-01-018-92	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION: SEPARATION PROCESSES
3-01-018-93	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION - RAW MATERIAL STORAGE
3-01-018-94	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION - SOLVENT STORAGE
3-01-018-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION - OTHERS NOT SPECIFIED
3-01-840-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Distillation Units
3-01-888-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUGITIVE EMISSIONS Specify in Comments Field
3-01-888-05	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUGITIVE EMISSIONS Specify in Comments Field
3-01-999-98	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - OTHER NOT CLASSIFIED Specify in Comments Field
3-99-900-04	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS MANUFACTURING INDUSTRIES PROCESS GAS: PROCESS HEATERS
3-99-900-14	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS MANUFACTURING INDUSTRIES PROCESS GAS: INCINERATORS
4-07-084-98	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - PHENOLS Specify Phenol: Working Loss
4-07-146-98	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - MISCELLANEOUS FIXED ROOF TANK:MISCELLANEOUS:SPECIFY IN COMMENTS: WORKING LOSS

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the

capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000107-21-1	1,2-ETHANEDIOL		0.00102		
000106-99-0	1,3-BUTADIENE		5.53E-6		
000098-86-2	1-PHENYLETHANONE		0.000296		
000095-48-7	2-METHYL-PHENOL		6.66		
000080-62-6	2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER		2.95		
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER		2.66E-6		
000075-07-0	ACETALDEHYDE		0.0624		
007440-36-0	ANTIMONY		0.0251		
007440-38-2	ARSENIC		0.00232		
000071-43-2	BENZENE		0.84		
000098-82-8	BENZENE, (1-METHYLETHYL)		0.899		
000106-46-7	BENZENE, 1,4-DICHLORO-		0.00676		
007440-41-7	BERYLLIUM		0.00209		
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE		6.81E-6		
007440-43-9	CADMIUM		0.132		
000630-08-0	CARBON MONOXIDE		3590		
000108-90-7	CHLOROBENZENE		0.00101		
000075-45-6	CHLORODIFLUORO-METHANE		0.0413		
000067-66-3	CHLOROFORM		0.976		
007440-47-3	CHROMIUM		0.149		
007440-48-4	COBALT		1.43E-7		
000000-33-1	CRESOLS (INCLUDES O, M, & P)/CRESYLIC ACIDS		0.000759		
000075-09-2	DICHLOROMETHANE		0.000223		
000071-55-6	ETHANE, 1,1,1-TRICHLORO		0.0719		
000100-41-4	ETHYLBENZENE		2		
000050-00-0	FORMALDEHYDE		0.0233		
000110-54-3	HEXANE		0.00015		
007783-06-4	HYDROGEN SULFIDE		0.0000134		
007439-92-1	LEAD		0.128		

007439-96-5	MANGANESE	0.0176
007439-97-6	MERCURY	1.43E-7
000067-56-1	METHYL ALCOHOL	212
000078-93-3	METHYL ETHYL KETONE	0.0002
000091-20-3	NAPHTHALENE	0.0025
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	0.157
0NY210-00-0	OXIDES OF NITROGEN	515
0NY075-00-0	PARTICULATES	126
000127-18-4	PERCHLOROETHYLENE	0.00991
000108-95-2	PHENOL	2.7
007803-51-2	PHOSPHINE	2.7E-7
0NY075-02-5	PM 2.5	126
0NY075-00-5	PM-10	126
000107-13-1	PROPENENITRILE	0.158
000123-38-6	PROPIONALDEHYDE	0.000027
007782-49-2	SELENIUM	0.016
000100-42-5	STYRENE	24.9
007446-09-5	SULFUR DIOXIDE	4.74
000108-88-3	TOLUENE	220
0NY100-00-0	TOTAL HAP	478
0NY998-00-0	VOC	543
001330-20-7	XYLENE, M, O & P MIXT.	3.5

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: **Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: **Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: **Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: **Severability - 6 NYCRR Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: **Permit Shield - 6 NYCRR Part 201-6.4(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

Item B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	167	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-HH.1670	38, 39, 40, 41, 42, 43, 44	Approval and Promulgation of Implementation Plans - NY Identification of Plans
A-PAREA/-/HOF	40CFR 52-HH.1670	113	Approval and Promulgation of Implementation Plans - NY Identification of Plans
H-IPSBG/-/HT3	40CFR 52-HH.1670	139	Approval and Promulgation of Implementation Plans - NY Identification of Plans
R-ESBLG/-/RRX	40CFR 52-HH.1670	151	Approval and Promulgation of Implementation Plans - NY Identification of Plans
R-ESBLG/00306/RT2/00306	40CFR 52-HH.1670	158	Approval and Promulgation of Implementation Plans - NY Identification of Plans
R-ESBLG/01305/RT2/RM606	40CFR 52-HH.1670	160	Approval and Promulgation of Implementation Plans - NY Identification of Plans
R-ESBLG/01365/RWS/IVSMS	40CFR 52-HH.1670	162, 163	Approval and Promulgation of Implementation Plans - NY Identification of Plans
R-ESBLG/01366/RPV/01366	40CFR 52-HH.1670	164	Approval and Promulgation of Implementation Plans - NY Identification of Plans
R-ESBLG/01379/RT4/T1379	40CFR 52-HH.1670	165	Approval and Promulgation of Implementation Plans - NY Identification of Plans

S-FSBLG/-/FEX/C2593	40CFR 52-HH.1670	166	Approval and Promulgation of Implementation Plans - NY Identification of Plans
FACILITY	40CFR 61-FF.356(a)	47	Benzene Emissions from Benzene waste operations - recordkeeping requirements
FACILITY	40CFR 61-FF.356(b)(1)	48	Benzene Emissions from Benzene waste operations - recordkeeping requirements
FACILITY	40CFR 61-FF.357(b)	49	Benzene Emissions from Benzene waste operations - reporting reqts
FACILITY	40CFR 61-M.145	45	Asbestos standards: standard for demolition and renovation
FACILITY	40CFR 61-M.150	46	Standard for waste disposal for manufacturing, fabricating, demolition, renovation and spraying operations
R-ESBLG/-/RPH/HS255	40CFR 63-DDDDD.7495(a)	149	ICI Boiler Major Source NESHAP - Compliance Date for New Sources
R-ESBLG/-/RPH/HS255	40CFR 63-DDDDD.7565	150	ICI Boiler Major Source NESHAP - General Provisions
A-PAREA	40CFR 63-F.102(a)	93	Subpart F - HON NESHAP - general standards
A-PAREA	40CFR 63-F.103(a)	94	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA	40CFR 63-F.103(b)(1)	95	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA	40CFR 63-F.103(b)(5)	96	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA	40CFR 63-F.103(c)(1)	97	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA	40CFR 63-F.103(c)(2)	98	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions

A-PAREA	40CFR 63-F.103(d)	99	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA/-/AFE/APHES	40CFR 63-F.104	100, 101, 102	Subpart F - HON NESHAP - heat exchange system requirements
A-PAREA/-/AFE/APHES	40CFR 63-F.104(a)(1)	103	Subpart F - HON NESHAP - heat exchange system requirements
A-PAREA/-/AFE/APHES	40CFR 63-F.104(a)(2)	104	Subpart F - HON NESHAP - heat exchange system requirements
A-PAREA/-/AFE/APMWW	40CFR 63-F.105	105	Subpart F - HON NESHAP - maintenance wastewater requirements
R-ESBLG	40CFR 63-FFFF.2450(a)	144	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - General Requirements
R-ESBLG/-/RT5	40CFR 63-FFFF.2450(c)(2	155	Miscellaneous Organic Chemical Mfg NESHAP - Combined Emission Streams
R-ESBLG/00460/RT5	40CFR 63-FFFF.2450(c)(2	159	Miscellaneous Organic Chemical Mfg NESHAP - Combined Emission Streams
R-ESBLG/-/RT5	40CFR 63-FFFF.2450(e)(1	156	Miscellaneous Organic Chemical Mfg. NESHAP - Control Devices
FACILITY	40CFR 63-FFFF.2450(k)	76	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Parameter Monitoring
R-ESBLG	40CFR 63-FFFF.2450(l)	145	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Startup, Shutdown, and Malfunctions
R-ESBLG	40CFR 63-FFFF.2450(m)	146	Miscellaneous Organic Chemical Mfg NESHAP - General reporting requirements
FACILITY	40CFR 63-FFFF.2450(r)	77	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Surge control vessels and bottoms receivers
FACILITY	40CFR 63-FFFF.2455(a)	78	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Emission limits
FACILITY	40CFR 63-FFFF.2455(b)	79	Miscellaneous Organic

			Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Group 1 or TRE calculations
FACILITY	40CFR 63-FFFF.2455(c)	80	Misc. Organic NESHAP - Continuous Process Vent Requirements
R-ESBLG/01365/RWS	40CFR 63-FFFF.2455(c)	161	Misc. Organic NESHAP - Continuous Process Vent Requirements
FACILITY	40CFR 63-FFFF.2460(a)	81	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Emission limits
FACILITY	40CFR 63-FFFF.2460(b)	82	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
R-ESBLG/-/RT6	40CFR 63-FFFF.2470(a)	157	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tank Provisions
FACILITY	40CFR 63-FFFF.2470(d)	83	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tanks - Planned Routine Maintenance
FACILITY	40CFR 63-FFFF.2475	84	Misc. Organic Chemical NESHAP
FACILITY	40CFR 63-FFFF.2480	85	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
FACILITY	40CFR 63-FFFF.2485	86	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
FACILITY	40CFR 63-FFFF.2490	87	Heat exchange system requirements
FACILITY	40CFR 63-FFFF.2520	88	Miscellaneous Organic Chemical Mfg NESHAP - Reporting
R-ESBLG	40CFR 63-FFFF.2525	147	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
R-ESBLG	40CFR 63-FFFF.2540	148	Miscellaneous Organic Chemical Mfg NESHAP - General Provisions
A-PAREA/01212	40CFR 63-G.113(b)	116	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-reference control technology

H-IPSBG	40CFR 63-G.113(b)	126	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-reference control technology
A-PAREA/01212	40CFR 63-G.113(e)	117	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-reference control technology
FACILITY	40CFR 63-G.114(a)(5)	50	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-monitoring requirements
A-PAREA/01212	40CFR 63-G.114(b)	118	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-monitoring requirements
A-PAREA/01212	40CFR 63-G.114(d)(2)	119	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-monitoring requirements
A-PAREA/01212	40CFR 63-G.115(d)(1)	120	HON NESHAP - provisions for process vents - calculation of TRE index value
A-PAREA/01212	40CFR 63-G.117(a)(4)(ii	121	HON NESHAP process vent provisions-reporting/recordkeeping rqts for group and TRE determinations and performance tests
A-PAREA/01212	40CFR 63-G.117(b)	122	HON NESHAP process vent provisions-reporting/recordkeeping rqts for group and TRE determinations and performance tests
A-PAREA/01212	40CFR 63-G.118(a)(2)	123	HON NESHAP process vent provisions-periodic reporting and recordkeeping requirements
A-PAREA/01212	40CFR 63-G.118(c)	124	HON NESHAP process vent provisions-periodic reporting and recordkeeping requirements
A-PAREA/01212	40CFR 63-G.118(h)	125	HON NESHAP process vent provisions-periodic reporting

			and recordkeeping requirements
A-PAREA/-/AT4	40CFR 63-G.119(e)	109	HON NESHAP - storage vessel provisions-reference control technology
A-PAREA/00282	40CFR 63-G.119(e)(1)	114, 115	HON NESHAP - storage vessel provisions-reference control technology
FACILITY	40CFR 63-G.123(a)	51	HON NESHAP - storage vessel provisions - recordkeeping
A-PAREA/-/AFE/APPWW	40CFR 63-G.132(a)(3)	106	HON - process wastewater provisions - general
A-PAREA/-/AFE/APPWW	40CFR 63-G.146(b)(2)	107	HON - process wastewater provisions - reporting
A-PAREA/-/AFE/APPWW	40CFR 63-G.147(a)	108	HON - process wastewater provisions - recordkeeping
A-PAREA/-/AT4	40CFR 63-G.152(c)(1)	110	General reporting and continuous records
A-PAREA/-/AT4	40CFR 63-G.152(d)(1)	111	General reporting and continuous records
FACILITY	40CFR 63-GGGGG	89	Site Remediation NESHAP
FACILITY	40CFR 63-H.160	52	Subpart H - HON NESHAP for Equipment Leaks
FACILITY	40CFR 63-H.162	53	Subpart H - HON NESHAP for Equipment Leaks - standards:general
FACILITY	40CFR 63-H.163	54	Subpart H - HON NESHAP for Equipment Leaks - standards:pumps in light liquid service
FACILITY	40CFR 63-H.163(b)(2)(ii	55	Subpart H - HON NESHAP for Equipment Leaks - standards:pumps in light liquid service
FACILITY	40CFR 63-H.164	56	Subpart H - HON NESHAP for Equipment Leaks - standards:compressors
FACILITY	40CFR 63-H.165	57	Subpart H - HON NESHAP for Equipment Leaks - standards:pressure relief devices in gas/vapor service
FACILITY	40CFR 63-H.166	58	Subpart H - HON NESHAP for Equipment Leaks - standards:sampling connection systems
FACILITY	40CFR 63-H.167	59	Subpart H - HON NESHAP for Equipment Leaks - standards:open-ended valves or lines

FACILITY	40CFR 63-H.168	60	Subpart H - HON NESHAP for Equipment Leaks - standards:valves in gas/ vapor and in light liquid service
FACILITY	40CFR 63-H.169	61	Subpart H - HON NESHAP for Equipment Leaks - standards:pumps, valves, connectors,agitators heavy liquid service, instruments
FACILITY	40CFR 63-H.170	62	Subpart H - HON NESHAP for Equipment Leaks - standards:surge control vessels and bottoms receivers
FACILITY	40CFR 63-H.171	63	Subpart H - HON NESHAP for Equipment Leaks - standards:delay of repair
FACILITY	40CFR 63-H.172	64	Subpart H - HON NESHAP for Equipment Leaks - standards:closed-vent systems and control devices
FACILITY	40CFR 63-H.173	65	Subpart H - HON NESHAP for Equipment Leaks - standards:agitators in gas/ vapor service and in light liquid service
FACILITY	40CFR 63-H.174	66	Subpart H - HON NESHAP for Equipment Leaks - standards:connectors in gas/vapor service and in light liquid service
FACILITY	40CFR 63-H.180	67	Subpart H - HON NESHAP for Equipment Leaks - test methods and procedures
FACILITY	40CFR 63-H.181	68, 69	Subpart H - HON NESHAP for Equipment Leaks - recordkeeping requirements
FACILITY	40CFR 63-H.182	70, 71	Subpart H - HON NESHAP for Equipment Leaks - reporting requirements
H-IPSBG	40CFR 63-JJJ.1311(f)	127	Subpart JJJ - NESHAP for Polymers and Resins IV - Butadiene Resins, PET
H-IPSBG/-/HFE	40CFR 63-JJJ.1311(o)	134	Polymers and Resins IV - compliance schedule - definition of time intervals

H-IPSBG	40CFR 63-JJJ.1313(a)	128	Polymers and Resins IV - Emission Standards
H-IPSBG/-/HPV	40CFR 63-JJJ.1315	137	Continuous Process Vents Provisions
H-IPSBG/-/HPV	40CFR 63-JJJ.1316	138	Group IV Polymers and Resins - PET and polystyrene continuous process affected sources - emissions control provisions
H-IPSBG/03041	40CFR 63-JJJ.1316	140	Group IV Polymers and Resins - PET and polystyrene continuous process affected sources - emissions control provisions
H-IPSBG	40CFR 63-JJJ.1317	129	Polymers and Resins IV - PET and polystyrene continuous process affected sources - monitoring provisions
H-IPSBG	40CFR 63-JJJ.1319(a)	130	Polymers and Resins IV - Polystyrene affected sources, recordkeeping provisions
H-IPSBG	40CFR 63-JJJ.1320(a)	131	Polymers and Resins IV - Reporting provisions for polystyrene affected sources
H-IPSBG/-/HFE/H-HES	40CFR 63-JJJ.1328	136	Heat exchange systems provisions
H-IPSBG/-/HFE	40CFR 63-JJJ.1331	135	Polymers & Resins IV - Equipment Leak Provisions
H-IPSBG	40CFR 63-JJJ.1335	132	Polymers and Resins IV - Recordkeeping and reporting provisions
H-IPSBG	40CFR 63-JJJ.1335(e)(6)	133	Periodic Reports
R-ESBLG/-/RT5	40CFR 63-SS.982(c)	152	National Emission Standards for Closed Vent Systems - Requirements for Closed Vent Systems and Nonflare Control Device
FACILITY	40CFR 63-SS.982(d)	72	NESHAP for Closed Vent Systems - Routing to a Fuel Gas System or Process
FACILITY	40CFR 63-SS.982(e)	73	NESHAP for Closed Vent Systems - Final Recovery Devices
R-ESBLG/-/RT5	40CFR 63-SS.983	153	GMACT - Closed Vent Systems requirements
R-ESBLG/-/RT5	40CFR 63-SS.985	154	GMACT - Requirements for nonflare control devices controlling

			emissions from storage tanks & low throughput transfer racks
FACILITY	40CFR 63-SS.990(b)	74	NESHAP For Closed Vent Systems, Control Devices, etc. - Absorbers & Condensers as Control Devices - performance testing
FACILITY	40CFR 63-SS.990(c)(2)	75	NESHAP for Closed Vent Systems, Control Devices, etc. - Absorbers, Condensors as Control
R-ESBLG	40CFR 63-SS.996	141	GMACT - General monitoring requirements for control and recovery devices
R-ESBLG	40CFR 63-SS.998	142	GMACT - Recordkeeping requirements for closed vent systems, control devices, recovery devices, and routing to fuel gas system
R-ESBLG	40CFR 63-SS.999	143	GMACT - Notifications and other reports
FACILITY	40CFR 63-ZZZZ	90	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	168	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 91, 92	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions -

FACILITY	6NYCRR 201-6.4(c)	3	Right to Inspect Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(2)	23	Operational Flexibility - Protocol
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.5(a)	169	State Enforceable Requirements
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	170	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	24	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.5(e)(2)	171	Demonstrating compliance for Part 212 through the federal NESHAP program
FACILITY	6NYCRR 212-2.1(a)	172	HTACs applicable to Table 212-2.3 Table 4
FACILITY	6NYCRR 212-2.1(b)	173, 174, 175	Conditions should be cited under Table 3 or Table 4, 212-2.3 (a) or (b)
FACILITY	6NYCRR 212-2.4(b)	176	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 212-3.1	177	Reasonably Available Control Technology for Major Facilities
FACILITY	6NYCRR 212-3.1(c)(4)(i)	178, 179, 180, 181, 182	RACT compliance plan control limits for Capture and Control
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(f)	25	Sulfur-in-Fuel Limitations
A-PAREA/-/AT4/MF150	6NYCRR 229.3(e)(1)	112	Volatile organic liquid storage tanks
FACILITY	6NYCRR 229.3(e)(2)(iv)	26	Volatile organic liquid storage tanks
FACILITY	6NYCRR 229.3(e)(2)(v)	27	Volatile organic liquid storage tanks

FACILITY	6NYCRR 236.3(a)	28	Control requirements.
FACILITY	6NYCRR 236.3(c)	29	Control requirements.
FACILITY	6NYCRR 236.4(b)	30	Repair requirements.
FACILITY	6NYCRR 236.4(c)	31	Repair requirements.
FACILITY	6NYCRR 236.5	32, 33, 34, 35, 36	Recordkeeping and reporting requirements.
FACILITY	6NYCRR 236.7	37	Monitoring.

Applicability Discussion:
Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted

semiannually.

6 NYCRR 201-6.4 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, SABIC INNOVATIVE PLASTICS US LLC has been determined to be subject to the following regulations:
40 CFR 52.1670
State Implementation Plan (SIP) reuirements that are federally enforceable.

40 CFR 61.145

40 CFR 61.150

40 CFR 61.356 (a)
This regulation requires the owner or operator to comply with the recordkeeping requirements of 40 CFR 61.356. Each record must be maintained in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified

40 CFR 61.356 (b) (1)
This regulation requires the owner or operator to maintain records that identify each waste stream at the facility subject to 40 CFR 61 Subpart FF, and indicate whether or not the waste stream is controlled for benzene emissions in accordance with this subpart.

40 CFR 61.357 (b)
If the total annual benzene quantity from the facility is less than 1 Mg/yr, this regulation requires the owner or operator to submit to the DEC and/or EPA a report that updates the information listed in paragraphs (a)(1) through (a)(3) of 40 CFR 61.357 whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr or more.

40 CFR 63.102 (a)
This condition specifies how the HON rule applies to the facility during times of startup, shutdown, and malfunctions. The HON rule does not apply during these periods, but if it is still within the facility's ability to comply despite the startup, shutdown, or malfunction, the facility shall comply with the rule. The facility shall also take all measures possible to reduce the emissions of hazardous air pollutants during startups, shutdowns, and malfunctions.

40 CFR 63.103 (a)
This condition specifies which parts of the General Provisions in 40CFR63, Subpart A apply to facilities subject to the HON and which parts do not apply. The General Provisions include provisions on reporting, recordkeeping, monitoring, performance testing, compliance extension provisions, etc.

40 CFR 63.103 (b) (1)
This condition establishes the schedule and procedures under which the facility is to perform their stack tests to determine compliance with the HON rule. This condition refers to §63.7(a) for the default

schedule and procedures, which basically gives the facility 180 days after the compliance date to perform their stack test.

40 CFR 63.103 (b) (5)
This condition allows the facility to waive any stack test required in the HON rule if the New York State DEC approves of it. The facility would need to justify why the performance test needs to be waived (ie, excessive cost, impractical to do, etc.)

40 CFR 63.103 (c) (1)
In order to make inspections easier, this condition requires the facility to keep any records required by the HON rule for at least five years. Furthermore, the latest 6 months of records need to be kept on site either on a computer or accessible within 2 hours.

40 CFR 63.103 (c) (2)
This condition specifies certain records which must always be kept for any unit subject to the HON rule. These records include information about any startups, shutdowns, and malfunctions of the unit or the monitoring equipment. Records must also be kept of whether the startup, shutdown, and malfunction plan was followed. In addition, this condition requires the facility to keep records proving that any equipment used to continuously monitor emissions for the HON rule has been calibrated and maintained. Having these records will demonstrate to inspectors that the facility has been complying with the provisions in the HON rule on an ongoing basis.

40 CFR 63.103 (d)
This condition explains how and where to send in all of their reports.

40 CFR 63.104
If there are heat exchangers in a process unit that is subject to the Hazardous Organic NESHAP rule, the facility must monitor the heat exchangers for leaks in order to prevent organic hazardous air pollutants from entering the coolant water supply. The facility can choose to either monitor the cooling water directly or measure some other parameter that would indicate a leak in the heat exchange equipment.

40 CFR 63.104 (a) (1)
This condition states that if the pressure in the cooling water is greater than the pressure in the process fluid, then the facility does not need to check for leaks of organic hazardous air pollutants in the heat exchanger equipment.

40 CFR 63.104 (a) (2)
This condition relieves the facility from needing to check the coolant fluid for leaks of organic hazardous air pollutants as long as there is another fluid in between the coolant and the process fluids.

40 CFR 63.105
This condition requires that the facility prepare a plan on how to manage the wastewater containing organic hazardous air pollutants that is generated during process unit maintenance or shutdown. This

plan should include every task that creates this type of wastewater and how best to handle the water to minimize the amount of organic hazardous air pollutants that get released to the atmosphere.

40 CFR 63.113 (b)
This condition controls the emissions of hazardous air pollutants by requiring that if the facility is controlling emissions of the gas stream by using a process heater or a boiler, then the stream must be introduced into the flame zone. This helps to ensure complete combustion within the boiler/process heater and therefore minimizes the amount of hazardous air pollutants that could escape to the atmosphere.

40 CFR 63.113 (e)
This condition provides an incentive for the facility to reduce the organic hazardous air pollutant emissions from the process vents by calculating a value (TRE index value) and trying to maintain the value above 4. The TRE index value is based on operating parameters such as heating value and flow rate of the gas stream, and the concentration of organic compounds. If the value stays above 4, the facility will only need to keep records and submit reports proving that the TRE has stayed above 4.

40 CFR 63.114 (a) (5)

40 CFR 63.114 (b)

40 CFR 63.114 (d) (2)

40 CFR 63.115 (d) (1)
This condition specifies the method the facility will use to calculate the TRE index value. The TRE index value is a parameter that is used to reflect the amount of organic hazardous air pollutants being emitted from a process vent. A higher TRE index value represents a lower rate of emissions of organic hazardous air pollutants. This condition in particular allows the facility to use an engineering assessment which includes test results, permit limits, and design analyses to determine the variables used in the calculation.

40 CFR 63.117 (a) (4) (iii)
This condition requires the facility to keep a description of where the process vent stream enters the boiler or process heater in order to ensure that the facility is in compliance with the hazardous air pollutant reduction requirements for process vents.

40 CFR 63.117 (b)
This condition specifies the amount of paperwork that is required of a facility with process vents emitting a low amount of organic hazardous air pollutants. The paperwork that is required includes all parts of an engineering assessment (measurements, calculations, etc.) performed in order to calculate the TRE index value. The TRE index value is a number which indicates the level of control and recordkeeping needed

to comply with the HON rule.

40 CFR 63.118 (a) (2)

40 CFR 63.118 (c)
If the facility chooses to maintain a TRE index value high enough to be in compliance with the HON rule, this condition requires the facility to keep records of any process changes and recalculations of the TRE index value. This will prove that the facility has always had a TRE index value high enough to keep emissions of organic hazardous air pollutants at a low level.

40 CFR 63.118 (h)
This condition requires that if the TRE index value falls below 4, a report needs to be submitted on a timely basis showing why the TRE index value changed, what the new TRE index value is, and that the facility will comply with the new requirements that are required due to the new TRE index value. Having the TRE index value above 4 indicates that the facility's value is high enough to keep emissions of organic hazardous air pollutants at a low level.

40 CFR 63.119 (e)
In order to reduce the emissions of organic hazardous air pollutants from storage vessels, a facility may elect to install a system that routes all of the emissions from the storage vessel to a control device. This condition requires that the control device reduces the organic hazardous air pollutants in this captured stream by 90-95% depending on when the control device was installed.

40 CFR 63.119 (e) (1)

40 CFR 63.123 (a)
This condition requires the facility to keep a record of the dimensions and the capacity of any storage vessel that is subject to the HON rule.

40 CFR 63.1311 (f)
This regulation requires the owners or operators of affected sources subject to 40CFR63 Subpart JJJ to comply with the requirements of Subpart A of Part 63. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

40 CFR 63.1311 (o)
This condition clarifies the time periods in which the facility may comply with the provisions of Subpart JJJ. Subpart JJJ contains many requirements that must be done on a periodic basis (for example, the quarterly leak detection monitoring for valves). This condition specifies that the quarterly monitoring must occur according to a calendar quarter (January 1 - March 31) as opposed to starting on some date in

the middle of the first month.

40 CFR 63.1313 (a)
This condition specifies which sections of subpart JJJ apply to each specific type of process equipment.

40 CFR 63.1315
This condition reduces the amount of hazardous air pollutants (HAPs) being emitted to the atmosphere by requiring certain controls on process vents that are subject to subpart JJJ of 40CFR63. This condition requires the facility to comply with the provisions for process vents contained in sections §63.113 through §63.118 of subpart G.

These provisions in subpart G require the facility to determine the level of emissions from each process vent by calculating a total resource efficiency index value (TRE) for each vent. If the TRE is below a certain level, then the facility is required to use air pollution control equipment to either reduce the emissions by a certain percentage or to an emission standard of 20 ppm. These provisions also require monitoring, recordkeeping, and reporting to ensure compliance with the process vent standards.

40 CFR 63.1316

40 CFR 63.1317
This condition requires that any facility with a continuous process vent that is using a control device to comply with the provisions of subpart JJJ shall monitor the control device according to the provisions in subpart G. The provisions in subpart G require specific parameters to be monitored depending on the type of air pollution control equipment that is used to reduce the emissions of hazardous air pollutants. For example, if the facility uses a flare to burn any HAPs that are emitted from a continuous process vent, then this condition requires them to monitor the flare using a thermocouple to ensure that the temperature is high enough to indicate that the flame inside the flare is in operation.

40 CFR 63.1319 (a)
This condition requires that any facility subject to the provisions for continuous processes producing polystyrene and PET shall comply with the recordkeeping requirements listed for process vents in §63.114 through §63.118 of subpart G. These provisions require the facility to keep records of the values that are required to determine whether the air pollution control equipment are operating and are reducing the level of emissions of hazardous air pollutants.

40 CFR 63.132 (a) (3)
According to this condition, the facility must keep certain records for wastewater streams that are not considered a high risk of hazardous air pollutant emissions. These records will ensure that the stream(s) remain a minor source of emissions and are subject to verification by the New York State DEC.

40 CFR 63.1320 (a)
This condition requires that any facility subject to the provisions for continuous processes producing polystyrene and PET shall comply with the reporting requirements listed for process vents in §63.114

through §63.118 of subpart G. These provisions require the facility to submit reports to the New York State DEC describing whether the facility is reducing the emissions of hazardous air pollutants and complying with the appropriate provisions in subpart JJJ.

40 CFR 63.1328
This regulation details the requirements for heat exchange systems at facilities subject to the requirements of 40 CFR 63 Subpart JJJ.

40 CFR 63.1331
These conditions detail the leak detection and repair program that is required under 40CFR63, Subpart JJJ. The facility will be required to periodically monitor each type of equipment for leaking of any organic hazardous air pollutant, and repair them on a timely basis. Records will also need to be kept indicating which equipment leaked and detailing information about the repair of the leaks. Reports will also be required listing which monitoring and repairs took place.

40 CFR 63.1335
This condition specifies what records the facility needs to keep and what reports need to be sent in order to demonstrate compliance with the requirements of subpart JJJ. Records that need to be kept include, but are not limited to, the values of the monitored parameters and start-up/shutdown/malfunction records. Reports include, but are not limited to, the Notification of Compliance Status report and semi-annual periodic reports.

40 CFR 63.1335 (e) (6)
This regulation requires the source owner or operator to submit periodic reports as specified in paragraphs (e)(6)(i) through (e)(6)(xi) of 40 CFR 63 Subpart JJJ-1335.

40 CFR 63.146 (b) (2)
This condition specifies the information that the facility needs to report in their Notification of Compliance Status Report concerning their process wastewater streams. This information shall be reported within 150 days of the facility's compliance date and shall identify each stream and list such information as the flowrate, concentration of organic hazardous air pollutants, intended compliance approach, etc.

40 CFR 63.147 (a)
This condition requires the facility to notify the wastewater treatment plant operator of the presence of organic HAPs if a contaminated wastewater stream is transferred to an off-site wastewater plant.

40 CFR 63.152 (c) (1)
This condition requires the facility to submit periodic reports on a semiannual basis starting at a specified number of days after the Notification of Compliance report is due.

40 CFR 63.152 (d) (1)
This condition requires the facility to submit reports of startups, shutdowns, and malfunctions that occur

during each 6-month period.

40 CFR 63.160
This section of the Equipment Leaks portion of the Hazardous Organic NESHAP rule describes the types of equipment subject to the rule and types that are exempt. It also describes how overlap with other federal regulations are handled.

40 CFR 63.162
This section o the Equipment Leaks rule describes the general standards that apply regardless of equipment type. Other sections contain standards specific to a given type of equipment (e.g., pumps in light liquid service).

40 CFR 63.163
This section of the Equipment Leaks rule describes the standards for pumps in light liquid service. Since the individual pumps at the facility are not listed in the permit but are contained in on-site logs or descriptions, the types of pumps that are exermpt are listed in the permit for clarity.

40 CFR 63.163 (b) (2) (iii) ('A')

40 CFR 63.164
This section of the Equipment Leaks rule describes the leak detection and repair standards for compressors. It describes the seal systems and sensors required as well as specific exemptions.

40 CFR 63.165
This section of the Equipment Leaks rule includes the standards for pressure relief devices in gas or vapor service. These devices are designed to prevent overpressurization of tanks, reactors, etc. When one releases, it must be manually reset to a defined sealed position in a specified period of time.

40 CFR 63.166
This condition reduces the emissions of hazardous air pollutants by requiring the facility to install sampling connection systems in such a way that the sampling system is either closed or disposed of in an approved method.

40 CFR 63.167

40 CFR 63.168
This section of the Equipment Leaks rule provides the monitoring schedule for valves in gas/vapor or light liquid service as well as the leak definition, and method for calculating of percent leaking valves.

The percent leaking valves determines which schedule to use and may trigger a quality improvement program.

40 CFR 63.169
This condition reduces the emissions of organic hazardous air pollutants by requiring the facility to periodically check for leaks on various types of equipment. The facility must check for physical evidence of a leak on any pumps, connectors, agitators, or valves that are in contact with process streams that are mostly in the liquid phase. If evidence of a leak is found, then further testing is required to determine if the leak is bad enough to call for repair. Records must be kept and reports must be submitted in order to verify compliance with this condition.

40 CFR 63.170
This condition reduces the escape of hazardous air pollutants to the atmosphere from bottoms receivers and surge control vessels at the facility. This condition requires the facility to enclose these pieces of equipment and send the emissions to a control device or recover the HAP's that may escape.

40 CFR 63.171

40 CFR 63.172

40 CFR 63.173
This section of the Equipment Leaks rule provides the leak monitoring schedule, leak definition, repair standards and exemptions for agitators in gas/vapor or light liquid service.

40 CFR 63.174

40 CFR 63.180
This regulation specifies the test methods and prcedures to be used to determine compliance with 40 CFR 63 Subpart H.

40 CFR 63.181

40 CFR 63.182

40 CFR 63.2450 (a)

40 CFR 63.2450 (c) (2)

40 CFR 63.2450 (e) (1)

40 CFR 63.2450 (k)

40 CFR 63.2450 (l)

40 CFR 63.2450 (m)

40 CFR 63.2450 (r)

40 CFR 63.2455 (a)

40 CFR 63.2455 (b)

40 CFR 63.2455 (c)

40 CFR 63.2460 (a)

40 CFR 63.2460 (b)

40 CFR 63.2470 (a)

40 CFR 63.2470 (d)

40 CFR 63.2475

40 CFR 63.2480

40 CFR 63.2485

40 CFR 63.2490

40 CFR 63.2520

40 CFR 63.2525

40 CFR 63.2540

40 CFR 63.7495 (a)

40 CFR 63.7565

40 CFR 63.982 (c)

40 CFR 63.982 (d)

40 CFR 63.982 (e)

40 CFR 63.983

40 CFR 63.985

40 CFR 63.990 (b)

40 CFR 63.990 (c) (2)

40 CFR 63.996

40 CFR 63.998

40 CFR 63.999

40 CFR Part 63, Subpart GGGGG

40 CFR Part 63, Subpart ZZZZ
This regulation defines performance standards for stationary reciprocating internal combustion engines

6 NYCRR 201-6.4 (f) (2)
Operational flexibility protocol terms.

6 NYCRR 201-6.5 (a)
This section identifies state enforceable requirements for Title V permits.

6 NYCRR 211.1
This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212-1.5 (e) (2)
A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) satisfies the requirements of Part 212 for the respective air contaminant regulated by the Federal standard.

However, NESHAPs regulating High Toxicity Air Contaminants (HTACs) must

provide evidence that the maximum offsite ambient air concentration is less than the AGC/SGC and that emissions are less than the PB trigger for the respective air contaminant.

6 NYCRR 212-2.1 (a)
This provision is for an air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List (HTAC). The facility owner or operator must either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4.

6 NYCRR 212-2.1 (b)
This provision applies to any air contaminant not listed on the High Toxicity Air Contaminant List (HTAC) and states the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 - or Table 4.

6 NYCRR 212-2.4 (b)
Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 212-3.1
SABIC is applying for a source specific Reasonably Available Control Technology (RACT) determination for emission point 01305-01 for RM-606 mix/run tank. The facility has applied for this determination in accordance with DAR-20: Economic and Technical Analysis for RACT. The facility determined that the cost per ton of reduction was well above the threshold of $5,500.00 per ton removed for the contaminant, toluene. The Department reviewed this RACT analysis and determined that it was not sufficient and not technologically feasible to install th etechnologies listed. Therefore, the facility is not required to implement any additional control technology for this source specific RACT determination.

6 NYCRR 212-3.1 (c) (4) (i)
This provision states that owners and/or operators of emission points subject to Part 212-3 operating prior to October 20, 1994 must submit a compliance plan to the

department. The compliance plan must demonstrate that the VOC emission points are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent.

6 NYCRR 225-1.2 (f)
Sulfur-in-fuel limitations for the purchase of #2 heating oil on or after July 1, 2012.

6 NYCRR 229.3 (e) (1)
This regulation requires fixed roof storage tanks subject to Part 229 to be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings, or equivalent control. Furthermore, replacement of other than liquid mounted seals is to be performed only when the tank is cleaned and gas-freed for other purposes.

6 NYCRR 229.3 (e) (2) (iv)
This section requires a tank with submerged fill for storage of volatile organic liquids

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR 236.3 (a)
This condition requires synthetic organic chemical manufacturing facilities to monitor (using EPA Method 21) certain process components for leaks of volatile organic compounds on a quarterly schedule.

6 NYCRR 236.3 (c)
This condition outlines variations from the typical quarterly leak detection and repair schedule for certain types of synthetic organic chemical manufacturing components.

6 NYCRR 236.4 (b)
This condition requires repairs to be performed on leaking components at synthetic organic chemical mfg. facilities. This section of the regulation also limits the time in which the repairs must be completed and the circumstances for delaying the repairs

6 NYCRR 236.4 (c)
This condition requires repairs to be performed on leaking components at synthetic organic chemical mfg. facilities. This section of the regulation also limits the time in which the repairs must be completed and

the circumstances for delaying the repairs

6 NYCRR 236.5
Conditions under section 236.5 detail the recordkeeping and reporting requirements of the process unit component leak detection and repair program. This includes an maintaining an onsite inspection log for two years and submitting quarterly reports.

6 NYCRR 236.7

Compliance Certification
Summary of monitoring activities at SABIC INNOVATIVE PLASTICS US LLC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	38	work practice involving specific operations
FACILITY	39	monitoring of process or control device parameters as surrogate
FACILITY	40	monitoring of process or control device parameters as surrogate
FACILITY	41	monitoring of process or control device parameters as surrogate
FACILITY	42	monitoring of process or control device parameters as surrogate
FACILITY	43	monitoring of process or control device parameters as surrogate
FACILITY	44	monitoring of process or control device parameters as surrogate
A-PAREA/-/HOF	113	record keeping/maintenance procedures
H-IPSBG/-/HT3	139	intermittent emission testing
R-ESBLG/-/RRX	151	monitoring of process or control device parameters as surrogate
R-ESBLG/00306/RT2/00306	158	monitoring of process or control device parameters as surrogate
R-ESBLG/01305/RT2/RM606	160	record keeping/maintenance procedures
R-ESBLG/01365/RWS/IVSMS	162	monitoring of process or control device parameters as surrogate
R-ESBLG/01365/RWS/IVSMS	163	monitoring of process or control device parameters as surrogate
R-ESBLG/01366/RPV/01366	164	monitoring of process or control device parameters as surrogate
R-ESBLG/01379/RT4/T1379	165	monitoring of process or control device parameters as surrogate
S-FSBLG/-/FEX/C2593	166	monitoring of process or control device parameters as surrogate
FACILITY	48	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
R-ESBLG/-/RPH/HS255	149	record keeping/maintenance procedures
A-PAREA	98	record keeping/maintenance procedures
A-PAREA/-/AFE/APHES	102	work practice involving specific operations
A-PAREA/-/AFE/APMWW	105	record keeping/maintenance procedures
R-ESBLG/00460/RT5	159	monitoring of process or control device parameters as surrogate

FACILITY	76	record keeping/maintenance procedures
FACILITY	78	record keeping/maintenance procedures
FACILITY	79	record keeping/maintenance procedures
FACILITY	80	monitoring of process or control device parameters as surrogate
R-ESBLG/01365/RWS	161	monitoring of process or control device parameters as surrogate
FACILITY	81	record keeping/maintenance procedures
FACILITY	82	record keeping/maintenance procedures
R-ESBLG/-/RT6	157	record keeping/maintenance procedures
FACILITY	83	record keeping/maintenance procedures
FACILITY	84	record keeping/maintenance procedures
FACILITY	85	record keeping/maintenance procedures
FACILITY	86	record keeping/maintenance procedures
FACILITY	87	record keeping/maintenance procedures
FACILITY	88	record keeping/maintenance procedures
R-ESBLG	147	record keeping/maintenance procedures
FACILITY	50	monitoring of process or control device parameters as surrogate
A-PAREA/01212	118	record keeping/maintenance procedures
A-PAREA/01212	119	record keeping/maintenance procedures
A-PAREA/01212	120	record keeping/maintenance procedures
A-PAREA/01212	121	record keeping/maintenance procedures
A-PAREA/01212	122	record keeping/maintenance procedures
A-PAREA/01212	123	record keeping/maintenance procedures
A-PAREA/01212	124	record keeping/maintenance procedures
A-PAREA/01212	125	record keeping/maintenance procedures
A-PAREA/-/AT4	109	intermittent emission testing
A-PAREA/00282	114	monitoring of process or control device parameters as surrogate
A-PAREA/00282	115	monitoring of process or control device parameters as surrogate
FACILITY	51	record keeping/maintenance procedures
A-PAREA/-/AFE/APPWW	106	record keeping/maintenance procedures
A-PAREA/-/AT4	111	record keeping/maintenance procedures
FACILITY	89	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
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FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	68	record keeping/maintenance procedures
FACILITY	69	record keeping/maintenance procedures
FACILITY	70	record keeping/maintenance procedures
FACILITY	71	record keeping/maintenance procedures
H-IPSBG/-/HFE	134	record keeping/maintenance procedures
H-IPSBG/-/HPV	138	record keeping/maintenance procedures
H-IPSBG/03041	140	monitoring of process or control device parameters as surrogate
H-IPSBG/-/HFE	135	record keeping/maintenance procedures
H-IPSBG	132	record keeping/maintenance procedures
FACILITY	72	record keeping/maintenance procedures
FACILITY	73	record keeping/maintenance procedures
R-ESBLG/-/RT5	153	record keeping/maintenance procedures

R-ESBLG/-/RT5	154	record keeping/maintenance procedures
FACILITY	74	record keeping/maintenance procedures
FACILITY	75	monitoring of process or control device parameters as surrogate
R-ESBLG	141	record keeping/maintenance procedures
R-ESBLG	142	record keeping/maintenance procedures
R-ESBLG	143	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	171	record keeping/maintenance procedures
FACILITY	172	record keeping/maintenance procedures
FACILITY	173	work practice involving specific operations
FACILITY	174	record keeping/maintenance procedures
FACILITY	175	monitoring of process or control device parameters as surrogate
FACILITY	176	monitoring of process or control device parameters as surrogate
FACILITY	177	record keeping/maintenance procedures
FACILITY	178	monitoring of process or control device parameters as surrogate
FACILITY	179	work practice involving specific operations
FACILITY	180	record keeping/maintenance procedures
FACILITY	181	monitoring of process or control device parameters as surrogate
FACILITY	182	monitoring of process or control device parameters as surrogate
FACILITY	25	work practice involving specific operations
FACILITY	29	record keeping/maintenance procedures

Basis for Monitoring
6 NYCRR 215.2
Open burning regulation.

6 NYCRR Part 215 was revised (filed on 9/14/2009) and the new version has been submitted to USEPA for inclusion in the New York State Implementation Plan (SIP) as a control measure for PM2.5. Until USEPA approves the SIP revision, the original version of the rule is federally enforceable whereas the new version is state enforceable only. The new rule has been placed on the federal side of the permit pending approval, however the rule is not federally enforceable until such a date when the US EPA approves the most recent submission of the New York State Implementation Plan.

6 NYCRR 212.4(c) (40 CFR 52.1670(c))
Emission Unit: A-PAREA Process: ASH
Emission Unit: A-PAREA Process: HOF
Emission Unit: C-XPRSS Emission Point: 05004
Emission Unit: C-XPRSS Emission Point: 05005
Emission Unit: S-FSBLG Emission Point: 00555
Emission Unit: S-FSBLG Emission Point: 00561
Emission Unit: S-FSBLG Emission Point: 00567
Emission Unit: S-FSBLG Emission Point: 00573
Emission Unit: S-FSBLG Emission Point: 01583
Emission Unit: S-FSBLG Emission Point: 01584
Emission Unit: S-FSBLG Emission Point: 01587
Emission Unit: S-FSBLG Emission Point: 01588

Emission Unit: S-FSBLG Emission Point: 01592
Emission Unit: S-FSBLG Emission Point: 02600
Emission Unit: S-FSBLG Emission Point: 02601
Emission Unit: S-FSBLG Emission Point: 02617
Emission Unit: S-FSBLG Emission Point: 02749
Emission Unit: H-IPSBG Emission Point: 03012 Process: HPV Emission Source: 03012
Emission Unit: S-FSBLG Emission Point: 02593 Process: FPV Emission Source: RECUP

Emission Unit: R-ESBLG Emission Point: 00337
Emission Unit: R-ESBLG Emission Point: 00367
Emission Unit: R-ESBLG Emission Point: 00368
Emission Unit: R-ESBLG Emission Point: 00369
Emission Unit: R-ESBLG Emission Point: 00370
Emission Unit: R-ESBLG Emission Point: 01378
Emission Unit: R-ESBLG Emission Point: 01395On a once-every-two-month basis the above mentioned emission points are observed for visible emissions to ensure compliance with the 20% or less opacity standard.

6 NYCRR 212.2-4(b)(1)
Emission Unit: A-PAREA Process: ASH
Emission Unit: A-PAREA Process: HOF
Emission Unit: C-XPRSS Emission Point: 05004
Emission Unit: C-XPRSS Emission Point: 05005
Emission Unit: S-FSBLG Emission Point: 00555
Emission Unit: S-FSBLG Emission Point: 00561
Emission Unit: S-FSBLG Emission Point: 00567
Emission Unit: S-FSBLG Emission Point: 00573
Emission Unit: S-FSBLG Emission Point: 01583
Emission Unit: S-FSBLG Emission Point: 01584
Emission Unit: S-FSBLG Emission Point: 01587
Emission Unit: S-FSBLG Emission Point: 01588
Emission Unit: S-FSBLG Emission Point: 01592
Emission Unit: S-FSBLG Emission Point: 02600
Emission Unit: S-FSBLG Emission Point: 02601
Emission Unit: S-FSBLG Emission Point: 02617
Emission Unit: S-FSBLG Emission Point: 02749
Emission Unit: H-IPSBG Emission Point: 03012 Process: HPV Emission Source: 03012
Emission Unit: S-FSBLG Emission Point: 02593 Process: FPV Emission Source: RECUP
Emission Unit: R-ESBLG Emission Point: 00337
Emission Unit: R-ESBLG Emission Point: 00367
Emission Unit: R-ESBLG Emission Point: 00368
Emission Unit: R-ESBLG Emission Point: 00369
Emission Unit: R-ESBLG Emission Point: 00370
Emission Unit: R-ESBLG Emission Point: 01378
Emission Unit: R-ESBLG Emission Point: 01395

On a once-every-two-month basis the above mentioned emission points are observed for visible emissions to ensure compliance with the 20% or less opacity standard.

6 NYCRR 225-1.2(b)

The sulfur content of oil is limited to less than or equal to 1.5% by weight to ensure that the sulfur dioxide emitted from the facility is limited. The facility shall monitor the sulfur in fuel certificate to ensure the sulfur in the fuel is equal or less than 1.5% by weight.

40 CFR 60.116b(b), NSPS Subpart Kb
Emission Unit: H-IPSBG Emission Point: 03032 Process: HT2 Emission Source: 03032
Emission Unit: H-IPSBG Emission Point: 03033 Process: HT2 Emission Source: 03033
Emission Unit: R-ESBLG Emission Point: 01305 Process: RT1 Emission Source: RM607
Emission Unit: R-ESBLG Emission Point: 01305 Process: RT2 Emission Source: RM606
Emission Unit: R-ESBLG Emission Point: 01305 Process: RT3 Emission Source: RM605
Emission Unit: S-FSBLG Emission Point: 02710 Process: FT1 Emission Source: 02710
Emission Unit: S-FSBLG Emission Point: 02756 Process: FT1 Emission Source: 02756
The facility shall keep records readily available showing the dimensions and the capacity of the storage vessels of the above emission sources.

40 CFR 61.356(b)(1), NESHAP Subpart FF
The facility will maintain benzene wastestream records in accordance with this subpart.

40 CFR 63.165, Subpart H
Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR
Emission Unit: R-ESBLG
This monitoring condition monitors the pressure relief devices at the facility to ensure that there are not any leaks present at these devices at or above 500 ppm above background. If the indicator shows a leak then they have up to 15 days to repair the leak unless otherwise specified by the regulation.

40 CFR 63.168, Subpart H
Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR
Emission Unit: R-ESBLG
This monitoring condition monitors valves for leaks in the systems referenced above, if the indicator shows that the facility has a leak which is defined as 500 ppm above background they have 15 days to repair the leak unless otherwise specified by the regulation.

40 CFR 63.169, Subpart H
Emission Unit: A-PAREA Process:AFE Emission Source: ALDAR
Emission Unit: R-ESBLG
This condition monitors for leaks in pumps, valves, connectors, and agitators in heavy liquid service, pressure relief devices in light or heavy liquid service. If a leak is found according to the methods specified in the regulation then the facility must make a first attempt of repair after 5 days. The leak shall be repaired within 15 days unless otherwise specified in the regulation.

40 CFR 63.173, Subpart H
Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR
Emission Unit: R-ESBLG
This requirement specifies that the facility will monitor leaks for agitators. If a leak is detected they have to attempt to repair with 5 days. the leak shall be repaired within 15 days unless otherwise specified by the regulations.

40 CFR 63.163(b)(2), Subpart H
Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR

This requirement specifies for pumps in light liquid service that if a leak is detected then they have up to 5 days to make an attempt to fix the leak. The leak shall be repaired within 15 days unless otherwise specified by the regulations.

40 CFR 63.174(a), Subpart H
Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR
This requirement specifies for connectors in gas/vapor and light liquid service the facility will monitor for leaks and when a leak is detected the first attempt at repair shall be done within 5 days. The leak shall be repaired within 15 days unless otherwise specified by the regulations. This condition also specifies the monitoring frequency by which the facility shall check for leaks.

40 CFR 63.104, Subpart F
Emission Unit: A-PAREA Process: AFE Emission Source: APHES
This requirement monitors if there is a leak in the cooling water quarterly. If there is a leak detected the leak shall be repaired as soon as practical, but no later than 45 days. Once repair the system will be checked within 7 days.

6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: A-PAREA Process: AT3 Emission Point: 00282
The process above uses a scrubber to ensure that the proper control is achieved for methyl alcohol, the monitoring required is that the scrubber liquid flow rate scrubber liquid flow rate shall be equal to or greater than 2.5 gallons per minute (gpm) when methanol is being loaded into the storage tank, and 0.25 gpm when methanol it not being loaded into the tank.

6 NYCRR 212.10(c) (40 CFR 52.1670(c))
Emission Unit: A-PAREA Process: AT3 Emission Point: 00282
The process above uses a scrubber to ensure that the proper control is achieved for volatile organic compounds, the monitoring required is that the scrubber liquid flow rate scrubber liquid flow rate shall be equal to or greater than 2.5 gallons per minute (gpm) when methanol is being loaded into the storage tank, and 0.25 gpm when methanol it not being loaded into the tank.

40 CFR 63.119(e)(1), Subpart G
Emission Unit: A-PAREA Process: AT3 Emission Point: 00282
This emission point shall be controlled to 95% of Hazardous Air Pollutants by maintaining the scrubber liquid flow rate scrubber liquid flow rate shall be equal to or greater than 2.5 gallons per minute (gpm) when methanol is being loaded into the associated tank, and 0.25 gpm when methanol it not being loaded into the tank.

6 NYCRR 212.10(c) (40 CFR 52.1670(c))
Emission Unit: A-PAREA Emission Point: 01252 Process: AT5 Emission Source: M305B
Emission Unit: A-PAREA Emission Point: 00704 Process: AT6
Emission Unit: H-IPSBG Process: HT3
This requirement states that the Volatile Organic Compounds shall be controlled to 81%. The carbon beds for the above sources shall be checked to ensure that the reading obtained by the FID is lower than 10ppm, there will be a change out of carbon if there is breakthrough.

6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Process: RRX
This requirement states that the upper limit in pounds/ hour must be 24 or less for the 5 emission points included in this process. For this process, toluene is controlled to 94% which also is inclusive of the 81% control of Volatile Organic Compounds.

6 NYCRR 212.10(c) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Emission Point 01355 Process: RWS Emission Source 01355
Emission Unit: R-ESBLG Emission Point 01356 Process: RWS Emission Source 01356
Emission Unit: R-ESBLG Emission Point 01357 Process: RWS Emission Source 01357
Emission Unit: R-ESBLG Emission Point 01358 Process: RWS Emission Source 01358
Emission Unit: R-ESBLG Emission Point 01359 Process: RWS Emission Source 01359This condition requires that the volatile organic compounds must be controlled to 81% or more with condensers and both scrubbers operating.

6 NYCRR 212.10(c)(1) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Emission Point: 00306 Process: RT2 Emission Source: 00306
To control volatile organic compounds to 81% from the tanks when filling, the glycol temperature must be maintained and monitored to stay at or below 30 degrees Fahrenheit in the condenser.

40 CFR 63.2470(a), Subpart FFFF
Emission Unit: R-ESBLG Emission Point: 00460 Process: RT5
To reduce hazardous air pollutants to 95% control or more the water scrubber water flow rate must be monitored on a daily average to ensure compliance with the control limit.
To reduce hazardous air pollutants to 95% control or more the methanol scrubber outlet gas temperature shall be monitored on a daily average to ensure compliance with the control limit.
To reduce hazardous air pollutants to 95% control or more the methanol scrubber methanol feed rate shall be monitored on a daily average to ensure compliance with the control limit.
To reduce hazardous air pollutants to 95% control or more the gas flow rate through the scrubber system shall be monitored on a daily average to ensure compliance with the control limit.

6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Emission Point: 00460 Process: RT5
To reduce hazardous air pollutants to 94% control or more the water scrubber water flow rate must be monitored on a daily average to ensure compliance with the control limit.
To reduce hazardous air pollutants to 94% control or more the methanol scrubber outlet gas temperature shall be monitored on a daily average to ensure compliance with the control limit.
To reduce hazardous air pollutants to 94% control or more the methanol scrubber methanol feed rate shall be monitored on a daily average to ensure compliance with the control limit.
To reduce hazardous air pollutants to 94% control or more the gas flow rate through the scrubber system shall be monitored on a daily average to ensure compliance with the control limit.

6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Emission Point: 01355 Process: RWS Emission Source: 01355
Emission Unit: R-ESBLG Emission Point: 01356 Process: RWS Emission Source: 01356
Emission Unit: R-ESBLG Emission Point: 01357 Process: RWS Emission Source: 01357
Emission Unit: R-ESBLG Emission Point: 01358 Process: RWS Emission Source: 01358
Emission Unit: R-ESBLG Emission Point: 01359 Process: RWS Emission Source: 01359
To reduce emissions of toluene to 94% at the above mentioned sources the emission data shall be recorded continuously to ensure that the scrubbers and condensers are working properly.

40 CFR 63.2455(c), Subpart FFFF
Emission Unit: R-ESBLG Emission Point: 01365 Process: RWS
The water scrubber water temperature, water scrubber water flow rate, methanol scrubber liquid methanol flow rate, gas flow rate, and the methanol scrubber liquid methanol influent temperature will be monitored

on a daily average to ensure that the proper control is being attained. In this case, the TRE (Total Resource Effectiveness) must be maintained with the above mentioned parameters.

6 NYCRR 212.10(c)(1) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Emission Point: 01365 Process: RWS
The water scrubber water temperature, water scrubber water flow rate, methanol scrubber liquid methanol flow rate, gas flow rate, and the methanol scrubber liquid methanol influent temperature will be monitored on a daily average to ensure that the proper control is being attained. In this case, level of VOC control required is 81%.

6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Emission Point: 01365 Process: RWS Emission Source: IVSMS
The methyl alcohol and toluene is controlled to 99% by monitoring the emissions from the emission point.

6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Emission Point: 01366 Process: RPV Emission Source: 01366
The toluene is controlled to 99% and the parameters are monitored to calculate the Emission Rate Potential emitting from the above mentioned emission point.

6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: R-ESBLG Emission Point: 01379 Process: RT4 Emission Source: T1379
The carbon bed is monitored for breakthrough so that volatile organic compounds are voluntarily controlled to 90% this control requirement also satisfies the 81% reasonable available control technology requirement.

6 NYCRR 212-3.1(c)
Emission Unit: R-ESBLG Emission Point: 01379 Process: RT4 Emission Source: T1379
This requirement states that the Volatile Organic Compounds shall be controlled to 81%. The carbon beds for the above source shall be checked to ensure that the reading obtained by the FID is lower than 10ppm, there will be a change out of carbon if there is breakthrough.

6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: S-FSBLG Process: FEX Emission Source: C2581
The tonnage of product is monitored to ensure that volatile organic compounds emitted are at 94% control. When the tonnage of product is reached the carbon beds are changed to ensure compliance with the regulations.

6 NYCRR 212-3.1(c)
Emission Unit: S-FSBLG Process: FEX Emission Source: C2581
The tonnage of product is monitored to ensure that volatile organic compounds emitted are at 81% control. When the tonnage of product is reached the carbon beds are changed to ensure compliance with the regulations.

6 NYCRR 212-2.1(b)
Emission Unit: S-FSBLG Process: FEX Emission Source: C2581
The tonnage of product is monitored to ensure that emission rates of A-rated compounds from this source included in air dispersion modeling completed for the permit application are not exceeded.
6 NYCRR 212.4(a) (40 CFR 52.1670(c))
Emission Unit: S-FSBLG Process: FEX Emission Source: C2593

The temperature of the recuperative thermal oxidizer shall be monitored to ensure that the volatile organic compounds emitted is controlled to the appropriate level.

6 NYCRR 212-3.1(c)
Emission Unit: S-FSBLG Process: FEX Emission Source: C2593
The temperature of the recuperative thermal oxidizer shall be monitored to ensure that the volatile organic compounds emitted is controlled to the appropriate level.

6 NYCRR 212-3.1(c)
Emission Unit: S-FSBLG Process: FEX Emission Source: C2593
The temperature of the recuperative thermal oxidizer shall be monitored to ensure that emission rates of A-rated compounds from this source included in air dispersion modeling completed for the permit application are not exceeded.

40 CFR 63.114(a)(5)
Emission Unit: A-PAREA Emission Point: 01212
The carbon adsorption system monitors total organic vapor concentration to ensure compliance with the HON requirement to reduce OHAP concentration either by at least 98% or to no more than 20 ppmv at the outlet.

40 CFR 63.1316(c)(1)(i)
Emission Unit: H-IPSBG Emission Point: 03041
The carbon adsorption system monitors total organic vapor concentration to ensure compliance with the mass emissions per mas of product requirements.

6 NYCRR 212-2.1(a)
Emission Unit: S-FSBLG Process: FEX Emission Source: C2581
Emission Unit: S-FSBLG Process: FEX Emission Source: C2593
Emission Unit: C-XPRSS Process: CXP Emission Source: 05000
Emission Unit: W-TAREA Process: WT1 Emission Source: 00709
Emission Unit: W-TAREA Process: WPV Emission Source: 00717
Emission Unit: W-TAREA Process: WPV Emission Source: 00718
Emission Unit: W-TAREA Process: WPV Emission Source: 00727

6 NYCRR 212.10(c) (40 CFR 52.1670(c))
Emission Unit: A-PAREA Process: HOF
Hours of operation are monitored to illustrate the operating time of the HOF, which meets RACT.

6 NYCRR 212-3.1(c)
Emission Unit: A-PAREA Process: HOF
Hours of operation are monitored to illustrate the operating time of the HOF, which meets RACT.