Division of Air Resources

Permit Review Report

Permit ID: 5-4154-00002/01743
Renewal Number: 4
Modification Number: 2 01/28/2026

Facility Identification Data
Name: MOMENTIVE PERFORMANCE MATERIALS
Address: 260 HUDSON RIVER RD
Waterford, NY 12188

Owner/Firm
Name: MPM SILICONES, LLC
Address: 260 HUDSON RIVER RD
WATERFORD, NY 12188, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: BETH A MAGEE
Address: NYSDEC - WARRENSBURG SUBOFFICE
232 GOLF COURSE RD
WARRENSBURG, NY 12885-1172
Phone:5186231281

Division of Air Resources:
Name: YASMINI PATEL
Address: 232 GOLF COURSE RD
WARRENSBURG, NY 12885
Phone:5186231200

Air Permitting Contact:
Name: RUTH YEOMANS
Address: MOMENTIVE PERFORMANCE MATERIALS
260 HUDSON RIVER RD
WATERFORD, NY 12188
Phone:5182335075

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
The renewal 4 mod 2 application is being submitted for the installation of a new ultra-low NOx burner on Boiler 13 to ensure compliance with the requirements of 40 CFR 52.45 by the May 1, 2026 compliance date. The application also incorporated the new requirements for 40 CFR 84 and 6 NYCRR Part 494. In addition, sources, emission points and processes that have been permanently taken out of service are being

removed from the permit along with certain associated permit conditions and added several that had been inadvertently removed from the permit renewal 4. Changes made under operational flexibility since the issuance of renewal 4 mod 0 are also being incorporated into Mod 2.

Attainment Status
MOMENTIVE PERFORMANCE MATERIALS is located in the town of WATERFORD in the county of SARATOGA.
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:
Momentive Performance Materials operates a silicone production facility (sic 2821) located in Saratoga County, New York, in the town of Waterford. The plant is approximately 12 miles north of Albany. The site produces silicone products and materials including resins, fluids, dispersions, emulsions, heat curing elastomers and room temperature vulcanizing (rtv) elastomers. The site has continuous and batch chemicals processes, compounding, finishing and packaging operations, and steam generation capability.

Permit Structure and Description of Operations
The Title V permit for MOMENTIVE PERFORMANCE MATERIALS
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.

MOMENTIVE PERFORMANCE MATERIALS is defined by the following emission unit(s):

Emission unit W97004 - This Emission Unit is the wastewater treatment process system of the waste handling area. The wastewater treatment plant is a physical/chemical treatment system consisting of pH neutralization, oil and grease separation, clarification, and air stripping operations.

Emission unit W97004 is associated with the following emission points (EP):
97004, 97005, 97008, 97013, 97015, 97016, 97018, 97019, 97020, 97021, 97044, 97060, 97063, 97064, 97100
Process: 705 is located at Building AREA 96 - WWTP Tank Farm Operation: The WWTP Tank Farm stores various materials to support WWTP operations. The tanks all have nitrogen blankets and may be equipped with pressure control valves. Some of the tanks may be used to handle Group 1 wastewaters subject to 40CFR 63, Subpart FFFF and are managed as described under Process MN1 and the applicable requirements for processes 213-215 and 217-219.

Process: 745 is located at Building AREA 96 - Biological Wastewater Treatment System: The Bio Reactor system is an activated sludge process that receives influents of pretreated wastewater, and containment water. Bio Reactors T-20 and T-21 (sources BIOR1, BIOR2) consist of aeration basins and integral clarifiers that are operated in parallel. The overflow from the primary treatment clarifiers and T-507 is transferred to the Bio Equalization Tank (T-505) prior to flowing to the Bio Reactors. IPA is stored in T-18 prior to being used as food in the Bio Reactors. Non-contact cooling water/clean storm water sewers can be diverted to the containment tanks (T-502, T-503, T-504, T-506). The waste sludge subsystem is used to remove excess sludge from the Bio Reactors. The Bio Reactors may be used to handle Group 1 wastewaters subject to 40CFR 63, Subpart FFFF and are managed as described under processes MN1, MN2, and MN3 and the applicable requirements for processes 213-215 and 217-219.

Process: 825 is located at Building AREA 96 - Primary Wastewater Treatment Plant: Wastewater from plant processes is treated prior to discharge to the river. The system consists of the API wet well (neutralizer), API oil/water separator, two API decant tanks and clarifiers which operate in series. Underflow from the clarifiers is directed to the thickener and overflow goes to the T-507 tank. Lime, caustic and polymers are added to the treatment system from feed tanks as needed. The clarifier sir strippers (sources ST100 and ST101) are used to remove volatile organic compounds from the wastewater in T-507 prior to it being sent to secondary treatment in the biological treatment system. Effluent from T-507 may also be directed to the back neutralizers. The clarifier strippers normally vent to the incinerators through the clarifier air stripper header but may also vent to atmosphere at EP 97013 or through incinerator purge vents at EP 97015 and 97016. The stripper system is subject to regulation under 40 CFR 63, Subpart G.

Emission unit U28003 - Emission Unit U28003 consists of boilers 14 and 16.

Emission unit U28003 is associated with the following emission points (EP):

28003, 28004
Process: 415 is located at Building 28 - Natural gas is combusted in Boiler 14. Boiler 14 was manufactured by Babcock and Wilcox and has a maximum heat input rating of 171 MMBtu/hr (125,000 lb/hr steam). It is equipped with a low NOx burner and is exhausted directly to the atmosphere through a common stack shared with Boiler 15 (EP 28003). The boiler is used to generate steam for both process use and space heating. Boiler 14 is classified as a large boiler under 6NYCRR Part 227-2 as revised 6/2010.

Process: 417 is located at Building 28 - Natural gas is combusted in Boiler 16. Boiler 16 is a Keeler boiler with a maximum heat input rating of 49.3 MMBtu/hr (40,000 lb/hr steam). It is exhausted directly to the atmosphere through a steel stack (EP 28005). The boiler is used to generate steam for both process use and space heating. Boiler 16 is classified as a mid-size boiler under 6NYCRR Part 227-2 as revised 6/2010.

Emission unit FINISH - Finishing - intermediate and final production of silicone products and materials including resins, fluids, dispersions, emulsions, heat curing elastomers, room temperature vulcanizing (rtv) elastomers, sealants, and treated fumed silica. Also includes various maintenance shops and individual maintenance sources (such as degreasers).

Emission unit FINISH is associated with the following emission points (EP):
21101, 23100, 23101, 23103, 23104, 24116, 24132, 24133, 24134, 24135, 24136, 24137, 24138, 24139, 24140, 24205, 24207, 24209, 24210, 24211, 24302, 24305, 24308, 24309, 24311, 24312, 24402, 24404, 24405, 24408, 24409, 24413, 24414, 24702, 24704, 24806, 24909, 24934, 24942, 24943, 24944, 24945, 24972, 27102, 30001, 30004, 30910, 30911, 30932, 30933, 30935, 31003, 31501, 31502, 31503, 31504, 31505, 31506, 31507, 31508, 32007, 32008, 32009, 32016, 32017, 32025, 32026, 32028, 32029, 32033, 32040, 32042, 32044, 32046, 32049, 32050, 33002, 33003, 33004, 33016, 33017, 33024, 33025, 33027, 33028, 33902, 33903, 33904, 33906, 33908, 33909, 37001, 37003, 37005, 37016, 37032, 37048, 37049, 37050, 37101, 37102, 37103, 37104, 37105, 37701, 37816, 37919, 37924, 37935, 37936, 37937, 37938, 37939, 37940, 37948, 38008, 42001, 42002, 42003, 42004, 42012, 42017, 42018, 42019, 42020, 42021, 44001, 44004, 44044, 61602, 71010, 76006, 76007, 78008, 78021, 78022, 78023, 78024, 78026, 78033, 78034, 78035, 78036, 78037, 78038, 78039, 85001, 85002, 85004, 85005, 85006, 85008, 85013, 85017, 85020, 85025, 85032, 85043, 85044, 85045, 85046, 85054, 85059, 85068, 85901, 85902, 85903, 85906, 85907, 97023
Process: 029 is located at Building 85 - The endcapper system makes fluids. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process also includes any associated cleanouts. The endcapper system vents to atmosphere through the vent head at EP 85906 or EP 85907.

Process: 053 is located at Building 76 - The CASH system is a Group 1 continuous process subject to 40 CFR 63, Subpart FFFF. The system vents through the CASH scrubber, which is a MON MACT Group 1 control device, to EP 76006. This process includes any associated cleanouts.

Process: 058 is located at Building 42 - The Banbury I system includes a mill, tiller hopper, extruder and mixer. It is a batch system used to make silicone rubber. It may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR 63, Subpart FFFF are tracked under monthly MON MACT batch tracking and managed in process MN3. This process includes any associated cleanouts. The mill vents through EP 42001 and the mixer vents through EP 42012. The decanter vents through EP 42013. The Banbury Mixer vents through EP 42014. The drum purge vents through EP 42017. The drum purge manifold vents

through EP 42018.

Process: 059 is located at Building 42 - The Banbury 2 system includes a mill, tiller hopper, extruder and mixer. It is a batch system used to make silicone rubber. It may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR 63, Subpart FFFF are tracked under monthly MON MACT batch tracking and managed in process MN3. This process includes any associated cleanouts. The mill vents through EP 42002 and the mixer vents through EP 42012. The decanter vents through EP 42013. The Banbury Mixer vents through EP 42014. The drum purge vents through EP 42017. The drum purge manifold vents through EP 42018.

Process: 060 is located at Building 42 - The Banbury 3 system includes a mill, tiller hopper, extruder and mixer. It is a batch system used to make silicone rubber. It may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR 63, Subpart FFFF are tracked under monthly MON MACT batch tracking and managed in process MN3. This process includes any associated cleanouts. The mill vents through EP 42003 and the mixer vents through EP 42012. The decanter vents through EP 42013. The Banbury Mixer vents through EP 42014. The drum purge vents through EP 42017. The drum purge manifold vents through EP 42018. The drum feed station vents through EP 42021. The liquid add station vents through EP 42020.

Process: 061 is located at Building 30 - The doughmixer 8 system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The system vents through EPS 32016 and 32042.

Process: 063 is located at Building 42 - The Banbury 4 system includes a mill, tiller hopper, extruder and mixer. It is a batch system used to make silicone rubber. It may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR 63, Subpart FFFF are tracked under monthly MON MACT batch tracking and managed in process MN3. This process includes any associated cleanouts. The mixer vents through EP 42012. Silicone Rubber Mill 4 vents through EP 42004. The decanter vents through EP 42013. The Banbury Mixer vents through EP 42014. The drum purge vents through EP 42017. The drum purge manifold vents through EP 42018.

Process: 065 is located at Building 42 - The banbury filler vents, cyclone separator, bag dump stations, general vacuum system and hoffman vacuum systems are included in this process. Particulate emissions from these sources vent through a dust collector to EP 42012.

Process: 102 is located at Building 30 - The TFK 2 (treated filler kettle 2) system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process also includes any associated cleanouts. The system vents through EP 32026. The light ends receiver system can also vent through EP 32028 (either using ammonia scrubber or not). The tank loading station vents through the scrubber at EP 32028.

Process: 111 is located at Building 30 - The vent dust collection system captures the particulates that escape from the atmospheric vents on TFK 1, TFK 2, TFK3, hoppers 1 through 5 as well as silos 1 through 6. This process also includes any associated cleanouts. Particulates vent through the dust collector EP

32046.

Process: 136 is located at Building 30 - Alkoxy catalyst feed tank, tote/drum stations, drum transfer stations, miscellaneous totes, hydride catalyst feed tank and the MTMS feed tank vent through conservation vents consisting of a nitrogen blanket, PCV and/or flame arrestor before discharging through EP 33024. The acetoxy feed tank vents through a conservation vent at EP 33016.

Note: This process represents a system which can supply feeds to the WP extruder systems included under Process Codes 176, 177 & 178.

Process: 157 is located at Building 30 - The TFK 3 (treated filler kettle 3) system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3 This process includes any associated cleanouts. The system vents through EP 32028.

Process: 168 is located at Building 24 - The east resin system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The system vents through EPs 24207, 24305, 24308, 24309, 24311, 24312, 24404, 24409, 24413, 24702, 24704, 24944, 24302, 24945, 24955, 24956

Process: 170 is located at Building 30 - The doughmixer 9 system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The system vents through EPs 32017 and 32050.

Process: 171 is located at Building 30 - The Doughmixer 7 system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The system vents through EPs 32009 and 32049.

Process: 173 is located at Building 78 - The TFE system may make products subject to 40 CFR 63 Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process may operate in two different modes: initial startup, as well as a semi-continuous operation. This process includes any associated cleanouts. The system vents through EPs 78008, 78021, 78022, 78023, 78033, 78034, 78035.

Process: 174 is located at Building 30 - The doughmixer 6 system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The system vents through EPs 32008 and 32040.

Process: 175 is located at Building 85 - The WP-3 system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch

tracking and managed as described in process MN3. This process includes any associated cleanouts. The system vents through EPs 85002, 85013, 85906, 85907 and 85068.

Process: 176 is located at Building 30 - The WP-1 system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN3. This process includes any associated cleanouts. The system vents through EPs 33004 and 33017. Inputs to the WP-1 system may be supplied via the feed system described under process code 136.

Process: 177 is located at Building 30 - The WP-4 System may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN3. This process includes any associated cleanouts. The system vents through EPs 33004 and 33017. Inputs to the WP-1 system may be supplied via the feed system described under process code 136.

Process: 178 is located at Building 30 - The WP-5 system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN3. This process includes any associated cleanouts. The system vents through EPs 33004 and 33017. Inputs to the WP-1 system may be supplied via the feed system described under process code 136.

Process: 182 is located at Building 85 - The WP-2 system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN3. This process includes any associated cleanouts. The system vents through EPs 85002, 85004, 85045 and 85067.

Process: 183 is located at Building 30 - The doughmixer 5 system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The system vents through EPs 32007 and 32044.

Process: 190 is located at Building 85 - The treated filler kettle (TFK) 4 system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process also includes any associated cleanouts. The system vents through EPs 85008 and 85013.

Process: 191 is located at Building 85 - The treated filler kettle (TFK) 5 system is a batch system that includes the treated filler kettle, receiver, heat exchanger and overhead condenser. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The TFK 5 system vents through a spray column to EP 85008. The extruder can also vent through a water separator system to EP 85013.

Process: 203 This process represents heat exchange systems (cooling water) within the Miscellaneous

Organic Chemical Manufacturing Process Units (MCPUs) in Unit F-INISH that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Heat exchange systems subject to Subpart FFFF are summarized in the Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 204 This process represents the management of Group 1 wastewater or residuals in containers. The Group 1 wastewater or residuals are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit F-INISH that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 207 This process represents the management of Group 1 wastewater in individual drain systems. The Group 1 wastewater streams are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit F-INISH that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 212 This process represents the management of MON maintenance wastewater streams from unit F-INISH that are subject to 40 CFR 63, Subpart F.

Process: 215 This process represents the management of Group 1 process wastewater in tanks. The Group 1 wastewater is generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit F-INISH that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater storage tank determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 219 This process represents the treatment of Group 1 wastewater streams and/or residuals removed from Group 1 wastewater streams. The Group 1 wastewater or residuals are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit F-INISH that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions). If any associated emissions occur, amounts are reported under Process FUG.

Process: 222 This process represents any pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems in the unit F-INISH processes that are subject to the leak detection and repair requirements in 40 CFR 63, Subpart UU for MON MACT (40 CFR 63, Subpart FFFF) compliance. Each piece of equipment to which Subpart UU applies is identified in the LeakDAHS system. If any associated emissions occur, amounts are reported under Process FUG.

Process: 500 The 40 Gallon Ross MIxer Room systems may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on these systems that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The system vents through EPs 31501-31508. One mixer was relocated from building 14 and two new mixers are to be installed in 2023. A fourth mixer may be installed post 2023.

Process: 708 is located at Building 30 - The Molding Compounds Area Solids Handling Baghouse 2 vents through EP 33002. The grinding conveying dust pick up vents through the Molding Compounds Area Solids Handling Baghouse 3 vents to atmosphere at EP 33003. The pill room exhaust hoods vent through

the Molding Compounds Area Solids Handling Baghouse 1 to atmosphere at EP 31003.

Process: 729 is located at Building 71 - Transfer Truck loading/unloading vents to atmosphere through a scrubber.

Process: 751 is located at Building 23 - Building 23 and Building 23 Tank Farm storage tank working and breathing losses that vent to atmosphere. All tanks have a nitrogen blanket or are under pressure. Additionally, some tanks also have a pressure control valve present. (includes Op-flex 01/20/2021)

Process: 778 is located at Building 37 - Vapors from Building 37 processes that vent to atmosphere through sewer vents

Process: 779 is located at Building 24 - The west system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN3. The system may vent through emission points 24402, 24413, 24405. This process includes any associated cleanouts.

Process: 780 is located at Building 24 - Building 24 Storage tank working and breathing looses that vent to the atmosphere. All tanks have a nitrogen blanket or are under pressure. Additionally, some tanks also have a pressure control valve and/or flame arrestor present.

Process: 781 is located at Building 37 - Building 37 storage tank working and breathing losses that vent to the atmosphere. All tanks have a nitrogen blanket. Additionally, some tanks also have a pressure control valve present.

Process: 789 is located at Building 24 - The south system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN3. The system may vent through emission points 24209, 24210, 24211, 24413. This process includes any associated cleanouts.

Process: 796 is located at Building 78 - Elephant trunk systems capture vapors from drums and other sources and vent to the atmosphere. Elephant trunk systems vent through EPs 78036, 78037, 78038 and 78039.

Process: 798 is located at Building 85 - The high speed drum line system includes process tanks. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The pigment tanks vent through a conservation vent to atmosphere at EP 85058.

Process: 800 is located at Building 85 - Building 85 storage tanks working and breathing losses that vent to the atmosphere. All tanks have a nitrogen blanket or are under pressure. Additionally, some tanks also have a pressure control valve present and some tanks vent through the vent header to EP 85906 or EP 85907.

Process: 802 is located at Building 30 - Building 30 storage tank working and breathing losses that vent to

the atmosphere. All tanks have a nitrogen blank. Additionally, some tanks also have a pressure control valve present.

Process: 804 is located at Building 85 - Elephant trunk systems capture vapors from drums and other sources and vent through main dust collector to EP 85002.

Process: DEG is located at Building 44 - Maintenance shop degreasers. Cold cleaning solvent degreasing units that use a petroleum distillate solvent and are subject to requirements under 6 NYCRR Part 226.

Process: MN3 "This process includes all of the individual Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in unit F-INISH that are subject to 40 CFR 63, Subpart FFFF (MON MACT). The MCPUs are organized based on a Family of Materials (FOM). The complete list of MCPUs, FOMs and operating scenarios is maintained in the Subpart FFFF Notification of Compliance Status (NOCS). Process MN3 and the Subpart FFFF NOCS include Group 1 process vent streams and controls, storage tanks, transfer racks, and heat exchange systems, as well as the storage, management and treatment of designated Group 1 wastewater streams. Changes to the MON MACT MCPUs, FOMs, or operating scenarios are documented within the NOCS on a semiannual basis and are included in the Subpart FFFF Semiannual reports. Monthly MON MACT batch emission calculations are completed in order to verify the Group 2 status of applicable process vents.
Note: The MON MACT MCPUs utilize equipment and emission points that are already included under the Process codes designated for Title V permitting, which are organized by equipment rather than product. Emissions for Process MN3 are, therefore, included in the emissions for individual Process codes".

Emission unit ELISTS - This EU consists of lists of Processes, Emission Points & Emission Sources referenced in other EU Compliance Monitoring Activities

Process: L01 is located at 1st floor, Building All - List of Processes subject to 40 CFR 63 Subpart SS [63.983(a, b, c & d), 63.990(a & b), 63.996, 63.996(d), 63.998(a)(2), 63.998(b & c), 63.998(c)(1 & 2) & 63.998(d)(1)]

EU-C27018: Proc - 023-026, 040, 047, 083, 108 & 715
EU-FINISH: Proc - 053

Process: L02 is located at 1st floor, Building All - List of Processes subject to 40 CFR 63 Subpart SS [63.988(a), 63.988(b)]

EU-C27018: Proc - 023-026, 083 & 715

Process: L03 is located at 1st floor, Building All - List of Processes subject to 40 CFR 63 Subpart UU [63.1019, 63.1022, 63.1023(a, b & c), 63.1023(e), 63.1024(a, c, d, e & f), 63.1025(b, c & d), 63.1025(e)(1, 2 & 3), 63.1026, 63.1026(b)(4), 63.1026(e), 63.1027(b), 63.1027(e)(1 & 2), 63.1028, 63.1029, 63.1030, 63.1031(f), 63.1032, 63.1033, 63.1035, 63.1036, 63.1038(b & c) & 63.1039(a & b)]:

EU-C27018: Proc - 220, Source FUGM1

EU-C27035: Process - 221, Source FUGM2.

EU-FINISH: Processes - 222, Source FUGM3.

Process: L04 is located at Building All - List of Emission Points subject to Part 212-3.1(c)(4)(i):

EU-FINISH: EPs - 32028, 71013, 76006 & 85008.

EU-C27018: EPs - 76001, 23002.

Process: L05 is located at 1st floor, Building All - List of Emission Points subject to Part 212-3.1(c)(4)(iii):

EU-C27018: EPs - 24806

EU-FINISH: EPs - 32040, 32042, 32044, 32049 & 32050.

Process: L06 is located at 1st floor, Building All - List of Emission Points subject to Part 212-2.4(b) & Part 212-1.6(a):

EU-FINISH: EPs - 31001, 3200(6, 7, 8 & 9), 3201(6 & 7), 3300(2, 3), 42012, 85002, 85057 & 37105.

EU-C27018: EPs - 14006, 24120, 24132, 31002, 31003, 31022, 31030, 32038, 37707, 37934, 78005, & 97500.

EU-W97004: EP - 95002.

EU-T13004: EP 13013.

Exempt vents under
201-3.2(c)(44): 13013
(27): 31001, 31002, 42007, 85057

32046 (controlled emissions from EPs 32023, 32024, 32011-32015) (Process 111)
85045 (Proc 182)
85046 (Process 175)

No reference to this EP in the flow diagrams - 68005

Process: L07 is located at 1st floor, Building All - List of Emission Points & Processes subject to Part 227-1.3(a):

EU-HOFURN

EU-U28002: Proc - 408 & 410.

EU-U28003: Proc - 415 & 417.

Process: L08 is located at 1st floor, Building All - List of Emission Points, Processes & Emission Sources subject to Part 229.5(d):

EU-C27018: 76ACW.

EU-FINISH: 23APS, 37APS.

Process: L18 is located at Building All - List of Emergency Generators under Emission Unit E-GNRTR:

Generators < 500 HP [subject to 40 CFR 63 Subpart ZZZZ (RICE MACT)];

Emission Point	Emission Source
28010	28EG1
28011	28EG2
28012	28EG3
80002	80EG1
80003	80EG2
85064	85EG1
97037	GEN01
97025	952E1
97026	952E2
51002	51EG3
51003	51EG4
97033	FFPD4

Generators > 500 HP (Exempt under Subpart ZZZZ);

Emission Point	Emission Source
86003	86EG1
86004	86EG2
97032	FFPD3

Emission unit U28002 - Emission Unit U28002 consists of Boilers 13 and 18.

Emission unit U28002 is associated with the following emission points (EP):
28002, 28006, 28020
Process: 408 is located at Building 28 - Natural gas is combusted in Boiler 13. Boiler 13 was manufactured by Combustion Engineering and has a maximum heat input rating of 122 MMBtu/hr. It is equipped with a new ultra low NOx, gas only, burner that meets the limits of both 40 CFR 52.45 and 6 NYCRR Part 227.2 (NOx RACT) will be installed and tested in the first half of 2026 . The boiler is exhausted to the atmosphere partially through a condensing heat exchanger (EP 28020,) and partially through a steel stack (EP 28002). The boiler is used to generate steam for both process use and space heating. Boiler 13 is classified as a large boiler under 6NYCRR Part 227-2 as revised 6/2010.

Process: 410 is located at Building 28 - Natural gas is combusted in Boiler 18. Boiler 18 is a Zurn Keystone boiler and has a maximum heat input rating of 308 MMBtu/hr. It is equipped with a low NOx burner and is exhausted to the atmosphere partially through a condensing heat exchanger (EP 28020,) and partially through a steel stack (EP 28006). The boiler is used to generate steam for both process use and space heating. Boiler 18 is classified as a very large boiler under 6NYCRR Part 227-2 as revised 6/2010. Boiler 18 utilizes a CEMS for NOx and is subject to requirements under 40CFR 60 Subpart Db.

Emission unit C27018 - This unit consists of specific processes in buildings/areas 14, 21, 23, 24, 27, 30, 35, 37, 71, 72, 76, 78 and the WWTP. The unit includes the following control devices and their associated equipment: the MON MACT Thermal Oxidizer and scrubbers in areas 23, 71, and 76. Sources in this unit include storage tanks, distillation columns and process vessels and equipment. Applicable regulations for unit C-27018 include: 40 CFR 63 Subparts F, G, and H, the Miscellaneous Organic NESHAP (MON MACT) under 40 CFR Subpart FFFF, Volatile Organic Compound Reasonably Available Control Technology (VOC RACT) under 6 NYCRR Part 212, VOC RACT for storage tanks under 6 NYCRR Part 229, and High Toxicity Air contaminants under 6 NYCRR part 212.

Emission unit C27018 is associated with the following emission points (EP):
14006, 21011, 23002, 23005, 24113, 24120, 24141, 24142, 24143, 24144, 24150, 24151, 24208, 24417, 24423, 24703, 24908, 24925, 24927, 24933, 24936, 24937, 24938, 24939, 24949, 24950, 24951, 24952, 24953, 24954, 24962, 24978, 30804, 30806, 30807, 30808, 30907, 30914, 30916, 30917, 30918, 30938, 30945, 30947, 31019, 31022, 31030, 31031, 31032, 31034, 31035, 31036, 31037, 31040, 31041, 31046, 31047, 32038, 35006, 35007, 35009, 35010, 35011, 35012, 35016, 35018, 35028, 35031, 35032, 35033, 35034, 35035, 35036, 35037, 35039, 35040, 35901, 36001, 36003, 36004, 37002, 37004, 37007, 37009, 37011, 37013, 37014, 37017, 37018, 37019, 37020, 37021, 37022, 37023, 37026, 37027, 37033, 37034, 37036, 37038, 37039, 37040, 37041, 37042, 37043, 37044, 37045, 37060, 37062, 37063, 37066, 37067, 37068, 37069, 37070, 37071, 37072, 37077, 37078, 37079, 37080, 37081, 37085, 37702, 37705, 37707, 37708, 37801, 37803, 37804, 37805, 37812, 37813, 37814, 37827, 37901, 37902, 37903, 37905, 37907, 37909, 37910, 37911, 37917, 37918, 37920, 37921, 37922, 37923, 37925, 37926, 37932, 37934, 37941, 37942, 37943, 37944, 37945, 37946, 37947, 37951, 37952, 37956, 37957, 37958, 37960, 37961, 37962, 38006, 38007, 38018, 48001, 70001, 70003, 70006, 71001, 71003, 71005, 71013, 76001, 76005, 76009, 76012, 76013, 76014, 76701, 76710, 76711, 76712, 76713, 76714, 76715, 76718, 76719, 78001, 78002, 78004, 78005, 78006, 78007, 78009, 78011, 78015, 78016, 78017, 78018, 78019, 78025, 78031, 78032, 78041, 78042, 97500

Process: 005 is located at Building 78 - The PK10 (Polykettle 10) system is a batch system used to make silicone polymers. It may make products subject to 40 CFR 63 Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system vents through EPs 78032/78015 and 78016.

Process: 007 is located at Building 14 - The 40 gallon Ross Mixer system is a batch system operated by building 30. It makes products subject to 40 CFR 63 Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The mixer vents through EP 14006.

Process: 008 is located at Building 37 - The building 37 Cracker system may make products

subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system vents through EPs 37952, 37901 and 37902.

Process: 012 is located at Building 78 - The PK12 (Polykettle 12) system is a batch system used to make silicone polymers. It may make products subject to 40 CFR 63 Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process includes any associated cleanouts. The system vents through EP 78018 or EP 78019.

Process: 023 is located at Building 30 - PK1 (Polykettle 1) is a Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. This polykettle system is connected to the Building 30 vent header which in turn vents to the compressor knockout tank and then through the MON MACT vent header to the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 024 is located at Building 30 - PK2 (Polykettle 2) is a Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. This polykettle system is connected to the Building 30 vent header which in turn vents to the compressor knockout tank and then through the MON MACT vent header to the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 025 is located at Building 30 - PK3 (Polykettle 3) is a Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. This polykettle system is connected to the Building 30 vent header which in turn vents to the compressor knockout tank and then through the MON MACT vent header to the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 026 is located at Building 30 - PK5 (Polykettle 5) is a Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. This polykettle system is connected to the Building 30 vent header which in turn vents to the compressor knockout tank and then through the MON MACT vent header to the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 039 is located at Building 37 - The 300 gallon glass reactor system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 37040, 37021, 37060, 37066 and 37083.

Process: 040 is located at Building 76 - The east hydrolyzer system and east filter aid kettle (FAK) are used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 76001, 76004, 76009, 76710, 76711, 76714.

Process: 041 is located at Building 30 - The PK8 (Polykettle 8) system is a batch system used to make various oils and gums. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process also includes any cleanouts. The system vents through EP 30808 or EP

30918.

Process: 042 is located at Building 30 - The PK4 (Polykettle 4) system is a batch system used to make various oils and gums. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process also includes any cleanouts. The system vents through EP 30804 or EP 30914.

Process: 043 is located at Building 30 - The PK6 (Polykettle 6) system is a batch system used to make various oils and gums. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process also includes any cleanouts. The system vents through EP 30806 or EP 30916 or to EP 97500.
Note: Source code 30EVP, venting through EP 30945 or 97500, for the pilot TFE unit is assigned to this process code.

Process: 045 is located at Building 30 - The PK7 (Polykettle 7) system is a batch system used to make various oils and gums. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process also includes any cleanouts. The system vents through EP 30807 or EP 30917.

Process: 047 is located at Building 71 - The west hydrolyzer system and west filter aid kettle (FAK) are used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The east hydrolyzer system vents through a vent gas scrubber to EP 76001. The system also includes EP 76005, EP 76710, EP 76711 and 76715.T

Process: 066 is located at Building 76 - The west blend tank system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EP 76712, 76713, 76718 and 76719.

Process: 073 is located at Building 35 - Manufacture of mixed cyclics in the cracker "C" and "D" systems. The system may vent through EPs 35006, 35007, 35009, 35010, 35011, 35016, 35040 and 35901.

Process: 083 is located at Building 23 - The Building 23 blend tank system vents to the B24 MON MACT Water Scrubber (MTCSS) and compressor knockout tank (24KOT) and then through the MON MACT vent header to the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 084 is located at Building 37 - The 300 gallon Stainless Steel Reactor system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system vents through EP 37804.

Process: 086 is located at Building 37 - The 4M Dispersion Kettle/NPK Reactor may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any cleanouts. The system may vent through EPs 37017, 37020, 37078, 37089, 37033, 37707, 37902, 37952 or 37901

Process: 087 is located at Building 37 - The 2M Dispersion Kettle system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 37011, EP 37080, 37081, or 37707.

Process: 088 is located at Building 37 - The 2M Hydrolyzer system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through Emission Points 37002 and 37022. It also may vent through Emission Points 37701, 37018, 37018, 37067, 37068, 37069, 37070, 37071, 37072 or 37004 under certain ejector scenarios.

Process: 092 is located at Building 71 - The 1M Fluorosilicone system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking as described in Process MN3. This process also includes as any cleanouts. The system vents through a vapor scrubber and ejector system to EP 71013.

Process: 096 is located at Building 37 - The Rodney Hunt system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 37013, 37708, 37814, 37813, 37805, 37072, 37004, 37085 or 37021.

Process: 100 is located at Building 37 - The CPU system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 37010, 37019, 37023, 37026, 37027, 37033, 37062, 37063, 37064, 37901 and 37902.

Process: 106 is located at Building 23 - The storage tanks vent through the intermediates vent scrubber and then to the atmosphere via EP 23002. The tanks have a nitrogen blanket or are under pressure.

Process: 108 is located at Building 76 - The specialty kettle system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 76001, 76011 and 76005.

Process: 109 is located at Building 37 - The dimethyl fluids equilibrator system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system

that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The dimethyl fluids equilibrator system may vent through emission points 37009, 37934, 37903, 37910, 37920, 37921, 37707, 37909, 37917, 48001. NOTE: Process Code 009 was removed at Renewal 3. It was combined with Process Code 109. Process Code 109 was retained.

Process: 112 is located at Building 30 - The 3M Filter Aid Kettle (FAK) system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process also includes any associated cleanouts. The system may vent through EPs 37039, 37038, 37905 and 37827.

Process: 114 is located at Building 37 - The 1500 gallon glass (1500 PUFA) reactor system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 37019, 37042, 37045, 37044, 37041, 37812 and 37827.

Process: 119 is located at Building 23 - The continuous hydrolysis loop system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are managed as described in process MN1. The process includes any associated cleanouts. The system may vent through EPs 24121(trivial), 24423, 24703, 24925, 24936, 24937, 24938, 24939, 24950, 24951, 24954 and 24962.

Process: 121 is located at Building 37 - The 4M PUFA Reactor system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system vents through EPs 37007, 37077, 37034, 37014, 37041, 37019, 37801 and 37803.

Process: 131 is located at Building 78 - The PK9 system may make products subject to 40 CFR 63 Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPS 78006, 78011, 78007 and 78016.

Process: 132 is located at Building 78 - The PK11 system may make products subject to 40 CFR Part 63 Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPS and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process includes any associated cleanouts. The system may vent through EPs 78017, 78016 and 78002.

Process: 133 is located at Building 78 - The fluorosilicone cracker system may make products subject to 40 CFR 63 Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPS and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process may operate in two different modes: initial startup, as well as a semi-continuous operation. This process includes any associated cleanouts. The system vents through EPs 78001 and 78031.

Process: 134 is located at Building 78 - The PK14 system may make products subject to 40 CFR Part 63

Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPS and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process includes any associated cleanouts. The system may vent through EPs 78025 and 78019. 78002.

Process: 137 is located at Building 30 - The 500 gallon BK mixer system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process includes any associated cleanouts. The system vents through EPs 31022 and 31019.

Process: 138 is located at Building 30 - The 200 gallon Reynolds mixer may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. The 200 gallon Reynolds mixer may vent through EPs 31046 and 31022. This process includes any associated cleanouts.

Process: 139 is located at Building 30 - The 3000 L North Drais mixer system may be used to make products subject to 40CFR 63, Subpart FFFF, as well as non MON MACT products. Products made on this system that contain HAPs and are subject to Subpart FFFF are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process includes any associated cleanouts. The system may vent through EPs 31030, 31031, 31034, 31036, 31037 and 31040.

Process: 142 is located at Building 30 - The 3000 L South Drais mixer system may make products subject to 40CFR 63, Subpart FFFF, as well as non MON MACT products. Products made on this system that contain HAPs and are subject to Subpart FFFF are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process includes any associated cleanouts. The system vents through EPs 31030, 31031, 31032,31034, 31035, 31036, 31037, 31040 and 31041.

Process: 146 is located at Building 30 - The 500 gallon Day mixer system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process includes any associated cleanouts. The system may vent through EPS 31019 and 31022.

Process: 153 is located at Building 37 - The artisan system consists may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The artisan system may vent through EPs 37911, 37901, 37902, 37958.

Process: 154 is located at Building 71 - The 1M Reactor system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking as described in Process MN1. This process also includes any associated cleanouts and the local ventilation system used to remove vapors during filter rebuild . The system may vent through EPS 71001 and 71003.

Process: 156 is located at Building 71 - The 3M Hydrolyzer system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The

system vents through EP 71001.

Process: 189 is located at Building 78 - The fluorosilicone doughmixer 'A' system many make products subject to 40 CFR 63 Subpart FFFF as well as non MON MACT products. Products 09made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process includes any associated cleanouts. The system vents through EPs 78001 and 78004.

Process: 201 This process represents heat exchange systems (cooling water) within the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27018 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Heat exchange systems subject to Subpart FFFF are summarized in the Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 205 This process represents the management of Group 1 wastewater or residuals in containers. The Group 1 wastewater or residuals are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27018 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 209 This process represents the management of Group 1 wastewater in individual drain systems. The Group 1 wastewater streams are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27018 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF This process represents the management of Group 1 wastewater in individual drain systems. The Group 1 wastewater streams are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27018 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 210 This process represents the management of MON maintenance wastewater streams from unit C-27018 that are subject to 40 CFR 63, Subpart F.

Process: 213 This process represents the management of Group 1 process wastewater in tanks. The Group 1 wastewater is generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27018 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater storage tank determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 217 This process represents the treatment of Group 1 wastewater streams and/or residuals removed from Group 1 wastewater streams. The Group 1 wastewater or residuals are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27018 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 220 This process represents any pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems in the unit C-27018 processes that are subject to the leak detection and repair requirements in 40 CFR 63, Subpart UU for

MON MACT (40 CFR 63, Subpart FFFF) compliance. Each piece of equipment to which Subpart UU applies is identified in the LeakDAHS system. If anyassociated emissions occur, amounts are reported under Process FUG.

Process: 300 is located at Building 78 - The fluorosilicone doughmixer 'B' system may make products subject to 40 CFR 63 Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process includes any associated cleanouts. The system vents through EPs 78041 and 78042.

Process: 701 is located at Building 37 - Material from TFE that has been stripped goes intermediate storage tank/blend tanks. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. The system may vent to atmosphere at EPs 37941, 37942, 37943, 37944, 36001, 37945 and 37946.

Process: 707 is located at Building 35 - The 117/118 column system vents through a knockout tank to EP 35031. The remaining vapors are sent to an eductor water unit, where the gases are mixed with tempered water and are sent to the chemical sewer.

Process: 715 is located at Building AREA 96 - The MQ Resins system is a Group 1 batch system subject to 40 CFR 63, Subpart FFFF. The system vents through the MON MACT vent header to the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 723 is located at Building 30 - The 25-gallon Ross mixer is used to mix silicone polymer. The mixer makes products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. The Ross mixer may vents through EP 30907 and EP 30938. This process includes any associated cleanouts.

Process: 750 is located at Building 23 - The acid storage tank vents through the tank scrubber and then to the atmosphere via EP 23005.

Process: 753 is located at Building 35 - Building 35 storage tanks working and breathing losses that vent to atmosphere. All tanks have a nitrogen blank. Additionally, some tanks also have a pressure control valve present.

Process: 754 is located at Building 35 - Siloxane tank vapors vent through a wash scrubber before discharging to the atmosphere at EP 35018. During planned maintenance shutdowns flow may be reduced/stopped, but there may still be breathing losses from the tanks. All tanks are equipped with individual vacuum regulators to prevent vacuum damage to the tanks.

Process: 755 is located at Building 71 - The building 71 elephant trunks capture vapors from drumming stations and vent to atmosphere through a single location.

Process: 758 is located at Building 37 - Building 37 elephant trunks vent directly to atmosphere.

Process: 761 is located at Building 21 - 107/108 Column vents through a vent knock out tank prior to venting to atmosphere at EP21011.

Process: 766 is located at Building 76 - Building 76 storage tanks working and breathing losses that vent

directly to atmosphere or to the vent gas scrubber. All tanks have a nitrogen blank and/or PCV. (Includes Op-flex 01/06/2021 Modification)

Process: 770 is located at Building 76 - Vapors from drumming stations and working losses from loading stations vent to atmosphere or through a scrubber prior to discharging to the atmosphere.

Process: 776 is located at Building 78 - Building 78 storage tanks working and breathing losses.

Process: 782 is located at Building 37 - Building 37 storage tank working and breathing losses that vent to the atmosphere. All tanks have a nitrogen blanket. Additionally, some tanks also have a pressure control valve present. These sources belong to emission unit C-27018.

Process: 786 is located at Building 30 - The doughmixer vacuum cleaner vents directly to atmosphere at EP 32038. The doughmixers that this vacuum cleaner is used with are all in Unit F-INISH.

Process: 788 is located at Building 24A - Building 24A storage tank working and breathing losses that vent to the atmosphere. All tanks have a nitrogen blank. Additionally, some tanks also have a pressure control valve present.

Process: 790 is located at Building 24A - Building 24A drums and mix tank that vent to atmosphere. The acid charge drum vents to atmosphere at EP 24952. The KOH drum vents to atmosphere at EP 24953. The HCl Mix Tank vents to atmosphere at EP 24417.

Process: 792 is located at Building 24A - The west filter aid hopper for the MQ Resins system vents to atmosphere at EP 24120. The silicate mix tank vents to atmosphere at EP 24978.

Process: 794 is located at Building 71 - The 1M Hydrolyzer system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 71001 and 71013.

Process: 795 is located at Building 30 - Elephant trunk systems capture vapors from drums and other sources and vent to the atmosphere. Elephant trunk systems vent through EP 31047.

Process: MN1 is located at Building All - This process includes all of the individual Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in unit C-27018 that are subject to 40 CFR 63, Subpart FFFF (MON MACT). The MCPUs are organized based on a Family of Materials (FOM) basis. The complete list of MCPUs, FOMs and operating scenarios is maintained in the Subpart FFFF Notification of Compliance Status (NOCS). Process MN1 and the Subpart FFFF NOCS include Group 1 process vent streams and controls, storage tanks, transfer racks, and heat exchange systems, as well as the storage, management and treatment of designated Group 1 wastewater streams. Changes to the MON MACT MCPUs, FOMs, or operating scenarios are documented within the NOCS on a semiannual basis and are included in the Subpart FFFF Semiannual reports. Monthly MON MACT batch emission calculations are completed in order to verify the Group 2 status of applicable process vents. Note: The MON MACT MCPUs utilize equipment and emission points that are already included under the Process codes designated for Title V permitting, which are organized by equipment rather than product. Emissions for Process MN1 are, therefore, included in the emissions for individual Process codes.

Emission unit T14009 - This unit consists of equipment in the facility's Pilot Plant. Batch and semicontinuous processes occur here. The Pilot Plant makes developmental/experimental products for evaluation, and scaled-down batches of problem production grades to develop process adjustments. Scaled down batched of commercial products are also made here.

Emission unit T14009 is associated with the following emission points (EP):
14003, 14005
Process: PP1 is located at Building 14 - Elephant trunks and lab hoods remove vapors from pilot plant systems including small scale (5020 liters) reactors and a mini thin film evaporator in building 14.

Emission unit HOFURN - This unit consists of additional hot oil furnaces not already included in another emission unit.

Emission unit HOFURN is associated with the following emission points (EP):
21012, 35027, 85063
Process: 418 Operation of Hot Oil Furnaces

Emission unit T13004 - Vapors and particulates are vented to the atmosphere outside of building 13 at different emissions points. These include process, filter, and local extraction discharges. Vapors from building 12 30 mm WP extruder are vented to atmosphere.

Emission unit T13004 is associated with the following emission points (EP):
12004, 13300
Process: PP0 is located at Building 13 - Ventilation to remove vapors from pilot plant systems including a 100 gallon reactor system, a 130 gallon reactor system and a scrubber in building 13. Ventilation to remove vapors from the 30 mm WP extruder in building 12.

Title V/Major Source Status
MOMENTIVE PERFORMANCE MATERIALS is subject to Title V requirements. This determination is based on the following information:
MOMENTIVE PERFORMANCE MATERIALS is subject to Title V requirements. This determination is based on the following information:
The facility is potentially a major source of:
Carbon Monoxide
Oxides of Nitrogen
Volatile Organic Compounds
Total Hazardous Air Pollutants
Toluene

Program Applicability
The following chart summarizes the applicability of MOMENTIVE PERFORMANCE MATERIALS 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	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52.21, 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
2819	INDUSTRIAL INORGANIC CHEMICALS
2821	PLASTICS MATERIALS AND RESINS
2822	SYNTHETIC RUBBER
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
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-01-018-47	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION

	Epoxy Resins
3-01-026-30	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - SYNTHETIC RUBBER (MANUFACTURING ONLY) Silicone Rubber
3-01-070-02	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL MANUFACTURING (GENERAL) Storage/Transfer
3-01-820-10	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - WASTEWATER AGGREGATE CHEMICAL PLANT WASTEWATER SYSTEM: CLARIFIER
3-01-840-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Distillation Units
3-01-999-98	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - OTHER NOT CLASSIFIED Specify in Comments Field
3-01-999-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - OTHER NOT CLASSIFIED Specify in Comments Field
3-02-999-99	FOOD AND AGRICULTURE FOOD AND AGRICULTURE - OTHER NOT SPECIFIED Other Not Classified
3-05-102-99	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS STORAGE BINS Other Not Classified
3-85-001-10	COOLING TOWER COOLING TOWER - PROCESS COOLING OTHER NOT SPECIFIED
3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified
4-01-002-99	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING OTHER NOT CLASSIFIED - OPEN-TOP VAPOR DEGREASING
4-90-001-99	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - SOLVENT EXTRACTION PROCESS Other Not Classified
5-03-007-01	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE General

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
000107-98-2	2-PROPANOL, 1-METHOXY			322	
000064-19-7	ACETIC ACID	7370		3686	
013170-23-5	ACETIC ACID,DIANHYDRIDE W/ SILICIC ACID (H4SIO4)BIS(1,1-DIME			173	
000075-36-5	ACETYL CHLORIDE	5877			
007664-41-7	AMMONIA	29334		8763	
000071-43-2	BENZENE			19	
000124-38-9	CARBON DIOXIDE				12667
000630-08-0	CARBON MONOXIDE			218997	
007782-50-5	CHLORINE			1027	
000067-66-3	CHLOROFORM			76	
068037-53-6	CYCLOSILOXANES, METHYL			204	
000541-02-6	DECAMETHYLCYCLOPENTASILOXANE	105000			
000067-64-1	DIMETHYL KETONE	105852		52926	
069430-24-6	DIMETHYLCYCLOSILOXANES			1594	
000075-78-5	DIMETHYLDICHLOROSILANE			1495	
003277-26-7	DISILOXANE, 1,1,3,3-TETRAMETHYL-			273	
064742-46-7	DISTILLATES (PETROLEUM) HYDROTREATED MIDDLE			136	
064742-47-8	DISTILLATES (PETROLEUM), HYDROTREATED LIGHT			404	
000074-84-0	ETHANE			5676	
000141-78-6	ETHYL ACETATE			234	
000064-17-5	ETHYL ALCOHOL (ETHANOL)			280	
000100-41-4	ETHYLBENZENE			141	
002374-14-3	FLUOROSILICONE TRIMER			502	
000050-00-0	FORMALDEHYDE	83.9		28	
000541-05-9	HEXAMETHYLC	11932			

	YCLOTRISILOXANE		
000999-97-3	HEXAMETHYLDISILAZANE	282	102
000107-46-0	HEXAMETHYLDISILOXANE	16919	
000110-54-3	HEXANE		3341
068513-26-8	HYDROCARBONS, C3-6		3290
001333-74-0	HYDROGEN		159
007647-01-0	HYDROGEN CHLORIDE	10212	5106
000067-63-0	ISOPROPYL ALCOHOL		4059
000074-82-8	METHANE		2576.3
000067-56-1	METHYL ALCOHOL	20539	388.4
000074-87-3	METHYL CHLORIDE	87	31
068083-14-7	METHYL PHENYL SILOXANE		2345
000075-79-6	METHYLTRICHLOROSILANE	17448	108.4
001185-55-3	METHYLTRIMETHOXYSILANE	17448	755.61
008030-30-6	NAPTHA		2639.9
010024-97-2	NITROUS OXIDE		4028
000556-67-2	OCTAMETHYLCYCLOTETRA SILOXANE	155000	26897
0NY210-00-0	OXIDES OF NITROGEN	567053	133539
0NY075-00-0	PARTICULATES	47321	5545
000109-66-0	PENTANE		4760
0NY075-00-5	PM-10	47321	5545
007691-02-3	SILANAMINE, 1-ETHENYL-N-(ETHENYLDIMETHYLSILYL)-1,1-DIMETHYL-		169.8
001066-35-9	SILANE,CHLORODIMETHYL	60	24.2
004253-34-3	SILANETRIOL, METHYL-, TRIACETATE		23.3
063148-62-9	SILOXANES AND SILICONES,DI-ME		469
007446-09-5	SULFUR DIOXIDE		674.5
000108-88-3	TOLUENE	43030	17815
0NY100-00-0	TOTAL HAP	37860	21683
000075-77-4	TRIMETHYLCHLOROSILANE		0.002
068083-19-2	VINYL TERMINATED POLYDIMETHYL SILOXANE		161.5
0NY998-00-0	VOC	24500	1270.9
001330-20-7	XYLENE, M, O & P MIXT.		970.6
000106-42-3	XYLENE, PARA-		43.8

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	224	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.45	2 -8, 2 -9, 2 -10	Ozone season NOx at Basic Chemical, Petroleum/Coal, Pulp,Paper, and Paperboard Mills, Metal Ore, Iron/Steel/Ferroalloy Plants
FACILITY	40CFR 60-A.12	72	General provisions - Circumvention
FACILITY	40CFR 60-A.13(a)	73	General provisions - Monitoring requirements
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			requirements
FACILITY	40CFR 60-A.4	68	General provisions - Address
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FACILITY	40CFR 60-Db.44b(h)	75	Standards for Nitrogen Oxides Provisions.
FACILITY	40CFR 60-Db.48b(c)	76	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
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FACILITY	40CFR 60-Db.49b(g)	78	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 61-A	83	General Provisions - applicability of part 61
FACILITY	40CFR 61-M.145	84	Asbestos standards: standard for demolition and renovation
FACILITY	40CFR 63-A.6(e)(1)	85	General Provisions - Operations and Maintenance Requirements During Startup, Shutdown, and Malfunction
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FACILITY	40CFR 63-A.6(f)(1)	87	Compliance with Nonopacity Standards (MACT Gen. Prov.)
FACILITY	40CFR 63-DDDDD.7540(a)	173, 174	ICI Boiler Major Source NESHAP - Continuous Compliance
FACILITY	40CFR 63-DDDDD.7545(e)	175	ICI Boiler Major Source NESHAP - Notification of Compliance Status
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FACILITY	40CFR 63-F.105	88	Subpart F - HON NESHAP - maintenance wastewater requirements
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			of halogenated vent streams
FACILITY	40CFR 63-FFFF.2450(e)	179, 2 -13	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
FACILITY	40CFR 63-FFFF.2450(e)(1	181	Miscellaneous Organic Chemical Mfg. NESHAP - Control Devices
FACILITY	40CFR 63-FFFF.2450(e)(4	182	Miscellaneous Organic Chemical Mfg. NESHAP - General Requirements for Control Devices
FACILITY	40CFR 63-FFFF.2450(h)	183	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Design Evaluations
FACILITY	40CFR 63-FFFF.2450(i)	184	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Outlet Concentration Correction for Combustion Devices
FACILITY	40CFR 63-FFFF.2450(k)	185	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Parameter Monitoring
FACILITY	40CFR 63-FFFF.2450(l)	186	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Startup, Shutdown, and Malfunctions
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FACILITY	40CFR 63-FFFF.2455(a)	190, 191, 192, 193	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Emission limits
FACILITY	40CFR 63-FFFF.2455(b)	194	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Group 1 or TRE calculations
FACILITY	40CFR 63-FFFF.2460(a)	195	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Emission limits
FACILITY	40CFR 63-FFFF.2460(b)	198	Miscellaneous Organic

FACILITY	40CFR 63-FFFF.2460(c)	199	Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2460(c)(7	200	Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Exceptions to Subpart SS Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2465(a)	202, 203	Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Intermittent flow to the control device Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2470(e)	204	Chemical Manufacturing NESHAP (MON) - Process Vents Emitting Halogens or PM - emission limits Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2480	205	Chemical Mfg NESHAP - Storage Tanks - Vapor Balancing Alternative Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2480(e)(1	206	Chemical Manufacturing NESHAP (MON) - Equipment leak provisions Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2480(e)(3	207	Chemical Manufacturing NESHAP (MON) - Pressure Release Provisions Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2485(c)	208	Chemical Manufacturing NESHAP (MON) - Pressure Release Provisions Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2515	209	Chemical Manufacturing NESHAP (MON) - Wastewater Requirements - group 1 wastewater streams Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2520(c)	210, 211	Chemical Mfg NESHAP - Notifications Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2520(f)	212	Chemical Manufacturing NESHAP (MON) - Reporting Requirements - Precompliance report Miscellaneous Organic
FACILITY	40CFR 63-FFFF.2525	213	Chemical Manufacturing NESHAP (MON) - Performance Test Reports Miscellaneous Organic Chemical Manufacturing NESHAP

			(MON) - Recordkeeping Requirements
FACILITY	40CFR 63-FFFF.2525(t)	214	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Electronic Records
FACILITY	40CFR 63-FFFF.2540	215	Miscellaneous Organic Chemical Mfg NESHAP - General Provisions
FACILITY	40CFR 63-G.132(f)	95	HON - process wastewater provisions - general
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FACILITY	40CFR 63-G.133(f)	99	HON - process wastewater provisions - wastewater tanks
FACILITY	40CFR 63-G.135(b)	100, 101, 102	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.135(c)	103	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.135(f)	105	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.136	106	HON - process wastewater provisions - individual drain systems
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FACILITY	40CFR 63-G.138(k)	108	Hazardous Organic NESHAP - Residuals from Group 1 Wastewater Streams
FACILITY	40CFR 63-G.139(b)	109	HON - process wastewater provisions - control devices
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FACILITY	40CFR 63-G.146(b)	2 -11	HON - process wastewater provisions - reporting
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FACILITY	40CFR 63-G.148	117	Leak inspection provisions
FACILITY	40CFR 63-GGG.1253	216	Pharmaceutical MACT - Storage tank standards
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			operating requirements
FACILITY	40CFR 63-SS.983(b)	119	GMACT - Standards for closed vent systems - closed vent system inspection requirements
FACILITY	40CFR 63-SS.983(c)	120	GMACT - Requirements for closed vent systems - closed vent system inspection procedures
FACILITY	40CFR 63-SS.983(d)	121	GMACT - Requirements for closed vent systems - closed vent system leak repair provisions
FACILITY	40CFR 63-SS.988(a)	122	NESHAP For Closed Vent Systems, Control Devices, etc. - Incinerators, boilers, and process heaters equipment and operating
FACILITY	40CFR 63-SS.988(b)	123	NESHAP For Closed Vent Systems, Control Devices, etc. - Incinerators, boilers, and process heaters - performance tests
FACILITY	40CFR 63-SS.990(a)	124	NESHAP For Closed Vent Systems, Control Devices, etc. - Absorbers & Condensers as Control Devices - equipment and operation
FACILITY	40CFR 63-SS.990(b)	125	NESHAP For Closed Vent Systems, Control Devices, etc. - Absorbers & Condensers as Control Devices - performance testing
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FACILITY	40CFR 63-SS.996(d)	128	NESHAP for Closed Vent Systems & Control Devices - Alternatives to Monitoring Requirements
FACILITY	40CFR 63-SS.997(c)(3)	129	GMACT - Change in Control Device
FACILITY	40CFR 63-SS.998(a)(2)	130, 131	Recordkeeping Requirements
FACILITY	40CFR 63-SS.998(b)	132	Recordkeeping Requirements
FACILITY	40CFR 63-SS.998(c)(1)	133	NESHAP for Closed Vent Systems & Control Devices -

			Recordkeeping Provisions - nonflare control & recovery device - monitoring
FACILITY	40CFR 63-SS.998(c)(2)	134	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - nonflare control device - combustion monitoring
FACILITY	40CFR 63-SS.998(d)	135	Recordkeeping Requirements
FACILITY	40CFR 63-SS.998(d)(1)	136	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - Closed Vent System Records
FACILITY	40CFR 63-UU.1019	137	NESHAP for Equipment Leaks
FACILITY	40CFR 63-UU.1022	138	Equipment Identification
FACILITY	40CFR 63-UU.1023(a)	139	NESHAP for Equipment Leaks - Control Level 2 - Instrument and Sensory Monitoring for Leaks
FACILITY	40CFR 63-UU.1023(b)	140	NESHAP for Equipment Leaks - Control Level 2 - Instrument and Sensory Monitoring for Leaks - Instrument monitoring methods
FACILITY	40CFR 63-UU.1023(c)	141	NESHAP for Equipment Leaks - Control Level 2 - Instrument and Sensory Monitoring for Leaks - Use of background adjustments
FACILITY	40CFR 63-UU.1023(e)	142	NESHAP for Equipment Leaks - Control Level 2 - Instrument and Sensory Monitoring for Leaks - Leak identification and records
FACILITY	40CFR 63-UU.1024(a)	143	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair - Leak repair schedule
FACILITY	40CFR 63-UU.1024(c)	144	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair - Leak identification removal
FACILITY	40CFR 63-UU.1024(d)	145	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair - Delay of repair
FACILITY	40CFR 63-UU.1024(e)	146	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair -

			Unsafe to repair connectors
FACILITY	40CFR 63-UU.1024(f)	147	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair - Records
FACILITY	40CFR 63-UU.1025(b)	148	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Leak detection
FACILITY	40CFR 63-UU.1025(c)	149	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Percent leaking valves
FACILITY	40CFR 63-UU.1025(d)	150	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Leak repair
FACILITY	40CFR 63-UU.1025(e)(1)	151	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Unsafe to monitor
FACILITY	40CFR 63-UU.1025(e)(2)	152	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Difficult to monitor
FACILITY	40CFR 63-UU.1025(e)(3)	153	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Fewer than 250 valves
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FACILITY	40CFR 63-UU.1026(b)(4)	155, 156	NESHAP for Equipment Leaks - Control Level 2 - Pumps in Light Liquid Service - Visual inspections
FACILITY	40CFR 63-UU.1026(e)	157	NESHAP for Equipment Leaks - Control Level 2 - Pumps in Light Liquid Service - Special provisions for pumps
FACILITY	40CFR 63-UU.1027(b)	158	NESHAP for Equipment Leaks - Control Level 2 - Connectors in gas, vapor, and light liquid service - Leak

FACILITY	40CFR 63-UU.1027(e)(1)	159	Detection NESHAP for Equipment Leaks - Control Level 2 - Connectors in gas, vapor, and light liquid service - Unsafe to monitor
FACILITY	40CFR 63-UU.1027(e)(2)	160	NESHAP for Equipment Leaks - Control Level 2 - Connectors in gas, vapor, and light liquid service - Inaccessible and ceramic
FACILITY	40CFR 63-UU.1028	161, 162	GMACT - NESHAP for Equipment Leaks - Control Level 2 - Standards for agitators in gas/vapor & light liquid service
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FACILITY	40CFR 63-UU.1032	165	GMACT - NESHAP for Equipment Leaks - Control Level 2 - Standards for sampling connection systems
FACILITY	40CFR 63-UU.1033	166	GMACT - NESHAP for Equipment Leaks - Control Level 2 - Standards for open-ended valves or lines
FACILITY	40CFR 63-UU.1035	167	Quality Improvement Program for Pumps
FACILITY	40CFR 63-UU.1036	168	Alternative means of emission limitation: Batch processes
FACILITY	40CFR 63-UU.1038(b)	169	NESHAP for Equipment Leaks - Control Level 2 - Recordkeeping - General equipment leak records
FACILITY	40CFR 63-UU.1038(c)	170	NESHAP for Equipment Leaks - Control Level 2 - Recordkeeping - Specific equipment leak records
FACILITY	40CFR 63-UU.1039(a)	2 -12	Reporting Requirements
FACILITY	40CFR 63-UU.1039(b)	172	Reporting Requirements
FACILITY	40CFR 63-ZZZZ.6625(e)	218	Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control device
FACILITY	40CFR 63-ZZZZ.6625(f)	219	Reciprocating Internal Combustion

			Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
FACILITY	40CFR 63-ZZZZ.6640(f)	220	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency engines
FACILITY	40CFR 68	17	Chemical accident prevention provisions
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FACILITY	40CFR 98	221	Mandatory Greenhouse Gas Reporting
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	2 -1	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	225	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
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FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
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FACILITY	6NYCRR 201-6	20, 222, 223	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	14	General Conditions - Requirement to Provide Information
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FACILITY	6NYCRR 201-6.4(c)	3	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)	21	Compliance Schedules - Progress Reports
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			methods and procedures
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FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 226	55	SOLVENT METAL CLEANING PROCESSES
FACILITY	6NYCRR 227-1.4(a)	56	Opacity Standard
FACILITY	6NYCRR 227-2.4(a)(1)	57	Emission limits.
FACILITY	6NYCRR 227-2.4(b)(1)	2 -4, 2 -5	Emission limits.
FACILITY	6NYCRR 227-2.4(c)(1)	59	Emission limits.
FACILITY	6NYCRR 227-2.6(b)	2 -6	CEMS requirements
FACILITY	6NYCRR 229.3(e)(2)(v)	2 -7	Volatile organic liquid storage tanks
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FACILITY	6NYCRR 231-2.6	65, 66, 67	Emission reduction credits

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 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 202-2.5
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, MOMENTIVE PERFORMANCE MATERIALS has been determined to be subject to the following regulations:
40 CFR 52.45
Per 52.45(6)(1) the requirements of this section apply to each new or existing boiler with a design capacity of 100 mmBtu/hr or greater that receives 90% or more of its heat input from coal, residual oil, distillate oil, natural gas, or combinations of these fuels in the previous ozone season and is located at sources that is within the Basic Chemical Manufacturing industry. MPM operates Boiler 18 (Source BLR18) which has a heat input capacity greater than 250 mm BTU /hr and burns natural gas.
Per 52.45(c) if you are the owner or operator of an affected unit, you must meet the following emissions limitations on a 30-day rolling average basis during the 2026 ozone season and in each ozone season thereafter: Natural gas-fired industrial boilers: 0.08 lbs NOx/mmBtu. Historic monitoring data under 40 CFR 60.13 for Subart Db indicates that boiler 18 meets the 0.08 lbs NOx/mmBtu limit of 52.45(c)(l). The boiler and CEMS will be operated per the requirements of 40 CPR 52.45 (d)(2).

Per 52.45(6)(1) the requirements of this section apply to each new or existing boiler with a design capacity of 100 mmBtu/hr or greater that receives 90% or more of its heat input from coal, residual oil, distillate oil, natural gas, or combinations of these fuels in

the previous ozone season and is located at sources that is within the Basic Chemical Manufacturing industry. MPM operates Boiler 13 (Source BLR13) which has a heat input capacity greater than 100 mmBTU /hr and burns natural gas.

Per 52.45(c) if you are the owner or operator of an affected unit, you must meet the following emissions limitations on a 30-day rolling average basis during the 2026 ozone season and in each ozone season thereafter: Natural gas-fired industrial boilers: 0.06 lbs NOx/mmBtu. A new ultra-low NOx burner will be installed on boiler 13 during the first half of 2026 with a manufacturer's guarantee of 0.06 lbs NOx/mmBtu. Initial testing of the new burner will be completed per 52.45(d)(l) and annual testing will be completed as required by 52.45(d)(3). The new burner will also meet the natural gas-only limit in 6NYCRR Part 227-2 NOxRACT).

Per 52.45(b)(l) the requirements of this section apply to each new or existing boiler with a design capacity of 100 mmBtu/hr or greater that receives 90% or more of its heat input from coal, residual oil, distillate oil, natural gas, or combinations of these fuels in the previous ozone season and is located at sources that is within the Basic Chemical Manufacturing industry. MPM operates Boiler 14 (Source BLR14) which has a heat input capacity greater than 100 mmBTU/hr and burns natural gas.

Per 52.45(c) if you are the owner or operator of an affected unit, you must meet the following emissions limitations on a 30-day rolling average basis during the 2026 ozone season and in each ozone season thereafter: Natural gas-fired industrial boilers: 0.08 lbs NOx/mmBtu. During the ozone season (May I - September 30) of each year, beginning with calendar year 2026, the facility will not operate source BLR14.

NOx emissions for this boiler will be O lbs during the ozone season. During the non-ozone season, BLR14 will continue to meet the NOx emission limit in 6NYCRR Part 227-2 (NOx RACT).

40 CFR 60.12
This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40 CFR 60.13 (a)
This regulation specifies that all New Source Performance Standard (NSPS) affected sources that are

required to have continuous monitoring systems (CMS) are subject to the requirements of Appendix B of 40 CFR Part 60 and if the CMS is used to demonstrate compliance with emission limits on a continuous basis, then it is also subject to Appendix F of 40 CFR Part 60.

40 CFR 60.13 (d)
This regulation contains the requirements for daily drift testing for continuous monitoring systems required by 40 CFR Part 60.

40 CFR 60.4
This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.44b (h)
This regulation specifies that the NSPS nitrogen oxide standards apply at all time including periods of startup, shutdown, or malfunction.

40 CFR 60.48b (c)
This regulation requires that the continuous monitoring system (CMS) and data recorder for nitrogen oxides be operated during all periods of operation of the affected facility except for CMS breakdowns and repairs. Data must be recorded during calibration checks, and zero and span adjustments.

40 CFR 60.48b (f)
This regulation requires that standby methods of obtaining minimum emissions data for oxides of nitrogen be specified by the source owner or operator.

40 CFR 60.49b (g)
This subdivision requires reporting and recordkeeping for affected steam generating units - specific oxides of nitrogen requirements.

40 CFR 60.7 (b)
This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40 CFR 60.7 (d)
This condition specifies the required information and format for a summary report form and details when either a summary form and/or excess emissions reports are required.

40 CFR 60.7 (f)
This condition specifies requirements for maintenance of files of all measurements, including

continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40 CFR 61.145

The permittee shall comply with all applicable procedures for removal of asbestos containing material in 40 CFR 61.145(c)

40 CFR 63.1019
This citation states the applicability of Subpart UU.

40 CFR 63.1022
Conditions under this section relate to the identification of equipment subject to Subpart UU. Physical tagging of the equipment (pupms, valves, connectors, etc.) is not required, but is allowed as one method of identification. Other allowable methods are by a site plan, log entries, designation of process boundaries, etc. Equipment identification is needed so equipment subject to leak detection monitoring can be differentiated from equipment not needing monitoring.

40 CFR 63.1023 (a)
This citation states the requirements for instrument and sensory monitoring for leaks.

40 CFR 63.1023 (b)
This citation states the methods to be used for instrument monitoring.

40 CFR 63.1023 (c)
This citation states the requirements for instrument monitoring using background adjustments.

40 CFR 63.1023 (e)
This citation states the requirements for leaking equipment identification and records.

40 CFR 63.1024 (a)
This citation states the schedule for repairing leaks.

40 CFR 63.1024 (c)
This citation states the requirements for removal of leak identification.

40 CFR 63.1024 (d)
This citation states the procedures for delaying repair of leaks.

40 CFR 63.1024 (e)
This citation states the requirements for unsafe-to-repair connectors.

40 CFR 63.1024 (f)
This citation states the recordkeeping requirements for leak repairs.

40 CFR 63.1025 (b)
This citation states the leak detection procedures for valves in gas and vapor service and in light liquid service.

40 CFR 63.1025 (c)
This citation states the procedures for calculating percent leaking valves.

40 CFR 63.1025 (d)
This citation states the leak repair requirements for valves in gas and vapor service and in light liquid service.

40 CFR 63.1025 (e) (1)
This citation states the special provisions for unsafe-to-monitor valves.

40 CFR 63.1025 (e) (2)
This citation states the special provisions for difficult-to-monitor valves.

40 CFR 63.1025 (e) (3)
This citation states the special provisions for facilities with less than 250 valves.

40 CFR 63.1026
This citation states the requirements for pumps in light liquid service.

40 CFR 63.1026 (b) (4)
This citation states the visual inspection requirements for pumps in light liquid service.

40 CFR 63.1026 (e)
This citation states the special provisions for pumps.

40 CFR 63.1027 (b)
This citation states the leak detection requirements for connectors in gas and vapor service and in light liquid service.

40 CFR 63.1027 (e) (1)
This citation states the special provisions for unsafe-to-monitor connectors.

40 CFR 63.1027 (e) (2)
This citation states the special provisions for inaccessible, ceramic, or ceramic-lined connectors.

40 CFR 63.1028
This citation states the requirements for agitators in gas and vapor service and in light liquid service.

40 CFR 63.1029
This citation states the requirements for pumps, valves, connectors, and agitators in heavy liquid service, pressure relief devices in liquid service, and instrumentation systems.

40 CFR 63.1032
This citation states the requirements for sampling connection systems.

40 CFR 63.1033
This citation states the requirements for open-ended valves and lines.

40 CFR 63.1035
When a large percentage of the pumps within the facility and subject to this rule leak, a quality improvement program (QIP) to reduce the number of leaking pumps is triggered. Conditions under this section describe the requirements QIP including it's recordkeeping and reporting requirements.

40 CFR 63.1036
Conditions under this section provide alternatives to the leak detection and repair standards of sections 63.1025 through 63.1033. They also describe the means of tracking changes of operation between the alternatives.

40 CFR 63.1038 (b)
This citation states the general recordkeeping requirements for equipment leaks.

40 CFR 63.1038 (c)
This citation states the specific recordkeeping requirements for equipment leaks.

40 CFR 63.1039 (a)
Each owner or operator shall submit an Initial Compliance Status Report according to the procedures in the referencing subpart. The notification shall include the following:

1) The notification shall provide the information listed in paragraphs (a)(1)(i) through (a)(1)(iv) of this section for each process unit or affected facility subject to the requirements of this subpart.

(i) Process unit or affected facility identification.

(ii) Number of each equipment type (e.g., valves, pumps) excluding equipment in vacuum service.

(iii) Method of compliance with the standard (e.g., "monthly leak detection and repair"

or "equipped with dual mechanical seals").

(iv) Planned schedule for requirements in §§63.1025 and 63.1026.

2) The notification shall provide the information listed in paragraphs (a)(2)(i) and (a)(2)(ii) of this section for each process unit or affected facility subject to the requirements of §63.1036(b).

(i) Batch products or product codes subject to the provisions of this subpart, and

(ii) Planned schedule for pressure testing when equipment is configured for production of products subject to the provisions of this subpart.

3) The notification shall provide the information listed in paragraphs (a)(3)(i) and (a)(3)(ii) of this section for each process unit or affected facility subject to the requirements in §63.1037.

(i) Process unit or affected facility identification.

(ii) A description of the system used to create a negative pressure in the enclosure and the control device used to comply with the requirements of §63.1034 of this part.

40 CFR 63.1039 (b)
This citation states the requirements for periodic reports.

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 63.1253
This citation states the requirements for storage tanks.

40 CFR 63.132 (f)
This citation states the restrictions for discarding liquid or solid organic materials into water or wastewater streams.

40 CFR 63.133 (a) (1)
This citation states the roof type required for wastewater tanks.

40 CFR 63.133 (f)
This citation states the inspection requirements for wastewater tanks.

40 CFR 63.135 (b)
This citation states the cover requirements for containers of Group 1 wastewater streams.

40 CFR 63.135 (c)
This citation states the requirement to use a submerged fill pipe for containers greater than or equal to 0.42 cubic meters.

40 CFR 63.135 (f)
This citation states the repair requirements for an improper work practice or control failure.

40 CFR 63.136
This citation states the process wastewater provisions for individual drain systems.

40 CFR 63.138 (a)
This citation states the general requirements for performance standards for treatment processes managing Group 1 wastewater streams and/or residuals removed from Group 1 wastewater streams.

40 CFR 63.138 (k)
This citation states the control requirements for residuals removed from Group 1 wastewater streams.

40 CFR 63.139 (b)

This citation states that control devices must be operated when organic HAP are vented to them.

40 CFR 63.139 (f)
This citation states the repair requirements for gaps, cracks, tears, or holes in ductwork, piping, or connections.

40 CFR 63.146 (b)
For MCPUs subject to 40 CFR Part 63, Subpart FFFF, after the compliance dates specified in § 63.2445, if you have a Group 1 wastewater stream that is also subject to provisions in 40 CFR parts 260 through 272, you may elect to determine whether this subpart or 40 CFR parts 260 through 272 contain the more stringent control requirements (e.g., design, operation, and inspection requirements for waste management units; numerical treatment standards; etc.) and the more stringent testing, monitoring, recordkeeping, and reporting requirements. Compliance with provisions of 40 CFR parts 260 through 272 that are determined to be more stringent than the requirements of this subpart constitute compliance with this subpart. For example, provisions of 40 CFR parts 260 through 272 for treatment units that meet the conditions specified in § 63.138(h) constitute compliance with this subpart. You must identify in the notification of compliance status report required by § 63.2520(d) the information and procedures that you used to make any stringency determinations.

40 CFR 63.147
This citation states the recordkeeping requirements for process wastewater operations.

40 CFR 63.148
This citation states the provisions for leak inspections.

40 CFR 63.2450 (a)
This citation states the general requirements for complying with Subpart FFFF.

40 CFR 63.2450 (b)

This citation states the requirement to determine if an emission stream is a halogenated vent stream.

40 CFR 63.2450 (e)
If a halogen reduction device is used to reduce hydrogen halide and halogen HAP emissions from halogenated vent streams, it must meet the requirements of §63.994 and the requirements referenced therein. If a halogen reduction device is used before a combustion device, the halogen atom emission rate prior to the combustion device must be determined according to the procedures in §63.115(d)(2)(v).

40 CFR 63.2450 (e) (1)
This citation states the requirements for venting emissions through a closed-vent system to any combination of control devices (other than a flare) or recovery devices.

40 CFR 63.2450 (e) (4)
This citation states the portions of Subpart SS that do not apply when demonstrating compliance.

40 CFR 63.2450 (h)
This citation states the requirements for the design evaluation.

40 CFR 63.2450 (i)
This citation states the requirements for outlet concentration correction for combustion devices.

40 CFR 63.2450 (k)
This citation states the requirements for continuous parameter monitoring.

40 CFR 63.2450 (l)
This citation states the requirements for startup, shutdown, and malfunctions.

40 CFR 63.2450 (m)
This citation states the reporting requirements.

40 CFR 63.2450 (p)
This citation states when a safety device may be opened.

40 CFR 63.2455 (a)
This citation states the emission limits for continuous process vents.

40 CFR 63.2455 (b)
This citation states the designation requirements for continuous process vents.

40 CFR 63.2460 (a)
This citation states the emission limits for batch process vents.

40 CFR 63.2460 (b)
This citation states the process to group batch process vents.

40 CFR 63.2460 (c)
This citation states the exceptions to the requirements in 40 CFR 63 Subparts SS and WW.

40 CFR 63.2460 (c) (7)
This citation states the requirement to install, calibrate, and operate a flow indicator if flow to a control device could be intermittent.

40 CFR 63.2465 (a)
This citation states the emission limits for process vents that emit hydrogen halide and halogen HAP or HAP metals.

40 CFR 63.2470 (e)
This citation states the option to use vapor balancing of storage tanks instead of complying with the emission limits in Table 4 to Subpart FFFF.

40 CFR 63.2480
This citation states the requirements for equipment leaks.

40 CFR 63.2480 (e) (1)
This citation states the operating requirements for pressure relief devices.

40 CFR 63.2480 (e) (3)
This citation states the requirements for pressure relief devices in organic HAP service.

40 CFR 63.2485 (c)
This citation states the requirements for Group 1 wastewater streams.

40 CFR 63.2515
This citation states the notification requirements for Subpart FFFF.

40 CFR 63.2520 (c)
This citation states the requirements for a precompliance report.

40 CFR 63.2520 (f)
This citation states the requirements for performance test reports to be submitted electronically to EPA via the Electronic Reporting Tool.

40 CFR 63.2525
This citation states the recordkeeping requirements for Subpart FFFF.

40 CFR 63.2525 (t)
This citation states a facility's ability to maintain electronic records submitted to EPA via the Compliance and Emissions Data Reporting Interface in electronic format.

40 CFR 63.2540

This citation states the applicability of the General Provisions to Part 63.

40 CFR 63.6 (e) (1)
This citation states the general requirement to operate and maintain equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions.

40 CFR 63.6 (e) (3)
Paragraph 63.6(e)(3) requires a startup, shutdown, and malfunction (SSM) plan for MACT-affected sources and that the plan be followed.

40 CFR 63.6 (f) (1)
This section states that non-opacity standards apply at all times except during periods of startup, shutdown, and malfunction.

40 CFR 63.6625 (e)
This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR 63.6625 (f)
This condition reduces the emission of hazardous air pollutants by requiring existing emergency engines greater than or equal to 500 brake horsepower located at a major source of HAP emissions and existing emergency engines located at an area source of HAP emissions to install a non-resettable hour meter.

40 CFR 63.6640 (f)
This condition states the operation requirements for emergency engines.

40 CFR 63.7540 (a)
This condition states how to demonstrate continuous compliance with emission limits, work practice standards, and operating limits.

40 CFR 63.7545 (e)
This condition states the requirements of the notification of compliance status

40 CFR 63.7550 (b)
This condition states when reports must be submitted.

40 CFR 63.7881 (c)
This citation states site remediation activities that are only subject to recordkeeping requirements.

40 CFR 63.983 (a)
This citation states the closed vent system equipment and operating requirements.

40 CFR 63.983 (b)
This citation states the closed vent system inspection and monitoring requirements.

40 CFR 63.983 (c)
This citation states the closed vent system inspection procedures.

40 CFR 63.983 (d)
This citation states the closed vent system leak repair provisions.

40 CFR 63.988 (a)
This citation states the equipment and operating requirements for incinerators, boilers, and process heaters.

40 CFR 63.988 (b)
This citation states the performance test requirements for incinerators, boilers, and process heaters.

40 CFR 63.990 (a)
This citation states the equipment and operating requirements for absorbers, condensers, and carbon adsorbers.

40 CFR 63.990 (b)
This citation states the performance test requirements for absorbers, condensers, and carbon adsorbers.

40 CFR 63.996
This citation states the general monitoring requirements for control and recovery devices.

40 CFR 63.996 (d)
This citation states alternative monitoring requirements for controls and recovery devices.

40 CFR 63.997 (c) (3)
This citation states the notification requirements for sources changing control devices.

40 CFR 63.998 (a) (2)
This citation states the recordkeeping requirements for nonflare control device performance tests.

40 CFR 63.998 (b)
This citation states the recordkeeping requirements for continuous records and monitoring system data handling.

40 CFR 63.998 (c) (1)
This citation states the recordkeeping requirements for nonflare control and recovery devices.

40 CFR 63.998 (c) (2)

This citation states the recordkeeping requirements for combustion control and halogen reduction device monitoring records.

40 CFR 63.998 (d)
This citation states the recordkeeping requirements for Subpart SS.

40 CFR 63.998 (d) (1)
This citation states the recordkeeping requirements for closed vent systems.

40 CFR Part 61, Subpart A
This regulation, 40 CFR 61 Subpart A, lists the general provisions that a facility subject to a National Emissions Standard for Hazardous Air Pollutant is subject to.

40 CFR Part 98
40 CFR Part 98 sets forth the reporting requirements for facilities that are subject to the mandatory reporting of greenhouse gases.

6 NYCRR 201-6.4 (f)
This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 202-2.4 (a) (3)
Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

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 212-1.3

Based upon the following requirements, all air contaminants will assigned an Environmental Rating from A to D.

(a) Toxic and other properties and emission rate potential of the air contaminant;
(b) location of the process emission source or emission point(s) for the air contaminant with respect to residences or other sensitive environmental receptors, taking into account the area's anticipated growth;
(c) emission dispersion characteristics at or near the process emission source or emission point(s), taking into account the physical location of the process emission source or emission point(s) relative to the surrounding buildings and terrain; and
(d) the projected maximum cumulative impact of an air contaminant taking into account emissions from all process emission sources at the facility under review and the pre-existing ambient concentration of the air contaminant under review.

6 NYCRR 212-1.6 (a)
This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.1
Scrubber water flow during stripping and filter addition will be monitored minimum at 10 gallons per minute and 2.4 gallons per minute to ensure sufficient control efficiency. The lower limit of monitoring ensures compliance with all process batch operations. Engineering calculations will be used as evidence of compliance with contaminant control efficiency when the measured flow rate falls below the lower limit of monitoring.

Outlet temperature of condensing column 85TST will be monitored below 75 to ensure sufficient control efficiency. The lower limit of monitoring ensures compliance with all process batch operations. Engineering calculations will be used as evidence of compliance with contaminant control efficiency when the measured parameter exceeds the upper limit of monitoring.

Condenser outlet temperature shall be monitored below 67 F to ensure sufficient control efficiency. This process emits through the emission point 32026. The upper limit of monitoring ensures compliance with all process batch operations. Engineering calculations shall be used as evidence of compliance with contaminant control efficiency when the measured temperature rises above the upper limit of monitoring.

6 NYCRR 212-2.3 (b)

The facility shall not allow emissions of the air contaminant(s) listed above to exceed the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, for the environmental rating assigned by the Department. Chlorosilanes have been given an Environmental Rating of "B" and demonstrated to have an emission rate potential (ERP) greater than or equal to 10-25 pounds per hour which requires 90% control or Toxic - Best Available Control Technology (T-BACT).

Chlorosilanes (a VOC) from Processes 715 and 083 are removed from the Group 2 vent stream by contact with water in the scrubber (ES MTCSS). The chlorosilanes are first converted to HCl on contact with the scrubber water which is then removed by the scrubber. In order to ensure compliance with the degree of air cleaning required a minimum scrubber water level limit has been established based on the manufacturer's recommendation. Water level in the scrubber will be monitored continuously when either one or both processes are operating. To assure compliance with the 90% control requirement of Table 4, the facility will limit scrubber water to no less than 39 inches, expressed as a percentage of maximum water level, based on a 24 hr average (% maximum water level is based on the most recent radar level calibrations and is typically in the range of 70 +/- 5%). Essentially, the minimum height of water remains constant but the % that the height is expressed as varies based on the instrument calibrations (two DPs and radar).

Other chlorosilanes may be used in these processes provided ambient impacts, including HCL, remain below the % SGC/AGC provided in the Ren 3 Mod 1 application. Records of these potential ambient impacts shall be maintained on-site and made available upon request.

Compliance with this monitoring requirement also assures compliance with 6 NYCRR 212-3.1(c)(4)(i) -VOC RACT.

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 (a) (2)

This provision states that owners and/or operators of facilities located outside of the the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury or New York City metropolitan area with an annual potential

to emit of 100 tons or more of NOx or 50 tons or more of VOCs must comply with the requirements of this section.

6 NYCRR 212-3.1 (c) (4) (i)
Water flow rate to the scrubber shall be monitored minimum at 5 gallons per minute to meet required control efficiency. The lower limit of monitoring ensures compliance with all process operations. Engineering calculations shall be used as evidence of compliance with Ammonia control efficiency when the measured flow rate falls below the lower limit of monitoring.

6 NYCRR 212-3.1 (c) (4) (iii)
This provision states that if owners and/or operators can show to the satisfaction of the department that an emission point cannot achieve an overall removal efficiency of 81 percent or use coatings not exceeding 3.5 pounds VOC per gallon as applied (minus water and excluded VOC) for reasons of technological or economic feasibility, the department may accept a lesser degree of control upon submission of satisfactory evidence that the facility owner or operator will apply reasonably available control technology.

6 NYCRR 227-1.4 (a)
This subdivisions sets the opacity standard for subject stationary combustion installations.

6 NYCRR 227-2.4 (a) (1)
NOx emission limits for very large boilers.

6 NYCRR 227-2.4 (b) (1)
This condition applies to natural gas/oil fired and only natural gas fired large boilers. The owner or operator shall submit a testing protocol to the Department for approval a minimum of 30 days prior to any stack testing.

The facility must re-evaluate their NOx RACT plan prior to the use of oil for this source. They have also committed to performing an annual tune up as part of their NOx RACT compliance. The applicable emission limit for natural gas/oil fired large boiler is 0.15 lb(NOx)/mmBTU and only natural gas fired large boiler is 0.06 lb(NOx)/mmBTU.

The owner or operator will maintain records on-site for a minimum of five years.

6 NYCRR 227-2.4 (c) (1)
Presumptive NOx RACT emission limits for mid-size boilers.

6 NYCRR 227-2.6 (b)
(3) The owner or operator of an emission source that monitors NOx emissions with a CEMS must install, calibrate, maintain, and operate a CEMS for measuring NOx at locations approved in the CEMS certification protocol under paragraph (2) of this subdivision, and must record the output of each such system. The following procedures and test methods must be used for determining compliance with the relevant NOx emission limit under section 227-2.4 of this Subpart:

(i) With the exception of emission sources subject to paragraph (a)(4) of this section, the owner or operator of an emission source must:

(a) calculate all 24-hour daily heat input-weighted average NOx emission rates from block hourly arithmetic emission rate averages calculated by the CEMS and expressed in terms of pounds of NOx per million Btu;

(b) demonstrate compliance with the appropriate emission limit under section 227-2.4 of this Subpart by using a CEMS for measuring NOx and calculating a 24-hour daily heat input-weighted average NOx emission rate. Facilities that are subject to 40 CFR part 75 (see Table 1, section 200.9 of this Title) will calculate their NOx emission rate using part 75 (see Table 1, section 200.9 of this Title) monitoring requirements. Facilities that are not subject to 40 CFR part 75 (see Table 1, section 200.9 of this Title) may calculate their NOx emission rate using either 40 CFR part 60, appendix A, method 19 (see Table 1, section 200.9 of this Title) or 40 CFR part 75 (see Table 1, section 200.9 of this Title). A 30-day rolling heat input-weighted average emission rate may be used to demonstrate compliance with the appropriate emission limit under section 227-2.4 of this Subpart from October 1st to April 30th for emission sources other than combustion turbines; and

(c) determine the 24-hour daily heat input-weighted average NOx emission rate based on the heat input-weighted average of the block hourly arithmetic average emission rates during each 24-hour daily period from 12:00 AM to 12:00 AM the following day using CEMS data. The block hourly heat input-weighted average emission rate must be calculated for each one-hour period starting with the period 12:00 AM to 1:00 AM and

continuing through until the last period 11:00 PM to 12:00 AM; or, starting with the period 12:00 PM to 1:00 PM and continuing through the last period 11:00 AM to 12:00 PM. The 30-day rolling heat input-weighted average must be the average of the 24-hour daily heat input-weighted NOx emission rate.

(ii) The owner or operator of an emission source subject to paragraph (a)(4) of this section must calculate:

(a) block hourly arithmetic average emission rates using data points generated by CEMS and expressed in terms of parts per million on a dry volume basis, corrected to 15 percent oxygen; and

(b) block hourly arithmetic average emission rates for the periods starting 12:00 AM to 1:00 AM, 1:00 AM to 2:00 AM, and so on.

(iii) At a minimum, valid CEMS data must be obtained for 90 percent of the operating hours in each calendar quarter that the subject facility is operating.

(iv) All valid CEMS data must be used in calculating emission rates even if the minimum data requirements of subparagraph (iii) of this paragraph are not met.

(v) The procedures under 40 CFR part 60, appendix B, Performance Specification 2 (see Table 1, section 200.9 of this Title); and any additional criteria specified by the department must be followed for the installation, evaluation, and operation of the CEMS.

(vi) Along with any specific additional data requirements mandated by the department for an emission source, annual recertifications, quarterly accuracy, and daily calibration drift tests must be performed in accordance with either 40 CFR part 60, appendix F (see Table 1, section 200.9 of this Title) or 40 CFR part 75 (see Table 1, section 200.9 of this Title), as applicable.

(vii) When NOx emissions data are not obtained because of CEMS downtime, emission data shall be obtained by using the 90th percentile value of all CEMS NOx emission data collected over the last 180 days. Alternatively, the owner or operator of a facility subject to part 75 (see Table 1, section 200.9 of this Title) may use 40 CFR part 75 (see Table 1, section 200.9 of this Title) data substitution procedures for periods when no valid CEMS data is available.

6 NYCRR 229.3 (e) (2) (v)
Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservative vent.

6 NYCRR 229.5 (d)
This section requires facilities subject to the requirements under Part 229.3, to maintain a record of the capacity of the volatile organic liquid storage tanks, in gallons, for a period of 5 years.

6 NYCRR 231-2.6
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6.

6 NYCRR Part 226
This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyorized and cold cleaning degreasers.

6 NYCRR Subpart 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility.

Compliance Certification
Summary of monitoring activities at MOMENTIVE PERFORMANCE MATERIALS:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	2-8	work practice involving specific operations
FACILITY	2-9	intermittent emission testing
FACILITY	2-10	continuous emission monitoring (cem)
FACILITY	74	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
FACILITY	78	record keeping/maintenance procedures
FACILITY	87	record keeping/maintenance procedures
FACILITY	173	record keeping/maintenance procedures

FACILITY	174	record keeping/maintenance procedures
FACILITY	175	record keeping/maintenance procedures
FACILITY	176	record keeping/maintenance procedures
FACILITY	88	record keeping/maintenance procedures
FACILITY	178	record keeping/maintenance procedures
FACILITY	2-13	record keeping/maintenance procedures
FACILITY	179	monitoring of process or control device parameters as surrogate
FACILITY	183	record keeping/maintenance procedures
FACILITY	184	record keeping/maintenance procedures
FACILITY	185	record keeping/maintenance procedures
FACILITY	186	record keeping/maintenance procedures
FACILITY	189	record keeping/maintenance procedures
FACILITY	190	monitoring of process or control device parameters as surrogate
FACILITY	191	monitoring of process or control device parameters as surrogate
FACILITY	192	monitoring of process or control device parameters as surrogate
FACILITY	193	monitoring of process or control device parameters as surrogate
FACILITY	194	record keeping/maintenance procedures
FACILITY	195	intermittent emission testing
FACILITY	198	record keeping/maintenance procedures
FACILITY	199	record keeping/maintenance procedures
FACILITY	200	record keeping/maintenance procedures
FACILITY	202	monitoring of process or control device parameters as surrogate
FACILITY	203	monitoring of process or control device parameters as surrogate
FACILITY	204	record keeping/maintenance procedures
FACILITY	205	record keeping/maintenance procedures
FACILITY	206	record keeping/maintenance procedures
FACILITY	207	record keeping/maintenance procedures
FACILITY	208	record keeping/maintenance procedures
FACILITY	210	record keeping/maintenance procedures
FACILITY	211	record keeping/maintenance procedures
FACILITY	213	record keeping/maintenance procedures
FACILITY	95	record keeping/maintenance procedures
FACILITY	96	record keeping/maintenance procedures
FACILITY	97	record keeping/maintenance procedures
FACILITY	99	record keeping/maintenance procedures
FACILITY	100	record keeping/maintenance procedures
FACILITY	101	record keeping/maintenance procedures
FACILITY	102	record keeping/maintenance procedures
FACILITY	103	record keeping/maintenance procedures
FACILITY	105	record keeping/maintenance procedures
FACILITY	106	record keeping/maintenance procedures
FACILITY	107	record keeping/maintenance procedures
FACILITY	108	record keeping/maintenance procedures
FACILITY	109	record keeping/maintenance procedures
FACILITY	111	record keeping/maintenance procedures
FACILITY	2-11	record keeping/maintenance procedures
FACILITY	116	record keeping/maintenance procedures
FACILITY	117	record keeping/maintenance procedures
FACILITY	216	record keeping/maintenance procedures
FACILITY	217	record keeping/maintenance procedures
FACILITY	118	record keeping/maintenance procedures
FACILITY	119	record keeping/maintenance procedures
FACILITY	120	record keeping/maintenance procedures
FACILITY	121	record keeping/maintenance procedures
FACILITY	122	record keeping/maintenance procedures
FACILITY	123	record keeping/maintenance procedures
FACILITY	124	record keeping/maintenance procedures
FACILITY	125	record keeping/maintenance procedures

FACILITY	127	record keeping/maintenance procedures
FACILITY	128	record keeping/maintenance procedures
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FACILITY	163	record keeping/maintenance procedures
FACILITY	165	record keeping/maintenance procedures
FACILITY	166	record keeping/maintenance procedures
FACILITY	167	record keeping/maintenance procedures
FACILITY	168	record keeping/maintenance procedures
FACILITY	169	record keeping/maintenance procedures
FACILITY	170	record keeping/maintenance procedures
FACILITY	2-12	record keeping/maintenance procedures
FACILITY	172	record keeping/maintenance procedures
FACILITY	218	record keeping/maintenance procedures
FACILITY	219	record keeping/maintenance procedures
FACILITY	220	record keeping/maintenance procedures
FACILITY	221	record keeping/maintenance procedures
FACILITY	2-1	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	2-14	monitoring of process or control device parameters as surrogate
FACILITY	2-15	monitoring of process or control device parameters

		as surrogate
FACILITY	2-16	monitoring of process or control device parameters as surrogate
FACILITY	2-17	monitoring of process or control device parameters as surrogate
FACILITY	227	record keeping/maintenance procedures
FACILITY	228	record keeping/maintenance procedures
FACILITY	229	record keeping/maintenance procedures
FACILITY	230	record keeping/maintenance procedures
FACILITY	232	monitoring of process or control device parameters as surrogate
FACILITY	233	monitoring of process or control device parameters as surrogate
FACILITY	234	monitoring of process or control device parameters as surrogate
FACILITY	235	monitoring of process or control device parameters as surrogate
FACILITY	238	monitoring of process or control device parameters as surrogate
FACILITY	239	monitoring of process or control device parameters as surrogate
FACILITY	241	monitoring of process or control device parameters as surrogate
FACILITY	2-2	monitoring of process or control device parameters as surrogate
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	35	monitoring of process or control device parameters as surrogate
FACILITY	36	monitoring of process or control device parameters as surrogate
FACILITY	37	monitoring of process or control device parameters as surrogate
FACILITY	38	monitoring of process or control device parameters as surrogate
FACILITY	242	intermittent emission testing
FACILITY	243	monitoring of process or control device parameters as surrogate
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	2-3	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
FACILITY	45	record keeping/maintenance procedures
FACILITY	46	monitoring of process or control device parameters as surrogate
FACILITY	47	monitoring of process or control device parameters as surrogate
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	monitoring of process or control device parameters as surrogate
FACILITY	51	monitoring of process or control device parameters as surrogate
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures

FACILITY	55	record keeping/maintenance procedures
FACILITY	56	monitoring of process or control device parameters as surrogate
FACILITY	57	continuous emission monitoring (cem)
FACILITY	2-4	intermittent emission testing
FACILITY	2-5	intermittent emission testing
FACILITY	59	record keeping/maintenance procedures
FACILITY	2-6	record keeping/maintenance procedures
FACILITY	2-7	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures

Basis for Monitoring
Title V permits must contain sufficient periodic monitoring to assure compliance with the applicable requirements. In some cases, in order to provide reasonable compliance assurance with applicable requirements, it is necessary to develop facility specific operating/monitoring activities/conditions, which may include testing, monitoring, work practices, record-keeping and reporting requirements. The basis of monitoring for these permit conditions is as follows:

Boilers - There is one very large boiler (>250 million Btu/hour), 2 large boilers and one medium boiler. The boilers are subject to 6NYCRR Part 227 NOx RACT (Reasonably Available Control Technology) and the very large boiler is also subject to 40 CFR 60 Subpart Db. To comply, the very large boiler operates continuous emissions monitors for Nitrogen Oxides and Oxygen. The other boilers have stack tests for Nitrogen Oxides every 5 years. The boilers are subject to Part 227 opacity requirements but since they burn natural gas, there is no expectation of excessive opacity and there is no opacity monitoring required. The boilers have a PM-10 emission limit of 15.5 tpy under 6 NYCRR Part 201-7. fuel use will be monitored continuously, and emission will be calculated based on 12 month rolling basis to avoid being subject to 40 CFR 52.21.
The total NOx emissions from emission unit U28002 which include boiler 18 and boiler 13 may not exceed 143 tpy on an annual rolled monthly basis. emission shall be based on the rate demonstrated in the last stack test of the affected boilers. To comply with the NOx RACT, plan annual tune up will be performed on the boiler #18. NOx RACT plan must be revaluated prior to the use of oil for boiler #18. The total emissions of NOx from emission units consisting of all 4 boilers may not exceed 223.5 tpy on a rolling 12-month basis.

6 NYCRR 212-2.1

The miscellaneous organic chemical manufacturing process units consisting of the systems which are used to make products that include HAPs subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT (Miscellaneous Organic NESHAP Maximum Achievable Control Technology) products. These products including HAPs and VOCs tracked under monthly MON MACT batch tracking. The vapors from each process are captured through vapor recovery system (which include condensers, hooding, & other enclosures). Each condenser's outlet temperature at the limit will be monitored to ensure sufficient control efficiency. Engineering calculation will be used as evidence of compliance with contaminant control efficiency when the measured temperature rises

above the upper limit. Also, these units have control devices such as packed Gas Absorption system, high acid scrubber, wet scrubber, and spray tower to control VOC and non-VOCs. In order to compliance with all process batch operations the volumetric flow rate of the control devises will be monitored at lower limit to ensure sufficient control efficiency to be in compliance with RACT and BACT.

6 NYCRR 212-2.3 (b)
Since VOCs (Chlorosilane) emissions are between 10-25 pounds per hour, and Chlorosilane has an "A" environmental rating, a 90 percent reduction of emissions or Toxic - Best Available Control Technology (T-BACT) is required, pursuant to Table 4 of Part 212. In this case, to assure compliance with the 90% control requirement of Table 4, the facility will limit scrubber water flow rate, recirculation flow rate and scrubber water height of the maximum water level of the tank based on a 24-hr average. Compliance with this monitoring requirement also assures compliance with 6 NYCRR 212-3.1(c)(4)(i) - VOC RACT.
Also, The facility wide Potential to Emit (PTE) for the air contaminants such as 1,3-DIETHENYL-1,1,3,3-TETRAMETHYL DISILOXANE, OCTAMETHYLCYCLOTETRA SILOXANE, DECAMETHYLCYCLOPENTASILOXANE, are limited to 2,500, 155000, 105000 pounds/year in order to maintain facility wide % AGC below 100%. The facility will calculate actual emissions on a rolling 12-month basis to demonstrate the emissions remain below the limit.

6 NYCRR 212-2.4 (b)
Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. These process emission sources have bag house to control, solid particulate (or particulate matter, PM). The facility shall conduct a performance test of bag house to demonstrate compliance with the PM NAAQS based on the allowable PM emission standard of 0.050 grains per dscf.
PM emitted from these process emission sources/control consists primarily of Cristobalite (SiO_2), a non-criteria air contaminant. Determine the environmental rating based on part 212-1.2 in order to demonstrate compliance with the AGC for Cristobalite. The facility shall conduct a performance test within 180-days of the baghouse (ES 97BAG) startup to demonstrate compliance with the PM NAAQS based on the allowable PM emission standard of 0.050 grains per dscf.
Also, the facility shall conduct visual observations of the baghouse exhaust daily when the process is operating to assure continuous compliance with the 0.050 grain per dscf emission standard for B rated solid particulate (or particulate matter, PM). At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safety, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions in accordance with 6

NYCRR Part 212.1.5(g).

6 NYCRR 212-3.1(c)(4)
In order to demonstrate compliance with the VOC RACT, VOC emission points that are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent are equipped with reasonably available control technology. VOC emission control efficiencies will be calculated, per the op-flex plan, for any new product grades to assure a minimum 81% control. The control devices such as scrubber and condenser for the processes subject to this part have been determined to achieve an overall removal efficiency of 81% provided the operating parameters specified in this permit are met. Water flow to the scrubber and temperature of the condenser will be monitored to ensure sufficient VOC control efficiency. The east & west hydrolyzer system, and east & west filter aid kettle (FAK) are used to make products subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT products. The hydrolyzers system vents through a high acid scrubber. High acid scrubber water flow will be monitored to ensure sufficient control efficiency of VOC to demonstrate compliance with RACT and BACT. This will be submitted to USEPA for approval as a revision to the NYS SIP.

6 NYCRR 227-2.4
NOx RACT studies for the very large boiler and large boilers established nitrogen oxides (NOx) emission limits. These RACT analyses have been submitted to EPA for approval as single source SIP revisions.
The boilers (Boilers #13, #14, #16, #18) met RACT as operated and requires only periodic testing and annual tune up to ensure it continues to meet emission limits.
The very large boiler (Boiler #18) and large boiler (Boiler #13) stacks have continuous emissions monitor for NOx emissions. Compliance with the emission limit will be based on a 24-hour heat input weighted average from May 1st through September 30th. Compliance with the emission limit will be based on a 30-day rolling heat input weighted average from October 1st through April 30th.
The facility must re-evaluate their NOx RACT plan prior to the use of oil for this source.

40 CFR 63.114 (a)(1) Subpart G
Box Incinerator (FBI) Vent Mode Operation subject to subpart G.
The facility has process vents connected to a combustion device, a recovery device or recapture device with monitoring equipment to comply with the HON (Hazardous Organic NESHAP) NESHAP.
In order to comply with this subpart an incinerator will be equipped with a temperature monitoring device. An incinerator other than a catalytic incinerator is used (FBI Process 430), a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.

A scrubber is used with the FBI. The pH monitoring device equipped with a continuous recorder shall be installed to monitor the minimum pH at 8.4 of the FBI IWS scrubbers. The countercurrent scrubber flow rate of the fixed box combustor packed tower will be monitored to maintain 1017 gallons per minute.
The countercurrent scrubber flow rate of the fixed box gas absorption system will be monitored through flow meter equipped with continuous recorder to maintain 1,178 gallons per minute. The gas flow rate of the Fixed box gas absorption system will be determined using blower capacity, with appropriate adjustments for pressure drop. Emissions from the north air stripper and south air stripper will be vented to the Fixed Box #2 incinerator or the MON MACT Thermal Oxidizer. The VOC destruction efficiency of the Fixed Box#2 shall be 95% or greater in order to compliance with Subpart G.

40 CFR 63.24 Subpart FFFF
The facility is subject to Subpart FFFF because it operates miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source of hazardous air pollutants (HAP) emissions as defined in section 112(a) of the Clean Air Act (CAA). In order to demonstrate initial and continuous compliance with this subpart, the facility shall establish emission limit, operating limit and work practice standards.
To assure compliance with emission limit, the facility shall reduce Collective uncontrolled organic HAP emission by equal to or greater than 98 percent by weight by venting emissions from a sufficient number of the vents through a closed-vent system to the pre-scrubbers and then to Thermal Oxidizer (97OXI) or Fixed Box #2 Incinerator. The thermal oxidizer and a fixed box incinerator shall operate at a minimum daily average temperature of 1480 degrees F and 1796 F respectively, until/unless a new operating limit is established to comply with NESHAP for miscellaneous organic chemical manufacturing. The temperature monitoring device shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. The continuous parameter monitoring system (CPMS) shall be install, operational and the data verified by conducting performance tests. This monitoring requirement also applies to Group 1 (PR 715, 023 - 026) and Group 2 (PR 083) batch process vents to assure compliance with 6 NYCRR 212-3.1(c)(4)(i) -VOC RACT. In addition, this monitoring condition assures compliance with 6 NYCRR 212-2.3(b). CASH scrubber (which is a MON MACT Group 1 control device), high acid scrubber, spray tower flow rate will be monitored at all stages to ensure sufficient control efficiency to demonstrate compliance with all process batch operations under 6 NYCRR 212-3.1 for VOC and with subpart FFFF for HAPs.