Facility Identification Data
Name: ARCH CHEMICALS INC
Address: 100 MCKEE RD
ROCHESTER, NY 14611

Owner/Firm
Name: ARCH CHEMICALS INC
Address: 501 MERRITT SEVEN
NORWALK, CT 06856, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: ROGER T MCDONOUGH
Address: 6274 EAST AVON LIMA RD
AVON, NY 14414-9519
Phone:5852262466

Division of Air Resources:
Name: DANIEL E WALSH
Address: 6274 EAST AVON-LIMA RD
AVON, NY 14414
Phone:5852262466

Air Permitting Contact:
Name: FRANCIEN TRUBIA
Address: ARCH CHEMICALS INC
PO BOX 30205
ROCHESTER, NY 14603-0205
Phone:5854363030

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
Application for renewal of Air Title V Facility.

Attainment Status
ARCH CHEMICALS INC is located in the town of ROCHESTER in the county of MONROE.
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*	TRANSPORT REGION (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
THE ARCH CHEMICALS ROCHESTER PLANT PRODUCES MORE THAN 60 PRODUCTS. AT THE FACILITY SEVEN (7) MANUFACTURING PROCESSES CONTRIBUTE TO A MAJORITY OF THE FACILITY'S AIR EMISSIONS. THESE INCLUDE: 1) SODIUM OMADINE, 2) CHEMICAL 2422, 3) 2-CHLOROPYRIDINE, 4) PBC, 5) IPBC, 6) PURIFIED TCAN, 7) FV-100P. IN ADDITION TO THESE SEVEN MAIN PROCESSES, THE FACILITY ALSO INCLUDES AN R&D TECHNICAL CENTER, AS WELL AS SEVERAL AUXILLIARY COMPONENTS INVOLVING WASTE WATER TREATMENT AND AIR EMISSIONS CONTROL.

Permit Structure and Description of Operations
The Title V permit for ARCH CHEMICALS INC
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.

ARCH CHEMICALS INC is defined by the following emission unit(s):
Emission unit A00007 - A-AREA FILTRATION SYSTEMS.
Emission unit A00007 is associated with the following emission points (EP):
A0022
It is further defined by the following process(es):
Process: A70 is located at Building A-AREA - LAROX FILTER SYSTEM: THE LAROX FILTER SYSTEM IS UTILIZED TO SEPARATE IPBC FROM A SLURRY OF IPBC AND METHANOL. FILTRATE (MIXTURE OF METHANOL AND WATER) IS TRANSFERRED INTO TWO FILTRATE RECEIVER TANKS. IN THE FUTURE, THIS FILTER SYSTEM MAY BE UTILIZED FOR THE FILTRATION OF OTHER MATERIALS. VENTILATION AIR (EMISSION POINT A0022) IS UTILIZED TO CONTROL EMISSIONS IN THE VICINITY OF THE FILTER (EMISSION SOURCE A7001), DRUM PACK OUT STATION (EMISSION SOURCE A7002), AND FILTER RECEIVER TANKS (EMISSION SOURCES A7003 AND A7004).

Emission unit A00008 - A-AREA SOLVENT RECOVERY.
Emission unit A00008 is associated with the following emission points (EP):
A0043, A0065
It is further defined by the following process(es):
Process: A81 is located at Building A-AREA - Methanol is distilled for recovery using R-A 14. Vapors arented through a conservation vent. Recovered methanol is transferred to a receiver tank vented to a refrigerated condenser. This system may also be used for recovery of other solvents.
Process: A82 is located at Building A-AREA - Production of PHMB-S in reactor R-A-06 (EP-A0043, ES-A8201)

Emission unit B00001 - B-AREA VENTILATION SYSTEMS FOR REACTOR MANWAYS, DRUMOUT STATIONS, SPOT VENTILATION, AND OTHER MISCELLANEOUS EMISSION SOURCES.
Emission unit B00001 is associated with the following emission points (EP):
B0003, B0004, B0008, B0040, B0058, B0070, B0080, B0081, B0082, B0084, B0140, B0147
It is further defined by the following process(es):
Process: B10 is located at Building B-AREA - EXHAUST VENTILATION SYSTEMS (EMISSION POINTS B0003, B0040, AND B0058) FOR REACTOR MANWAYS AND OTHER MISCELLANEOUS EMISSION SOURCES IN B-AREA WHICH UTILIZE ELEPHANT TRUNKS AND SPOT VENTILATION. THE VENTILATION SYSTEMS ARE FOR VOCS AND MISCELLANEOUS INORGANICS. FUGITIVE EMISSIONS ONLY.
Process: B11 is located at Building B-AREA - EXHAUST VENTILATION SYSTEMS (EMISSION POINTS B0004 AND B0081) FOR REACTOR MANWAYS AND OTHER MISCELLANEOUS EMISSION SOURCES IN B-AREA WHICH UTILIZE ELEPHANT TRUNKS AND SPOT VENTILATION. THIS EXHAUST VENTILATION SYSTEM IS FOR VENTING PARTICULATE EMISSIONS. PARTICULATE CONTROLS ARE PROVIDED FOR EMISSION POINT B0081 (EMISSION CONTROL B1103).
Process: B12 is located at Building B-AREA - EXHAUST VENTILATION SYSTEM (EMISSION POINT B0080) FOR DRUMOUT STATIONS IN B-AREA WHICH UTILIZE ELEPHANT TRUNKS AND SPOT VENTILATION. THE VENTILATION SYSTEM IS FOR VOCS, PARTICULATES, AND MISCELLANEOUS INORGANICS. FUGITIVE EMISSIONS ONLY.
Process: B14 is located at Building B-AREA - EXHAUST VENTILATION SYSTEM (EMISSION POINT B0082) FOR REACTOR MANWAYS AND OTHER MISCELLANEOUS EMISSION SOURCES IN TRAIN II WHICH UTILIZE ELEPHANT TRUNKS AND SPOT VENTILATION. THE VENTILATION SYSTEM IS FOR VOCS, MISCELLANEOUS INORGANICS, AND PARTICULATES. FUGITIVE EMISSIONS ONLY.
Process: B15 is located at Building B-AREA - EXHAUST VENTILATION SYSTEM (EMISSION POINT B0084) FOR REACTOR MANWAYS AND OTHER MISCELLANEOUS EMISSION SOURCES IN USSC PROCESS WHICH UTILIZE ELEPHANT TRUNKS AND SPOT VENTILATION. THE VENTILATION SYSTEM IS FOR

VOCS AND PARTICULATES. FUGITIVE EMISSIONS ONLY.
Process: B16 is located at Building B-AREA - EXHAUST VENTILATION SYSTEM (EMISSION POINT B0008) FOR REACTOR MANWAYS AND OTHER MISCELLANEOUS EMISSION SOURCES IN THE OXIDATION BUILDNG WHICH UTILIZE ELEPHANT TRUNKS AND SPOT VENTILATION. THE VENTILATION SYSTEM IS FOR VOCS, MISCELLANEOUS INORGANICS, AND PARTICULATES. FUGITIVE EMISSIONS ONLY.
Process: B17 is located at Building B-AREA - Ventilation from U-2 centrifuge room.

Emission unit B00002 - B-AREA PROCESS STORAGE TANKS THAT ARE REGULATED UNDER 6 NYCRR PART 229.
Emission unit B00002 is associated with the following emission points (EP):
B0010, B0021, B0065, B0071, B0143
It is further defined by the following process(es):
Process: B22 is located at Building B-AREA - Storage tanks supporting 2-chloropyridine vacuum stripping and associated operations.
Process: B25 is located at Building B-AREAOST - B-Area organic storage tanks using scrubber S-CL-11 as alternative controls as regulated under 6 NYCRR PART 229. Emission points associated with these storage tanks are B0021 (ES B2501) and B0071 (ES B2503).

Emission unit B00003 - B-AREA PROCESS STORAGE TANKS THAT ARE NOT REGULATED UNDER 6 NYCRR PART 229.
Emission unit B00003 is associated with the following emission points (EP):
B0007, B0044, B0046, B0047, B0048, B0050, B0051, B0052, B0057, B0064, B0068, B0076, B0079
It is further defined by the following process(es):
Process: B30 is located at Building B-AREA - B-AREA STORAGE TANKS FOR CAUSTIC (SODIUM HYDROXIDE): EMISSIONS FROM SODIUM HYDROXIDE STORAGE TANKS ARE INSIGNIFICANT SINCE SODIUM HYDROXIDE DOES NOT EXERT ANY SIGNIFICANT VAPOR PRESSURE. EMISSION POINTS ASSOCIATED WITH THESE STORAGE TANKS ARE B0057 (EMISSION SOURCE B3001) AND B0068 (EMISSION SOURCE B3002).
Process: B31 is located at Building B-AREA - B-AREA STORAGE TANKS FOR SODIUM OMADINE (NaPT): EMISSIONS FROM SODIUM OMADINE STORAGE TANKS ARE INSIGNIFICANT SINCE SODIUM OMADINE DOES NOT EXERT ANY SIGNIFICANT VAPOR PRESSURE. EMISSION POINTS ASSOCIATED WITH STORAGE TANKS ARE B0007 (EMISSION SOURCE B3101) AND B0064 (EMISSION SOURCE B3102).
Process: B32 is located at Building B-AREA - STORAGE TANKS WHICH STORE SODIUM SULFAHYDRATE: EMISSIONS FROM SODIUM SULFAHYDRATE STORAGE TANKS ARE INSIGNIFICANT SINCE SODIUM SULFAHYDRATE DOES NOT EXERT ANY SIGNIFICANT VAPOR PRESSURE. EMISSION POINT ASSOCIATED WITH SUCH STORAGE TANKS IS B0044 (EMISSION SOURCE B3201).
Process: B33 is located at Building B-AREA - STORAGE TANKS WHICH CONTAIN ZINC CONTAMINATED WASTEWATERS DESIGNATED FOR TREATMENT. EMISSIONS FROM THESE STORAGE TANKS ARE INSIGNIFICANT SINCE ZINC COMPOUNDS DO NOT EXERT ANY SIGNIFICANT VAPOR PRESSURE. EMISSION POINTS ASSOCIATED WITH STORAGE TANKS ARE B0046 (EMISSION SOURCE B3301), B0047 (EMISSION SOURCE B3302), B0048 (EMISSION SOURCE B3303), AND B0076 (EMISSION SOURCE B3304).
Process: B34 is located at Building B-AREA - B-AREA STORAGE TANKS WHICH CONTAIN ACETIC ACID. EMISSIONS FROM ACETIC ACID STORAGE TANKS ARE INSIGNIFICANT DUE TO LOW VAPOR PRESSURE AND QUANTITY OF ACETIC ACID TRANSFERRED THROUGH STORAGE TANKS. EMISSION POINTS ASSOCIATED WITH THESE STORAGE TANKS ARE B0051 (EMISSION SOURCE B3401) AND B0079 (EMISSION SOURCE B3402).
Process: B35 is located at Building B-AREA - STORAGE TANKS WHICH CONTAIN HYDROGEN PEROXIDE. EMISSIONS FROM HYDROGEN PEROXIDE STORAGE TANKS ARE INSIGNIFICANT SINCE HYDROGEN PEROXIDE DOES NOT EXERT ANY SIGNIFICANT VAPOR PRESSURE. EMISSION POINT

ASSOCIATED WITH SUCH STORAGE TANKS IS B0052 (EMISSION SOURCE B3501).

Emission unit B00004 - B-AREA REACTORS WHICH ULTILIZE SCRUBBER SYSTEMS FOR EMISSION CONTROLS.
Emission unit B00004 is associated with the following emission points (EP):
B0002, B0053, B0055, B0060
It is further defined by the following process(es):
Process: B40 is located at Building B-AREA - R-B-03 IS UTILIZED IN THE PRODUCTION OF PLANT STREAM NaPT. THE OFF GAS FROM R-B-03 (EMISSION SOURCE B4001) IS PASSED THROUGH T-B-29 CAUSTIC SCRUBBER COLUMN PRIOR TO VENTING TO THE ATMOSPHERE (EMISSION POINT B0002).
Process: B41 is located at Building B-AREA - R-B-09 (EMISSION SOURCE B4101) IS UTILIZED FOR THE PRODUCTION OF 2-CHLOROPYRIDINE N-OXIDE. THE OFF GAS FROM R-B-09 AND CONTAINMENT TANK VB-09E (EMISSION SOURCE B4103) IS PASSED THROUGH A VENT CONDENSER AND A CAUSTIC SCRUBBER PRIOR TO VENTING TO THE ATMOSPHERE (EMISSION POINT B0060).
Process: B42 is located at Building B-AREA - R-B-93 (EMISSION SOURCE B4201) IS UTILIZED IN THE PRODUCTION OF SODIUM OMADINE. THE OFF GAS FROM R-B-93 IS PASSED THROUGH TWO CAUSTIC SCRUBBER COLUMNS, T-B-93A AND T-B-93B BEFORE VENTING TO THE ATMOSPHERE (EMISSION POINT B0055).
Process: B43 is located at Building B-AREA - R-B-91 (EMISSION SOURCE B4301) IS UTILIZED IN THE PRODUCTION OF 2-CHLOROPYRIDINE N-OXIDE. THE OFF GAS FROM R-B-91 IS PASSED THROUGH A VENT CONDENSER AND A CAUSTIC SCRUBBER PRIOR TO VENTING TO THE ATMOSPHERE (EMISSION POINT B0053).

Emission unit B00005 - B-AREA REACTORS WHICH DO NOT UTILIZE SCRUBBER SYSTEMS FOR EMISSION CONTROLS, EITHER BECAUSE THE EMISSIONS DO NOT REQUIRE SUCH CONTROL MEASURES OR ALTERNATIVE EMISSION CONTROL DEVICES ARE USED.
Emission unit B00005 is associated with the following emission points (EP):
B0027, B0043, B0054, B0061, B0063, B0067, B0075, B0077, B0085
It is further defined by the following process(es):
Process: B50 is located at Building B-AREA - R-B-14 (EMISSION POINT B0027 AND EMISSION SOURCE B5001) IS UTILIZED FOR PRECIPITATION AND HOLDING OF ZINC OMADINE.
Process: B51 is located at Building B-AREA - R-B-07 (EMISSION POINT B0043 AND EMISSION SOURCE B5101) IS UTILIZED FOR THE PRODUCTION OF ZINC OMADINE PRECIPITATE, 40% NaPT, TRIADINE 10, OMDS, AND PURIFIED SODIUM OMADINE.
Process: B52 is located at Building B-AREA - R-B-92 (Emission Point B0054 and Emission Source B5201) Train 2 and R-B-04 (Emission Point B0067 and Emission Source B5204) Train 1are used for neutralization of crude 2-Chloropyridine N-oxide solution produced in R-B-911 (Train 2) and R-B 09 (Train 1).
Process: B53 is located at Building B-AREA - R-B-12 (EMISSION POINT B0063 AND EMISSION SOURCE B5301) IS UTILIZED IN THE PRODUCTION OF TERRAZOLE, 40% SODIUM OMADINE, AND 10% SODIUM HYPOCHLORITE SOLUTION.
Process: B54 is located at Building B-AREA - R-B-05 (EMISSION POINT B0075 AND EMISSION SOURCE B5401) IS UTILIZED AS A MIXING TANK FOR THE FORMULATION OF 40% NaPT, PRODUCTION OF TRIADINE 10, PURIFIED SODIUM OMADINE, AND OMDS AND HOLDING OF PLANT STREAM NaPT.
Process: B56 is located at Building B-AREA - VESSELS (V-B-103 SOLID SEPARATION FEED TANK - EMISSION SOURCE B5602, V-B-130-EMISSION SOURCE B5603, AND V-B-132 - EMISSION SOURCE 5604) AND REACTORS (R-B-102 PRECIPITATOR VESSEL - EMISSION SOURCE B5601) WHICH ARE UTILIZED IN THE PRODUCTION OF USSC.

Emission unit B00006 - B-Area distillation columns and associated equipment.
Emission unit B00006 is associated with the following emission points (EP):
B0017, B0144, B0146
It is further defined by the following process(es):
Process: B61 is located at Building B-AREA - DISTILLATION COLUMN SYTEM T-B-24 (EMISSION POINT

B0017 AND EMISSION SOURCE B6001) IS UTILIZED FOR THE RECOVERY OF CARBON TETRACHLORIDE, 2-CHLORPYRIDINE, 2,6-DICHLOROPYRIDINE, AND PYRIDINE.
Process: B63 is located at Building B-AREA - Vacuum distillation processes for 2-Chloropyridine recovery involving columns T-B-155, T-B-156 and V-B-92C and V-B-70.

Emission unit B00007 - VENTURI SCRUBBER SYSTEM S-B-38 IS UTILIZED TO CONTROL EMISSIONS FROM THE 2,6 DICHLOROPYRIDINE RECOVERY SYSTEM IN TWO PROCESS MODES (ONE WITH CARBON TETRACHLORIDE REMOVED FROM THE PROCESS AND ANOTHER WITH IT STILL IN USE).
Emission unit B00007 is associated with the following emission points (EP):
B0066
It is further defined by the following process(es):
Process: B70 is located at Building B-AREA - VENTURI SCRUBBER SYSTEM S-B-38 (EMISSION POINT B0066) RECEIVES VENTS FROM R-B-10 (EMISSION SOURCE B7001) AND V-B-10 (EMISSION SOURCE B7003). IN THIS PROCESS, STEAM IS UTILIZED AS A SOLVENT INSTEAD OF CARBON TETRACHLORIDE.

Emission unit B00008 - SCRUBBER SYSTEM S-CL-11 IS UTILIZED TO REMOVE ORGANICS FROM APPROXIMATELY 26 EMISSION SOURCES (SCRUBBERS, STORAGE TANKS, DISTILLATION COLUMNS, AND REACTORS) IN THE PRODUCTION OF 2-CHLOROPYRIDINE AND 2,6-DICHLOROPYRIDINE. TWO PROCESSES ARE ASSOCIATED WITH THIS EMISSION UNIT, ONE WITH CARBON TETRACHLORIDE REMOVED FROM THE PROCESS AND ANOTHER WHERE IT IS STILL IN USE.
Emission unit B00008 is associated with the following emission points (EP):
B0005
It is further defined by the following process(es):
Process: B80 is located at Building B-AREA - S-CL-11 SCRUBBER SYSTEM (EMISSION POINT B0005) IS UTILIZED TO REMOVE ORGANICS FROM VARIOUS CONTINUOUS AND NON CONTINUOUS PROCESS EQUIPMENT VENTS ASSOCIATED WITH THE PRODUCTION OF 2-CHLOROPYRIDINE AND 2,6-DICHLOROPYRIDINE. IN THIS PROCESS, STEAM IS UTILIZED AS A SOLVENT INSTEAD OF CARBON TETRACHLORIDE. THE CONTINUOUS PROCESS SOURCES INCLUDE VENTS FROM A CAUSTIC SCRUBBER, VARIOUS TANKS (BLOWDOWN, SURGE, RECEIVER, STORAGE, ETC.), PHASE SEPARATORS, AND VACUUM PUMPS AND ARE AS FOLLOWS:

EMISSION SOURCE B8003 - V-CL-100 QUENCH TANK (NOTE: VENTS TO S-CL-01 VENTURI CAUSTIC SCRUBBER WHICH VENTS TO S-CL-11)
EMISSION SOURCE B8004 - V-CL-10 (750 GAL) BLOWDOWN STORAGE TANK
EMISSION SOURCE B8005 - V-CL-128 PHASE SEPARATOR
EMISSION SOURCE B8006 - V-B-57 (15,000 GAL) AQUEOUS STORAGE TANK
EMISSION SOURCE B8007 - V-CL-129 WET ORGANIC SURGE TANK
EMISSION SOURCE B8008 - V-B-135 PHASE SEPARATOR
EMISSION SOURCE B8009 - V-B-55 ORGANIC SURGE TANK
EMISSION SOURCE B8010 - V-B-71 PYRIDINE RECEIVER TANK
EMISSION SOURCE B8011 - V-CL-06 BY-PRODUCT STORAGE TANK
EMISSION SOURCE B8012 - V-B-59 CRUDE 2-PCL STORAGE
EMISSION SOURCE B8013 - V-B-13 2-PCL RECEIVER TANK
EMISSION SOURCE B8014 - V-B-14 2-PCL RECEIVER TANK
EMISSION SOURCE B8015 - V-B-64A 2- PCL RECEIVER TANK
EMISSION SOURCE B8016 - V-B-64B 2-PCL RECEIVER TANK
EMISSION SOURCE B8017 - V-B-64C 2-PCL RECEIVER TANK
EMISSION SOURCE B8018 - V-B-08 OFF SPEC 2-PCL TANK
EMISSION SOURCE B8019 - V-B-62 2-PCL STORAGE
EMISSION SOURCE B8020 - V-B-64 2-PCL STORAGE
EMISSION SOURCE B8021 - V-B-25 G VACUUM SYSTEM (NOTE: VACUUM SYSTEM PROVIDES

VACUUM FOR EMISSION SOURCES B8033: R-B-06, B8034: R-B-08, B8035: TB-23 PYRIDINE COLUMN, B8036: TB-25 PYRIDINE COLUMN, AND B8037: TB-134 3-PCL COLUMN
EMISSION SOURCE B8022 - V-B-25H OVERFLOW RECEIVER
EMISSION SOURCE B8023 - V-B-50 DIRTY STREAM STORAGE
EMISSION SOURCE B8024 - V-B-54 UTILITY STORAGE
EMISSION SOURCE B8025 - V-CL-06A UTILITY STORAGE
EMISSION SOURCE B8026 - V-B-01A RECYCLE STORAGE
EMISSION SOURCE B8027 - V-B-142 REDUCTION PRODUCT STORAGE TANK
EMISSION SOURCE B8028 - V-B-95 STRIP RECEIVER

THE NON CONTINUOUS PROCESS SOURCES INCLUDE VENTS FROM CHARGING VARIOUS STILLS AND STORAGE TANKS. THESE INCLUDE EMISSION SOURCES B8008, B8018, B8019, B8020, B8024, B8025, B8027, B8028 AND THE FOLOWING:

EMISSION SOURCE B8029 - V-B-91B 2-PCL RECEIVER
EMISSION SOURCE B8030 - V-B-91D 2-PCL RECEIVER
EMISSION SOURCE B8031 - R-B-01 STEAM STILL
EMISSION SOURCE B8032 - R-B-02 STEAM STILL
EMISSION SOURCE B8033 - R-B-06 2-PCL BATCH VACUUM DISTILLATION
EMISSION SOURCE B8034 - R-B-08 2-PCL BATCH VACUUM DISTILLATION
EMISSION SOURCE B8038 - TB-135 CAUSTIC EXTRACTOR

Emission unit C00002 - C-AREA VENTILATION SYSTEMS FOR REACTORS WHEN CHARGING OR DRUMMING OUT.
Emission unit C00002 is associated with the following emission points (EP):
C0003
It is further defined by the following process(es):
Process: C20 is located at Building C-AREA - EXHAUST VENTILATION SYSTEM (EMISSION POINT C0003) FOR C-AREA REACTORS WHEN CHARGING OR DRUMMING OUT REACTORS.

Emission unit C00004 - C-AREA REACTORS FOR PRODUCTION OF CHEMICALS NOT REQUIRING EMISSION CONTROLS.
Emission unit C00004 is associated with the following emission points (EP):
C0011, C0012, C0013
It is further defined by the following process(es):
Process: C40 is located at Building C-AREA - PRODUCTION OF WAYHIB S AND OMACIDE P PRODUCTION IN REACTOR R-C-12 (EMISSION POINT C0011 AND EMISSION SOURCE C4001) WHICH DOES NOT NEED EMISSION CONTROLS.
Process: C41 is located at Building C-AREA - C-Area reactors for production of 40% Sodium Omadine not requiring emission controls.

Emission unit D00002 - D-AREA VENTILATION SYSTEMS FOR REACTORS AND MISCELLANEOUS EMISSION SOURCES.
Emission unit D00002 is associated with the following emission points (EP):
D0003, D0017
It is further defined by the following process(es):
Process: D20 is located at Building D-AREA - EXHAUST VENTILATION SYSTEMS (EMISSION POINTS D0003 AND D0017) FROM D-AREA REACTORS AND MISCELLANEOUS EMISSION SOURCES. THE VENTILATION SYSTEMS ARE FOR VOCS AND HYDROCHLORIC ACID. FUGITIVE EMISSIONS ONLY.

Emission unit D00004 - AQUEOUS WASTE ORGANIC REMOVAL AND STORAGE SYSTEM.
Emission unit D00004 is associated with the following emission points (EP):
D0010, D0011

It is further defined by the following process(es):
Process: D41 is located at Building D-AREA - STRIPPER SYSTEM FOR ORGANIC WASTEWATERS. ORGANIC STRIPPER T-D-02 (EMISSION POINT D0010) IS UTILIZED TO STRIP ORGANICS FROM ORGANIC CONTAINING WASTEWATER BEFORE THE WASTEWATER IS FED TO AN ACTIVATED CARBON SYSTEM.

Emission unit UBOLRS - TWO 22.150 MM BTU/HR BOILERS FIRING NATURAL GAS WITH #2 FUEL OIL BACKUP.
It is further defined by the following process(es):
Process: OILBoilers burning #2 fuel oil

Emission unit A00001 - A-AREA ventilation systems for reactor man ways, filter hoods, spot ventilation, weigh shed and other miscellaneous emission sources.
Emission unit A00001 is associated with the following emission points (EP):
A0014, A0093, A0120, A0121, A0122, A0123, A0124
It is further defined by the following process(es):
Process: A10 is located at Building A-AREA - VENTILATION SYSTEMS (EMISSION POINTS A0120 AND A0121) FOR A-AREA REACTORS, MANWAYS, AND FILTER PRESSES UTILIZING SPOT VENTILATION, ELEPHANT TRUNKS, AND HOODS. THE VENTILATION SYSTEMS ARE FOR VOC, PARTICULATES, AND MISCELLANEOUS INORGANICS. FUGITIVE EMISSIONS ONLY.
Process: A11 is located at Building A-AREA - VENTILATION SYSTEMS (EMISSION POINTS A0093, A0122, A0123, AND A0124). PARTICULATE CONTROLS ARE PROVIDED FOR EMISSION POINTS A0122 (EMISSION CONTROL A1103), A0123 (EMISSION CONTROL A1105), AND A0124 (EMISSION CONTROL A1107) FOR A-AREA REACTORS, MANWAYS, AND FILTER PRESSES UTILIZING SPOT VENTILATION, ELEPHANT TRUNKS, AND HOODS. THE VENTILATION SYSTEMS ARE FOR VOC, PARTICULATES, MISCELLANEOUS ACIDS (NITRIC, HYDROCHLORIC, ETC.) FUGITIVE EMISSIONS ONLY.
Process: A12 is located at Building A-AREA - EMERGENCY VENTILATION SYSTEM (EMISSION POINT A0014) FOR THE A-AREA PCMM WEIGH SHED. THIS VENTILATION SYSTEM IS ONLY USED TO EVACUATE THE PCMM WEIGH SHED IN THE EVENT OF V-A-25 RELEASING PCMM.

Emission unit A00002 - A-AREA SOLIDS DRYING SYSTEMS.
Emission unit A00002 is associated with the following emission points (EP):
A0077, A0078, A0101, A0118
It is further defined by the following process(es):
Process: A21 is located at Building A-AREA - A-AREA SOLIDS DRYING SYSTEMS (EMISSION POINTS A0077, A0078, AND A0118). EMISSION CONTROLS ARE PROVIDED FOR EMISSION POINTS A0077 (EMISSION CONTROLS A2102 AND A2103), A0078 (EMISSION CONTROLS A2105, A2106, AND A2107), AND A0118 (EMISSION CONTROL A2111) WHICH UTILIZE ROTARY VACUUM DRYERS AND ASSOCIATED DRUM OUT STATIONS.

Emission unit A00003 - A-AREA ORGANIC CHEMICAL STORAGE TANKS: REGULATED UNDER NYCRR PART 229.
Emission unit A00003 is associated with the following emission points (EP):
A0027, A0038, A0039, A0041, A0052, A0053, A0056, A0059, A0061, A0062, A0071, A0072, A0113, A0125
It is further defined by the following process(es):
Process: A30 is located at Building A-AREAOST - A-AREA ORGANIC STORAGE TANKS THAT ARE LESS THAN 10,000 GAL IN CAPACITY AND UTILIZE CONSERVATION VENTS AS CONTROL EQUIPMENT AS REQUIRED UNDER 6 NYCRR PART 229. EMISSION POINTS ASSOCIATED WITH THESE STORAGE TANKS INCLUDE A0039 (EMISSION SOURCE A3001), A0053 (EMISSION SOURCE A3003), A0056 (EMISSION SOURCE A3005), A0061 (EMISSION SOURCE A3007), A0062 (EMISSION SOURCE A3009), A0071 (EMISSION SOURCE A3011), A0072 (EMISSION SOURCE A3013), A0112 (EMISSION SOURCE A3015), A0113 (EMISSION SOURCE A3017), A0125 (EMISSION SOURCE A3019).
Process: A32 is located at Building A-AREAOST - A-AREA ORGANIC STORAGE TANKS USING VENT

CONDENSERS AS ALTERNATIVE CONTROLS AS REGULATED UNDER 6 NYCRR PART 229. EMISSION POINT ASSOCIATED WITH THESE STORAGE TANKS IS A0041 (EMISISON SOURCES A3201, A3202, AND A3203).

Emission unit A00004 - A-AREA STORAGE TANKS: NOT REGULATED UNDER NYCRR PART 229.
Emission unit A00004 is associated with the following emission points (EP):
A0068, A0069, A0070, A0089, A0091, A0104, A0110, A0114
It is further defined by the following process(es):
Process: A40 is located at Building A-AREAIST - A-AREA STORAGE TANKS FOR CAUSTIC (SODIUM HYDROXIDE): EMISSIONS FROM SODIUM HYDROXIDE STORAGE TANKS ARE INSIGNIFICANT SINCE SODIUM HYDROXIDE DOES NOT EXERT ANY SIGNIFICANT VAPOR PRESSURE. EMISSION POINTS ASSOCIATED WITH THESE STORAGE TANKS INCLUDE A0068 (EMISSION SOURCE A4001), A0069 (EMISSION SOURCE A4002), AND A0070 (EMISSION SOURCE A4003).
Process: A42 is located at Building A-AREAIST - A-AREA STORAGE TANKS FOR HYDROGEN PEROXIDE: EMISSIONS FROM HYDROGEN PEROXIDE STORAGE TANKS ARE INSIGNIFICANT SINCE HYDROGEN PEROXIDE DOES NOT EXERT ANY SIGNIFICANT VAPOR PRESSURE. EMISSION POINTS ASSOCIATED WITH THESE STORAGE TANKS INCLUDE A0089 (EMISSION SOURCE A4201) AND A0091 (EMISSION SOURCE A4202).
Process: A43 is located at Building A-AREAIST - A-AREA STORAGE TANKS FOR ACETIC ACID: EMISSIONS FROM ACETIC ACID STORAGE TANKS ARE INSIGNIFICANT DUE TO LOW VAPOR PRESSURE AND QUANTITY OF ACETIC ACID TRANSFERRED THROUGH STORAGE TANKS. EMISSION POINT ASSOCIATED WITH ACETIC ACID STORAGE TANK IS A0114 (EMISSION SOURCE A4301).
Process: A44 is located at Building A-AREAIST - A-AREA STORAGE TANKS FOR HYDROGEN CHLORIDE. EMISSION POINT ASSOCIATED WITH HYDROGEN CHLORIDE TANK IS A0110 (EMISSION SOURCE A4401).

Emission unit A00005 - A-AREA EQUIPMENT WHICH UTILIZE SCRUBBER SYSTEMS FOR EMISSION CONTROLS.
Emission unit A00005 is associated with the following emission points (EP):
A0001, A0007, A0099, A0112, A0119, A0127, A0128
It is further defined by the following process(es):
Process: A52 is located at Building A-AREA - 1. PRODUCTION OF EXPANDEX 5 PT UTILIZING THE CAUSTIC SCRUBBER SYSTEM V-PH-60 (EMISSION CONTROL A5202): DIMETHYLFORMAMIDE IS CHARGED TO R-A-02 (EMISSION SOURCE 5201). THE REACTOR IS THEN CHARGED WITH SODIUM AZIDE AND AMMONIUM CHLORIDE. IT IS NEXT CHARGED WITH BENZONITRILE. WATER IS THEN ADDED TO THE REACTOR. RESIDUAL DIMETHYLFORMAMIDE, WHICH IS THE ONLY VOLATILE MATERIAL PRESENT IN THE REACTOR, IS SOLUBLE IN THE WATER. THE BATCH IS COMPLETED WITH THE ADDITION OF 32% HYDROCHLORIC ACID. REACTOR R-A-02 IS VENTED TO V-PH-60 (OR AN EQUIVALENT CAUSTIC SCRUBBER) DURING THE ENTIRE PRODUCTION PROCESS.

2. PRODUCTION OF MONOETHANOLAMINE HYDROCHLORIDE: HYDROCHLORIC ACID (32%) IS CHARGED TO R-A-02. THE REACTOR IS THEN CHARGED WITH MONOETHANOLAMINE, WHICH REACTS WITH THE HYDROCHLORIC ACID TO FORM MONOETHANOLAMINE HYDROCHLORIDE. REACTOR R-A-02 IS VENTED TO V-PH-60 (OR EQUIVALENT CAUSTIC SCRUBBER) DURING THE ENTIRE PRODUCTION PROCESS.

3. TUNGSTIC ACID RECOVERY: A SLURRY OF CALCIUM CARBONATE SLUDGE (CONTAINS CALCIUM TUNGSTATE) AND WATER IS PREPARED IN R-A-03. BOTH HYDROCHLORIC ACID (32%) AND NITRIC ACID (70%) ARE ADDED TO R-A-02. THE SLURRY CONTAINING THE CALCIUM TUNGSTATE IS THEN TRANSFERRED INTO R-A-02. THE CALCIUM TUNGSTATE REACTS WITH THE ACID MIXTURE AND IS CONVERTED TO TUNGSTIC ACID. UPON COMPLETION OF THE CONVERSION TO TUNGSTIC ACID, THE MIXTURE IS EITHER TRANSFERRED TO V-A-34/35 (OR

EQUIVALENT) AND HELD FOR FILTERING OR FED DIRECTLY FROM R-A-02 TO A FILTER PRESS. R-A-02 IS VENTED TO V-PH-60 (OR AN EQUIVALENT CAUSTIC SCRUBBER) DURING THE ENTIRE PRODUCTION PROCESS. EMISSION POINT ASSOCIATED WITH CAUSTIC SCRUBBER V-PH-60 IS A0094.
Process: A53 is located at Building A-AREA - PRODUCTION IN R-A-11 (EMISSION SOURCE A5301) AND R-A-17 (EMISSION SOURCE A5302) OF EXPANDEX 5PT, IPBC, AND OMACIDE IPBC BLENDS 20, 30, AND 40 UTILIZING THE CAUSTIC SCRUBBER SYSTEM V-A-16A (EMISSION CONTROL A5303). EMISSION POINT ASSOCIATED WITH CAUSTIC SCRUBBER V-A-16A IS A0099.
Process: A55 is located at Building A-AREA - Catalytic hydrazine reduction to convert 2-chloropyridine byproducts to usable 2-chloropyridine and pyridine.

Emission unit A00006 - A-AREA REACTORS WITHOUT SCRUBBERS.
Emission unit A00006 is associated with the following emission points (EP):
A0042, A0097, A0098, A0111, A0117
It is further defined by the following process(es):
Process: A61 is located at Building A-AREA - PRODUCTION OF TERRAZOLE: PURIFIED CHEMICAL 2422 AND ETHANOL ARE CHARGED TO REACTOR R-A-15 (EMISSION POINT A0042 AND EMISSION SOURCE A6102). PRIOR TO ETHANOL CHARGING, THE REACTOR IS PURGED WITH NITROGEN. SODIUM HYDROXIDE (50%) IS ADDED TO THE REACTOR AT A CONTROLLED RATE SUCH THAT THE REACTOR'S TEMPERATURE CAN BE MAINTAINED AT THE DESIRED SET POINT. THE CAUSTIC CATALYZES THE LIQUID PHASE ETHOXYLATION OF THE 2422 TO CHEMICAL 2424. THE PH OF THE REACTION MIXTURE IS ADJUSTED USING EITHER HCL (32%) OR ADDITIONAL CAUSTIC. TEMPERED WATER IS UTILIZED TO EXTRACT INORGANIC SALTS FROM THE ORGANICS. STEAM DISTILLED TERRAZOLE FROM THE EMULSION RECOVERY SYSTEM IS CHARGED INTO THE REACTOR, WITH THE AMOUNT CHARGED BASED ON REACTOR SPACE AVAILABILITY. ADDITIONAL ACIDITY ADJUSTMENTS ARE MADE IF NECESSARY. AGITATION IS STOPPED AND THE REACTION MIXTURE IS ALLOWED TO SETTLE INTO THREE DISTINCT PHASES: (AN ORGANICS) PRODUCT LAYER, AN EMULSION LAYER, AND AN AQUEOUS LAYER. THE ORGANIC LAYER IS TESTED FOR ACIDITY AND CAUSTIC ADDED AS REQUIRED. THE REACTOR IS AGITATED AND THEN ALLOWED TO SETTLE. THE PH ADJUSTMENT PROCESS IS REPEATED UNTIL THE ACIDITY SPECIFICATION IS SATISFIED. THE THREE LAYERS ARE DECANTED AS FOLLOWS: (1) ORGANIC LAYER IS TRANSFERRED TO REACTOR R-A-06 FOR PURIFICATION. (2) EMULSION LAYER IS DRUMMED AND STORED FOR USE AS FEED TO
THE EMULSION RECOVERY PROCESS. (3) AQUEOUS LAYER IS TRANSFERRED TO STORAGE FOR FEED TO ETHANOL RECOVERY PROCESS.
Process: A62 is located at Building A-AREA - OXIDATION OF WASTE SOLUTION TO SULFATES IN REACTOR R-A-20 (EMISSION POINT A0098 AND EMISSION SOURCE A6201): WASTE SCRUBBER SOLUTIONS, WHICH CONTAIN SODIUM SULFIDE, ARE AERATED. A PORTION OF THE OXYGEN IN THE GENERATION AIR REACTS WITH Na2S AND THE REMAINDER IS EXHAUSTED TO THE ATMOSPHERE THROUGH A REFRIGERATED VENT CONDENSER (EMISSION CONTROL A6202). A HIGH PERCENTAGE OF THE Na2S IS OXIDIZED TO SULFATE SALTS. A SMALL PERCENTAGE OF THE Na2S MAY DECOMPOSE TO FORM HYDROGEN SULFIDE. THIS HYDROGEN SULFIDE REACTS WITH RESIDUAL SODIUM HYDROXIDE IN THE SCRUBBER SOLUTION.
Process: A63 is located at Building A-AREA - PRODUCTION OF OMACIDE BLENDS IPBC 20, IPBC 30, AND IPBC 40 IN REACTOR R-A-18 (EMISSION POINT A0111 AND EMISSION SOURCE A6301).
Process: A64 is located at Building A-AREA - PRODUCTION OF CALCIUM TUNGSTATE SLURRY IN REACTOR R-A-03 (EMISSION POINT A0117 AND EMISSION SOURCE A6401). A SLURRY OF CALCIUM CARBONATE SLUDGE (CONTAINS CALCIUM TUNGSTATE) AND WATER IS PREPARED IN THIS REACTOR.

Emission unit B00009 - B-Area Chlorine Scrubber System
It is further defined by the following process(es):
Process: B90 is located at Building B-AREA - Chlorine Scrubber System V-C-17 utilized to scrub chlorine

blowdown from tank cars and vaporizer (Emission Point B0148)

Emission unit D00006 - Solids handling system and associated emission control systems.
Emission unit D00006 is associated with the following emission points (EP):
D0021
It is further defined by the following process(es):
Process: D61 is located at Building D-AREA - Equipment utilized to grind material to satisfy product size requirement and ventilation air is passed through particulate removal equipment.

Title V/Major Source Status
ARCH CHEMICALS INC is subject to Title V requirements. This determination is based on the following information:
The Facility meets the definition of a Major Source in 6 NYCRR Part 201-2.1(b)(21), and is required to obtain a Title V Facility Permit as specified in 6 NYCRR Part 201-6, due to potential emissions in excess of the following Title V thresholds specified in 6 NYCRR Part 201-2 and Title V of the Clean Air Act: 50 tons per year of volatile organic compounds (VOC), 25 tons per year of total hazardous air pollutants (HAP), and 10 tons per year of individual HAP compounds. HAPs emitted include methanol, hydrochloric acid, and chlorine. Other contaminants emitted include particulates, oxides of nitrogen, sulfur dioxide, and carbon monoxide from facility boilers. In addition, there are fugitive emissions from pretreatment of the facility's wastewater.

Program Applicability
The following chart summarizes the applicability of ARCH CHEMICALS INC with regards to the principal air pollution regulatory programs:

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

RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - 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 Part 231) - 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) - 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) - 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) - 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) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - 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 212.10, 226, 227-2, 228, 229, 230, 232, 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) - 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
2869	INDUSTRIAL ORGANIC CHEMICALS,NEC

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorizeprocesses 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
1-02-005-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
3-01-125-35	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - CHLORINE DERIVATIVES Chlorobenzenes: General
3-01-800-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Fugitive Leaks
3-01-830-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Storage/Transfer
3-01-840-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Distillation Units
3-01-870-34	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS) HYDROCHLORIC ACID: WORKING LOSS
3-01-870-98	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS) Specify Liquid: Working Loss
3-01-999-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - OTHER NOT CLASSIFIED Specify in Comments Field
3-06-006-02	PETROLEUM INDUSTRY PETROLEUM INDUSTRY - VACUUM DISTILLATE COLUMN CONDENSORS Vacuum Distillation Column Condensor
3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series 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 Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). 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 Name	PTE	
		lbs/yr	Range
000107-21-1	1,2-ETHANEDIOL		> 0 but < 10 tpy
003811-73-2	1-OXIDE,2-PYRIDINETHIOL SODIUM SALT		> 0 but < 2.5 tpy
002402-78-0	2,6-DICHLORO PYRIDINE		> 0 but < 2.5 tpy
000109-09-1	2-CHLOROPYRIDINE		>= 10 tpy but < 25 tpy
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000110-98-5	2-PROPANOL, 1,1'-OXYBIS-		> 0 but < 2.5 tpy
005848-93-1	5-CHLORO(3-TRICHLOROMETHYL)1,2,4 THIADIAZOLE		> 0 but < 2.5 tpy
000064-19-7	ACETIC ACID		>= 10 tpy but < 25 tpy
007664-41-7	AMMONIA		> 0 but < 2.5 tpy
000100-47-0	BENZONITRILE		> 0 but < 2.5 tpy
000111-36-4	BUTANE,1-ISOCYANATO-		> 0 but < 2.5 tpy
076114-73-3	CARBAMIC ACID, BUTYL-,2-PROPYNYL ESTER		> 0 but < 2.5 tpy
055406-53-6	CARBAMIC ACID, BUTYL-,3-IODO-2-PROPYNYLESTER		> 0 but < 2.5 tpy
000630-08-0	CARBON MONOXIDE		> 0 but < 2.5 tpy
007782-50-5	CHLORINE		> 0 but < 10 tpy
000067-66-3	CHLOROFORM		> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE		> 0 but < 10 tpy
000115-10-6	DIMETHYL ETHER		> 0 but < 2.5 tpy
000067-64-1	DIMETHYL KETONE		> 0 but < 2.5 tpy
000067-68-5	DIMETHYL SULFOXIDE		> 0 but < 2.5 tpy
000079-21-0	ETHANEPEROXOIC ACID (METHYL ESTER)		> 0 but < 2.5 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)		>= 2.5 tpy but < 10 tpy
000050-00-0	FORMALDEHYDE		> 0 but < 10 tpy
000068-12-2	FORMAMIDE, N,N-DIMETHYL		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 25 tpy but < 40 tpy
007647-01-0	HYDROGEN CHLORIDE		> 0 but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE		> 0 but < 10 tpy
007722-84-1	HYDROGEN PEROXIDE		> 0 but < 2.5 tpy
007783-06-4	HYDROGEN SULFIDE		> 0 but < 2.5 tpy
007681-52-9	HYPOCHLOROUS ACID, SODIUM SALT		> 0 but < 2.5 tpy
007553-56-2	IODINE		> 0 but < 2.5 tpy
000110-19-0	ISOBUTYL ACETATE		> 0 but < 2.5 tpy
000078-83-1	ISOBUTYL ALCOHOL		>= 2.5 tpy but < 10 tpy
000078-84-2	ISOBUTYRIC ALDEHYDE		> 0 but < 2.5 tpy
000067-63-0	ISOPROPYL ALCOHOL		> 0 but < 2.5 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
000594-42-3	METHANESULFENYL CHLORIDE, TRICHLORO- CCL4S		> 0 but < 2.5 tpy
000067-56-1	METHYL ALCOHOL		> 0 but < 10 tpy
007697-37-2	NITRIC ACID		> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 25 tpy but < 40 tpy
0NY075-00-0	PARTICULATES		>= 10 tpy but < 25 tpy
007664-38-2	PHOSPHORIC ACID		> 0 but < 2.5 tpy
007723-14-0	PHOSPHORUS (YELLOW)		> 0 but < 10 tpy
0NY075-00-5	PM-10		>= 10 tpy but < 25 tpy
008017-16-1	POLYPHOSPHORIC ACIDS		> 0 but < 2.5 tpy

000110-86-1	PYRIDINE	>= 2.5 tpy but < 10 tpy
000626-60-8	PYRIDINE,3-CHLORO-	> 0 but < 2.5 tpy
039393-37-8	SANTICIZER 711 (9CI)	> 0 but < 2.5 tpy
016721-80-5	SODIUM HYDROSULFIDE	> 0 but < 2.5 tpy
001310-73-2	SODIUM HYDROXIDE	> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE	> 0 but < 2.5 tpy
007664-93-9	SULFURIC ACID	> 0 but < 2.5 tpy
002593-15-9	THIADIAZOLE 1,2,4-,5-ETHOXY-3-(TRICHLOROMETHYL)-	> 0 but < 2.5 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
000545-06-2	TRICHLOROACETONITRILE	> 0 but < 2.5 tpy
024800-44-0	TRIPROPYLENE GLYCOL	> 0 but < 2.5 tpy
001314-62-1	VANADIUM OXIDE V2O5	> 0 but < 2.5 tpy
0NY998-00-0	VOC	>= 50 tpy but < 100 tpy
001330-20-7	XYLENE, M, O & P MIXT.	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;
(3) During the period of the emergency the facility owner and/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 and/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 and/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 B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(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 D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(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 E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(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 F: **Permit Revocation, Modification, Reopening, Reissuance or** Termination, and Associated Information Submission Requirements - 6 **NYCRR Part 201-6.5(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 G: **Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR** Part 201-6.5(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 H: **Property Rights - 6 NYCRR Part 201-6.5(a)(6)**

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: **Severability - 6 NYCRR Part 201-6.5(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 J: **Permit Shield - 6 NYCRR Part 201-6.5(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 K: **Reopening for Cause - 6 NYCRR Part 201-6.5(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 201-6.7 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 L: **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 M: **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: **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		187	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 68-A.10(a)	33	
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	188	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 34, 35	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	
FACILITY	6NYCRR 201-6.5(a)(7)	2	
FACILITY	6NYCRR 201-6.5(a)(8)	16	
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	17	
FACILITY	6NYCRR 201-6.5(e)	6	
FACILITY	6NYCRR 201-6.5(f)	24	
FACILITY	6NYCRR 201-6.5(f)(6)	18	
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-1.3	25	
FACILITY	6NYCRR 202-1.4	26	Separate emission tests by the commissioner.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	189	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
A-00001/-/A11	6NYCRR 212.4(c)	40	General Process Emission Sources - emissions from new processes and/or modifications
A-00002/A0101	6NYCRR 212.4(c)	45	General Process Emission Sources - emissions from new processes and/or modifications

A-00005/-/A53	6NYCRR 212.4(c)	64	General Process Emission Sources - emissions from new processes and/or modifications
A-00006/-/A64	6NYCRR 212.4(c)	75	General Process Emission Sources - emissions from new processes and/or modifications
A-00007/-/A70	6NYCRR 212.4(c)	77	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/-/B12	6NYCRR 212.4(c)	88	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/-/B14	6NYCRR 212.4(c)	91	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/-/B15	6NYCRR 212.4(c)	97	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/-/B16	6NYCRR 212.4(c)	100	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/-/B17	6NYCRR 212.4(c)	106	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/B0004/B11	6NYCRR 212.4(c)	107, 108	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/B0080/B15	6NYCRR 212.4(c)	109	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/B0081/B11	6NYCRR 212.4(c)	110	General Process Emission Sources - emissions from new processes and/or modifications
B-00001/B0140/B17	6NYCRR 212.4(c)	111	General Process Emission Sources - emissions from new processes and/or modifications
B-00003/-/B33	6NYCRR 212.4(c)	121	General Process Emission Sources - emissions from new processes and/or modifications
B-00004/-/B40	6NYCRR 212.4(c)	128	General Process Emission Sources - emissions from new processes and/or modifications
B-00004/-/B42	6NYCRR 212.4(c)	134	General Process Emission Sources - emissions from new processes and/or modifications
B-00005/-/B50	6NYCRR 212.4(c)	142	General Process Emission Sources - emissions from new processes and/or modifications
B-00005/-/B51	6NYCRR 212.4(c)	143	General Process Emission Sources - emissions from new processes and/or modifications
B-00005/-/B53	6NYCRR 212.4(c)	147	General Process Emission Sources - emissions from new processes and/or modifications
B-00005/-/B54	6NYCRR 212.4(c)	151	General Process Emission Sources - emissions from new processes and/or modifications

B-00005/-/B56	6NYCRR 212.4(c)	155	General Process Emission Sources - emissions from new processes and/or modifications
C-00004/-/C40	6NYCRR 212.4(c)	178	General Process Emission Sources - emissions from new processes and/or modifications
A-00003	6NYCRR 212.5(a)	47	Applicable emission standards
A-00004	6NYCRR 212.5(a)	52	Applicable emission standards
A-00005	6NYCRR 212.5(a)	58	Applicable emission standards
A-00006	6NYCRR 212.5(a)	71	Applicable emission standards
A-00008	6NYCRR 212.5(a)	80	Applicable emission standards
B-00002	6NYCRR 212.5(a)	112	Applicable emission standards
B-00003	6NYCRR 212.5(a)	116	Applicable emission standards
B-00004	6NYCRR 212.5(a)	126	Applicable emission standards
B-00005	6NYCRR 212.5(a)	140	Applicable emission standards
B-00006	6NYCRR 212.5(a)	160	Applicable emission standards
B-00007	6NYCRR 212.5(a)	163	Applicable emission standards
B-00008	6NYCRR 212.5(a)	166	Applicable emission standards
C-00002	6NYCRR 212.5(a)	171	Applicable emission standards
C-00004	6NYCRR 212.5(a)	176	Applicable emission standards
D-00004	6NYCRR 212.5(a)	183	Applicable emission standards
A-00003	6NYCRR 212.5(c)	48	Applicable emission standards
A-00004	6NYCRR 212.5(c)	53	Applicable emission standards
A-00005	6NYCRR 212.5(c)	59	Applicable emission standards
A-00006	6NYCRR 212.5(c)	72	Applicable emission standards
A-00008	6NYCRR 212.5(c)	81	Applicable emission standards
B-00002	6NYCRR 212.5(c)	113	Applicable emission standards
B-00003	6NYCRR 212.5(c)	117	Applicable emission standards
B-00004	6NYCRR 212.5(c)	127	Applicable emission standards
B-00005	6NYCRR 212.5(c)	141	Applicable emission standards
B-00006	6NYCRR 212.5(c)	161	Applicable emission standards
B-00007	6NYCRR 212.5(c)	164	Applicable emission standards
B-00008	6NYCRR 212.5(c)	167	Applicable emission standards
C-00002	6NYCRR 212.5(c)	172	Applicable emission standards
C-00004	6NYCRR 212.5(c)	177	Applicable emission standards
D-00004	6NYCRR 212.5(c)	184	Applicable emission standards
FACILITY	6NYCRR 212.6(a)	27, 28	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 212.9(a)	29	
A-00001/-/A10	6NYCRR 212.9(b)	36, 37, 38, 39	General Process Emission Sources - tables
A-00001/-/A11	6NYCRR 212.9(b)	41	General Process Emission

A-00001/-/A12	6NYCRR 212.9(b)	42	General Process Emission Sources - tables
A-00002/A0077	6NYCRR 212.9(b)	43	General Process Emission Sources - tables
A-00002/A0078	6NYCRR 212.9(b)	44	General Process Emission Sources - tables
A-00002/A0101	6NYCRR 212.9(b)	46	General Process Emission Sources - tables
A-00004/-/A40	6NYCRR 212.9(b)	54	General Process Emission Sources - tables
A-00004/-/A42	6NYCRR 212.9(b)	55	General Process Emission Sources - tables
A-00004/-/A43	6NYCRR 212.9(b)	56	General Process Emission Sources - tables
A-00004/-/A44	6NYCRR 212.9(b)	57	General Process Emission Sources - tables
A-00005/-/A52	6NYCRR 212.9(b)	60, 61, 62, 63	General Process Emission Sources - tables
A-00005/-/A53	6NYCRR 212.9(b)	65, 66, 67, 68, 69	General Process Emission Sources - tables
A-00005/-/A55	6NYCRR 212.9(b)	70	General Process Emission Sources - tables
A-00006/-/A62	6NYCRR 212.9(b)	73	General Process Emission Sources - tables
A-00006/-/A63	6NYCRR 212.9(b)	74	General Process Emission Sources - tables
A-00006/A0042/A61	6NYCRR 212.9(b)	76	General Process Emission Sources - tables
A-00007/-/A70	6NYCRR 212.9(b)	78, 79	General Process Emission Sources - tables
A-00008/-/A81	6NYCRR 212.9(b)	82, 83, 84	General Process Emission Sources - tables
B-00001/-/B10	6NYCRR 212.9(b)	85, 86, 87	General Process Emission Sources - tables
B-00001/-/B12	6NYCRR 212.9(b)	89, 90	General Process Emission Sources - tables
B-00001/-/B14	6NYCRR 212.9(b)	92, 93, 94, 95, 96	General Process Emission Sources - tables
B-00001/-/B15	6NYCRR 212.9(b)	98, 99	General Process Emission Sources - tables
B-00001/-/B16	6NYCRR 212.9(b)	101, 102, 103, 104, 105	General Process Emission Sources - tables
B-00003/-/B30	6NYCRR 212.9(b)	118	General Process Emission Sources - tables
B-00003/-/B31	6NYCRR 212.9(b)	119	General Process Emission Sources - tables
B-00003/-/B32	6NYCRR 212.9(b)	120	General Process Emission Sources - tables
B-00003/-/B33	6NYCRR 212.9(b)	122, 123	General Process Emission Sources - tables
B-00003/-/B34	6NYCRR 212.9(b)	124	General Process Emission Sources - tables
B-00003/-/B35	6NYCRR 212.9(b)	125	General Process Emission Sources - tables
B-00004/-/B40	6NYCRR 212.9(b)	129, 130	General Process Emission Sources - tables
B-00004/-/B41	6NYCRR 212.9(b)	131, 132, 133	General Process Emission Sources - tables
B-00004/-/B42	6NYCRR 212.9(b)	135, 136	General Process Emission Sources - tables
B-00004/-/B43	6NYCRR 212.9(b)	137, 138, 139	General Process Emission Sources - tables
B-00005/-/B51	6NYCRR 212.9(b)	144, 145, 146	General Process Emission Sources - tables
B-00005/-/B53	6NYCRR 212.9(b)	148, 149, 150	General Process Emission Sources - tables
B-00005/-/B54	6NYCRR 212.9(b)	152, 153, 154	General Process Emission Sources - tables
B-00005/B0054/B52	6NYCRR 212.9(b)	156, 157	General Process Emission Sources - tables
B-00005/B0067/B52	6NYCRR 212.9(b)	158, 159	General Process Emission Sources - tables
B-00006/-/B61	6NYCRR 212.9(b)	162	General Process Emission

			Sources - tables
B-00007/-/B70	6NYCRR 212.9(b)	165	General Process Emission Sources - tables
B-00008/-/B80	6NYCRR 212.9(b)	168, 169, 170	General Process Emission Sources - tables
C-00002/-/C20	6NYCRR 212.9(b)	173, 174, 175	General Process Emission Sources - tables
C-00004/-/C40	6NYCRR 212.9(b)	179, 180	General Process Emission Sources - tables
D-00002/D0003	6NYCRR 212.9(b)	181, 182	General Process Emission Sources - tables
D-00004/-/D41	6NYCRR 212.9(b)	185	General Process Emission Sources - tables
FACILITY	6NYCRR 215	9	
FACILITY	6NYCRR 225-1.2(a)(2)	30	Sulfur in Fuel Limitations Post 12/31/87.
U-BOLRS	6NYCRR 225-1.8(a)	186	Reports, sampling and analysis.
FACILITY	6NYCRR 229.1(a)	31	Applicability and compliance
A-00003/-/A30	6NYCRR 229.3(e)(2)(v)	50	Volatile organic liquid storage tanks
A-00003/A0041/A32	6NYCRR 229.3(g)(1)(i)	51	
B-00002/-/B22	6NYCRR 229.3(g)(1)(i)	115	
FACILITY	6NYCRR 229.4(a)	32	
A-00003	6NYCRR 229.5(d)	49	Recordkeeping - VOL storage tanks
B-00002	6NYCRR 229.5(d)	114	Recordkeeping - VOL storage tanks

Applicability Discussion:

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

ECL 19-301.
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.

6NYCRR Part 200-.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 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

6NYCRR Part 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.

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

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

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR 201-6.5(d)(5)
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.

6NYCRR Part 201-6.5(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.

6NYCRR 201-6.5(f)(6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 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.

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

6NYCRR Part 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.

6NYCRR Part 211-.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3
This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215
Prohibits open fires at industrial and commercial sites.

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, ARCH CHEMICALS INC has been determined to be subject to the following regulations:

40CFR 68-A.10 (a)
(a) An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance is required to comply with the requirements to have an accidental release plan within a defined time, which is no later than:

(1) June 21, 1999;

(2) Three years after the date on which a regulated substance is first listed; or

(3) The date on which a regulated substance is first present above a threshold quantity.

6NYCRR 201-6.5 (f)
This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 202-1.3
This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. Alternate methods may be also be used provided they are determined to be acceptable by the department. Finally, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6NYCRR 202-1.4
This regulation allows the department discretion to conduct separate or additional emission tests, including preparation of the testing site, at the source owner's expense, to determine compliance.

6NYCRR 212 .4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .5 (a)
This section establishes an emission rate when two or more control devices exit to the atmosphere through a single emission point.

6NYCRR 212 .5 (c)
This section provides emission rates when two control devices exhaust to one emission point and the concentration is in grains per standard cubic foot

6NYCRR 212 .6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 212 .9 (a)
This section refers to Table 1 which specifies criteria for establishing environmental ratings for individual air contaminants.

6NYCRR 212 .9 (b)
This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6NYCRR 225-1.2 (a) (2)
This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8 (a)
Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the

commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 229 .1 (a)
This requires owners or operators of a gasoline bulk plant, gasoline loading terminal, marine loading vessel, petroleum liquid storage tanks or volatile organic liquid storage tanks which meet current applicability criteria, submit a permit to construct or a certificate to operate prior to commencing construction and/or operation, as required by NYCRR Part 201. It includes the method or methods used to comply with the control requirements of this Part.

6NYCRR 229 .3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6NYCRR 229 .3 (g) (1) (i)
This section allows for alternative emission contol technologies equivalent to prescribed controls to reduce VOC emssions from storage tanks.

6NYCRR 229 .4 (a)
This subdivision specifies the test methods that must be used when a test is required to determine compliance with Part 229.

6NYCRR 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.

Compliance Certification
Summary of monitoring activities at ARCH CHEMICALS INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
A-00001/-/A11	40	intermittent emission testing
A-00002/A0101	45	intermittent emission testing
A-00005/-/A53	64	intermittent emission testing
A-00006/-/A64	75	intermittent emission testing
A-00007/-/A70	77	intermittent emission testing
B-00001/-/B12	88	intermittent emission testing
B-00001/-/B14	91	intermittent emission testing
B-00001/-/B15	97	intermittent emission testing
B-00001/-/B16	100	intermittent emission testing
B-00001/-/B17	106	intermittent emission testing
B-00001/B0004/B11	107	monitoring of process or control device parameters as surrogate
B-00001/B0004/B11	108	intermittent emission testing
B-00001/B0080/B15	109	monitoring of process or control device parameters as surrogate

B-00001/B0081/B11	110	monitoring of process or control device parameters as surrogate
B-00001/B0140/B17	111	monitoring of process or control device parameters as surrogate
B-00003/-/B33	121	intermittent emission testing
B-00004/-/B40	128	intermittent emission testing
B-00004/-/B42	134	intermittent emission testing
B-00005/-/B50	142	intermittent emission testing
B-00005/-/B51	143	intermittent emission testing
B-00005/-/B53	147	intermittent emission testing
B-00005/-/B54	151	intermittent emission testing
B-00005/-/B56	155	intermittent emission testing
C-00004/-/C40	178	intermittent emission testing
FACILITY	27	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
A-00001/-/A10	36	record keeping/maintenance procedures
A-00001/-/A10	37	record keeping/maintenance procedures
A-00001/-/A10	38	record keeping/maintenance procedures
A-00001/-/A10	39	record keeping/maintenance procedures
A-00001/-/A11	41	record keeping/maintenance procedures
A-00001/-/A12	42	record keeping/maintenance procedures
A-00002/A0077	43	record keeping/maintenance procedures
A-00002/A0078	44	record keeping/maintenance procedures
A-00002/A0101	46	record keeping/maintenance procedures
A-00004/-/A40	54	record keeping/maintenance procedures
A-00004/-/A42	55	record keeping/maintenance procedures
A-00004/-/A43	56	record keeping/maintenance procedures
A-00004/-/A44	57	record keeping/maintenance procedures
A-00005/-/A52	60	work practice involving specific operations
A-00005/-/A52	61	work practice involving specific operations
A-00005/-/A52	62	record keeping/maintenance procedures
A-00005/-/A52	63	record keeping/maintenance procedures
A-00005/-/A53	65	record keeping/maintenance procedures
A-00005/-/A53	66	work practice involving specific operations
A-00005/-/A53	67	record keeping/maintenance procedures
A-00005/-/A53	68	record keeping/maintenance procedures
A-00005/-/A53	69	record keeping/maintenance procedures
A-00005/-/A55	70	monitoring of process or control device parameters as surrogate
A-00006/-/A62	73	record keeping/maintenance procedures
A-00006/-/A63	74	record keeping/maintenance procedures
A-00006/A0042/A61	76	monitoring of process or

		control device parameters as surrogate
A-00007/-/A70	78	record keeping/maintenance procedures
A-00007/-/A70	79	record keeping/maintenance procedures
A-00008/-/A81	82	monitoring of process or control device parameters as surrogate
A-00008/-/A81	83	record keeping/maintenance procedures
A-00008/-/A81	84	monitoring of process or control device parameters as surrogate
B-00001/-/B10	85	record keeping/maintenance procedures
B-00001/-/B10	86	record keeping/maintenance procedures
B-00001/-/B10	87	record keeping/maintenance procedures
B-00001/-/B12	89	record keeping/maintenance procedures
B-00001/-/B12	90	record keeping/maintenance procedures
B-00001/-/B14	92	record keeping/maintenance procedures
B-00001/-/B14	93	record keeping/maintenance procedures
B-00001/-/B14	94	record keeping/maintenance procedures
B-00001/-/B14	95	record keeping/maintenance procedures
B-00001/-/B14	96	record keeping/maintenance procedures
B-00001/-/B15	98	record keeping/maintenance procedures
B-00001/-/B15	99	record keeping/maintenance procedures
B-00001/-/B16	101	record keeping/maintenance procedures
B-00001/-/B16	102	record keeping/maintenance procedures
B-00001/-/B16	103	record keeping/maintenance procedures
B-00001/-/B16	104	record keeping/maintenance procedures
B-00001/-/B16	105	record keeping/maintenance procedures
B-00003/-/B30	118	record keeping/maintenance procedures
B-00003/-/B31	119	record keeping/maintenance procedures
B-00003/-/B32	120	record keeping/maintenance procedures
B-00003/-/B33	122	record keeping/maintenance procedures
B-00003/-/B33	123	record keeping/maintenance procedures
B-00003/-/B34	124	record keeping/maintenance procedures
B-00003/-/B35	125	record keeping/maintenance procedures
B-00004/-/B40	129	work practice involving specific operations
B-00004/-/B40	130	record keeping/maintenance procedures
B-00004/-/B41	131	work practice involving specific operations
B-00004/-/B41	132	record keeping/maintenance procedures
B-00004/-/B41	133	monitoring of process or control device parameters as surrogate

B-00004/-/B42	135	record keeping/maintenance procedures
B-00004/-/B42	136	work practice involving specific operations
B-00004/-/B43	137	work practice involving specific operations
B-00004/-/B43	138	monitoring of process or control device parameters as surrogate
B-00004/-/B43	139	record keeping/maintenance procedures
B-00005/-/B51	144	record keeping/maintenance procedures
B-00005/-/B51	145	record keeping/maintenance procedures
B-00005/-/B51	146	record keeping/maintenance procedures
B-00005/-/B53	148	record keeping/maintenance procedures
B-00005/-/B53	149	record keeping/maintenance procedures
B-00005/-/B53	150	record keeping/maintenance procedures
B-00005/-/B54	152	record keeping/maintenance procedures
B-00005/-/B54	153	record keeping/maintenance procedures
B-00005/-/B54	154	record keeping/maintenance procedures
B-00005/B0054/B52	156	monitoring of process or control device parameters as surrogate
B-00005/B0054/B52	157	monitoring of process or control device parameters as surrogate
B-00005/B0067/B52	158	monitoring of process or control device parameters as surrogate
B-00005/B0067/B52	159	monitoring of process or control device parameters as surrogate
B-00006/-/B61	162	monitoring of process or control device parameters as surrogate
B-00007/-/B70	165	monitoring of process or control device parameters as surrogate
B-00008/-/B80	168	monitoring of process or control device parameters as surrogate
B-00008/-/B80	169	work practice involving specific operations
B-00008/-/B80	170	work practice involving specific operations
C-00002/-/C20	173	record keeping/maintenance procedures
C-00002/-/C20	174	record keeping/maintenance procedures
C-00002/-/C20	175	record keeping/maintenance procedures
C-00004/-/C40	179	record keeping/maintenance procedures
C-00004/-/C40	180	record keeping/maintenance procedures
D-00002/D0003	181	record keeping/maintenance procedures
D-00002/D0003	182	record keeping/maintenance procedures
D-00004/-/D41	185	record keeping/maintenance procedures
FACILITY	30	work practice involving specific operations
U-BOLRS	186	record keeping/maintenance

		procedures
A-00003/-/A30	50	record keeping/maintenance procedures
A-00003/A0041/A32	51	monitoring of process or control device parameters as surrogate
B-00002/-/B22	115	monitoring of process or control device parameters as surrogate
A-00003	49	record keeping/maintenance procedures
B-00002	114	record keeping/maintenance procedures

Basis for Monitoring

Condition 5 requires reporting of compliance monitoring every six based on the requirements of 6 NYCRR Part 201-6.5(c)(3)(ii) and 40 CFR 70.6(a)(3)(iii).

Condition 6 requires annual reporting of compliance status of each individual permit condition based on the requirements of 6 NYCRR Part 201-6.5(e) and 40 CFR 70.6(c)(5).

Condition 7 requires the submission of a statement of actual emissions based on the requirements of 6 NYCRR Part 202-2.1 and 40 CFR 70.9(a) and (b)(2).

Condition 24 provides for an operational flexibility plan which allows the permitee to make minor operational changes without having to formally modify the permit in compliance with 6 NYCRR Part 201-6.5(f) and 40 CFR 70.4(b)(12).

Condition 27 requires periodic observation of process emissions to detect opacity emissions as limited by 6 NYCRR Part 212.6(a).

Conditon 28 specifies maintenance procedures to be followed if opacity emissions are observed in compliance with previous permit condition to determine compliance with 6 nycrrpart 212.6(a).

Condition 29 establishes environmental ratings for air contaminant emissions as specified in 6 NYCRR Part 212.9(a).

Condition 30 specifies sulfur limit for distillate fuel oil as per 6 NYCRR Part 225-1.2(a)(2).

Conditions 36, 37, 38, 39, 41, 42, 43, 44, 46, 54, 55,56, 57, 60, 61, 62, 63, 65, 66, 67, 68, 69, 70, 73, 74, 76, 78, 79, 82, 83, 84, 85, 86, 87, 89, 90, 92, 93, 94, 95, 96, 98, 99, 101, 102, 103, 104, 105, 118, 119, 120, 122, 123, 124, 125, 129, 130, 131, 132, 133, 135, 136, 137, 138, 139, 144, 145, 146, 148, 149, 150, 152, 153, 154, 156, 157, 158, 159, 162, 165, 168, 169, 170, 173, 174, 175, 179, 180, 181, 182, and 185 specify emission controls, if any, required for each regulated contaminant from identified processes as required by 6 NYCRR Part 212.9(b)..

Conditions 40, 45, 64, 75, 77, 88, 91, 97, 100, 106, 107, 108, 109, 110, 111, 121, 128, 134, 142, 143, 147, 151, 155 and 178 set particulate emission limits for process sources and monitoring device control parameters where appropriate as required by 6 NYCRR Part 212.4(c).

Conditions 49 and 114 require documentation of storage tank capacity as specified in 6 NYCRR Part 229.5(d).

Condition 50 requires installation and maintenance of conservation vents on storage tanks as specified in 6 NYCRR Part 229.3(e)(2)(v).

Conditions 51 and 115 set condenser temperature limits to control storage tank emissions as required by 6 NYCRR Part 229.3(g)(1)(i).

Condition 186 requires record keeping for fuel oil delivered to document compliance with fuel sulfur limits as specified in 6 NYCRR Part 225-1.8(a).