

MAJOR SOURCE OPERATING PERMIT

PERMITTEE: MDA MANUFACTURING, INC.
FACILITY NAME: MDA MANUFACTURING, INC.
FACILITY/PERMIT NO.: 712-0042
LOCATION: DECATUR, MORGAN COUNTY, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: DRAFT
Effective Date: DRAFT
Expiration Date: DRAFT

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<p>1. <u>Transfer</u></p> <p>This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-16-.13(1)(a)5.</p>	Rule 335-3-16-.02(6)
<p>2. <u>Renewals</u></p> <p>An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.</p> <p>The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph</p>	Rule 335-3-16-.12(2)
<p>3. <u>Severability Clause</u></p> <p>The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	Rule 335-3-16-.05(e)
<p>4. <u>Compliance</u></p> <p>(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	Rule 335-3-16-.05(f)
<p>5. <u>Termination for Cause</u></p> <p>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 will not stay any permit condition.</p>	Rule 335-3-16-.05(h)

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6. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

Rule 335-3-16-.05(i)

7. Submission of Information

The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.

Rule 335-3-16-.05(j)

8. Economic Incentives, Marketable Permits, and Emissions Trading

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

Rule 335-3-16-.05(k)

9. Certification of Truth, Accuracy, and Completeness:

Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness except as provided in Rule 335-3-16-.04(9). 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.

Rule 335-3-16-.07(a)

10. Inspection and Entry

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:

Rule 335-3-16-.07(b)

- (a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where the records must be kept pursuant to the conditions of the permit;
- (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of the permit;
- (c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;

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<p>(a) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.</p>	
<p>11. <u>Compliance Provisions</u></p>	
<p>(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</p>	Rule 335-3-16-.07(c)
<p>(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</p>	
<p>12. <u>Compliance Certification</u></p>	
<p>A compliance certification shall be submitted annually by August 31st of each year, unless more frequent periods are specified according to the specific rule governing the source or required by the Department.</p>	Rule 335-3-16-.07(e)
<p>(a) The compliance certification shall include the following:</p> <ol style="list-style-type: none">(1) The identification of each term or condition of this permit that is the basis of the certification;(2) The compliance status;(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recording Keeping Requirements);(4) Whether compliance has been continuous or intermittent;(5) Such other facts as the Department may require to determine the compliance status of the source;	
<p>(b) The compliance certification shall be submitted to:</p> <p style="text-align: center;">Alabama Department of Environmental Management Air division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p style="text-align: center;">and to:</p> <p style="text-align: center;">Air Enforcement and Toxics Branch EPA Region 4 61 Forsyth Street, SW Atlanta, GA 30303</p>	

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13. Reopening for Cause

Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:

- (a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (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.
- (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.
- (c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

Rule 335-3-16-.13(5)

14. Additional Rules and Regulations

This permit is issued on the basis of Rules and Regulation existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

15. Equipment Maintenance or Breakdown

- (a) In case of shutdown of air pollution control equipment for schedules maintenance for a period of greater than one (1) hour, the intent of to shutdown shall be reported to the Department at least 24 hours prior to the planned shutdown, unless accompanied by the immediate shutdown of the emission source. Such prior notice shall include, but is not limited to the following:
 - (1) Identification of the specific facility to be taken out of service as well as its location and permit number;
 - (2) The expected length of time that the air pollution control equipment will be out of service;

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<ul style="list-style-type: none">(1) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period(2) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;(3) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period. <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.</p>	
<p>16. <u>Operation of Capture and Control Devices</u></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p>	§22-28-16(d), Code of Alabama 1975, as amended
<p>17. <u>Obnoxious Odors</u></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be take upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.</p>	Rule 335-3-1-.08
<p>18. <u>Fugitive Dust</u></p> <ul style="list-style-type: none">(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne:<ul style="list-style-type: none">(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic; or	Rule 335-3-4-.02

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- (2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created; or
- (3) By paving; or
- (4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or
- (5) By any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.

17. Additions and Revisions

Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.

Rule 335-3-16-.13 and .14

18. Recordkeeping Requirements

- (a) Records of required monitoring information of the source shall include the following:
 - (1) The date, place, and time of all sampling or measurements;
 - (2) The date analyses were performed;
 - (3) The company or entity that performed the analyses
 - (4) The analytical techniques or methods used;
 - (5) The results of all analysis;
 - (6) The operating conditions that existed at the time of sampling or measurement.
- (b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.

335-3-16-.05(c)2.

19. Reporting Requirements

- (a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9).

Rule 335-3-16-.05(c)(3)

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<p>(b) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9).</p> <p>(c) Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p>	Rule 335-3-16-.05(c)(3)
<p>19. <u>Emission Testing Requirements</u></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p>	Rule 335-3-1-.05(3) and Rule 335-3-1-.04(1)
<p>(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.</p> <p>(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).</p> <p>(c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.</p> <p>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p>	Rule 335-3-1-.04

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<p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p> <p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	Rule 335-3-1-.04
<p>20. <u>Payment of Emission Fees</u></p> <p>Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.</p>	Rule 335-1-7-.04
<p>21. <u>Other Reporting and Testing Requirements</u></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	Rule 335-3-1-.04(1)
<p>22. <u>Title VI Requirements (Refrigerants)</u></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	335-3-16-.05(a)
<p>23. <u>Chemical Accident Prevention Provisions</u></p> <p>If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <ul style="list-style-type: none">(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.(b) The owner or operate shall submit one of the following:	40 CFR Part 68

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<p>(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,</p> <p>(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.</p>	
<p>22. <u>Display of Permit</u></p> <p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will be made readily available for inspection by any or all persons who may request to see it.</p>	Rule 335-3-14-.01(1)(d)
<p>23. <u>Circumvention</u></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	Rule 335-3-1-.10
<p>24. <u>Visible Emissions</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	Rule 335-3-4-.01(1)
<p>25. <u>Fuel-Burning Equipment</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.</p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.</p>	Rule 335-3-4-.03 Rule 335-3-5-.01
<p>26. <u>Process Industries – General</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.</p>	Rule 335-3-4-.04

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27. Averaging Time for Emission Limits

Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.

Rule 335-3-1-.05

28. Permit Shield

A permit shield exists under this operating permit in accordance with ADEM Administrative Code R. 335-3-16-.10 in that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance. The permit shield is based on the accuracy of the information supplied in Item 12 of the application's ADEM Form 103 for this permit. Under this shield, it has been determined that requirements listed as non-applicable in this section are not applicable to this source.

Rule 335-3-16-.10

29. Continuous Assurance Monitoring (CAM)

Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.

(a) Operation of Approved Monitoring

- (1) Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).
- (2) Proper maintenance. At all times, except as identified in (a)(3), the owner or operator shall maintain monitoring equipment. This includes, but is not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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- (3) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- (4) Response to excursions or exceedances. (a) Upon detection an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operations as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

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<p>(5) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency conducting monitoring and collecting data, or the monitoring of additional parameters.</p>	
<p>(b) Quality Improvement Plan (QIP) Requirements</p>	
<p>(1) Based on the results of a determination made under Section 34(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR 64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.</p>	
<p>(2) Elements of a QIP:</p>	
<p>A. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.</p>	
<p>B. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:</p>	

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| <ul style="list-style-type: none">(i) Improved preventative maintenance practices.(ii) Process operation changes.(iii) Appropriate improvements to control methods.(iv) Other steps appropriate to correct control performance.(v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above). <p>(3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.</p> <p>(4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 34(a)(4)(b) above, the Department may require that an owner or operate make reasonable changes to the QIP if the QIP is found to have:</p> <ul style="list-style-type: none">A. Failed to address the cause of the control device performance problems; orB. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. <p>(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting, or recordkeeping requirement that may apply under Federal, State, or local law, or any other applicable requirements under the Act.</p> <p>(c) Reporting and Recordkeeping Requirements</p> <ul style="list-style-type: none">(1) General reporting requirements | |

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| <p>A. On an after the date specified in Section 34(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. r. 335-3-16-.05(c)(3).</p> <p>B. A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code r. 335-3-16-.05(c)(3) and the following information, as applicable:</p> <ul style="list-style-type: none">(i) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;(ii) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and(iii) A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursion or exceedances occurring. <p>(2) General recordkeeping requirements.</p> <p>A. The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code r. 335-3-16-.05(c)(2). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 34(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).</p> | |

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<p>B. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.</p> <p>(d) Savings Provisions</p> <p>(1) Nothing in this part shall:</p> <p>A. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting, or recordkeeping requirement that may apply under Federal, State, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to Title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.</p> <p>B. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.</p> <p>C. Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.</p>	

R-22 Manufacturing Unit Informational Summary

Description: Chlorodifluoromethane (R-22) Manufacturing Unit

Emission Unit: 001

Installation Date: 1993

Reconstruction/Modification Date: N/A

Operating Capacity: N/A

Operating Schedule: 8,760 hours/year

This unit contains equipment that is subject to the following NSPSs, NESHAPs, or MACTs:

40 CFR Part 60, Subpart VV

40 CFR Part 60, Subpart RRR

Pollutants Emitted

Emission Point	Point Description	Pollutant	Emission Limit	Standard
J1-2	Total Scrubber	VOC	1.5 lb/hr	335-3-14-.04
J1-2	R-22 Reactor Vent	VOC	TRE>8	335-3-10-.02(70)
J1-3	Distillation Columns Vented to T-Thermal Incinerator	VOC/CFC	99.99% DRE	335-3-14-.04
J1-3	R-22 Reactor Vent	VOC	TRE>8	335-3-10-.02(70)
J1-4	HCL Storage Tank Scrubber	VOC	0.083 lb/hr	335-3-14-.04
J1-6	Waste HCL Area Scrubber	VOC	1.0 lb/hr	335-3-14-.04
	R-22 Unit	VOC	Subpart VV	335-3-10-.02(48)

R-22 Manufacturing Unit Provisos

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, Major Source Operating Permits.	ADEM Admin. Code r. 335-3-16-.03
2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-4, "Visible Emissions".	ADEM Admin. Code r. 335-3-4
3. This source is subject to the requirements of the Federal New Source Performance Standards (NSPS) for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry (SOCMI) as listed in 40 CFR Part 60, Subpart VV.	ADEM Admin. Code r. 335-3-10-.02(48)
4. This source is subject to the requirements of the Federal New Source Performance Standards (NSPS) for Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes as listed in 40 CFR Part 60, Subpart RRR.	ADEM Admin. Code r. 335-3-10-.02(70)
5. This source is subject to the requirements of the General Provisions as indicated in 40 CFR Part 60, Subpart A, unless otherwise stated in 40 CFR Part 60, Subpart VV, or Subpart RRR.	ADEM Admin. Code r. 335-3-10-.02(1)
6. This source is subject to PSD emission limitations.	ADEM Admin. Code r. 335-3-14-.04
7. This source is subject to synthetic minor PSD limitations.	ADEM Admin. Code r. 335-3-14-.04
Emission Standards	
2. The VOC emission rate from the total scrubber (J1-2) shall not exceed 1.5 lb/hr.	ADEM Admin. Code r. 335-3-14-.04
3. The distillation area (J1-3) of the R-22 process shall be routed to the T-Thermal incinerator for control of VOC and CFC.	ADEM Admin. Code r. 335-3-14-.04
4. The T-Thermal incinerator shall be properly maintained, controlled, and operated to achieve a 99.99% or greater destruction removal efficiency (DRE) of all inlet VOC and CFC.	ADEM Admin. Code r. 335-3-14-.04
5. In order to remain exempt from all provisions of 40 CFR Part 60, Subpart RRR except §§60.702(c); 60.704(d), (e), and (f); and 60.705(g), (l)(1), (l)(6), and (t), the total resource	ADEM Admin. Code r. 335-3-10-.02(70)

R-22 Manufacturing Unit Provisos

Federally Enforceable Provisos	Regulations
effectiveness (TRE) index value of the R-22 reactor and the recovery system into which its vent stream is discharged shall be maintained at greater than 8.0 as stated in 40 CFR 60.700(c)(2).	
6. As indicated in 40 CFR 60.702(c), a TRE index value greater than 1.0 shall be maintained without the use of a VOC emission control device for the R-22 reactor and the recovery system into which its vent stream is discharged.	ADEM Admin. Code r. 335-3-10-.02(70)
7. This source shall meet the standards for the leak detection and repair (LDAR) program of 40 CFR Part 60, Subpart VV as listed in 40 CFR 60.482-1 through 60.483-2.	ADEM Admin. Code r. 335-3-10-.02(48)
8. The emissions from the predryer shall be routed to the bubbling columns (J1-5).	ADEM Admin. Code r. 335-3-14-.04
Compliance and Performance Test Methods and Procedures	
1. Compliance with the VOC emission rates of this unit shall be determined by Reference Method 18 in Appendix A of 40 CFR 60 (latest edition). Alternate test methods may be used provided prior approval by the Department is granted.	ADEM Admin. Code r. 335-3-1-.05
2. As stated in 40 CFR 60.704(d), the test methods listed in 40 CFR 704(d)(1) – (6) shall be used for determining the net heating value of the gas combusted to determine the process vent stream TRE index value.	ADEM Admin. Code r. 335-3-10-.02(70)
3. As stated in 40 CFR 60.704(e), the TRE index value for each vent stream subject to the requirements of Subpart RRR shall be calculated using the equation for incineration in 40 CFR 60.704(e)(1) for halogenated vent streams. The TRE index value for nonhalogenated vent streams shall be determined by calculating values using both the incinerator equation in 40 CFR 60.704(e)(1) and the flare equation in 60.704(e)(2) and selecting the lower of the two values.	ADEM Admin. Code r. 335-3-10-.02(70)
4. The test methods and procedures of 40 CFR 60.485 of Subpart VV shall be followed as applicable.	ADEM Admin. Code r. 335-3-1-.05

R-22 Manufacturing Unit Provisos

Federally Enforceable Provisos	Regulations
Emission Monitoring	
<p>1. As an indicator of compliance for the total scrubber (J1-2), the scrubber recirculation flow rate shall be monitored at least every 12 hours and shall be maintained at greater than 30 gpm.</p>	ADEM Admin. Code r. 335-3-14-.04
<p>2. As an indicator of compliance for the T-Thermal incinerator, the following listed parameters shall be monitored and maintained within the following ranges:</p> <ul style="list-style-type: none"> • The operating temperature at the combustion chamber exit shall be maintained at ≥ 2300 °F. • The exhaust oxygen content at the combustion chamber exit shall be maintained at $\geq 2\%$. • The quench water flow rate shall be maintained at ≥ 55 gpm. • The scrubber solution pH shall be maintained at ≥ 7. • The scrubber solution density shall be maintained at ≥ 1.10 g/ml. <p>A 3-hour averaging period shall be utilized for each of the above noted parameters. If an excursion occurs, investigative and corrective action shall be instituted within 2 hours.</p>	ADEM Admin. Code r. 335-3-14-.04
<p>3. A device to continuously monitor and record the operating temperature of the unit, as measured at the exit of the combustion chamber, shall be installed and properly operated and maintained on the T-Thermal incinerator.</p>	ADEM Admin. Code r. 335-3-14-.04
<p>4. A device to continuously monitor and record the oxygen content in the exhaust of the T-Thermal incinerator, as measured at the exit of the combustion chamber, shall be installed and properly operated and maintained.</p>	ADEM Admin. Code r. 335-3-14-.04

R-22 Manufacturing Unit Provisos

Federally Enforceable Provisos	Regulations
<p>5. Devices to continuously monitor the following items shall be installed and properly operating and maintained:</p> <ul style="list-style-type: none"> • Quench water blowdown flow rate • Scrubber solution pH • Scrubber solution density 	ADEM Admin. Code r. 335-3-14-.04
<p>6. As indicated in 40 CFR 60.704(f), the procedures outlined in 40 CFR 60.704(f)(1) and (2) shall be followed for recalculating the TRE index value whenever a process change is made to a vent stream subject to the requirements of Subpart RRR.</p>	ADEM Admin. Code r. 335-3-10-.02(70)
Recordkeeping and Reporting Requirements	
<p>1. The records of the operating temperature of the T-Thermal incinerator, as measured at the exit of the combustion chamber, shall be retained for a period of five years from the measurement date and shall be readily available for inspection.</p>	ADEM Admin. Code r. 335-3-14-.04
<p>2. The records of the oxygen content in the exhaust of the T-Thermal incinerator shall be maintained and readily available for inspection for a period of 5 years.</p>	ADEM Admin. Code r. 335-3-14-.04
<p>3. The records of the monitor readings of the quench water blowdown flow rate, the scrubber solution pH, and the scrubber solution density from the T-Thermal incinerator system shall be maintained and readily available for inspection for a period of 5 years.</p>	ADEM Admin. Code r. 335-3-14-.04
<p>4. The records of the scrubber recirculation flow rates for the total scrubber (J1-2), HCL storage tanks scrubber (J1-4), and the limestone pit and waste HCL scrubber (J1-6) shall be maintained and readily available for inspection for a period of 5 years.</p>	ADEM Admin. Code r. 335-3-14-.04
<p>5. As stated in 40 CFR 60.705(g), the following records shall be kept up to date and readily available for inspection for a period of 5 years:</p>	ADEM Admin. Code r. 335-3-10-.02(70)

R-22 Manufacturing Unit Provisos

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> • Any changes in production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of recovery equipment or reactors; • Any recalculation of the TRE index values performed pursuant to 40 CFR 60.704(f); and • The results of any performance test performed pursuant to the methods and procedures required by 40 CFR 60.704(d). 	
6. As stated in 40 CFR 60.705(t), a record of the initial test for determining the TRE index value which demonstrates compliance with 40 CFR 60.700(c)(2) shall be maintained and readily available for inspection for the life of the unit.	ADEM Admin. Code r. 335-3-10-.02(70)
7. The recordkeeping requirements of 40 CFR 60.486 of Subpart VV shall be followed as applicable.	ADEM Admin. Code r. 335-3-10-.02(48)
8. As stated in 40 CFR 60.705(l), a semiannual report shall be submitted every 6 months. The report shall detail any exceedences of monitored parameters recorded under 40 CFR 60.705(c), (f), and (g), and any recalculation of the TRE index value, as recorded under 60.705(g).	ADEM Admin. Code r. 335-3-10-.02(70)
9. As stated in 40 CFR 60.487(a), a semiannual report shall be submitted every 6 months. The report shall include the information listed in 40 CFR 60.487(c)(1) – (4).	ADEM Admin. Code r. 335-3-10-.02(48)

R-22 Unit Storage Tanks Informational Summary

Description: R-22 Unit Storage Tanks

Emission Unit: 001T

Installation Date: 1993/1999

Reconstruction/Modification Date: N/A

Operating Capacity: See below

Operating Schedule: 8,760 hours/year

This unit contains equipment that is subject to the following NSPSs, NESHAPs, or MACTs:

40 CFR Part 60, Subpart Kb

40 CFR Part 60, Subpart VV

Pollutants Emitted

Tank I.D.	Point Description	Capacity (Gallons)	Pollutant	Control Technique	Standard
J1-V014	Vertical Fixed Roof Storage Tank	77,550	VOC/HAP	T-Thermal Incinerator	335-3-14-.04
J1-V014	Vertical Fixed Roof Storage Tank	77,550	VOC/HAP	T-Thermal Incinerator	335-3-10-.02(11)(b)
J1-V011	Horizontal Fixed Roof Storage Tank	42,300	HAP	J1-5	335-3-14-.04
J1-V021	Horizontal Fixed Roof Storage Tank	42,300	HAP	J1-5	335-3-14-.04
J1-V412	Vertical Fixed Roof Storage Tank	259,000	HAP	J1-4	335-3-14-.04
J1-V422	Vertical Fixed Roof Storage Tank	259,000	HAP	J1-4	335-3-14-.04
J1-V256	Horizontal Fixed Roof Storage Tank	4,000	HAP	J1-6	335-3-14-.04
R-22 Unit			VOC	Subpart VV	335-3-10-.02(48)

R-22 Storage Tanks Provisos

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, Major Source Operating Permits.	ADEM Admin. Code r. 335-3-16-.03
2. This source is subject to the requirements of 40 CFR Part 60, Subpart Kb, Federal New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.	ADEM Admin. Code r. 335-3-10-.02(9)(b)
3. This source is subject to the requirements of the Federal New Source Performance Standards for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry as listed in 40 CFR Part 60, Subpart VV.	ADEM Admin. Code r. 335-3-10-.02(48)
4. This source is subject to the General Provisions as listed in 40 CFR Part 60, Subpart A, unless otherwise specified in 40 CFR Part 60, Subpart Kb or Subpart VV.	ADEM Admin. Code r. 335-3-10-.02(1)
5. This source is subject to synthetic minor PSD emission limitations.	ADEM Admin. Code r. 335-3-14-.04
6. This source is subject to PSD emission limitations.	ADEM Admin. Code r. 335-3-14-.04
Emission Standards	
1. Storage tank J1-V014 shall be routed to the T-Thermal incinerator for control of VOC.	ADEM Admin. Code r. 335-3-14-.04 & 335-3-10-.02(11)(b)
2. The T-Thermal incinerator shall be properly maintained, controlled, and operated to achieve a 99.99% or greater destruction removal efficiency (DRE) of VOC	ADEM Admin. Code r. 335-3-14-.04
3. As indicated in 40 CFR 60.112b(a)(3)(ii), the T-Thermal incinerator shall be properly maintained, controlled, and operated to achieve a 95% or greater destruction removal efficiency (DRE) of VOC.	ADEM Admin. Code r. 335-3-10-.02(11)(b)

R-22 Storage Tanks Provisos

Federally Enforceable Provisos	Regulations
4. Storage tanks J1-V412 and J1-V422 shall be routed to the HCL scrubber (J1-4).	ADEM Admin. Code r. 335-3-14-.04
5. Storage tank J1-V011 and J1-V021 shall be routed to bubbling columns (J1-5).	ADEM Admin. Code r. 335-3-14-.04
6. Storage tank J1-V256 shall be routed to the limestone pit and waste HCL storage scrubber (J1-6).	ADEM Admin. Code r. 335-3-14-.04
7. The VOC emission rate from the HCL storage tank scrubber (J1-4) shall not exceed 0.083 lb/hr.	ADEM Admin. Code r. 335-3-14-.04
8. The VOC emission rate from the limestone pit and waste HCL storage scrubber (J1-6) shall not exceed 1.0 lb/hr.	ADEM Admin. Code r. 335-3-14-.04
9. This source shall meet the standards for the leak detection and repair (LDAR) program of 40 CFR Part 60, Subpart VV as listed in 40 CFR 60.482-1 through 60.483-2.	ADEM Admin. Code r. 335-3-14-.04
Compliance and Performance Test Methods and Procedures	
1. Compliance with the VOC emission rates of this unit shall be determined by Reference Method 18 in Appendix A of 40 CFR 60 (latest edition). Alternate test methods may be used provided prior approval by the Department is granted.	ADEM Admin. Code r. 335-3-10-.02(1)
2. The true vapor pressure shall be determined in accordance with the methods described in American Petroleum Institute Bulletin 2517, "Evaporation Loss from External Floating Roof Tanks," 1962, Second Edition, February 1980. Alternate test methods may be used provided prior approval by the Department is granted.	ADEM Admin. Code r. 335-3-1-.02(bbbb)
3. The test methods and procedures of 40 CFR 60.485 of Subpart VV shall be followed, as applicable.	ADEM Admin. Code r. 335-3-14-.04
Emission Monitoring	
1. The true vapor pressure of the material stored in storage tank J1-V014 shall be calculated at the storage temperature of the material.	ADEM Admin. Code r. 335-3-1-.02(bbbb)

R-22 Storage Tanks Provisos

Federally Enforceable Provisos	Regulations
2. As an indicator of compliance for the HCL storage tank scrubber (J1-4), the scrubber recirculation flow rate shall be monitored at least every 12 hours and shall be maintained at 15 gpm or greater.	ADEM Admin. Code r. 335-3-14-.04
3. As an indicator of compliance for the limestone pit and waste HCL storage scrubber (J1-6), the scrubber recirculation flow rate shall be monitoring at least every 12 hours and shall be maintained at 20 gpm or greater.	ADEM Admin. Code r. 335-3-14-.04
4. As an indicator of compliance for the T-Thermal incinerator, the following listed parameters shall be monitored and maintained within the following ranges: <ul style="list-style-type: none"> • The operating temperature at the combustion chamber exit shall be maintained at ≥ 2300 °F. • The exhaust oxygen content at the combustion chamber exit shall be maintained at $\geq 2\%$. • The quench water flow rate shall be maintained at ≥ 55 gpm. • The scrubber solution pH shall be maintained at ≥ 7. • The scrubber solution density shall be maintained at ≥ 1.10 g/ml. <p>A 3-hour averaging period shall be utilized for each of the above noted parameters. If an excursion occurs, investigative and corrective action shall be instituted within 2 hours.</p>	ADEM Admin. Code r. 335-3-14-.04
5. A device to continuously monitor and record the operating temperature of the unit, as measured at the exit of the combustion chamber, shall be installed and properly operated and maintained on the T-Thermal incinerator.	ADEM Admin. Code r. 335-3-14-.04
6. A device to continuously monitor and record the oxygen content in the exhaust of the T-Thermal incinerator, as measured at the exit of the combustion chamber, shall be installed and properly operated and maintained.	ADEM Admin. Code r. 335-3-14-.04

R-22 Storage Tanks Provisos

Federally Enforceable Provisos	Regulations
<p>7. Devices to continuously monitor the following items shall be installed and properly operating and maintained:</p> <ul style="list-style-type: none"> • Quench water blowdown flow rate • Scrubber solution pH • Scrubber solution density 	<p>ADEM Admin. Code r. 335-3-14-.04</p>
<p>Recordkeeping and Reporting Requirements</p>	
<p>1. The true vapor pressure of the material stored in storage tank J1-V014 shall be recorded and kept on site in a form suitable for inspection for the life of the tanks.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p>
<p>2. The records of the operating temperature of the T-Thermal incinerator, as measured at the exit of the combustion chamber, shall be retained for a period of five years from the measurement date and shall be readily available for inspection.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p>
<p>3. The records of the oxygen content in the exhaust of the T-Thermal incinerator shall be maintained and readily available for inspection for a period of 5 years.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p>
<p>4. The records of the monitor readings of the quench water blowdown flow rate, the scrubber solution pH, and the scrubber solution density from the T-Thermal incinerator system shall be maintained and readily available for inspection for a period of 5 years.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p>
<p>5. The records of the scrubber recirculation flow rates for the HCL storage tanks scrubber (J1-4), and limestone pit and waste HCL neutralization scrubber (J1-6) shall be maintained and readily available for inspection for a period of 5 years.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p>
<p>6. The recordkeeping requirements of 40 CFR 60.486 of Subpart VV shall be followed as applicable.</p>	<p>ADEM Admin. Code r. 335-3-10-.02(48)</p>
<p>7. As stated in 40 CFR 60.487(a), a semiannual report shall be submitted every 6 months. The report shall include the information listed in 40 CFR 60.487(c)(1)-(4).</p>	<p>ADEM Admin. Code r. 335-3-10-.02(48)</p>

HFP Unit Informational Summary

Description: Hexafluoropropylene (HFP) Manufacturing Unit

Emission Unit: 002

Installation Date: 1993

Reconstruction/Modification Date: N/A

Operating Capacity: N/A

Operating Schedule: 8,760 hours/year

This unit contains equipment that is subject to the following NSPSs, NESHAPs, or MACTs:

N/A

Pollutants Emitted

Emission Point	Point Description	Pollutant	Emission Limit	Standard
T-Thermal Incinerator	Vent Gas and Nonhazardous Liquid Incinerator	VOC/CFC	99.99% DRE	335-3-14-.04
	HFP Unit	VOC	Subpart VV	335-3-14-.04

HFP Unit Provisos

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, Major Source Operating Permits.	ADEM Admin. Code r. 335-3-16-.03
2. This source is subject to PSD emission limitations.	ADEM Admin. Code r. 335-3-14-.04
Emission Standards	
1. During any period that the nonhazardous wastes generated from this unit are incinerated in the T-Thermal incinerator, the T-Thermal incinerator shall be properly maintained, controlled, and operated to achieve a 99.99% or greater destruction efficiency of all inlet VOC and CFC.	ADEM Admin. Code r. 335-3-14-.04
2. This source shall meet the requirements for the leak detection and repair (LDAR) program equivalent to those listed in 40 CFR 60.482-1 through 60.483-2 of 40 CFR Part 60, Subpart VV.	ADEM Admin. Code r. 335-3-14-.04
Compliance and Performance Test Methods and Procedures	
1. Compliance with the VOC emission rates of the T-Thermal incinerator shall be determined by Reference Method 18 in Appendix A of 40 CFR 60 (latest edition). Alternate test methods may be used provided prior approval by the Department is granted.	ADEM Admin. Code r. 335-3-
2. The test methods and procedures of 40 CFR 60.485 of Subpart VV shall be followed, as applicable.	ADEM Admin. Code r. 335-3-14-.04
Emission Monitoring	
1. As an indicator of compliance, the following parameters associated with the T-Thermal incinerator shall be monitored and maintained within the following ranges: <ul style="list-style-type: none"> • The operating temperature at the combustion chamber exit shall be maintained at ≥ 2300 °F. • The exhaust oxygen content at the combustion chamber exit shall be maintained at $\geq 2\%$. • The quench water flow rate shall be maintained at ≥ 55 gpm. 	ADEM Admin. Code r. 335-3-14-.04

HFP Unit Provisos

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> • The scrubber solution pH shall be maintained at ≥ 7. • The scrubber solution density shall be maintained at ≤ 1.10 g/ml. <p>A 3-hour averaging period shall be utilized for each of the above noted parameters. If an excursion occurs, investigative and corrective action shall be instituted within 2 hours.</p>	
2. A device to continuously monitor and record the operating temperature of the unit, as measured at the exit of the combustion chamber, shall be installed and properly operated and maintained on the T-Thermal incinerator.	ADEM Admin. Code r. 335-3-14-.04
3. A device to continuously monitor and record the oxygen content in the exhaust of the T-Thermal incinerator, as measured at the exit of the combustion chamber, shall be installed and properly operated and maintained.	ADEM Admin. Code r. 335-3-14-.04
4. Devices to continuously monitor the following items shall be installed and properly operated and maintained. <ul style="list-style-type: none"> • Quench water blowdown flow rate • Scrubber solution pH • Scrubber solution density 	ADEM Admin. Code r. 335-3-14-.04
Recordkeeping and Reporting Requirements	
1. Recordkeeping requirements equivalent to those listed in 40 CFR 60.486 of Subpart VV shall be followed.	ADEM Admin. Code r. 335-3-14-.04
2. As stated in 40 CFR 60.487(a), a semiannual report shall be submitted every 6 months. The report shall include the information listed in 40 CFR 60.487(c)(1) – (4).	ADEM Admin. Code r. 335-3-14-.04
3. Records of the operating temperature of the T-Thermal incinerator, as measured at the exit of the combustion chamber, shall be retained for a period of five years from the measurement date and shall be readily available for inspection.	ADEM Admin. Code r. 335-3-14-.04

HFP Unit Provisos

Federally Enforceable Provisos	Regulations
4. Records of the oxygen content in the exhaust of the T-Thermal incinerator shall be retained for a period of five years from the measurement date and shall be readily available for inspection.	ADEM Admin. Code r. 335-3-14-.04
5. Records of the monitor readings of the quench water blowdown flow rate, the scrubber solution pH, and the scrubber solution density from the T-Thermal incinerator system shall be maintained and readily available for inspection for a period of 5 years from the monitoring date.	ADEM Admin. Code r. 335-3-14-.04

HFP Unit Storage Tanks Informational Summary

Description: HFP Unit Storage Tanks

Emission Unit: 002T

Installation Date: 1993/1999

Reconstruction/Modification Date: N/A

Operating Capacity: See below

Operating Schedule: 8,760 hours/year

This unit contains equipment that is subject to the following NSPSs, NESHAPs, or MACTs:

N/A

Pollutants Emitted

Tank I.D.	Point Description	Capacity (Gallons)	Pollutant	Control Technique	Standard
J2-V201	Vertical Fixed Roof Storage Tank	2,600	VOC/HAP	Seal Pot	335-3-14-.04
J2-V202	Vertical Fixed Roof Storage Tank	1,340	VOC	Conservation Vent	335-3-14-.04
J2-V203	Vertical Fixed Roof Storage Tank	8,800	VOC/HAP	Seal Pot	335-3-14-.04
J2-V501	Vertical Fixed Roof Storage Tank	11,600	VOC	Conservation Vent	335-3-14-.04
HFP Unit			VOC	Subpart VV	335-3-14-.04

HFP Storage Tanks Provisos

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, Major Source Operating Permits.	ADEM Admin. Code r. 335-3-16-.03
2. This source is subject to synthetic minor PSD emission limitations.	ADEM Admin. Code r. 335-3-14-.04
3. This source is subject to PSD emission limitations.	ADEM Admin. Code r. 335-3-14-.04
Emission Standards	
1. Storage tanks J2-V201 and J2-V203 shall be vented through a water seal pot. The depth of the water above the vent pipe opening and the VOC concentration in the water of the water seal pot shall be properly maintained and controlled to minimize VOC emissions.	ADEM Admin. Code r. 335-3-14-.04
2. The VOC concentration of the water in the seal pots shall not exceed 10% by weight and the water level in the water seal pots shall be maintained above the discharge of the vent pipe.	ADEM Admin. Code r. 335-3-14-.04
3. Storage tanks J2-V202 and J2-V501 shall be equipped with a conservation vent.	ADEM Admin. Code r. 335-3-14-.04
4. This source shall meet the requirements for the leak detection and repair (LDAR) program equivalent to those listed in 40 CFR 60.482-1 through 60.483-2 of 40 CFR Part 60, Subpart VV.	ADEM Admin. Code r. 335-3-14-.04
Compliance and Performance Test Methods and Procedures	
1. A hydrometer shall be utilized to determine the specific gravity of the water in the water seal pots in order to determine the VOC concentration.	ADEM Admin. Code r. 335-3-14-.04
2. The test methods and procedures of 40 CFR 60.485 of Subpart VV shall be followed, as applicable.	ADEM Admin. Code r. 335-3-14-.04

HFP Storage Tanks Provisos

Federally Enforceable Provisos	Regulations
Emission Monitoring	
1. In order to ensure that the VOC concentration of the water of the seal pots does not exceed 10% by weight, the specific gravity and temperature of the water shall be measured and recorded monthly. The VOC content of the water shall be determined based upon a specific gravity versus methanol curve.	ADEM Admin. Code r. 335-3-14-.04
2. The water level of the seal pots shall be monitored monthly via the sight glass of the seal pot or a level monitoring instrument to ensure that the water level is above the vent pipe opening.	ADEM Admin. Code r. 335-3-14-.04
Recordkeeping and Reporting Requirements	
1. The monthly measurements of the specific gravity, temperature, water level, and VOC concentration of the water in the water seal pots shall be recorded and maintained in a form suitable for inspection for a period of 5 years from the measurement date.	ADEM Admin. Code r. 335-3-14-.04
2. The recordkeeping requirements of 40 CFR 60.486 of Subpart VV shall be followed, as applicable.	ADEM Admin. Code r. 335-3-14-.04
3. As stated in 40 CFR 60.487(a), a semiannual report shall be submitted every 6 months. The report shall include the information listed in 40 CFR 60.487(c)(1) – (4).	ADEM Admin. Code r. 335-3-14-.04