



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES**

OPERATING PERMIT

CLARIANT CORPORATION

(HPP – Part 3 of 6)

PERMIT NO. RI-45-06

(Expiration date: October 13, 2011)

Pursuant to the provisions of Air Pollution Control Regulation No. 29, this operating permit is issued to:

Clariant Corporation
500 Washington Street
Coventry, RI 02816

This permit shall be effective from the date of its issuance. All terms and conditions of the permit are enforceable by the USEPA and citizens under the federal Clean Air Act, 42 U.S.C. 7401, et seq., unless specifically designated as not federally enforceable

**Stephen Majkut, Chief
Office of Air Resources**

Date of issuance: 10/13/06

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SECTION I. SOURCE SPECIFIC CONDITIONS

A. Requirements for Emissions Unit P201

The following requirements are applicable to:

- Emissions unit P201 (Orange GR/Red RRN Process) which consists of 6 kettles K2201, K2231, K2233, K2232, K2234 and K2210 (1 with distillation column D12210A), 3 condensers C3008, C3210A and C3210B, 1 heat exchanger E3210C, 1 pressure filter PF3366, 7 receivers, R1005, R1006, R1008, R1013, R1014, R1017, and R3210E, 1 slurry tank SL3210D, 1 vat V2258, 2 filter presses FP1166 and FP2268, 2 tanks T209 and T210 and 1 dust collector F3210G. P201 is associated with air pollution control devices C202 and C201 back-up.
- Air pollution control device C202 (B Scrubber) consists of two Ceilcote packed tower scrubbers operated in series. The first scrubber operates with water as the scrubbing liquor and the second operates with a caustic solution. Air pollution control device C201 (A Scrubber), which is a two stage scrubbing system (Venturi water scrubber in series with a packed tower caustic scrubber), followed by a two-stage mist eliminator. C201 is a back-up control device for emission units P201.

1. **Emission Limitations**

a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet the opacity requirement of this section, such failure shall not be a violation of this permit. [1.4]

2. **Operating Requirements**

- a. C201 and/or C202 shall be operated according to their design specifications whenever P201 is in operation or is emitting air contaminants. [16.1]
- b. There shall be no bypassing of C202 at any time. C201 shall be used as a back-up to C202 during scrubber regeneration. [Approval No. 1309(E)(2)]
- c. Water shall be used as the scrubbing liquid to the first stage of C202 and shall be supplied at a rate no less than 80 gallons per minute. [Approval No. 1309(A)(1)]

- d. The water make-up rate of C202, for the first stage, shall be maintained at or above 5 gallons per minute. [Approval No. 1309(A)(2)]
- e. Caustic solution shall be used as the scrubbing liquid to the second stage of C202 and shall be supplied at a rate no less than 60 gallons per minute. [Approval No. 1309(A)(3)]
- f. Malfunctions
 - (1) In the case of malfunction of C201 and/or C202 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C201 and/or C202 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P201 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [Approval No. 1309(D)(1), 16.2]
 - (a) Identification of the specific air pollution control system (i.e. C201 and/or C202) and the source on which it is installed; (i.e. P201); [Approval No. 1309(D)(1)(a), 16.2(a)]
 - (b) The expected period of time that the control system will be malfunctioning or out of service; [Approval No. 1309(D)(1)(b), 16.2(b)]
 - (c) The nature and quantity of air contaminants likely to be emitted during said period, [Approval No. 1309(D)(1)(c), 16.2(c)]
 - (d) Measures that will be taken to minimize the length of said period, and [Approval No. 1309(D)(1)(d), 16.2(d)]
 - (e) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 1309(D)(1)(e), 16.2(e)]
 - (2) The permittee may seek to establish that a malfunction of the air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval No. 1309(D)(2)]

- (a) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval No. 1309(D)(2)(a)]
- (b) The malfunction was not part of a recurring pattern indicative of inadequate design, operation or maintenance; [Approval No. 1309(D)(2)(b)]
- (c) Repairs necessary to bring the air pollution control system back to operating at its design control efficiency were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. Any parts or material needed should be shipped overnight where possible or practical. [Approval No. 1309(D)(2)(c)]
- (d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval No. 1309(D)(2)(d)]
- (e) Emissions during the period of time that the repairs were performed will not: [Approval No. 1309(D)(2)(e)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval No. 1309(D)(2)(e)(1)]
 - (ii) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard. [Approval No. 1309(D)(2)(e)(2)]
- (f) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 1309(D)(2)(f)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken. [Approval No. 1309(D)]

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval No. 1309(D)]

3. Monitoring Requirements

- a. The flow rate of water, make-up water and caustic solution in C202 shall be measured continuously. [Approval No. 1309(B)(1)]
- b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [Approval No. 1309(B)(2)]
- c. The pressure drop across each stage of C202 shall be measured continuously. [Approval No. 1309(B)(3)]

4. Testing Requirements

- a. Opacity

Tests for determining compliance with the opacity emission limitations specified in Condition I.A.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

5. Recordkeeping Requirements

- a. The permittee shall, record the flow rate of water, make-up water and caustic solution in C202 once per day, when the building is conducting operation. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(B)(1)]
- b. The permittee shall, record the pressure drop across each stage of the C202, once per day when the building is conducting operation. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(B)(3)]
- c. The permittee shall maintain records of the following measurements:
 - (1) The flow rate of water, make-up water and caustic solution in C202. [Approval No. 1309(C)(1)(a)]

- (2) The caustic strength and salt concentration of the caustic solution. [Approval No. 1309(C)(1)(b)]
- (3) The pressure drop across each stage of C202. [Approval No. 1309(C)(1)(c)]

If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(C)(1)]

- d. The permittee shall maintain records of all raw materials used in P201 and the VOC content of the materials, ingredients used in each individual batch type, and the total number of batches of individual products produced. [Consent Agreement 98-01-AP(9)(A)]

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of Section I.A. of this permit or any other applicable air pollution control rules and regulations. [Approval No. 1309(C)(2)]
- b. The permittee shall submit an annual notification report to the Office of Air Resources no later than 30 May of each year. The annual notification report shall include the following: [Consent Agreement 98-01-AP(9)(B)]
 - (1) Certification that the potential emissions from Oange GR/Red RRN has not changed from the original RACT estimates (21,150lbs VOC/yr.) or if the potential emissions have changed, the new potential emissions estimates for the process, and [Consent Agreement 98-01-AP(9)(B)(1)]
 - (2) Summary of any process change and the reevaluation of the original economic feasibility limit (52,785 lbs VOC/yr) to determine that control options are not technically and/or economically feasible for the modified process. [Consent Agreement 98-01-AP(9)(B)(2)]

7. Other Requirements

- a. To the extent consistent with the requirements of Section I.A. of this permit and applicable Federal and State laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the preconstruction permit application. [Approval No. 1309(E)(1)]

- b. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate C201, and/or C202 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval No. 1309(A)(4)]

B. Requirements for Emissions Unit P205

- Emissions unit P205 (oxidation reaction) (Tetra Acid, Phase III) which consists of 2 kettles K2224 and K2225. P205 is associated with air pollution control devices C202, C203, and C201 back-up. C203 consists of three 22-inch diameter canisters each filled with activated carbon in series
- Air pollution control device C202 (B Scrubber) consists of two Ceilcote packed tower scrubbers operated in series. The first scrubber operates with water as the scrubbing liquor and the second operates with a caustic solution. Air pollution control device C201 (A Scrubber), which is a two stage scrubbing system (Venturi water scrubber in series with a packed tower caustic scrubber), followed by a two-stage mist eliminator. C201 is a back-up control device for emission units P205.

1. Emission Limitations

- a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet the opacity requirement of this section, such failure shall not be a violation of this permit. [1.4]

- b. The quantity of carbon monoxide discharged to the atmosphere from P205 shall not exceed 28.75 lbs. per batch. [Approval Nos. 1097-1099(2)(b)]

2. Operating Requirements

- a. C201, C202 and/or C203 shall be operated according to their design specifications whenever P205 and is in operation or is emitting air contaminants. [16.1]

- b. There shall be no bypassing of C202 at any time. C201 shall be used as a back-up to C202 during scrubber regeneration. [Approval No. 1309(E)(2)]
- c. Water shall be used as the scrubbing liquid to the first stage of C202 and shall be supplied at a rate no less than 80 gallons per minute. [Approval No. 1309(A)(1)]
- d. The water make-up rate of C202, for the first stage, shall be maintained at or above 5 gallons per minute. [Approval No. 1309(A)(2)]
- e. Caustic solution shall be used as the scrubbing liquid to the second stage of C202 and shall be supplied at a rate no less than 60 gallons per minute. [Approval No. 1309(A)(3)]
- f. The oxidation reaction shall be limited to no more than 1500 batches in any 12- month period. [Approval Nos. 1097-1099(4)(b)]
- g. Malfunctions
 - (1) In the case of malfunction of C201, C202 and/or C203 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C201, C202 and/or C203 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P205 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [Approval No. 1309(D)(1), 16.2]
 - (a) Identification of the specific air pollution control system (i.e. C201, C202 and/or C203) and the source on which it is installed; (i.e. P205); [Approval No. 1309(D)(1)(a), 16.2(a)]
 - (b) The expected period of time that the control system will be malfunctioning or out of service; [Approval No. 1309(D)(1)(b), 16.2(b)]
 - (c) The nature and quantity of air contaminants likely to be emitted during said period, [Approval No. 1309(D)(1)(c), 16.2(c)]
 - (d) Measures that will be taken to minimize the length of said period, and [Approval No. 1309(D)(1)(d), 16.2(d)]
 - (e) The reasons that it would be impossible or impractical to

cease the source operation during said period. [Approval No. 1309(D)(1)(e), 16.2(e)]

- (2) The permittee may seek to establish that a malfunction of the air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval No. 1309(D)(2)]
- (a) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval No. 1309(D)(2)(a)]
 - (b) The malfunction was not part of a recurring pattern indicative of inadequate design, operation or maintenance; [Approval No. 1309(D)(2)(b)]
 - (c) Repairs necessary to bring the air pollution control system back to operating at its design control efficiency were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. Any parts or material needed should be shipped overnight where possible or practical. [Approval No. 1309(D)(2)(c)]
 - (d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval No. 1309(D)(2)(d)]
 - (e) Emissions during the period of time that the repairs were performed will not: [Approval No. 1309(D)(2)(e)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval No. 1309(D)(2)(e)(1)]
 - (ii) Cause or contribute to air pollution in violation of

any applicable state or national ambient air quality standard. [Approval No. 1309(D)(2)(e)(2)]

- (f) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 1309(D)(2)(f)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken. [Approval No. 1309(D)]

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval No. 1309(D)]

3. Monitoring Requirements

- a. The flow rate of water, make-up water and caustic solution in C202 shall be measured continuously. [Approval No. 1309(B)(1)]
- b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [Approval No. 1309(B)(2)]
- c. The pressure drop across each stage of C202 shall be measured continuously. [Approval No. 1309(B)(3)]

4. Testing Requirements

- a. Opacity

Tests for determining compliance with the opacity emission limitations specified in Condition I.B.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

5. Recordkeeping Requirements

- a. The permittee shall, record the flow rate of water, make-up water and caustic solution in C202 once per day, when the building is conducting operation. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(B)(1)]
- b. The permittee shall, record the pressure drop across each stage of the

C202, once per day when the building is conducting operation. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(B)(3)]

- c. The permittee shall maintain records of the following measurements:
- (1) The flow rate of water, make-up water and caustic solution in C202. [Approval No. 1309(C)(1)(a)]
 - (2) The caustic strength and salt concentration of the caustic solution. [Approval No. 1309(C)(1)(b)]
 - (3) The pressure drop across each stage of C202. [Approval No. 1309(C)(1)(c)]

If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(C)(1)]

- d. The permittee shall maintain the following records for emission unit P205: [Approval Nos. 1097-1099(5)]
- (1) Each batch reaction indicating the reaction;
 - (2) The date and time the batch began,
 - (3) The date and time the batch ended; and
 - (4) The total number of batches in that month.
- e. The permittee shall maintain records for C203 indicating the date the carbon was replaced and the number of batch operations that have taken place since the last replacement. [Approval Nos. 1097-1099(6)]

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of Section I.B. of this permit or any other applicable air pollution control rules and regulations. [Approval No. 1309(C)(2)]

7. Other Requirements

- a. To the extent consistent with the requirements of Section I.B. of this permit and applicable Federal and State laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the preconstruction permit application. [Approval No. 1309(E)(1)]
- b. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate C201, and/or C202 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval No. 1309(A)(4)]

C. Requirements for Emissions Unit P206

- Emissions unit P206 (Dispersions) which consists of 2 kettles K2261 and K2262, 2 vats V2260 and V2263, Kady Mills B1001 and B1002, Horizontal Mills M1012 and M1014 and Torit Dust Filter FI2001A. P206 is associated with air pollution control devices C202 and C201.
- Air pollution control device C202 (B Scrubber) consists of two Ceilcote packed tower scrubbers operated in series. The first scrubber operates with water as the scrubbing liquor and the second operates with a caustic solution. Air pollution control device C201 (A Scrubber), which is a two stage scrubbing system (Venturi water scrubber in series with a packed tower caustic scrubber), followed by a two-stage mist eliminator. C201 is a back-up control device for emissions unit P206.

1. Emission Limitations

- a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet the opacity requirement of this section, such failure shall not be a violation of this permit. [1.4]

2. Operating Requirements

- a. C201 and/or C202 shall be operated according to their design specifications whenever P206 is in operation or is emitting air contaminants. [16.1]
- b. There shall be no bypassing of C202 at any time. C201 shall be used as a back-up to C202 during scrubber regeneration. [Approval No. 1309(E)(2)]
- c. Water shall be used as the scrubbing liquid to the first stage of C202 and shall be supplied at a rate no less than 80 gallons per minute. [Approval No. 1309(A)(1)]
- d. The water make-up rate of C202, for the first stage, shall be maintained at or above 5 gallons per minute. [Approval No. 1309(A)(2)]
- e. Caustic solution shall be used as the scrubbing liquid to the second stage of C202 and shall be supplied at a rate no less than 60 gallons per minute. [Approval No. 1309(A)(3)]
- f. Malfunctions
 - (1) In the case of malfunction of C201 and/or C202 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C201 and/or C202 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P206 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [Approval No. 1309(D)(1),16.2]
 - (a) Identification of the specific air pollution control system (i.e. C201 and/or C202) and the source on which it is installed; (i.e. P206); [Approval No. 1309(D)(1)(a), 16.2(a)]
 - (b) The expected period of time that the control system will be malfunctioning or out of service; [Approval No. 1309(D)(1)(b), 16.2(b)]
 - (c) The nature and quantity of air contaminants likely to be emitted during said period, [Approval No. 1309(D)(1)(c), 16.2(c)]
 - (d) Measures that will be taken to minimize the length of said

period, and [Approval No. 1309(D)(1)(d), 16.2(d)]

- (e) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 1309(D)(1)(e), 16.2(e)]
- (2) The permittee may seek to establish that a malfunction of the air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval No. 1309(D)(2)]
- (a) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval No. 1309(D)(2)(a)]
 - (b) The malfunction was not part of a recurring pattern indicative of inadequate design, operation or maintenance; [Approval No. 1309(D)(2)(b)]
 - (c) Repairs necessary to bring the air pollution control system back to operating at its design control efficiency were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. Any parts or material needed should be shipped overnight where possible or practical. [Approval No. 1309(D)(2)(c)]
 - (d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval No. 1309(D)(2)(d)]
 - (e) Emissions during the period of time that the repairs were performed will not: [Approval No. 1309(D)(2)(e)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval No. 1309(D)(2)(e)(1)]
 - (ii) Cause or contribute to air pollution in violation of

any applicable state or national ambient air quality standard. [Approval No. 1309(D)(2)(e)(2)]

- (f) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 1309(D)(2)(f)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken. [Approval No. 1309(D)]

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval No. 1309(D)]

3. Monitoring Requirements

- a. The flow rate of water, make-up water and caustic solution in C202 shall be measured continuously. [Approval No. 1309(B)(1)]
- b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [Approval No. 1309(B)(2)]
- c. The pressure drop across each stage of C202 shall be measured continuously. [Approval No. 1309(B)(3)]

4. Testing Requirements

- a. Opacity

Tests for determining compliance with the opacity emission limitations specified in Condition I.C.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

5. Recordkeeping Requirements

- a. The permittee shall, record the flow rate of water, make-up water and caustic solution in C202 once per day, when the building is conducting operation. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(B)(1)]
- b. The permittee shall, record the pressure drop across each stage of the

C202, once per day when the building is conducting operation. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(B)(3)]

- c. The permittee shall maintain records of the following measurements:
- (1) The flow rate of water, make-up water and caustic solution in C202. [Approval No. 1309(C)(1)(a)]
 - (2) The caustic strength and salt concentration of the caustic solution. [Approval No. 1309(C)(1)(b)]
 - (3) The pressure drop across each stage of C202. [Approval No. 1309(C)(1)(c)]

If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval No. 1309(C)(1)]

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of Section I.C. of this permit or any other applicable air pollution control rules and regulations. [Approval No. 1309(C)(2)]

7. Other Requirements

- a. To the extent consistent with the requirements of Section I.C. of this permit and applicable Federal and State laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the preconstruction permit application. [Approval No. 1309(E)(1)]
- b. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate C201 and/or C202 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval No. 1309(A)(4)]

D. Requirements for Emissions Unit P202

The following requirements are applicable to:

- Emissions unit P202 (Multipurpose Batch Solvent Reaction Red-BX), which consists of 6 kettles, K2204, K2205, K2206, K2207, K2211 and K2208, 7 receivers R1002, R1004, R1009, R1010, R1011, R1208D, and R3207G, 1 filter F3211, 2 filter presses, FP3367 and FP3361, 3 tanks T3205B, T3207B and T8216, 6 condensers C3216, C3218, C3205A, C3207A, C3204A and C2208A and 1 liquid separator SP3204B.
- P202 is associated with air pollution control devices C201 (A Scrubber), which is a two stage scrubbing system (Venturi water scrubber in series with a packed tower caustic scrubber), followed by a two-stage mist eliminator and air pollution control device C202 (B Scrubber) which consists of two Ceilcote packed tower scrubber operated in series. C202 receives a small amount of emissions from P202 but is primarily a back-up control device for emissions unit P202.

1. Emission Limitations

a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet the opacity requirement of this section, such failure shall not be a violation of this permit. [1.4]

b. Hydrogen Chloride (HCl)

- (1) HCl emissions generated from Kettle K2207 in emission unit P202 shall be captured, contained and routed to C201 for treatment prior to discharge to the atmosphere. [Approval No. 1589(A)(1)(a)]
- (2) HCl emissions discharged to the atmosphere from P202 shall not exceed 1.0 pound per hour. [Approval No. 1589(A)(1)(b)]

c. Sulfur Dioxide (SO₂)

- (1) SO₂ emissions generated from Kettle K2207 in emission unit P202 shall be captured, contained and routed to C201 for treatment prior to discharge to the atmosphere. [Approval No. 1589(A)(2)(a)]
- (2) SO₂ emissions discharged to the atmosphere from P202 shall not exceed 5.0 pounds per hour. [Approval No. 1589(A)(2)(b)]

d. Thionyl Chloride

- (1) Thionyl chloride emissions generated from Kettle K2207 in emission unit P202 shall be captured, contained and routed to C201 for treatment prior to discharge to the atmosphere. [Approval No. 1589(A)(3)(a)]
- (2) HCl and SO₂ emissions discharged to the atmosphere as breakdown products from thionyl chloride scrubbing shall not exceed 3.1 and 2.7 pounds per hour, respectively. [Approval No. 1589(A)(3)(b)]

e. Orthodichlorobenzene

The quantity of orthodichlorobenzene discharged to the atmosphere via vents V20-18 and V20-22 from emission unit P202 shall not exceed 117.0 lbs/day. [Approval No. 1589(A)(4)(a)]

2. Operating Requirements

- a. Water shall be used as the scrubbing liquid to the first stage of C201 and shall be supplied at a rate no less than 160 gallons per minute. [Approval Nos. 341 & 1759(A)(1)]
- b. Caustic solution shall be used as the scrubbing liquid to the second stage of C201 and shall be supplied at a rate no less than 40 gallons per minute. [Approval Nos. 341 & 1759(A)(2)]
- c. The water make-up rate of C201, for the first stage, shall be maintained at or above 5 gallons per minute. [Approval Nos. 341 & 1759(A)(3)]
- d. There shall be no bypassing of C201 at any time. Air pollution control device C202 shall be used as a back-up to C201 during scrubber regeneration. [Approval Nos. 341 & 1759(E)(2), Approval No. 1589(G)(2):(B)(2)]
- e. C201 and/or C202 shall be operated according to their design specifications whenever P202 is in operation or is emitting air contaminants. [16.1]
- f. Malfunctions
 - (1) In the case of malfunction of C201 and/or C202 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C201 and/or C202 is expected or may reasonably be expected to

continue for longer than 24 hours and if the permittee wishes to operate P202 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [16.2, Approval Nos. 341 & 1759(D)(1), Approval No. 1589(F)(1)]

- (a) Identification of the specific air pollution control system (i.e. C201 and/or C202) and the source on which it is installed; (i.e. P202); [16.2(a), Approval Nos. 341 & 1759(D)(1)(a), Approval No. 1589(F)(1)(a)]
 - (b) The expected period of time that the control system will be malfunctioning or out of service; [16.2(b), Approval Nos. 341 & 1759(D)(1)(b), Approval No. 1589(F)(1)(b)]
 - (c) The nature and quantity of air contaminants likely to be emitted during said period, [16.2(c), Approval Nos. 341 & 1759(D)(1)(c), Approval No. 1589(F)(1)(c)]
 - (d) Measures that will be taken to minimize the length of said period, and [16.2(d), Approval Nos. 341 & 1759(D)(1)(d), Approval No. 1589(F)(1)(d)]
 - (e) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2(e), Approval Nos. 341 & 1759(D)(1)(e), Approval No. 1589(F)(1)(e)]
- (2) The permittee may seek to establish that a malfunction of the air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval Nos. 341 & 1759(D)(2), Approval No. 1589(F)(2)]
- (a) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval Nos. 341 & 1759(D)(2)(a), Approval No. 1589(F)(2)(a)]
 - (b) The malfunction was not part of a recurring pattern

indicative of inadequate design, operation or maintenance; [Approval Nos. 341 & 1759(D)(2)(b), Approval No. 1589(F)(2)(b)]

- (c) Repairs necessary to bring the air pollution control system back to operating at its design control efficiency were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. Any parts or material needed should be shipped overnight where possible or practical. [Approval Nos. 341 & 1759(D)(2)(c), Approval No. 1589(F)(2)(c)]
- (d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval Nos. 341 & 1759(D)(2)(d), Approval No. 1589(F)(2)(d)]
- (e) Emissions during the period of time that the repairs were performed will not: [Approval Nos. 341 & 1759(D)(2)(e), Approval No. 1589(F)(2)(d)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval Nos. 341 & 1759(D)(2)(e)(1), Approval No. 1589(F)(2)(e)(i)]
 - (ii) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard. [Approval Nos. 341 & 1759(D)(2)(e)(2), Approval No. 1589(F)(2)(e)(ii)]
- (f) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval Nos. 341 & 1759(D)(2)(f), Approval No. 1589(F)(2)(f)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken. [Approval Nos. 341 & 1759(D)(2), Approval No. 1589(F)(2)]

The permittee shall have the burden of proof in seeking to establish that

noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval Nos. 341 & 1759(D)(2), Approval No. 1589(F)(2)]

- g. All particulate emissions generated from the loading of solid raw materials into process kettles K2204, K2205, K2206, K2207, K2211 and K2208 shall be captured, contained, and routed to C201 or C202 for treatment prior to discharge to the atmosphere. [Approval No. 1589(B)(1)]
- h. C202 shall be used as a back-up to C201 during scrubber regeneration and C201 shall be used as a back-up to C202 during scrubber regeneration. [Approval No. 1598(B)(2)]

3. Testing Requirements

- a. Opacity

Tests for determining compliance with the opacity emission limitations specified in Condition I.D.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

4. Monitoring Requirements

- a. The flow rate of water, make-up water and caustic solution in C201 shall be measured continuously and recorded once per day when the building is conducting operations. [Approval Nos. 341 & 1759(B)(1)]
- b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [Approval Nos. 341 & 1759(B)(2)]
- c. The pressure drop across the packed tower stage of C201, the acid mist eliminator pre-filter and the acid mist eliminator shall be measured continuously when the building is conducting operations. [Approval Nos. 341 & 1759(B)(3)]
- d. The temperature of vent gases exiting condensers C3216 and C3218 in emission unit P202 shall be measured continuously. [Approval No. 1589(C)(1)]

5. Recordkeeping Requirements

- a. The permittee shall maintain records of the following measurements:
- (1) The flow rate of water, make-up water and caustic solution in C201. [Approval Nos. 341 & 1759(C)(1)(a)]
 - (2) The caustic strength and salt concentration of the caustic solution. [Approval Nos. 341 & 1759(C)(1)(b)]
 - (3) The pressure drop across the packed tower stage of C201 the acid mist eliminator pre-filter and the acid mist eliminator. [Approval Nos. 341 & 1759(C)(1)(c)]

If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval Nos. 341 & 1759(C)(1)]

- b. The permittee, shall record once per batch, the temperature of vent gases exiting condensers C3216 and C3218 in emission unit P202. [29.6.3(b), Approval No. 1589(E)(1)(a)]
- c. The permittee shall maintain production records that show the total number of batches manufactured. [Approval No. 1589(E)(2)]
- d. The permittee shall record once per day the pressure drop across the packed tower stage of C201, the acid mist eliminator pre-filter and the acid mist eliminator when the building is conducting operations. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval Nos. 341 & 1759(B)(3)]

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of Section I.D. of this permit or any other applicable air pollution control rules and regulations. [Approval Nos. 341 & 1759(C)(2), Approval No. 1589(E)(5)]
- b. The permittee shall notify the Office of Air Resources, in writing, whenever the estimated emissions from P202 increase by more than 10% over the estimates provided in the permit application. [Approval No. 1589(E)(4)]

7. Other Requirements

- a. At all times, including periods of startup, shutdown and malfunction, the

permittee shall, to the extent practicable, maintain and operate C201 and/or C202 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval Nos. 341 & 1759(A)(4), Approval No. 1589(G)(5)]

- b. To the extent consistent with the requirements of Section I.D. of this permit, and applicable Federal and State laws, the facility shall be operated in accordance with the representation of the facility in the preconstruction permit application. [Approval Nos. 341 & 1759(E)(1), Approval No. 1589(G)(1)]
- c. As the condensers C3216 and C3218 are considered process equipment, P202 shall not be operated without these condensers in operation. The permittee may replace C3216 or C3218 with equally or more efficient solvent recovery equipment without prior notice to the Office of Air Resources. [Approval No. 1589(G)(3)]
- d. The emission characteristics of vents 20-18 and 20-22 shall be consistent with the parameters used in the air quality modeling to determine the air quality impact of air pollutants generated from P202. The Office of Air Resources may reopen this permit if it is determined that these emission characteristics have changed significantly and that this permit must be revised to ensure compliance with applicable air quality standards.

The parameters used in the air quality modeling for vent 20-18 were that emissions are discharged through a stack with a height equal to 65 feet above grade, an exit diameter equal to 26 inches, a flow rate equal to 3500 acfm and an exit temperature of 104°F.

The parameters used in the air quality modeling for vent 20-22 were that emissions are discharged through a stack with a height equal to 67 feet above grade, an exit diameter equal to 4 inches, a flow rate equal to 16 acfm and an exit temperature of 86°F. [Approval No. 1589(G)(6)]

E. Requirements for Emissions Unit P203

The following requirements are applicable to:

- Emissions unit P203 (Phase 1 Brominations), which consists of 2 kettles K2215 and K2217. Emissions unit P203 is associated with air pollution control devices C201 and

C202 back-up.

- P203 is associated with air pollution control device C201 (A Scrubber), is a two stage scrubbing system (venturi water scrubber in series with a packed tower caustic scrubber), followed by a two-stage mist eliminator. Air pollution control device C202 (B Scrubber) consists of two Ceilcote packed tower scrubber operated in series. The first scrubber operates with water as the scrubbing liquor and the second operates with caustic solution. C202 operates as a back-up control device to C201 for emissions unit P203.

1. Emission Limitations

a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet the opacity requirement of this section, such failure shall not be a violation of this permit. [1.4]

2. Operating Requirements

a. Water shall be used as the scrubbing liquid to the first stage of C201 and shall be supplied at a rate no less than 160 gallons per minute. [Approval Nos. 341 & 1759(A)(1)]

b. Caustic solution shall be used as the scrubbing liquid to the second stage of C201 and shall be supplied at a rate no less than 40 gallons per minute. [Approval Nos. 341 & 1759(A)(2)]

c. The water make-up rate of C201, for the first stage, shall be maintained at or above 5 gallons per minute. [Approval Nos. 341 & 1759(A)(3)]

d. C201 and/or C202 shall be operated according to their design specifications whenever P203 is in operation or are emitting air contaminants. [16.1]

e. There shall be no bypassing of C201 at any time. Air pollution control device C202 shall be used as a back up to C201 during scrubber regeneration. [Approval Nos. 341 & 1759(E)(2)]

f. Malfunctions

(1) In the case of malfunction of C201 and/or C202 all reasonable

measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C201 and/or C202 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P203 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [16.2, Approval Nos. 341 & 1759(D)(1)]

- (a) Identification of the specific air pollution control system (i.e. C201 and/or C202) and the source on which it is installed; (i.e. P203); [16.2(a), Approval Nos. 341 & 1759(D)(1)(a)]
 - (b) The expected period of time that the control system will be malfunctioning or out of service; [16.2(b), Approval Nos. 341 & 1759(D)(1)(b)]
 - (c) The nature and quantity of air contaminants likely to be emitted during said period; [16.2(c), Approval Nos. 341 & 1759(D)(1)(c)]
 - (d) Measures that will be taken to minimize the length of said period; and [16.2(d), Approval Nos. 341 & 1759(D)(1)(d)]
 - (e) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2(e), Approval Nos. 341 & 1759(D)(1)(e)]
- (2) The permittee may seek to establish that a malfunction of the air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval Nos. 341 & 1759(D)(2)]
- (a) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval Nos. 341 & 1759(D)(2)(a)]
 - (b) The malfunction was not part of a recurring pattern indicative of inadequate design, operation or maintenance; [Approval Nos. 341 & 1759(D)(2)(b)]

- (c) Repairs necessary to bring the air pollution control system back to operating at its design control efficiency were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. Any parts or material needed should be shipped overnight where possible or practical. [Approval Nos. 341 & 1759(D)(2)(c)]
- (d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval Nos. 341 & 1759(D)(2)(d)]
- (e) Emissions during the period of time that the repairs were performed will not: [Approval Nos. 341 & 1759(D)(2)(e)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval Nos. 341 & 1759(D)(2)(e)(1)]
 - (ii) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard. [Approval Nos. 341 & 1759(D)(2)(e)(2)]
- (f) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval Nos. 341 & 1759(D)(2)(f)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken. [Approval Nos. 341 & 1759(D)]

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval Nos. 341 & 1759(D)]

3. Testing Requirements

a. Opacity

Tests for determining compliance with the opacity emission limitations specified in Condition I.E.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify

as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

4. Monitoring Requirements

- a. The flow rate of water, make-up water and caustic solution in C201 shall be measured continuously and recorded once per day when the building is conducting operations. [Approval Nos. 341 & 1759(B)(1)]
- b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [Approval Nos. 341 & 1759(B)(2)]
- c. The pressure drop across the packed tower stage of C201, the acid mist eliminator pre-filter and the acid mist eliminator shall be measured continuously and recorded once per day when the building is conducting operations. [Approval Nos. 341 & 1759(B)(3)]

5. Recordkeeping Requirements

- a. The permittee shall maintain records of the following measurements:
 - (1) The flow rate of water, make-up water and caustic solution in C201. [Approval Nos. 341 & 1759(C)(1)(a)]
 - (2) The caustic strength and salt concentration of the caustic solution. [Approval Nos. 341 & 1759(C)(1)(b)]
 - (3) The pressure drop across the packed tower stage of C201 the acid mist eliminator pre-filter and the acid mist eliminator. [Approval Nos. 341 & 1759(C)(1)(c)]

If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval Nos. 341 & 1759(C)(1)]

- b. The permittee shall record once per day the pressure drop across the packed tower stage of C201, the acid mist eliminator pre-filter and the acid mist eliminator when the building is conducting operations. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval Nos. 341 & 1759(B)(3)]

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated

noncompliance with the terms of Section I.E. of this permit or any other applicable air pollution control rules and regulations. [Approval Nos. 341 & 1759(C)(2)]

7. Other Requirements

- a. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate C201 and/or C202 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval Nos. 341 & 1759(A)(4)]
- b. To the extent consistent with the requirements of Section I.E. of this permit, and applicable Federal and State laws, the facility shall be operated in accordance with the representation of the facility in the preconstruction permit application. [Approval Nos. 341 & 1759(E)(1)]

F. Requirements for Emissions Unit P204

- Emissions unit P204 (Saponification Indandion Phase II) which is kettle K2230. Emissions unit P204 is associated with air pollution control devices C208 which is a prescrubber, C204 Demister, and C201 and C202 back-up.
- P204 is associated with air pollution control devices C201 (A Scrubber), which is a two stage scrubbing system (venturi water scrubber in series with a packed tower caustic scrubber), followed by a two-stage mist eliminator. Air pollution control device C208 is a packed tower prescrubber with caustic scrubbant. Air pollution control device C204 is a demister. Air pollution control device C201 (A scrubber), is a two stage scrubbing system (venturi water scrubber in series with a packed tower caustic scrubber), followed by a two-stage mist eliminator. Air pollution control device C202 (B Scrubber) consists of two Ceilcote packed tower scrubbers operated in series. The first scrubber operates with water as the scrubbing liquor and the second operates with caustic solution. C202 operates as a back-up control device to C201 for emissions unit P204.

1. Emission Limitations

- a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the

presence of uncombined water is the only reason for failure to meet the opacity requirement of this section, such failure shall not be a violation of this permit. [1.4]

- b. The quantity of sulfuric acid mist discharged to the atmosphere from P204 shall not exceed 0.2 lbs. per batch. [Approval Nos. 1097-1099(1)]

2. Operating Requirements

- a. Water shall be used as the scrubbing liquid to the first stage of C201 and shall be supplied at a rate no less than 160 gallons per minute. [Approval Nos. 341 & 1759(A)(1)]
- b. Caustic solution shall be used as the scrubbing liquid to the second stage of C201 and shall be supplied at a rate no less than 40 gallons per minute. [Approval Nos. 341 & 1759(A)(2)]
- c. The water make-up rate of C201, for the first stage, shall be maintained at or above 5 gallons per minute. [Approval Nos. 341 & 1759(A)(3)]
- d. C201 and/or C202 shall be operated according to their design specifications whenever P204 is in operation or are emitting air contaminants. [16.1]
- e. There shall be no bypassing of C201 at any time. Air pollution control device C202 shall be used as a back up to C201 during scrubber regeneration. [Approval Nos. 341 & 1759(E)(2)]
- f. Saponification reactions in P204 shall be limited to 235 batches in any 12-month period [Approval Nos. 1097 – 1099(3)(b)]
- g. Malfunctions
 - (1) In the case of malfunction of C201, C202, C204 and/or C208 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C201, C202, C204 and/or C208 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P204 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [16.2, Approval Nos. 341 & 1759(D)(1)]
 - (a) Identification of the specific air pollution control system (i.e.

- C201, C202 and/or C208) and the source on which it is installed; (i.e. P204); [16.2(a), Approval Nos. 341 & 1759(D)(1)(a)]
- (b) The expected period of time that the control system will be malfunctioning or out of service; [16.2(b), Approval Nos. 341 & 1759(D)(1)(b)]
 - (c) The nature and quantity of air contaminants likely to be emitted during said period; [16.2(c), Approval Nos. 341 & 1759(D)(1)(c)]
 - (d) Measures that will be taken to minimize the length of said period; and [16.2(d), Approval Nos. 341 & 1759(D)(1)(d)]
 - (e) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2(e), Approval Nos. 341 & 1759(D)(1)(e)]
- (2) The permittee may seek to establish that a malfunction of the air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval Nos. 341 & 1759(D)(2)]
- (a) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval Nos. 341 & 1759(D)(2)(a)]
 - (b) The malfunction was not part of a recurring pattern indicative of inadequate design, operation or maintenance; [Approval Nos. 341 & 1759(D)(2)(b)]
 - (c) Repairs necessary to bring the air pollution control system back to operating at its design control efficiency were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. Any parts or material needed should be shipped overnight where possible or practical. [Approval Nos. 341 &

1759(D)(2)(c)]

- (d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval Nos. 341 & 1759(D)(2)(d)]
- (e) Emissions during the period of time that the repairs were performed will not: [Approval Nos. 341 & 1759(D)(2)(e)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval Nos. 341 & 1759(D)(2)(e)(1)]
 - (ii) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard. [Approval Nos. 341 & 1759(D)(2)(e)(2)]
- (f) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval Nos. 341 & 1759(D)(2)(f)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken. [Approval Nos. 341 & 1759(D)]

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval Nos. 341 & 1759(D)]

3. Testing Requirements

a. Opacity

Tests for determining compliance with the opacity emission limitations specified in Condition I.F.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

4. Monitoring Requirements

- a. The flow rate of water, make-up water and caustic solution in C201 shall be measured continuously and recorded once per day when the building is

conducting operations. [Approval Nos. 341 & 1759(B)(1)]

- b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [Approval Nos. 341 & 1759(B)(2)]
- c. The pressure drop across the packed tower stage of C201, the acid mist eliminator pre-filter and the acid mist eliminator shall be measured continuously when the building is conducting operations. [Approval Nos. 341 & 1759(B)(3)]
- d. The scrubber flow rate of C208 shall be checked a minimum of once per batch. [29.6.3(b)]

5. Recordkeeping Requirements

- a. The permittee shall maintain records of the following measurements:
 - (1) The flow rate of water, make-up water and caustic solution in C201. [Approval Nos. 341 & 1759(C)(1)(a)]
 - (2) The caustic strength and salt concentration of the caustic solution. [Approval Nos. 341 & 1759(C)(1)(b)]

If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval Nos. 341 & 1759(C)(1)]

- b. The permittee, shall maintain the following records for emission unit P204; [Approval Nos. 1097-1099(5)]
 - (1) Each batch reaction indicating the reaction;
 - (2) The date and time the batch began,
 - (3) The date and time the batch ended; and
 - (4) The total number of batches in that month.
- c. The permittee shall record once per day the pressure drop across the packed tower stage of C201, the acid mist eliminator pre-filter and the acid mist eliminator when the building is conducting operations. If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement. [29.6.3(b), Approval Nos. 341 & 1759(B)(3), (C)(1)(c)]

- d. The permittee shall record once per batch the date, time and measurement of the scrubber flow rate for C208. [29.6.3(b)]

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of Section I.F. of this permit or any other applicable air pollution control rules and regulations. [Approval Nos. 341 & 1759(C)(2)]

7. Other Requirements

- a. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate C201 and/or C202 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval Nos. 341 & 1759(A)(4)]
- b. To the extent consistent with the requirements of Section I.F. of this permit, and applicable Federal and State laws, the facility shall be operated in accordance with the representation of the facility in the preconstruction permit application. [Approval Nos. 341 & 1759(E)(1)]

G. Requirements for Emissions Units T208 and T213

The following requirements are applicable to:

- Emissions unit T208 (Tank 8208) which is a 10,000 gallon VOC and HAP storage tank.
- Emissions unit T213 (Tank 8213) which is a 10,000 gallon VOC and HAP storage tank.

There are no specific applicable requirements for T208 and T213. This does not relieve the permittee from compliance with the provisions of the General Conditions, outlined in Section II of this permit as they apply to emission units T208 and T213.

H. Requirements for Emissions Unit T220

The following requirements are applicable to:

- Emissions unit T220 (Tank 8220F) which is a 4,000 gallon Bromine storage tank.

Emissions unit T220 is associated with pollution control device C205, which is a packed tower scrubber.

1. Operating Requirements

- a. C205 shall be operated according to its design specifications whenever T220 is in operation or is emitting air contaminants. [16.1]
- b. In the case of malfunction of C205 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C205 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate T220 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [16.2]
 - (1) Identification of the specific air pollution control system (i.e. C205) and the source on which it is installed; (i.e. T220); [16.2(a)]
 - (2) The expected period of time that the control system will be malfunctioning or out of service; [16.2(b)]
 - (3) The nature and quantity of air contaminants likely to be emitted during said period, [16.2(c)]
 - (4) Measures that will be taken to minimize the length of said period, and [16.2(d)]
 - (5) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2(e)]

2. Monitoring Requirements

- a. The flow rate of caustic solution in C205 shall be measured continuously. [29.6.3(b)]
- b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [29.6.3(b)]

3. Recordkeeping Requirements

- a. The permittee shall maintain records of the following measurements:

- (1) The flow rate of the caustic solution in C205 shall be recorded during unloading (delivery). [29.6.3(b)]
- (2) The caustic strength and salt concentration of the caustic solution. If the building is not conducting operations, the permittee shall record that the building was not conducting operations in lieu of a measurement. [29.6.3(b)]

I. Requirements for Emissions Unit T221

The following requirements are applicable to:

- Emission Unit T221 (Tank 8221) which is a 8,000 gallon Sulfur Trioxide storage tank. Emission unit T221 is associated with pollution control device C206 which is a packed tower sulfuric acid scrubber with mist eliminator. [Approval 972]

1. Operating Requirements

- a. C206 shall be operated according to its design specifications whenever T221 is in operation or is emitting air contaminants. [16.1]
- b. In the case of malfunction of C206 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C206 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate T221 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following:
 - (1) Identification of the specific air pollution control system (i.e. C206) and the source on which it is installed; (i.e. T221);
 - (2) The expected period of time that the control system will be malfunctioning or out of service;
 - (3) The nature and quantity of air contaminants likely to be emitted during said period,
 - (4) Measures that will be taken to minimize the length of said period, and
 - (5) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2(a-e)]

2. Monitoring Requirements

- a. The permittee shall monitor the flow rate of the scrubbant solution in control device C206 during unloading (delivery). [29.6.3(b)]
- b. The permittee shall monitor the sulfuric acid content of the scrubber and ensure that the scrubber tank has fresh sulfuric acid before unloading (delivery). [29.6.3(b)]

3. Recordkeeping Requirements

- a. The permittee shall record the scrubbant flow rate for the control device C206 before unloading (delivery). A check off shall be provided on the unloading checklist verifying that the scrubber contains fresh sulfuric acid. [29.6.3(b)]

J. Alternative Operating I

- When the permittee operates C201 (A-scrubber) as the primary control device for emission units P201, P205 and P206, the following requirements are applicable:

1. Emission Limitations

- a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet the opacity requirement of this section, such failure shall not be a violation of this permit. [1.4]

2. Operating Requirements

- a. Water shall be used as the scrubbing liquid to the first stage of C201 and shall be supplied at a rate no less than 160 gallons per minute. [Approval Nos. 341 & 1759(A)(1)]
- b. Caustic solution shall be used as the scrubbing liquid to the second stage of C201 and shall be supplied at a rate no less than 40 gallons per minute. [Approval Nos. 341 & 1759(A)(2)]
- c. The water make-up rate of C201, for the first stage, shall be maintained at or above 5 gallons per minute. [Approval Nos. 341 & 1759(A)(3)]
- d. There shall be no bypassing of C201 at any time. Air pollution control

device C202 shall be used as a back-up to C201 during scrubber regeneration. [Approval Nos. 341 & 1759(E)(2)]

- e. C201 shall be operated according to its design specifications whenever P201, P205 and P206 are in operation or is emitting air contaminants. [16.1]
- f. Malfunctions
 - (1) In the case of malfunction of C201 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C201 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P201, P205 and P206 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [16.2, Approval Nos. 341 & 1759(D)(1)]
 - (a) Identification of the specific air pollution control system (i.e. C201) and the source on which it is installed; (i.e. P201, P205 and P206); [16.2(a), Approval Nos. 341 & 1759(D)(1)(a)]
 - (b) The expected period of time that the control system will be malfunctioning or out of service; [16.2(b), Approval Nos. 341 & 1759(D)(1)(b)]
 - (c) The nature and quantity of air contaminants likely to be emitted during said period, [16.2(c), Approval Nos. 341 & 1759(D)(1)(c)]
 - (d) Measures that will be taken to minimize the length of said period, and [16.2(d), Approval Nos. 341 & 1759(D)(1)(d)]
 - (e) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2(e), Approval Nos. 341 & 1759(D)(1)(e)]
 - (2) The permittee may seek to establish that a malfunction of the air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval

Nos. 341 & 1759(D)(2)]

- (a) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval Nos. 341 & 1759(D)(2)(a)]
- (b) The malfunction was not part of a recurring pattern indicative of inadequate design, operation or maintenance; [Approval Nos. 341 & 1759(D)(2)(b)]
- (c) Repairs necessary to bring the air pollution control system back to operating at its design control efficiency were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. Any parts or material needed should be shipped overnight where possible or practical. [Approval Nos. 341 & 1759(D)(2)(c)]
- (d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval Nos. 341 & 1759(D)(2)(d)]
- (e) Emissions during the period of time that the repairs were performed will not: [Approval Nos. 341 & 1759(D)(2)(e)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval Nos. 341 & 1759(D)(2)(e)(1)]
 - (ii) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard. [Approval Nos. 341 & 1759(D)(2)(e)(2)]
- (f) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval Nos. 341 & 1759(D)(2)(f)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken. [Approval Nos. 341 & 1759(D)(2)]

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval Nos. 341 & 1759(D)(2)]

3. Testing Requirements

a. Opacity

Tests for determining compliance with the opacity emission limitations specified in Condition I.J.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

4. Monitoring Requirements

a. The flow rate of water, make-up water and caustic solution in C201 shall be measured continuously when the building is conducting operations. [Approval Nos. 341 & 1759(B)(1)]

b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [Approval Nos. 341 & 1759(B)(2)]

c. The pressure drop across the packed tower stage of C201, the acid mist eliminator prefilter and the acid mist eliminator shall be measured continuously when the building is conducting operations. [Approval Nos. 341 & 1759(B)(3)]

5. Recordkeeping Requirements

a. The permittee shall maintain records of the following measurements:

(1) The flow rate of water, make-up water and caustic solution in C201 shall be recorded once per day. [Approval Nos. 341 & 1759(C)(1)(a)]

(2) The caustic strength and salt concentration of the caustic solution. [Approval Nos. 341 & 1759(C)(1)(b)]

(3) The pressure drop across the packed tower stage of C201 the acid mist eliminator pre-filter and the acid mist eliminator shall be recorded once per day. [Approval Nos. 341 & 1759(C)(1)(c)]

If the control device is not operating because all processes are shut down,

the permittee shall record that all processes are shut down in lieu of a measurement.

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of Section I.J of this permit or any other applicable air pollution control rules and regulations. [Approval Nos. 341 & 1759(C)(2)]

7. Other Requirements

- a. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate C201 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval Nos. 341 & 1759(A)(4)]
- b. To the extent consistent with the requirements of Section I.J of this permit, and applicable Federal and State laws, the facility shall be constructed, operated in accordance with the representation of the facility in the preconstruction permit application. [Approval Nos. 341 & 1759(E)(1)]

K. Alternative Operating II

- When the permittee operates C202 (B-scrubber) as the primary control device for emission units P202, P203 and P204, the following requirements are applicable:

1. Emission Limitations

- a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet the opacity requirement of this section, such failure shall not be a violation of this permit. [1.4]

2. Operating Requirements

- a. There shall be no bypassing of C202 at any time. C201 shall be used as a back-up to C202 during scrubber regeneration. [Approval No. 1309(E)(2)]
- b. Water shall be used as the scrubbing liquid to the first stage of C202 and shall be supplied at a rate no less than 80 gallons per minute. [Approval No. 1309(A)(1)]
- c. The water make-up rate of C202, for the first stage, shall be maintained at or above 5 gallons per minute. [Approval No. 1309(A)(2)]
- d. Caustic solution shall be used as the scrubbing liquid to the second stage of C202 and shall be supplied at a rate no less than 60 gallons per minute. [Approval No. 1309(A)(3)]
- e. C202 shall be operated according to its design specifications whenever P202, P203 and P204 are in operation or is emitting air contaminants. [16.1]
- f. Malfunctions
 - (1) In the case of malfunction of C202 all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C202 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P202, P203 and P204 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [Approval No. 1309(D)(1), 16.2]
 - (a) Identification of the specific air pollution control system (i.e. C202) and the source on which it is installed; (i.e. P202, P203 and P204); [Approval No. 1309(D)(1)(a), 16.2(a)]
 - (b) The expected period of time that the control system will be malfunctioning or out of service; [Approval No. 1309(D)(1)(b), 16.2(b)]
 - (c) The nature and quantity of air contaminants likely to be emitted during said period, [Approval No. 1309(D)(1)(c), 16.2(c)]
 - (d) Measures that will be taken to minimize the length of said period, and [Approval No. 1309(D)(1)(d), 16.2(d)]

- (e) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 1309(D)(1)(e), 16.2(e)]
- (2) The permittee may seek to establish that a malfunction of the air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval No. 1309(D)(2)]
- (a) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval No. 1309(D)(2)(a)]
 - (b) The malfunction was not part of a recurring pattern indicative of inadequate design, operation or maintenance; [Approval No. 1309(D)(2)(b)]
 - (c) Repairs necessary to bring the air pollution control system back to operating at its design control efficiency were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. Any parts or material needed should be shipped overnight where possible or practical. [Approval No. 1309(D)(2)(c)]
 - (d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval No. 1309(D)(2)(d)]
 - (e) Emissions during the period of time that the repairs were performed will not: [Approval No. 1309(D)(2)(e)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval No. 1309(D)(2)(e)(1)]
 - (ii) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality

standard. [Approval No. 1309(D)(2)(e)(2)]

- (f) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 1309(D)(2)(f)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken. [Approval No. 1309(D)]

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval No. 1309(D)]

3. Monitoring Requirements

- a. The flow rate of water, make-up water and caustic solution in C202 shall be measured continuously when the building is conducting operations. [Approval No. 1309(B)(1)]
- b. The caustic solution shall be sampled once per day when the building is conducting operations and the caustic strength and salt concentration shall be determined. [Approval No. 1309(B)(2)]
- c. The pressure drop across each stage of C202 shall be measured continuously when the building is conducting operations. [Approval No. 1309(B)(3)]

4. Testing Requirements

- a. Opacity

Tests for determining compliance with the opacity emission limitations specified in Condition I.K.1.a of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

5. Recordkeeping Requirements

- a. The permittee shall maintain records of the following measurements:
 - (1) The flow rate of water, make-up water and caustic solution in

C202 shall be recorded once per day. [Approval No. 1309(C)(1)(a)]

- (2) The caustic strength and salt concentration of the caustic solution. [Approval No. 1309(C)(1)(b)]
- (3) The pressure drop across each stage of C202 shall be recorded once per day. [Approval No. 1309(C)(1)(c)]

If the control device is not operating because all processes are shut down, the permittee shall record that all processes are shut down in lieu of a measurement.

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of Section I.K of this permit or any other applicable air pollution control rules and regulations. [Approval No. 1309(C)(2)]

7. Other Requirements

- a. To the extent consistent with the requirements of Section I.K. of this permit and applicable Federal and State laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the preconstruction permit application. [Approval No. 1309(E)(1)]
- b. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate C202 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval No. 1309(A)(4)]