



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-2911-00036/00149
Effective Date: 06/09/2006 Expiration Date: 06/08/2011

Permit Issued To: GOODYEAR TIRE & RUBBER COMPANY
1144 E MARKET ST
AKRON, OH 44316

Facility: GOODYEAR CHEM PLANT
5500 GOODYEAR DR
NIAGARA FALLS, NY 14304

Contact: JAMES E KOLHOFF
GOODYEAR TIRE & RUBBER COMPAN
5500 GOODYEAR DRIVE
NIAGARA FALLS, NY 14304-3110
(716) 236-2656

Description:
Description:

Goodyear Tire and Rubber
Title V Permit
Site Description

The Goodyear Niagara Falls Plant manufactures antioxidants used in tires and other rubber products to prevent deterioration in the form of cracking or checking.

This permit is a renewal of the existing Title V permit

The antioxidant process consists of a batch reaction distillation and finishing operation with a continuous process for recovery of raw materials from a process stream. There are nineteen emission units and their associated environmental control at the plant as follows:

- F0101 - o-Xylene storage tank with conservation vent and submerged fill pipe
- F0103 - Recycle storage tank with submerged fill pipe
- F0104 - Recycle storage tank with submerged fill pipe
- F0106 - Aniline storage tank carbon beds with periodic carbon replacement
- F0107 - Recycle storage tank with submerged fill pipe
- F0108 - o-Toluidine storage tank with submerged fill pipe
- F0109 - Aniline storage tank carbon beds with periodic carbon replacement
- F0110 - o-Toluidine storage tank with submerged fill pipe



New York State Department of Environmental Conservation
Facility DEC ID: 9291100036

- F0112 - Mixed xyldines storage with submerged fill pipe
- F1862 - Solvent extraction, distillation & water storage with vent condensor temperature monitoring
- 000D1 - Antioxidant process vent elimination tank with process stream temperature monitoring
- 000N2 - Antioxidant packaging dust collector with differential pressure monitoring
- 000N3 - Tri-mer scrubber with monitoring of column differential pressure & reservoir level
- 000N4 - Bucket elevator dust collector with differential pressure monitoring
- 0C2E0 - Carbon bed on air stripper discharge with periodic carbon replacement
- 32009 - Sump holding tank with no required monitoring
- 32017 - Neutralization solution makeup tank system with no required monitoring
- 32034 - Ventilation of sparkler filter with no required monitoring
- 3393A - Hydroquinone dust collector (premix) with differential pressure monitoring

The facility operation is permitted primarily under the following regulations:

- 1) 6 NYCRR Part 201-6 requires the facility to obtain a Title V permit
- 2) 6 NYCRR Part 212 requires process sources to install air emission control devices depending on the type of contaminant emitted and the emission rate potential.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DAVID S DENK
 DIVISION OF ENVIRONMENTAL PERMITS
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees, and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:



New York State Department of Environmental Conservation
Facility DEC ID: 9291100036

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: GOODYEAR TIRE & RUBBER COMPANY
1144 E MARKET ST
AKRON, OH 44316

Facility: GOODYEAR CHEM PLANT
5500 GOODYEAR DR
NIAGARA FALLS, NY 14304

Authorized Activity By Standard Industrial Classification Code:
2869 - INDUSTRIAL ORGANIC CHEMICALS,NEC

Permit Effective Date: 06/09/2006

Permit Expiration Date: 06/08/2011



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 212.4(a): Compliance Certification
- 25 6NYCRR 212.4(a): Compliance Certification
- 26 6NYCRR 212.6(a): Compliance Certification
- 27 40CFR 63, Subpart FFFF: Compliance Certification
- 28 40CFR 64: Compliance Certification

Emission Unit Level

- 29 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 30 6NYCRR 201-6: Process Definition By Emission Unit

EU=U-000D1,EP=000D1,Proc=ETA,ES=000D1

- 31 6NYCRR 212.4(a): Compliance Certification

EU=U-000D1,EP=000D1,Proc=ETA,ES=000D2

- 32 6NYCRR 212.4(a): Compliance Certification

EU=U-000N2



33 6NYCRR 212.4(c): Compliance Certification

EU=U-000N3

34 6NYCRR 212.4(a): Compliance Certification

EU=U-000N4

35 6NYCRR 212.4(c): Compliance Certification

EU=U-0C2EO

36 6NYCRR 212.4(a): Compliance Certification

EU=U-3393A

37 6NYCRR 212.4(c): Compliance Certification

EU=U-F1862

38 6NYCRR 212.4(a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

39 ECL 19-0301: Contaminant List

40 6NYCRR 201-1.4: Unavoidable noncompliance and violations

41 6NYCRR 211.2: Air pollution prohibited



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

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

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Act;

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

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, 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.

Condition 5: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If any of the above conditions are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) through (4) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraph (1) through (4) of this section must also be identified in the 6 month monitoring report required above.

If the permittee seeks to have a violation excused as provided in 201-1.4, the permittee shall report such violations as required under 201-1.4(b). However, in no case may reports of any deviation be on a less frequent basis than those described in paragraphs (1) through (4) above. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
 - and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.

- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

- iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April
15th each year for emissions of the previous calendar
year.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 06/09/2006 and 06/08/2011



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

**Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 06/09/2006 and 06/08/2011**

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT
TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 10: Maintenance of Equipment
Effective between the dates of 06/09/2006 and 06/08/2011**

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

**Condition 11: Recycling and Salvage
Effective between the dates of 06/09/2006 and 06/08/2011**



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

No person shall remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information

Effective between the dates of 06/09/2006 and 06/08/2011

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 211.3

Item 20.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 21: Accidental release provisions.
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 40CFR 68

Item 21.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 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. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 23: Emission Unit Definition
Effective between the dates of 06/09/2006 and 06/08/2011



Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-000D1

Emission Unit Description:

VENTS FROM THE ANTIOXIDANT PRODUCTION
PROCESS ARE CONNECTED TO THE ELIMINATION
TANK SYSTEM.

Building(s): 32

Item 23.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-000N2

Emission Unit Description:

PRODUCT DUST FROM THE PACKAGING AREA AND
MATERIAL FROM THE "LIQUID" DRUMMING STATION
ARE EXHAUSTED THROUGH A DUST COLLECTOR.

Building(s): 33

Item 23.3:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-000N3

Emission Unit Description:

A DRUM FLAKER, REMELT TANK, CENTRIFUGE AND
PASTILLE UNIT FEED TANK ARE VENTED THROUGH
A WATER BASED SCRUBBER USING A FAN FOR
SUCTION.

Building(s): 32

Item 23.4:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-000N4

Emission Unit Description:

PRODUCT DUST IS EXHAUSTED FROM A 90-FOOT
VIBRATORY CONVEYOR AND BUCKET ELEVATOR
THROUGH A PULSE JET TYPE DUST COLLECTOR AND
THEN TO THE ATMOSPHERE. EMISSIONS OF
ORGANICS ARE NEGLIGIBLE.

Building(s): 32

Item 23.5:



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-0C2EO

Emission Unit Description:

o-XYLENE IS STRIPPED FROM A WASTEWATER
STREAM BY AIR IN A EIGHT-INCH DIAMETER,
TWENTY-FOOT LONG PACKED COLUMN.

Building(s): C-2

Item 23.6:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-32009

Emission Unit Description:

WATER FROM THE PROCESS VESSEL FLUSH IS
HELD IN THE SUMP HOLDING TANK PRIOR TO
DISCHARGE. THE TANK IS VENTED TO
ATMOSPHERE.

Building(s): 32

Item 23.7:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-32017

Emission Unit Description:

VENTILATION IS PROVIDED FOR A SODIUM
CARBONATE MAKE UP TANK.

Building(s): 32

Item 23.8:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-32034

Emission Unit Description:

AFTER THE ANTIOXIDANT BATCHES ARE DEGASSED
THEY ARE FILTERED TO REMOVE THE NEUTRALIZED
CATALYST. THE FILTER IS CLEANED
PERIODICALLY AND FUMES FROM THE FILTER CAKE
ARE REMOVED BY A VENTILATION SYSTEM.

Building(s): 32

Item 23.9:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-3393A

Emission Unit Description:

HYDROQUINONE (HQ) IS DISCHARGED FROM BULK
BAGS THROUGH A CHUTE INTO A TANK. THE HQ



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

DUST FROM THE DUMPING OPERATION IS REMOVED BY THE DUST COLLECTOR STATION WHERE HQ IS SEPARATED FROM AIR. THIS EXHAUST ALSO VENTS PUMPS DURING MAINTENANCE ACTIVITIES AND A VACUUM CLEANING SYSTEM FOR RESIDUAL HQ.

Building(s): 33

Item 23.10:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0101

Emission Unit Description:

o-XYLENE IS UNLOADED FROM TANK TRUCK INTO AN UNINSULATED ATMOSPHERIC STORAGE VESSEL. AIR IS DISPLACED DURING THE UNLOADING OPERATION.

Building(s): 35

Item 23.11:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0103

Emission Unit Description:

A MIXTURE OF o-XYLENE, ANILINE, o-TOLUIDINE, PHENOL, DIPHENYLAMINES (DPA) AND MIXED XYLIDINES IS STORED IN AN ATMOSPHERIC TANK. THE TANK IS FILLED AND EMPTIED AS REQUIRED TO BALANCE PRODUCTION.

Building(s): 35

Item 23.12:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0104

Emission Unit Description:

A MIXTURE OF o-XYLENE, ANILINE, o-TOLUIDINE, PHENOL, DIPHENYLAMINES (DPA) AND MIXED XYLIDINES IS STORED IN AN ATMOSPHERIC TANK. THE TANK IS FILLED AND EMPTIED AS REQUIRED TO BALANCE PRODUCTION.

Building(s): 35

Item 23.13:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0106



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Emission Unit Description:

ANILINE IS UNLOADED FROM TANK TRUCKS OR RAIL CARS INTO A TEMPERATURE CONTROLLED ATMOSPHERIC STORAGE TANK. AS THE AIR IS DISPLACED DURING UNLOADING, ANILINE IS REMOVED BY AN ACTIVATED CARBON UNIT.

Building(s): 35

Item 23.14:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0107

Emission Unit Description:

A MIXTURE OF o-XYLENE, ANILINE, o-TOLUIDINE, PHENOL, DIPHENYLAMINES (DPA) AND MIXED XYLIDINES IS STORED IN AN ATMOSPHERIC TANK. THE TANK IS FILLED AND EMPTIED AS REQUIRED TO BALANCE PRODUCTION.

Building(s): 35

Item 23.15:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0108

Emission Unit Description:

o-TOLUIDINE IS UNLOAED FROM TANK TRUCKS OR RAIL CARS INTO A TEMPERATURE CONTROLLED ATMOSPHERIC STORAGE TANK. AIR IS DISPLACED DURING THIS OPERATION.

Building(s): 35

Item 23.16:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0109

Emission Unit Description:

ANILINE IS UNLOADED FROM TANK TRUCKS OR RAIL CARS INTO A TEMPERATURE CONTROLLED ATMOSPHERIC STORAGE TANK. AS THE AIR IS DISPLACED DURING UNLOADING, ANILINE IS REMOVED BY AN ACTIVATED CARBON UNIT.

Building(s): 35

Item 23.17:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0110



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Emission Unit Description:

o-TOLUIDINE IS UNLOAED FROM TANK TRUCKS OR RAIL CARS INTO A TEMPERATURE CONTROLLED ATMOSPHERIC STORAGE TANK. AIR IS DISPLACED DURING THIS OPERATION.

Building(s): 35

Item 23.18:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F0112

Emission Unit Description:

MIXED XYLIDINES ARE UNLOADED INTO A TEMPERATURE CONTROLLED ATMOSPHERIC STORAGE TANK FROM TANK TRUCKS OR TANK CARS. AIR IS DISPLACED DURING THE UNLOADING OPERATION AND THROUGH NORMAL BREATHING OF THE TANK.

Building(s): 35

Item 23.19:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-F1862

Emission Unit Description:

SOLVENT EXTRACTION EQUIPMENT, DISTILLATION EQUIPMENT AND WASTEWATER TANK VENT.

Building(s): C2

Condition 24: Compliance Certification

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 24.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THE FOLLOWING EMISSION UNITS ARE EQUIPPED WITH SUBMERGED FILL PIPES AND

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



MUST BE OPERATED ACCORDING TO GOOD OPERATING AND MAINTENANCE PRACTICES FOR COMPLIANCE WITH 6NYCRR PART 212, TABLE 2.

U-F0103: RECYCLE STORAGE TANK

U-F0104: RECYCLE STORAGE TANK

U-F0107: RECYCLE STORAGE TANK

U-F0108: o-TOLUIDINE STORAGE

TANK

U-F0110: o-TOLUIDINE STORAGE

TANK

U-F0112: MIXED XYLIDINES STORAGE

TANK

IN ADDITION THE FOLLOWING EMISSION UNIT MUST ALSO BE EQUIPPED WITH A CONSERVATION VENT AND OPERATED ACCORDING TO GOOD OPERATING AND MAINTENANCE PRACTICES.

U-F0101: o-XYLENE STORAGE

TANK

COMPUTERIZED DATA BASES ARE USED FOR PREVENTATIVE MAINTENANCE, EQUIPMENT RECORDS, MONITORING DATA AND PROCEDURES FOR THE EQUIPMENT AFFECTED BY THE TITLE V PROGRAM. THIS INFORMATION SHALL BE MADE AVAILABLE FOR INSPECTION UPON REQUEST.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 25: Compliance Certification

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000062-53-3 ANILINE

Item 25.2:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

ANILINE STORAGE TANKS, EMISSION UNITS U-F0106 AND U-F0109, ARE VENTED TO CARBON CANISTER DRUMS. VENT SAMPLING HAS DETERMINED THAT CARBON DRUM REPLACEMENT IS REQUIRED ANNUALLY FOR COMPLIANCE WITH 6 NYCRR PART 212, TABLE 2.

THESE TANKS MUST BE OPERATED ACCORDING TO GOOD OPERATING AND MAINTENANCE PRACTICES WITH CARBON CHANGEOVER PERFORMED ANNUALLY AND RECORDS MAINTAINED FOR FIVE YEARS.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

NO PERSON SHALL CAUSE OR ALLOW EMISSIONS HAVING AN AVERAGE OPACITY DURING ANY SIX CONSECUTIVE MINUTES OF 20 PERCENT OR GREATER FROM ANY PROCESS EMISSION SOURCE, EXCEPT ONLY THE EMISSION OF UNCOMBINED WATER. COMPLIANCE WITH THIS REQUIREMENT SHALL BE DETERMINED BY THE FACILITY OWNER/OPERATOR CONDUCTING DAILY SURVEY (NON-METHOD 9 OBSERVATION) OF VISIBLE EMISSIONS FROM FACILITY SOURCES. IF ANY ATYPICAL VISIBLE EMISSIONS ARE IDENTIFIED, CORRECTIVE ACTION IS REQUIRED AS APPROPRIATE FOR THE SOURCE. RECORDS



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

OF DAILY SURVEY OF VISIBLE EMISSIONS MUST BE RETAINED FOR FIVE YEARS. THE DEPARTMENT RESERVES THE RIGHT TO PERFORM OR REQUIRE THE PERFORMANCE OF A METHOD 9 OPACITY EVALUATION BY FIRM REPRESENTATIVE.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 40CFR 63, Subpart FFFF

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is subject to the requirements of 40 CFR Part 63, Subpart FFFF (NESHAP for Miscellaneous Organic Chemical Manufacturing) if the facility owns or operates miscellaneous organic chemical manufacturing process units (MCPUs) and if the facility is a major source of hazardous air pollutant emissions.

MCPU's are defined in Subpart FFFF as a unit which includes any equipment necessary to operate a miscellaneous organic chemical manufacturing process as defined in §63.2550, that satisfies all of the conditions listed in §63.2435(b)(1)-(3).

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Condition 28: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 40CFR 64

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility is subject to the Compliance Assurance Monitoring Rule (CAM Rule). The owner or operator of this facility must submit a plan to the Department for its review and approval showing how they will comply with this rule. The plan must include the following:

- An indicator to be monitored to show compliance with the applicable emission limit or standard.
- The ranges or designated conditions for such indicators, or the process by which such indicators ranges or designed conditions will be established.
- the performance criteria for the monitoring stated above
- if applicable, the indicator ranges and performance criteria for a CEMS, COMS or PEMS (if used).

The owner or operator of this facility shall submit an annual report of the monitoring required above. The report shall include the following:

- summary of information on the number, duration and cause (including unknown cause) of excursions or exceedances, as applicable, and the corrective actions taken;
- summary information on the number, duration and cause (including unknown cause) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks if applicable); and
- a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period. 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 excursions or exceedances occurring.

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

****** Emission Unit Level ******

Condition 29: Emission Point Definition By Emission Unit
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 29.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-000D1

Emission Point: 000D1

Height (ft.): 62 Diameter (in.): 12
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 29.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-000N2

Emission Point: 000N2

Height (ft.): 34 Diameter (in.): 18
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 33

Item 29.3:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-000N3

Emission Point: 000N3

Height (ft.): 80 Diameter (in.): 24
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 29.4:

The following emission points are included in this permit for the cited Emission Unit:



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Emission Unit: U-000N4

Emission Point: 000N4

Height (ft.): 61 Length (in.): 11 Width (in.): 11
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 29.5:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-0C2EO

Emission Point: 0C2EO

Height (ft.): 11 Diameter (in.): 4
Building: C-2

Item 29.6:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-32009

Emission Point: 32009

Height (ft.): 51 Diameter (in.): 4
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 29.7:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-32017

Emission Point: 32017

Height (ft.): 55 Diameter (in.): 30
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 29.8:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-32034

Emission Point: 32034

Height (ft.): 55 Diameter (in.): 32
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 29.9:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-3393A



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Emission Point: 3393A
Height (ft.): 56 Diameter (in.): 22
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 33

Item 29.10:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0101

Emission Point: F0101
Height (ft.): 28 Diameter (in.): 2

Building: 35

Item 29.11:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0103

Emission Point: F0103
Height (ft.): 8 Diameter (in.): 2

Building: 35

Item 29.12:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0104

Emission Point: F0104
Height (ft.): 8 Diameter (in.): 2

Building: 35

Item 29.13:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0106

Emission Point: F0106
Height (ft.): 4 Diameter (in.): 2

Building: 35

Item 29.14:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0107

Emission Point: F0107
Height (ft.): 2 Diameter (in.): 2

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Building: 35

Item 29.15:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0108

Emission Point: F0108

Height (ft.): 14

Diameter (in.): 2

Building: 35

Item 29.16:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0109

Emission Point: F0109

Height (ft.): 4

Diameter (in.): 2

Building: 35

Item 29.17:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0110

Emission Point: F0110

Height (ft.): 14

Diameter (in.): 2

Building: 35

Item 29.18:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F0112

Emission Point: F0112

Height (ft.): 3

Diameter (in.): 3

Building: 35

Item 29.19:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-F1862

Emission Point: F1862

Height (ft.): 30

Diameter (in.): 4

NYTMN (km.): 4778.02

NYTME (km.): 174.429

Building: C2



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

**Condition 30: Process Definition By Emission Unit
Effective between the dates of 06/09/2006 and 06/08/2011**

Applicable Federal Requirement: 6NYCRR 201-6

Item 30.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-000D1

Process: ETA

Source Classification Code: 3-01-999-99

Process Description:

THE ELIMINATION TANK SYSTEM IS FOR OVERFLOW PROTECTION AND TO PROVIDE ADDITIONAL CONDENSING PRIOR TO EMISSION TO THE ATMOSPHERE. THE ELIMINATION TANK SYSTEM HAS TWO PARALLEL SYSTEMS FOR CAPTURING LIQUID OVERFLOW AND VAPOR FROM THE ANTIOXIDANT PRODUCTION PROCESS. ELIMINATION TANK # 1 SERVES THE PRODUCT HOLDING TANK VENTS. ELIMINATION TANK # 2 SERVES VARIOUS RAW MATERIAL, RECYCLE, AND REACTOR SYSTEM VENTS. THE PARALLEL SYSTEMS ENHANCE THE ABILITY OF THE FACILITY TO RECOVER AND RECYCLE MATERIALS.

Emission Source/Control: 0HXD1 - Control

Control Type: VAPOR RECOVERY SYS(INCL. CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: 0HXD2 - Control

Control Type: VAPOR RECOVERY SYS(INCL. CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: 000D1 - Process

Emission Source/Control: 000D2 - Process

Item 30.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-000N2

Process: NPA

Source Classification Code: 3-01-999-99

Process Description:

THE PRODUCT IS SOLIDIFIED ON A DRUM FLAKER OR A METAL BELT. THE DUST FROM THE HANDLING AND PACKAGING IS REMOVED WITH THE DUST COLLECTOR SYSTEM. MATERIAL FROM



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

DRUMMING OF THE "LIQUID" PRODUCT IS ALSO EXHAUSTED THROUGH THE DUST COLLECTOR.

Emission Source/Control: 0F0N1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0F0N2 - Process

Item 30.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-000N3

Process: DFL

Source Classification Code: 3-01-999-99

Process Description:

A DRUM FLAKER IS USED TO FLAKE THE ANTIOXIDANT. THE REMELT TANK IS USED TO REWORK THE ANTIOXIDANT. THE CENTRIFUGE REMOVES SOLIDS FROM THE PRODUCT. THE PASTILLE UNIT ALSO SOLIDIFIES THE PRODUCT INTO A SMALL FLOWABLE SOLID. THE CONTROL TYPE FOR THIS PROCESS IS A WHIRLWET CONTINUOUS DUST COLLECTOR (SCRUBBER) MADE BY TRI-MER COMPANY. WATER IS USED TO SCRUB THE AIR STREAM.

Emission Source/Control: 0S0N3 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 000N3 - Process

Item 30.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-000N4

Process: BEL

Source Classification Code: 3-01-999-99

Process Description:

A BUCKET ELEVATOR AND VIBRATING CONVEYOR MOVE THE FLAKED ANTIOXIDANT.

Emission Source/Control: 0F0N4 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000N4 - Process

Item 30.5:

This permit authorizes the following regulated processes for the cited Emission Unit:



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Emission Unit: U-0C2EO

Process: AIR

Source Classification Code: 3-01-999-99

Process Description:

AN AIR STRIPPER REMOVES XYLENE FROM THE
WASTEWATER.

Emission Source/Control: 0CAEO - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0C2EO - Process

Item 30.6:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-32009

Process: SHT

Source Classification Code: 3-01-999-99

Process Description:

THE WATER THAT IS USED TO FLUSH THE
REACTOR AND DEGASSER IS RETAINED IN THE
SUMP HOLDING TANK PRIOR TO WASTEWATER
DISCHARGE. WATER QUALITY TESTS ARE
PERFORMED WHILE BEING RETAINED.

Emission Source/Control: 03009 - Process

Item 30.7:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-32017

Process: NMR

Source Classification Code: 3-01-999-99

Process Description:

A NEUTRALIZER SOLUTION IS MADE UP USING
PROCESS WATER.

Emission Source/Control: 03017 - Process

Item 30.8:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-32034

Process: SFI

Source Classification Code: 3-01-999-99

Process Description: SPARKLER FILTER

Emission Source/Control: 03034 - Process

Item 30.9:

This permit authorizes the following regulated processes for the cited Emission Unit:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Emission Unit: U-3393A

Process: PTA

Source Classification Code: 3-01-999-99

Process Description:

HYDROQUINONE (HQ) IS DISCHARGED FROM BULK BAGS THROUGH A CHUTE INTO A TANK, FROM TWO PUMPS DURING MAINTENANCE ACTIVITIES, AND FROM A VACUUM CLEANING SYSTEM FOR RESIDUAL HQ.

Emission Source/Control: 0F393 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 03393 - Process

Item 30.10:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0101

Process: OXS

Source Classification Code: 3-01-999-99

Process Description: o-XYLENE STORAGE

Emission Source/Control: 0F101 - Process

Item 30.11:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0103

Process: RS3

Source Classification Code: 3-01-999-99

Process Description: RECYCLE STORAGE TANK

Emission Source/Control: 0F103 - Process

Item 30.12:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0104

Process: RS4

Source Classification Code: 3-01-999-99

Process Description: RECYCLE STORAGE TANK

Emission Source/Control: 0F104 - Process

Item 30.13:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0106

Process: AS6

Source Classification Code: 3-01-999-99



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

Process Description: ANILINE STORAGE TANK

Emission Source/Control: 0C106 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0F106 - Process

Item 30.14:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0107
Process: RS7
Source Classification Code: 3-01-999-99
Process Description: RECYCLE STORAGE TANK

Emission Source/Control: 0F107 - Process

Item 30.15:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0108
Process: OT8
Source Classification Code: 3-01-999-99
Process Description: o-TOLUIDINE STORAGE

Emission Source/Control: 0F108 - Process

Item 30.16:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0109
Process: AS9
Source Classification Code: 3-01-999-99
Process Description: ANILINE STORAGE TANK

Emission Source/Control: 0C109 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0F109 - Process

Item 30.17:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0110
Process: O10
Source Classification Code: 3-01-999-99
Process Description: o-TOLUIDINE STORAGE

Emission Source/Control: 0F110 - Process

Item 30.18:



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F0112

Process: M12

Source Classification Code: 3-01-999-99

Process Description: MIXED XYLIDINES STORAGE

Emission Source/Control: 0F112 - Process

Item 30.19:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-F1862

Process: TAN

Source Classification Code: 3-01-999-99

Process Description:

WASTEWATER IS TRANSFERRED TO A STORAGE TANK. SOLVENT IS USED TO EXTRACT ORGANICS FROM THE WASTEWATER. THE SOLVENT IS SUBSEQUENTLY RECOVERED BY DISTILLATION.

Emission Source/Control: 0HSX2 - Control

Control Type: TUBE AND SHELL CONDENSER

Emission Source/Control: 0HXS1 - Control

Control Type: TUBE AND SHELL CONDENSER

Emission Source/Control: 01862 - Process

Emission Source/Control: 1862A - Process

Condition 31: Compliance Certification

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 31.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-000D1 Emission Point: 000D1

Process: ETA Emission Source: 000D1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

VENTS FROM THE ANTIOXIDANT PRODUCTION PROCESS ARE CONNECTED TO THE ELIMINATION TANK SYSTEM. THE ELIMINATION TANK VENT SYSTEM HAS TWO TANKS IN PARALLEL WITH OUTLET HEAT EXCHANGERS TO CONTROL EMISSIONS OF VOCs. ELIMINATION TANK # 1 (000D1) HAS TWO OUTLET HEAT EXCHANGERS (CONDENSORS) CONNECTED IN SERIES. THE PROCESS STREAM (VOC) TEMPERATURE IS CONTINUOUSLY MONITORED & RECORDED WITH CORRECTIVE ACTION TO BE TAKEN IF THE PROCESS STREAM TEMPERATURE EXCEEDS 50 DEGREES CENTIGRADE FROM THE FIRST EXCHANGER (COOLING TOWER WATER) OR 45 DEGREES CENTIGRADE FROM THE SECOND EXCHANGER (CHILLED WATER). ELIMINATION TANK SYSTEM HEAT EXCHANGER TEMPERATURES MUST BE MONITORED AND RECORDED BY THE OPERATOR ONCE PER SHIFT TO VERIFY THAT THE SYSTEM IS OPERATING PROPERLY.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 45 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 32: Compliance Certification

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 32.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-000D1 Emission Point: 000D1

Process: ETA Emission Source: 000D2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 32.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

VENTS FROM THE ANTIOXIDANT PRODUCTION PROCESS ARE CONNECTED TO THE ELIMINATION TANK SYSTEM. THE ELIMINATION TANK VENT SYSTEM HAS TWO TANKS IN PARALLEL WITH OUTLET HEAT EXCHANGERS TO CONTROL EMISSIONS OF VOCs. ELIMINATION TANK # 2 (000D2) HAS ONE OUTLET (TWO PASS) HEAT EXCHANGER (CONDENSOR). THE PROCESS STREAM (VOC) TEMPERATURE IS CONTINUOUSLY MONITORED AND RECORDED WITH CORRECTIVE ACTION TO BE TAKEN IF THE PROCESS STREAM TEMPERATURE EXCEEDS 45 DEGREES CENTIGRADE FROM THE HEAT EXCHANGER (CHILLED WATER). ELIMINATION TANK SYSTEM HEAT EXCHANGER TEMPERATURES MUST BE MONITORED AND RECORDED BY THE OPERATOR ONCE PER SHIFT TO VERIFY THAT THE SYSTEM IS OPERATING PROPERLY.

THIS CONDITION SATISFIES COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS UNDER 40 CFR 64. CAM PLAN FOR EMISSION SOURCE 000D2 IS ATTACHED TO THE TITLE V RENEWAL APPLICATION SUBMITTED TO THE REGION 9 OFFICE UNDER COVER LETTER DATED 18 NOV 2005.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 45 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 33.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Emission Unit: U-000N2

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

FACILITY MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSION
CONTROL EQUIPMENT (IE., DUST COLLECTOR)
IS OPERATING PROPERLY FOR COMPLIANCE WITH
0.05 GR/DSCF FOR THE FOLLOWING EMISSION
POINT:

EP 000N2: ANTIOXIDANT PACKAGING DUST
COLLECTOR

NOTE: MISCELLANEOUS TRACE ORGANICS AND
PRODUCT DUST ARE EXHAUSTED FROM THE
ANTIOXIDANT PACKAGING AREA THROUGH THIS
DUST COLLECTOR.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 2 inches of water

Upper Permit Limit: 11 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 34: Compliance Certification

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-000N3

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

TRIMER SCRUBBER. A DRUM FLAKER, REMELT TANK, CENTRIFUGE AND BELT PASTILLE UNIT ARE VENTED THROUGH A WATER BASED SCRUBBER USING A FAN FOR SUCTION. THE REQUIRED DIFFERENTIAL PRESSURE OF 6 - 12 IN. WATER ACROSS THE COLUMN (MANOMETER READING) AND MINIMUM LEVEL IN THE RESERVOIR (SIGHT GLASS READING) OF BETWEEN 4 - 8 IN. WATER IN THE TRIMER SCRUBBER ARE MONITORED AND RECORDED PER SHIFT BY THE OPERATOR. RECORDS MUST BE MAINTAINED FOR FIVE YEARS.

NOTE: MISCELLANEOUS TRACE ORGANICS AND PRODUCT DUST FROM THE DRUM FLAKER, REMELT TANK, CENTRIFUGE AND BELT PASTILLE UNIT ARE EXHAUSTED THROUGH THIS SCRUBBER.

Monitoring Frequency: PER SHIFT

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 35: Compliance Certification

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-000N4

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



FACILITY MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSION
CONTROL EQUIPMENT (IE., DUST COLLECTOR)
IS OPERATING PROPERLY FOR COMPLIANCE WITH
0.05 GR/DSCF FOR THE FOLLOWING EMISSION
POINT:

EP 000N4: BUCKET ELEVATOR DUST
COLLECTOR

NOTE: MISCELLANEOUS TRACE ORGANICS AND
PRODUCT DUST ARE EXHAUSTED FROM A 90 FOOT
VIBRATORY CONVEYOR AND BUCKET ELEVATOR
THROUGH A PULSE JET BAGHOUSE TYPE DUST
COLLECTOR.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 2 inches of water
Upper Permit Limit: 11 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 36: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-0C2EO

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

CARBON BED ON AIR STRIPPER DISCHARGE
MUST BE MONIOTRED QUARTERLY FOR VOC LOWER
EXPLOSIVE LEVEL (LEL) USING A COMBUSTION
GAS METER. REPLACEMENT OF THE CARBON BED
IS REQUIRED ONCE THE READING IS 10% OF



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

THE LEL RECORDS MUST BE MAINTAINED FOR FIVE YEARS OF CARBON MONITORING AND BED REPLACEMENTS.

Monitoring Frequency: QUARTERLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 37: Compliance Certification

Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-3393A

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

FACILITY MUST MONITOR CONTROL DEVICE PARAMETER AS AN INDICATOR THAT EMISSION CONTROL EQUIPMENT (IE., DUST COLLECTOR) IS OPERATING PROPERLY FOR COMPLIANCE WITH 0.05 GR/DSCF FOR THE FOLLOWING EMISSION POINT:

EP 3393A: HYDROQUINONE DUST COLLECTOR (PREMIX)

NOTE: PRESSURE DIFFERENTIAL MONITORING DEVICE MUST BE FUNCTIONING WHENEVER PROCESS IS IN OPERATION. BAGHOUSE PRESSURE DROP MUST BE RECORDED ONCE PER SHIFT BY GOODYEAR PERSONNEL WHENEVER PROCESS IS IN OPERATION. PRESSURE DROP LIMITS OF MONITORING ARE INTENDED TO BE INDICATORS THAT THE GRAIN LOADING STANDARD, 0.05 GR/DSCF, IS BEING

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



ACHIEVED. OPERATION OF THE BAGHOUSE OUTSIDE OF THE LIMITS OF MONITORING SHALL TRIGGER INVESTIGATION OF BAGHOUSE PERFORMANCE BY APPROPRIATE GOODYEAR PERSONNEL. RECORDS OF BAGHOUSE MONITORING MUST BE RETAINED FOR FIVE YEARS.

THIS CONDITION SATISFIES COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS UNDER 40 CFR 64. CAM PLAN FOR EMISSION SOURCE 03393 IS ATTACHED TO THE TITLE V RENEWAL APPLICATION SUBMITTED TO THE REGION 9 OFFICE UNDER COVER LETTER DATED 18 NOV 2005.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 2 inches of water
Upper Permit Limit: 11 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-F1862

Regulated Contaminant(s):
CAS No: 000095-47-6 BENZENE,1,2-DIMETHYL

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:
VENT CONDENSOR - FACILITY MUST MONITOR

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



VENT CONDENSOR COOLING WATER DISCHARGE
TEMPERATURE ON A DAILY BASIS NOT TO
EXCEED 45 DEGREES CENTIGRADE AND OPERATE
THIS SOURCE ACCORDING TO GOOD OPERATING
AND MAINTENENCE PRACTICES.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 45 degrees Centigrade (or Celsius)

Monitoring Frequency: DAILY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 39: Contaminant List
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable State Requirement: ECL 19-0301

Item 39.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036



permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000062-53-3

Name: ANILINE

CAS No: 000095-47-6

Name: BENZENE,1,2-DIMETHYL

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 40: Unavoidable noncompliance and violations
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable State Requirement: 6NYCRR 201-1.4

Item 40.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate



New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00149

Facility DEC ID: 9291100036

of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 41: Air pollution prohibited
Effective between the dates of 06/09/2006 and 06/08/2011

Applicable State Requirement: 6NYCRR 211.2

Item 41.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.