Division of Air Resources

Permit Review Report

Permit ID: 5-4154-00002/01743
Renewal Number: 4
09/20/2023

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

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

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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
This is a permit renewal.The renewal removes regulations, processes, sources and emission points associated with equipment that has been permanently taken out of service as part of the site's 2021-2022 transformation project.

Attainment Status
MOMENTIVE PERFORMANCE MATERIALS is located in the town of WATERFORD in the county of SARATOGA.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10μ in diameter (PM10)	ATTAINMENT

Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

Momentive Performance Materials operates a silicone production facility (sic 2821) located in Saratoga County, New York, in the town of Waterford. The site produces silicone products and materials including resins, fluids, dispersions, emulsions, heat curing elastomers and room temperature vulcanizing (RTV) elastomers. The site has continuous and batch chemicals processes, compounding, finishing and packaging operations, and steam generation capability.

Permit Structure and Description of Operations
The Title V permit for MOMENTIVE PERFORMANCE MATERIALS is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

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

Emission unit C27035 - Emission unit C-27035 is comprised of several above ground storage tanks which are used to store acids. The tanks vent to a water scrubber.

Emission unit C27035 is associated with the following emission points (EP):

27035, 27039
Process: 056 is located at Building 27 - Hydrochloric acid tanks are vented through the HCl tank vent scrubber to EP 27035. This process is subject to requirements under 40 CFR 63, Subparts SS and FFFF.

Process: 202 This process represents heat exchange systems (cooling water) within the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27035 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Heat exchange systems subject to Subpart FFFF are summarized in the Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 206 This process represents the management of Group 1 wastewater or residuals in containers. The Group 1 wastewater or residuals are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27035 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 208 This process represents the management of Group 1 wastewater in individual drain systems. The Group 1 wastewater streams are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27035 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 211 This process represents the management of MON maintenance wastewater streams from unit C-27035 that are subject to 40 CFR 63, Subpart F.

Process: 214 This process represents the management of Group 1 process wastewater in tanks. The Group 1 wastewater is generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27035 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater storage tank determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 218 This process represents the treatment of Group 1 wastewater streams and/or residuals removed from Group 1 wastewater streams. The Group 1 wastewater or residuals are generated by the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit C-27035 that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Group 1 wastewater determinations are included in the Subpart FFFF Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

Process: 221 This process represents any pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems in the unit C-27035 processes that are subject to the leak detection and repair requirements in 40 CFR 63, Subpart UU for MON MACT (40 CFR 63, Subpart FFFF) compliance. Each piece of equipment to which Subpart UU applies is identified in the LeakDAHS system. If any associated emissions occur, amounts are reported under Process FUG.

Process: 764 is located at Building 27 - HCl storage tank vents to scrubber at EP 27039.

Process: MN2 This process includes all of the individual Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in unit C-27035 that are subject to 40 CFR 63, Subpart FFFF (MON MACT). The MCPUs are organized based on a Family of Materials (FOM). The complete list of MCPUs, FOMs and

operating scenarios is maintained in the Subpart FFFF Notification of Compliance Status (NOCS). Process MN2 and the Subpart FFFF NOCS include Group 1 process vent streams and controls, storage tanks, transfer racks, and heat exchange systems, as well as the storage, management and treatment of designated Group 1 wastewater streams. Changes to the MON MACT MCPUs, FOMs, or operating scenarios are documented within the NOCS on a semiannual basis and are included in the Subpart FFFF Semiannual reports. Monthly MON MACT batch emission calculations are completed in order to verify the Group 2 status of applicable process vents. Note: The MON MACT MCPUs utilize equipment and emission points that are already included under the Process codes designated for Title V permitting, which are organized by equipment rather than product. Emissions for Process MN2 are, therefore, included in the emissions for individual Process codes.

Emission unit C27018 - This unit consists of specific processes in buildings/areas 14, 21, 23, 24, 27, 30, 35, 37, 71, 72, 76, 78 and the WWTP. The unit includes the following control devices and their associated equipment: the MON MACT Thermal Oxidizer, the Fixed Box Vent Incinerator, and scrubbers in areas 23, 71, and 76. Sources in this unit include storage tanks, distillation columns and process vessels and equipment. Applicable regulations for unit C-27018 include: 40 CFR 63 Subparts F, G, and H, the Miscellaneous Organic NESHAP (MON MACT) under 40 CFR Subpart FFFF, New Source Performance Standards (NSPS) for volatile organic liquid storage tanks under 40 CFR 60 Subpart Kb, Volatile Organic Compound Reasonably Available Control Technology (VOC RACT) under 6 NYCRR Subpart 212, VOC RACT for storage tanks under 6 NYCRR Subpart 229, and State Air Toxics under 6 NYCRR Subpart 212.

Emission unit C27018 is associated with the following emission points (EP):
14006, 21011, 23002, 23005, 24113, 24120, 24141, 24142, 24143, 24144, 24150, 24151, 24208, 24417, 24423, 24703, 24908, 24925, 24927, 24933, 24936, 24937, 24938, 24939, 24949, 24950, 24951, 24952, 24953, 24954, 24962, 24978, 30804, 30806, 30807, 30808, 30907, 30914, 30916, 30917, 30918, 30938, 30947, 31019, 31022, 31030, 31031, 31032, 31034, 31035, 31036, 31037, 31040, 31041, 31046, 31047, 32038, 35006, 35007, 35009, 35010, 35011, 35012, 35016, 35018, 35028, 35031, 35032, 35033, 35034, 35035, 35036, 35037, 35039, 35040, 35901, 36001, 36003, 36004, 37002, 37004, 37007, 37009, 37011, 37013, 37014, 37017, 37018, 37019, 37020, 37021, 37022, 37023, 37026, 37027, 37033, 37034, 37036, 37038, 37039, 37040, 37041, 37042, 37043, 37044, 37045, 37060, 37062, 37063, 37066, 37067, 37068, 37069, 37070, 37071, 37072, 37077, 37078, 37079, 37080, 37081, 37085, 37702, 37705, 37707, 37708, 37801, 37803, 37804, 37805, 37812, 37813, 37814, 37827, 37901, 37902, 37903, 37905, 37907, 37909, 37910, 37911, 37917, 37918, 37920, 37921, 37922, 37923, 37925, 37926, 37932, 37934, 37941, 37942, 37943, 37944, 37945, 37946, 37947, 37951, 37952, 37956, 37957, 37958, 37960, 37961, 37962, 38006, 38007, 38018, 48001, 70001, 70003, 70006, 71001, 71003, 71005, 71013, 76001, 76005, 76009, 76012, 76013, 76014, 76701, 76710, 76711, 76712, 76713, 76714, 76715, 76716, 76718, 76719, 78001, 78002, 78004, 78005, 78006, 78007, 78009, 78011, 78015, 78016, 78017, 78018, 78019, 78025, 78031, 78032, 78041, 78042, 97001, 97002, 97500
Process: 005 is located at Building 78 - The PK10 (Polykettle 10) system is a batch system used to make silicone polymers. It may make products subject to 40 CFR 63 Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also

includes any associated cleanouts. The system vents through EPs 78032/78015 and 78016.

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

Process: 008 is located at Building 37 - The building 37 Cracker system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system vents through EPs 37952, 37901 and 37902.

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

Process: 023 is located at Building 30 - PK1 (Polykettle 1) is a Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. This polykettle system is connected to the Building 30 vent header which in turn vents to the compressor knockout tank and then through the MON MACT vent header to the Fixed Box Incinerator at EP 97001/97002 or the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 024 is located at Building 30 - PK2 (Polykettle 2) is a Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. This polykettle system is connected to the Building 30 vent header which in turn vents to the compressor knockout tank and then through the MON MACT vent header to the Fixed Box Incinerator at EP 97001/97002 or the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 025 is located at Building 30 - PK3 (Polykettle 3) is a Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. This polykettle system is connected to the Building 30 vent header which in turn vents to the compressor knockout tank and then through the MON MACT vent header to the Fixed Box Incinerator at EP 97001/97002 or the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

Process: 026 is located at Building 30 - PK5 (Polykettle 5) is a Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. This polykettle system is connected to the Building 30 vent header which in turn vents to the compressor knockout tank and then through the MON MACT vent header to the Fixed Box Incinerator at EP 97001/97002 or the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

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

cleanouts. The system may vent through EPs 37040, 37021, 37060, 37066 and 37083.

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

Process: 041 is located at Building 30 - The PK8 (Polykettle 8) system is a batch system used to make various oils and gums. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process also includes any cleanouts. The system vents through EP 30808 or EP 30918.

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

Process: 043 is located at Building 30 - The PK6 (Polykettle 6) system is a batch system used to make various oils and gums. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN1. This process also includes any cleanouts. The system vents through EP 30806 or EP 30916 or to vent incineration at EP 97001/97002 or 97500.

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

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

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

Process: 073 is located at Building 35 - Manufacture of mixed cyclics in the cracker "C" and "D" systems.

The system may vent through EPs 35006, 35007, 35009, 35010, 35011, 35016, 35040 and 35901.

Process: 083 is located at Building 23 - The Building 23 blend tank system vents to the B24 MON MACT Water Scrubber (MTCSS) and compressor knockout tank (24KOT) and then through the MON MACT vent header to the Fixed Box Incinerator at EP 97001/97002 or the thermal oxidizer at EP 97500. This process includes any associated cleanouts.

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

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

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

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

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

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

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

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

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

Process: 109 is located at Building 37 - The dimethyl fluids equilibrator system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The dimethyl fluids equilibrator system may vent through emission points 37009, 37934, 37903, 37910, 37920, 37921, 37707, 37909, 37917, 48001. NOTE: Process Code 009 was removed at Renewal 3. It was combined with Process Code 109. Process Code 109 was retained.

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

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

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

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

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

Process: 132 is located at Building 78 - The PK11 system may make products subject to 40 CFR Part 63 Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPS and

are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process includes any associated cleanouts. The system may vent through EPs 78017, 78016 and 78002.

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

Process: 134 is located at Building 78 - The PK14 system may make products subject to 40 CFR Part 63 Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPS and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process includes any associated cleanouts. The system may vent through EPs 78025 and 78019. 78002.

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

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

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

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

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

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

artisan system may vent through EPs 37911, 37901, 37902, 37958.

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

Process: 156 is located at Building 71 - The 3M Hydrolyzer system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system vents through EP 71001.

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

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

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

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

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

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

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

Process: 220 This process represents any pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems in the unit C-27018 processes that are subject to the leak detection and repair requirements in 40 CFR 63, Subpart UU for MON MACT (40 CFR 63, Subpart FFFF) compliance. Each piece of equipment to which Subpart UU applies is identified in the LeakDAHS system. If anyassociated emissions occur, amounts are reported under Process FUG.

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

Process: 430 is located at WWTP, Building AREA 96 - Fixed Box Incinerator (FBI) Vent Mode Operation: The FBI is used to burn only process vents in this mode. This may include process vents from the WWTP clarifier air strippers (process 825), the WWTP tank farm header (process 705), the MON MACT vent header (processes 023, 024, 025, 026, 083, 715) or the MON MACT air strippers (process 705) and tanks. No hazardous waste is burned in this operation. Countercurrent scrubber # 1 and the IWS # 1 train may be off-line during this mode of operation. 40 CFR 63 Subpart G regulations apply during vent mode operation but Subpart EEE does not. This process vents through EP 97001 and/or EP 97002.

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

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

Process: 715 is located at Building AREA 96 - The MQ Resins system is a group 1 batch system subject to 40 CFR 63, Subpart FFFF and includes a body kettle condenser, receiver, wash tank, precoat tank, filter aid kettle, blend kettle, and polar solvent receiver . Equipment from this system vents though the MON MACT vent header to RKI (EP 97003) or FBI (EP97001, 97002). Emissions are accounted for under process code 422 (RKI) or 424 (FBI). Vents may go to the new thermal oxidizer and baghouse (EP 97500)

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

Process: 750 is located at Building 23 - The acid storage tank vents through the tank scrubber and then to the atmosphere via EP 23005. The tanks have a nitrogen blanket or are under pressure.

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

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

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

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

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

Process: 766 is located at Building 76 - Building 76 storage tanks working and breathing losses that vent directly to atmosphere or to the vent gas scrubber. All tanks have a nitrogen blank and/or PCV. (Includes Op-flex 01/06/2021 Modification)

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

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

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

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

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

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

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

Process: 794 is located at Building 71 - The 1M Hydrolyzer system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs

and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN1. This process also includes any associated cleanouts. The system may vent through EPs 71001 and 71013.

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

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

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

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

EU-C27018: Proc - 022-026, 040, 047, 083, 108 & 715
EU-C27035: Proc - 056
EU-FINISH: Proc - 053

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

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

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

EU-C27018: Proc - 220, Source FUGM1

EU-C27035: Process - 221, Source FUGM2.

EU-FINISH: Processes - 222, Source FUGM3.

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

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

EU-C27018: EPs - 76001, 23002.

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

EU-C27018: EPs - 24806

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

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

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

EU-C27018: EPs - 14006, 24120, 24132, 31002, 31003, 31022, 31030, 32038, 37707, 37934, 78005, 97001, 97002 & 97500.

EU-W97004: EP - 95002.

EU-T13004: EPs 13007, 13011, 13013.

Exempt vents under
201-3.2(c)(27): 13007
(44): 13011, 13012, 13013, 13015
(40): 13016
(27): 31001, 31002, 42007, 85057

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

No reference to this EP in the flow diagrams - 68005

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

EU-HOFURN

EU-U28002: Proc - 408 & 410.

EU-U28003: Proc - 415 & 417.

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

EU-C27018: 76ACW.

EU-FINISH: 23APS, 37APS & 76PTA.

Process: L09 is located at Building AREA 96 - List of Processes subject to Part 229.3(e)(2)(v) which emit through EU C-27018 Processes 430:

EU: W-97004: Process 705

Process: L10 is located at Building AREA 96 - List of Processes subject to Part 229.3(e)(2)(iv) which emit through EU C-27018 Processes 430:

EU: W-97004: Process 705

Process: L11 is located at Building AREA 96 - List of Processes subject to 40 CFR 63 Subpart G Sections 139(c), 140, 143(e) & 143(g) which emit through EU C-27018 Processes 430:

EU: W-97004: Process 705 ES/C MMNAS & MMSAS.

Process: L13 is located at Building AREA 96 - List of Processes subject to 40 CFR 63 Subpart G Sections 114(a)(4)(ii) which emit through EU C-27018 Process 430 ES/C FBCS1:

Process: L14 is located at Building AREA 96 - List of Processes subject to 40 CFR 63 Subpart G Sections 114(a)(4)(ii) which emit through EU C-27018 Process 430 ES/C FBCS2:

Process: L15 is located at Building AREA 96 - List of Processes subject to 40 CFR 63 Subpart G Sections 114(a)(4)(i) which emit through EU C-27018 Process 430 ES/C IWS11, IWS12, IWS21, IWS22, IWS1A, IWS1B, IWS2A or IWS2B:

Process: L16 is located at Building AREA 96 - List of Processes subject to 40 CFR 63 Subpart G Sections 114(a)(1)(i) which emit through EU C-27018 Process 430 and ES/C 93FBI:

EU: C-27018: Process 090.

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

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

Emission Point	Emission Source
28010	28EG1
28011	28EG2
28012	28EG3
80002	80EG1
80003	80EG2
85064	85EG1
97037	GEN01
97025	952E1
97026	952E2

51002	51EG3
51003	51EG4
97033	FFPD4

Generators > 500 HP (Exempt under Subpart ZZZZ);

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

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

Emission unit FINISH is associated with the following emission points (EP):
21101, 23100, 23101, 23103, 23104, 24116, 24132, 24133, 24134, 24135, 24136, 24137, 24138, 24139, 24140, 24205, 24207, 24209, 24210, 24211, 24302, 24305, 24308, 24309, 24311, 24312, 24402, 24404, 24405, 24409, 24413, 24414, 24702, 24704, 24806, 24909, 24934, 24942, 24943, 24944, 24945, 24972, 27102, 30001, 30910, 30911, 30932, 30933, 30935, 31003, 31501, 31502, 31503, 31504, 31505, 31506, 31507, 31508, 32007, 32008, 32009, 32016, 32017, 32026, 32027, 32028, 32033, 32040, 32042, 32044, 32046, 32049, 32050, 33002, 33003, 33004, 33016, 33017, 33024, 33025, 33027, 33028, 33902, 33903, 33904, 33906, 33908, 33909, 37001, 37003, 37005, 37016, 37032, 37048, 37049, 37050, 37101, 37102, 37103, 37104, 37105, 37701, 37816, 37919, 37924, 37935, 37936, 37937, 37938, 37939, 37940, 37948, 38008, 42001, 42002, 42003, 42004, 42012, 42017, 42018, 42019, 42020, 42021, 44001, 44044, 61602, 71010, 76006, 76007, 78008, 78021, 78022, 78023, 78024, 78026, 78033, 78034, 78035, 78036, 78037, 78038, 78039, 85001, 85002, 85003, 85004, 85005, 85006, 85008, 85013, 85017, 85020, 85025, 85032, 85043, 85044, 85045, 85046, 85054, 85059, 85068, 85901, 85902, 85903, 85906, 85907, 97023
Process: 029 is located at Building 85 - The endcapper system makes fluids. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process also includes any associated cleanouts. The endcapper system vents to atmosphere through the vent head at EP 85906 or EP 85907.

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

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

through EP 42018.

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

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

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

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

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

Process: 081 is located at Building 37 - The existing pre-upgrade phenyl tetramer system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN3. This process also includes any cleanouts. The system may vent through EPs 37001, 37074, 37005, 37003, 37048, 37049, 37050, 37016, 37047. The post-upgrade system (Op-Flex Modification 11/11/20) may vent through EPs 37101 - 37105.

Process: 102 is located at Building 30 - The TFK 2 (treated filler kettle 2) system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3. This process also includes any

associated cleanouts. The system vents through EP 32026.

Process: 111 is located at Building 30 - The vent dust collection system captures the particulates that escape from the atmospheric vents on TFK 1, TFK 2, TFK3, hoppers 1 through 5 as well as silos 1 through 6. This process also includes any associated cleanouts. Particulates vent through the dust collector EP 32046.

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

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

Process: 157 is located at Building 30 - The TFK 3 (treated filler kettle 3) system may make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in Process MN3 This process includes any associated cleanouts. The system vents through EPs 32027 and 32028.

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

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

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

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

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

vents through EPs 32008 and 32040.

Process: 175 is located at Building 85 - The WP-3 system may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly MON MACT batch tracking and managed as described in process MN3. This process includes any associated cleanouts. The system vents through EPs 85002, 85013, 85906, 85907 and 85068.

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

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

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

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

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

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

Process: 191 is located at Building 85 - The treated filler kettle (TFK) 5 system is a batch system that includes the treated filler kettle, receiver, heat exchanger and overhead condenser. It may be used to make products subject to 40 CFR 63, Subpart FFFF as well as non MON MACT products. Products made on this system that include HAPs and are subject to 40 CFR Part 63 Subpart FFFF, are tracked under monthly

MON MACT batch tracking and managed as described in Process MN3. This process includes any associated cleanouts. The TFK 5 system vents through a spray column to EP 85008. The extruder can also vent through a water separator system to EP 85013.

Process: 203 This process represents heat exchange systems (cooling water) within the Miscellaneous Organic Chemical Manufacturing Process Units (MCPUs) in Unit F-INISH that are regulated under 40 CFR Part 63, Subpart FFFF (MON MACT). Heat exchange systems subject to Subpart FFFF are summarized in the Notification of Compliance Status (original NOCS dated 10/8/08 and semiannual revisions).

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

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

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

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

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

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

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

installed in 2023. A fourth mixer may be installed post 2023.

Process: 708 is located at Building 30 - The Molding Compounds Area Solids Handling Baghouse 2 vents through EP 33002. The grinding conveying dust pick up vents through the Molding Compounds Area Solids Handling Baghouse 3 vents to atmosphere at EP 33003. The pill room exhaust hoods vent through the Molding Compounds Area Solids Handling Baghouse 1 to atmosphere at EP 31003.

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

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

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

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

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

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

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

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

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

Process: 800 is located at Building 85 - Building 85 storage tanks working and breathing losses that vent

to the atmosphere. All tanks have a nitrogen blanket or are under pressure. Additionally, some tanks also have a pressure control valve present and some tanks vent through the vent header to EP 85906 or EP 85907.

Process: 802 is located at Building 30 - Building 30 storage tank working and breathing losses that vent to the atmosphere. All tanks have a nitrogen blank. Additionally, some tanks also have a pressure control valve present.

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

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

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

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

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

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

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

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

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

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

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

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

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

Emission unit U28003 is associated with the following emission points (EP):
28003, 28004
Process: 415 is located at Building 28 - Natural gas is combusted in Boiler 14. Boiler 14 was manufactured by Babcock and Wilcox and has a maximum heat input rating of 171 MMBtu/hr (125,000 lb/hr steam). It is equipped with a low NOx burner and is exhausted directly to the atmosphere through a common stack shared with Boiler 15 (EP 28003). The boiler is used to generate steam for both process use and space heating. Boiler 14 is classified as a large boiler under 6NYCRR Part 227-2 as revised 6/2010.

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

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

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

Process: 745 is located at Building AREA 96 - Biological Wastewater Treatment System: The Bio Reactor system is an activated sludge process that receives influents of pretreated wastewater, APS and containment water. Bio Reactors T-20 and T-21 (sources BIOR1, BIOR2) consist of aeration basins and integral clarifiers that are operated in parallel. The overflow from the primary treatment clarifiers and T-507 is stripped and transferred to the Bio Equalization Tank (T-505) prior to flowing to the Bio Reactors. The APS waste is mixed sequentially in three equalization tanks (T-17, T-18, T-19) prior to being used as food in the Bio Reactors. Non-contact cooling water/clean storm water sewers can be diverted to the containment tanks (T-502, T-503, T-504, T-506). The waste sludge subsystem is used to remove excess sludge from the Bio Reactors. The Bio Reactors may be used to handle Group 1 wastewaters subject to 40CFR 63, Subpart FFFF and are managed as described under processes MN1, MN2, and MN3 and the applicable requirements for processes 213-215 and 217-219.

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

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

Program Applicability

The following chart summarizes the applicability of MOMENTIVE PERFORMANCE MATERIALS with regards to the principal air pollution
regulatory programs:

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

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2819	INDUSTRIAL INORGANIC CHEMICALS
2821	PLASTICS MATERIALS AND RESINS
2822	SYNTHETIC RUBBER
2869	INDUSTRIAL ORGANIC CHEMICALS,NEC

SCC Codes
SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS

	10-100 MMBtu/Hr
3-01-018-47	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Epoxy Resins
3-01-026-30	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - SYNTHETIC RUBBER (MANUFACTURING ONLY) Silicone Rubber
3-01-070-02	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL MANUFACTURING (GENERAL) Storage/Transfer
3-01-820-10	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - WASTEWATER AGGREGATE CHEMICAL PLANT WASTEWATER SYSTEM: CLARIFIER
3-01-840-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Distillation Units
3-01-999-98	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - OTHER NOT CLASSIFIED Specify in Comments Field
3-01-999-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - OTHER NOT CLASSIFIED Specify in Comments Field
3-02-999-99	FOOD AND AGRICULTURE FOOD AND AGRICULTURE - OTHER NOT SPECIFIED Other Not Classified
3-05-102-99	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS STORAGE BINS Other Not Classified
3-85-001-10	COOLING TOWER COOLING TOWER - PROCESS COOLING OTHER NOT SPECIFIED
3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified
4-01-002-99	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING OTHER NOT CLASSIFIED - OPEN-TOP VAPOR DEGREASING
4-90-001-99	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - SOLVENT EXTRACTION PROCESS Other Not Classified
5-03-007-01	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE General

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air

contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000107-98-2	2-PROPANOL, 1-METHOXY			322	
000064-19-7	ACETIC ACID	7370		3686	
013170-23-5	ACETIC ACID,DIANHYDRIDE W/ SILICIC ACID (H4SIO4)BIS(1,1-DIME			173	
000075-36-5	ACETYL CHLORIDE	5877			
007664-41-7	AMMONIA	29334		8763	
000071-43-2	BENZENE			19	
000124-38-9	CARBON DIOXIDE				12667
000630-08-0	CARBON MONOXIDE			218997	
007782-50-5	CHLORINE			1027	
000067-66-3	CHLOROFORM			76	
068037-53-6	CYCLOSILOXANES, METHYL			204	
000541-02-6	DECAMETHYLCYCLOPENTASILOXANE	105000			
000067-64-1	DIMETHYL KETONE	105852		52926	
069430-24-6	DIMETHYLCYCLOSILOXANES			1594	
000075-78-5	DIMETHYLDICHLOROSILANE			1495	
003277-26-7	DISILOXANE, 1,1,3,3-TETRAMETHYL-			273	
064742-46-7	DISTILLATES (PETROLEUM) HYDROTREATED MIDDLE			136	
064742-47-8	DISTILLATES (PETROLEUM), HYDROTREATED LIGHT			404	
000074-84-0	ETHANE			5676	
000141-78-6	ETHYL ACETATE			234	
000064-17-5	ETHYL ALCOHOL (ETHANOL)			280	
000100-41-4	ETHYLBENZENE			141	

002374-14-3	FLUOROSILICONE TRIMER		502
000050-00-0	FORMALDEHYDE		137
000541-05-9	HEXAMETHYLCYCLOTRISILOXANE	11932	
000999-97-3	HEXAMETHYLDISILAZANE		282
000107-46-0	HEXAMETHYLDISILOXANE	16919	
000110-54-3	HEXANE		3341
068513-26-8	HYDROCARBONS, C3-6		3290
001333-74-0	HYDROGEN		159
007647-01-0	HYDROGEN CHLORIDE	10212	5106
000067-63-0	ISOPROPYL ALCOHOL		4059
000074-82-8	METHANE		4755
000067-56-1	METHYL ALCOHOL	20539	
000074-87-3	METHYL CHLORIDE	87	
068083-14-7	METHYL PHENYL SILOXANE		3631
000075-79-6	METHYLTRICHLOROSILANE	17448	
001185-55-3	METHYLTRIMETHOXYSILANE	17448	
008030-30-6	NAPTHA		1977
010024-97-2	NITROUS OXIDE		4028
000556-67-2	OCTAMETHYLCYCLOTETRASILOXANE	155000	5
0NY210-00-0	OXIDES OF NITROGEN	567053	
0NY075-00-0	PARTICULATES	47321	
000109-66-0	PENTANE		4760
0NY075-02-5	PM 2.5		14919
0NY075-00-5	PM-10	31032.14	
007691-02-3	SILANAMINE, 1-ETHENYL-N-(ETHENYLDIMETHYLSILYL)-1,1-DIMETHYL-		238
007803-62-5	SILANE		3101
068479-14-1	SILANE, CHLOROMETHYL DERIVS	60	
001066-35-9	SILANE,CHLORODIMETHYL	60	
004253-34-3	SILANETRIOL, METHYL-, TRIACETATE		155
063148-62-9	SILOXANES AND SILICONES,DI-ME		469
007446-09-5	SULFUR DIOXIDE		1602
000108-88-3	TOLUENE	43030	
0NY100-00-0	TOTAL HAP	37860	
000075-77-4	TRIMETHYLCHLOROSILANE		50
068083-19-2	VINYL TERMINATED POLYDIMETHYL		3343

	SILOXANE		
0NY998-00-0	VOC	24500	
001330-20-7	XYLENE, M, O & P MIXT.		1123
000106-42-3	XYLENE, PARA-		41

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

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

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

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

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)
This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

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

iii. The Department or the Administrator determines that the Title V permit

must be revised or reopened to assure compliance with applicable requirements.

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

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

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	224	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.12	72	General provisions - Circumvention
FACILITY	40CFR 60-A.13(a)	73	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.13(d)	74	General provisions - Monitoring

			requirements
FACILITY	40CFR 60-A.4	68	General provisions - Address
FACILITY	40CFR 60-A.7(b)	69	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(d)	70	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(f)	71	Notification and Recordkeeping
FACILITY	40CFR 60-Db.44b(h)	75	Standards for Nitrogen Oxides Provisions.
FACILITY	40CFR 60-Db.48b(c)	76	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
FACILITY	40CFR 60-Db.48b(f)	77	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
FACILITY	40CFR 60-Db.49b(g)	78	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-Kb.112b(a)(3)	79	NSPS for volatile organic liquid storage vessels- standard for volatile organic compounds (VOC)
FACILITY	40CFR 60-Kb.113b(c)	80	NSPS for volatile organic liquid storage vessels- testing and procedures
FACILITY	40CFR 60-Kb.115b(c)	81	NSPS for volatile organic liquid storage vessels- reporting and recordkeeping requirements
FACILITY	40CFR 60-Kb.116b(b)	82	NSPS for volatile organic liquid storage vessels- monitoring of operations
FACILITY	40CFR 61-A	83	General Provisions - applicability of part 61
FACILITY	40CFR 61-M.145	84	Asbestos standards: standard for demolition and renovation
FACILITY	40CFR 63-A.6(e)(1)	85	General Provisions - Operations and Maintenance Requirements During Startup, Shutdown, and Malfunction
FACILITY	40CFR 63-A.6(e)(3)	86	Startup, Shutdown and Malfunction Plan
FACILITY	40CFR 63-A.6(f)(1)	87	Compliance with Nonopacity Standards (MACT Gen. Prov.)
FACILITY	40CFR 63-DDDDD.7540(a)	173, 174	ICI Boiler Major Source NESHAP -

FACILITY	40CFR 63-DDDDD.7545(e)	175	Continuous Compliance ICI Boiler Major Source NESHAP - Notification of Compliance Status
FACILITY	40CFR 63-DDDDD.7550(b)	176	ICI Boiler Major Source NESHAP - Reporting Requirements
FACILITY	40CFR 63-F.105	88	Subpart F - HON NESHAP - maintenance wastewater requirements
FACILITY	40CFR 63-FFFF.2450(a)	177	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - General Requirements
FACILITY	40CFR 63-FFFF.2450(b)	178	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Determination of halogenated vent streams
FACILITY	40CFR 63-FFFF.2450(e)	179, 180	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
FACILITY	40CFR 63-FFFF.2450(e)(1	181	Miscellaneous Organic Chemical Mfg. NESHAP - Control Devices
FACILITY	40CFR 63-FFFF.2450(e)(4	182	Miscellaneous Organic Chemical Mfg. NESHAP - General Requirements for Control Devices
FACILITY	40CFR 63-FFFF.2450(h)	183	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Design Evaluations
FACILITY	40CFR 63-FFFF.2450(i)	184	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Outlet Concentration Correction for Combustion Devices
FACILITY	40CFR 63-FFFF.2450(k)	185	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Parameter Monitoring
FACILITY	40CFR 63-FFFF.2450(l)	186	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Startup, Shutdown, and Malfunctions
FACILITY	40CFR 63-FFFF.2450(m)	187	Miscellaneous Organic Chemical Mfg NESHAP - General reporting requirements
FACILITY	40CFR 63-FFFF.2450(p)	188, 189	Miscellaneous Organic Chemical

			Manufacturing NESHAP (MON) - Opening of Safety Devices
FACILITY	40CFR 63-FFFF.2455(a)	190, 191, 192, 193	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Emission limits
FACILITY	40CFR 63-FFFF.2455(b)	194	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Group 1 or TRE calculations
FACILITY	40CFR 63-FFFF.2460(a)	195, 196, 197	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Emission limits
FACILITY	40CFR 63-FFFF.2460(b)	198	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
FACILITY	40CFR 63-FFFF.2460(c)	199	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Exceptions to Subpart SS
FACILITY	40CFR 63-FFFF.2460(c)(7	200	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Intermittent flow to the control device
FACILITY	40CFR 63-FFFF.2465(a)	201, 202, 203	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Process Vents Emitting Halogens or PM - emission limits
FACILITY	40CFR 63-FFFF.2470(e)	204	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tanks - Vapor Balancing Alternative
FACILITY	40CFR 63-FFFF.2480	205	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
FACILITY	40CFR 63-FFFF.2480(e)(1	206	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Pressure Release Provisions
FACILITY	40CFR 63-FFFF.2480(e)(3	207	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Pressure Release Provisions
FACILITY	40CFR 63-FFFF.2485(c)	208	Miscellaneous Organic

			Chemical Manufacturing NESHAP (MON) - Wastewater Requirements - group 1 wastewater streams
FACILITY	40CFR 63-FFFF.2515	209	Miscellaneous Organic Chemical Mfg NESHAP - Notifications
FACILITY	40CFR 63-FFFF.2520(c)	210, 211	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Reporting Requirements - Precompliance report
FACILITY	40CFR 63-FFFF.2520(f)	212	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Performance Test Reports
FACILITY	40CFR 63-FFFF.2525	213	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
FACILITY	40CFR 63-FFFF.2525(t)	214	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Electronic Records
FACILITY	40CFR 63-FFFF.2540	215	Miscellaneous Organic Chemical Mfg NESHAP - General Provisions
FACILITY	40CFR 63-G.114(a)(1)(i)	89	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-monitoring requirements
FACILITY	40CFR 63-G.114(a)(4)(i)	90	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-monitoring requirements
FACILITY	40CFR 63-G.114(a)(4)(ii	91, 92, 93, 94	Subpart G - HON NESHAP for Process Vents, Storage Vessels,etc-process vent provisions-monitoring requirements
FACILITY	40CFR 63-G.132(f)	95	HON - process wastewater provisions - general
FACILITY	40CFR 63-G.133(a)(1)	96, 97	HON - process wastewater provisions - wastewater tanks
FACILITY	40CFR 63-G.133(a)(2)	98	HON - process wastewater provisions - wastewater tanks
FACILITY	40CFR 63-G.133(f)	99	HON - process wastewater provisions - wastewater tanks

FACILITY	40CFR 63-G.135(b)	100, 101, 102	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.135(c)	103	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.135(e)	104	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.135(f)	105	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.136	106	HON - process wastewater provisions - individual drain systems
FACILITY	40CFR 63-G.138(a)	107	HON - process wastewater provisions - oil-water separators
FACILITY	40CFR 63-G.138(k)	108	Hazardous Organic NESHAP - Residuals from Group 1 Wastewater Streams
FACILITY	40CFR 63-G.139(b)	109	HON - process wastewater provisions - control devices
FACILITY	40CFR 63-G.139(c)	110	HON - process wastewater provisions - control devices
FACILITY	40CFR 63-G.139(f)	111	HON - process wastewater provisions - control devices
FACILITY	40CFR 63-G.140	112	HON - process wastewater provisions - inspection and monitoring of operations
FACILITY	40CFR 63-G.143(e)	113	HON - process wastewater provisions - inspection and monitoring of operations
FACILITY	40CFR 63-G.143(g)	114	HON - process wastewater provisions - inspection and monitoring of operations
FACILITY	40CFR 63-G.146(b)	115	HON - process wastewater provisions - reporting
FACILITY	40CFR 63-G.147	116	HON - process wastewater provisions - recordkeeping
FACILITY	40CFR 63-G.148	117	Leak inspection provisions
FACILITY	40CFR 63-GGG.1253	216	Pharmaceutical MACT - Storage tank standards
FACILITY	40CFR 63-GGGGG.7881(c)	217	Site Remediation NESHAP - Sources Subject Only To Limited Recordkeeping
FACILITY	40CFR 63-SS.983(a)	118	GMACT - Standards for closed vent systems -

			closed vent system equipment and operating requirements
FACILITY	40CFR 63-SS.983(b)	119	GMACT - Standards for closed vent systems - closed vent system inspection requirements
FACILITY	40CFR 63-SS.983(c)	120	GMACT - Requirements for closed vent systems - closed vent system inspection procedures
FACILITY	40CFR 63-SS.983(d)	121	GMACT - Requirements for closed vent systems - closed vent system leak repair provisions
FACILITY	40CFR 63-SS.988(a)	122	NESHAP For Closed Vent Systems, Control Devices, etc. - Incinerators, boilers, and process heaters equipment and operating
FACILITY	40CFR 63-SS.988(b)	123	NESHAP For Closed Vent Systems, Control Devices, etc. - Incinerators, boilers, and process heaters - performance tests
FACILITY	40CFR 63-SS.990(a)	124	NESHAP For Closed Vent Systems, Control Devices, etc. - Absorbers & Condensers as Control Devices - equipment and operation
FACILITY	40CFR 63-SS.990(b)	125	NESHAP For Closed Vent Systems, Control Devices, etc. - Absorbers & Condensers as Control Devices - performance testing
FACILITY	40CFR 63-SS.994(a)(2)	126	NESHAP for Closed Vent Systems & Control Devices - Halogen Scrubbers & Other Reduction Devices - equipment and operating
FACILITY	40CFR 63-SS.996	127	GMACT - General monitoring requirements for control and recovery devices
FACILITY	40CFR 63-SS.996(d)	128	NESHAP for Closed Vent Systems & Control Devices - Alternatives to Monitoring Requirements

FACILITY	40CFR 63-SS.997(c)(3)	129	GMACT - Change in Control Device
FACILITY	40CFR 63-SS.998(a)(2)	130, 131	Recordkeeping Requirements
FACILITY	40CFR 63-SS.998(b)	132	Recordkeeping Requirements
FACILITY	40CFR 63-SS.998(c)(1)	133	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - nonflare control & recovery device - monitoring
FACILITY	40CFR 63-SS.998(c)(2)	134	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - nonflare control device - combustion monitoring
FACILITY	40CFR 63-SS.998(d)	135	Recordkeeping Requirements
FACILITY	40CFR 63-SS.998(d)(1)	136	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - Closed Vent System Records
FACILITY	40CFR 63-UU.1019	137	NESHAP for Equipment Leaks
FACILITY	40CFR 63-UU.1022	138	Equipment Identification
FACILITY	40CFR 63-UU.1023(a)	139	NESHAP for Equipment Leaks - Control Level 2 - Instrument and Sensory Monitoring for Leaks
FACILITY	40CFR 63-UU.1023(b)	140	NESHAP for Equipment Leaks - Control Level 2 - Instrument and Sensory Monitoring for Leaks - Instrument monitoring methods
FACILITY	40CFR 63-UU.1023(c)	141	NESHAP for Equipment Leaks - Control Level 2 - Instrument and Sensory Monitoring for Leaks - Use of background adjustments
FACILITY	40CFR 63-UU.1023(e)	142	NESHAP for Equipment Leaks - Control Level 2 - Instrument and Sensory Monitoring for Leaks - Leak identification and records
FACILITY	40CFR 63-UU.1024(a)	143	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair - Leak repair schedule
FACILITY	40CFR 63-UU.1024(c)	144	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair -

			Leak identification removal
FACILITY	40CFR 63-UU.1024(d)	145	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair - Delay of repair
FACILITY	40CFR 63-UU.1024(e)	146	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair - Unsafe to repair connectors
FACILITY	40CFR 63-UU.1024(f)	147	NESHAP for Equipment Leaks - Control Level 2 - Leak Repair - Records
FACILITY	40CFR 63-UU.1025(b)	148	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Leak detection
FACILITY	40CFR 63-UU.1025(c)	149	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Percent leaking valves
FACILITY	40CFR 63-UU.1025(d)	150	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Leak repair
FACILITY	40CFR 63-UU.1025(e)(1)	151	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Unsafe to monitor
FACILITY	40CFR 63-UU.1025(e)(2)	152	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Difficult to monitor
FACILITY	40CFR 63-UU.1025(e)(3)	153	NESHAP for Equipment Leaks - Control Level 2 - Valves in Gas, Vapor, and Light Liquid Service - Fewer than 250 valves
FACILITY	40CFR 63-UU.1026	154	GMACT - NESHAP for Equipment Leaks - Control Level 2 - Standards for pumps in light liquid service
FACILITY	40CFR 63-UU.1026(b)(4)	155, 156	NESHAP for Equipment Leaks - Control Level 2 - Pumps in Light Liquid Service - Visual inspections
FACILITY	40CFR 63-UU.1026(e)	157	NESHAP for Equipment Leaks - Control Level

			2 - Pumps in Light Liquid Service - Special provisions for pumps
FACILITY	40CFR 63-UU.1027(b)	158	NESHAP for Equipment Leaks - Control Level 2 - Connectors in gas, vapor, and light liquid service - Leak Detection
FACILITY	40CFR 63-UU.1027(e)(1)	159	NESHAP for Equipment Leaks - Control Level 2 - Connectors in gas, vapor, and light liquid service - Unsafe to monitor
FACILITY	40CFR 63-UU.1027(e)(2)	160	NESHAP for Equipment Leaks - Control Level 2 - Connectors in gas, vapor, and light liquid service - Inaccessible and ceramic
FACILITY	40CFR 63-UU.1028	161, 162	GMACT - NESHAP for Equipment Leaks - Control Level 2 - Standards for agitators in gas/vapor & light liquid service
FACILITY	40CFR 63-UU.1029	163	GMACT - NESHAP for Equipment Leaks - Control Level 2 - Standards for equipment in heavy liquid service, etc.
FACILITY	40CFR 63-UU.1031(f)	164	NESHAP for Equipment Leaks - Control Level 2 - Compressors - Alternative standards
FACILITY	40CFR 63-UU.1032	165	GMACT - NESHAP for Equipment Leaks - Control Level 2 - Standards for sampling connection systems
FACILITY	40CFR 63-UU.1033	166	GMACT - NESHAP for Equipment Leaks - Control Level 2 - Standards for open-ended valves or lines
FACILITY	40CFR 63-UU.1035	167	Quality Improvement Program for Pumps
FACILITY	40CFR 63-UU.1036	168	Alternative means of emission limitation: Batch processes
FACILITY	40CFR 63-UU.1038(b)	169	NESHAP for Equipment Leaks - Control Level 2 - Recordkeeping - General equipment leak records
FACILITY	40CFR 63-UU.1038(c)	170	NESHAP for Equipment Leaks - Control Level 2 - Recordkeeping - Specific equipment

			leak records
FACILITY	40CFR 63-UU.1039(a)	171	Reporting Requirements
FACILITY	40CFR 63-UU.1039(b)	172	Reporting Requirements
FACILITY	40CFR 63-ZZZZ.6625(e)	218	Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control device
FACILITY	40CFR 63-ZZZZ.6625(f)	219	Reciprocating Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
FACILITY	40CFR 63-ZZZZ.6640(f)	220	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency engines
FACILITY	40CFR 68	17	Chemical accident prevention provisions
FACILITY	40CFR 82-F	18	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 98	221	Mandatory Greenhouse Gas Reporting
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	19	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	225	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	20, 222, 223	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	14	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	15	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements -

FACILITY	6NYCRR 201-6.4(d)(4)	21	Deviations and Noncompliance Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)	22, 23	Operational Flexibility
FACILITY	6NYCRR 201-7	24	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	16	Required emissions tests.
FACILITY	6NYCRR 202-2.4(a)(3)	28	Emission statement methods and procedures
FACILITY	6NYCRR 202-2.5	7, 8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	226	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	29	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.3	30	Determination of Environmental Rating
FACILITY	6NYCRR 212-1.6(a)	31	Limiting of Opacity
FACILITY	6NYCRR 212-2.1	227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241	Requirements
FACILITY	6NYCRR 212-2.3(b)	32, 33, 34, 35, 36, 37	State Air Program Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 212-2.4(b)	38, 242, 243	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 212-3.1(a)(2)	39, 40	RACT applicability for facilities outside of Lower Orange Co and NYC Metro area
FACILITY	6NYCRR 212-3.1(c)(4)(i)	41, 42, 43, 44, 45, 46, 47, 48, 49, 50	RACT compliance plan control limits for Capture and Control
FACILITY	6NYCRR 212-3.1(c)(4)(ii	51, 52, 53, 54	Waiver provision from the capture and control requirements or surface coating limits
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 226	55	SOLVENT METAL CLEANING PROCESSES
FACILITY	6NYCRR 227-1.4(a)	56	Opacity Standard
FACILITY	6NYCRR 227-2.4(a)(1)	57	Emission limits.
FACILITY	6NYCRR 227-2.4(b)(1)	58	Emission limits.
FACILITY	6NYCRR 227-2.4(c)(1)	59	Emission limits.
FACILITY	6NYCRR 227-2.6	60	Testing, monitoring, and reporting requirements
FACILITY	6NYCRR 229.3(e)(2)(iv)	61, 62	Volatile organic liquid storage tanks

FACILITY	6NYCRR 229.3(e)(2)(v)	63	Volatile organic liquid storage tanks
FACILITY	6NYCRR 229.5(d)	64	Recordkeeping - VOL storage tanks
FACILITY	6NYCRR 231-2.6	65, 66, 67	Emission reduction credits

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

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

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

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

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, MOMENTIVE PERFORMANCE MATERIALS has been determined to be subject to the following regulations:
40 CFR 60.112b (a) (3)
This regulation requires owner or operators of storage vessels with the dimensions listed below, to install a closed vent system and control device to collect all volatile organic compounds that are discharged from the vessel. This requirement applies to storage vessels with the following dimensions: design capacity > 151 m3 containing a VOL that, as stored, has a maximum true vapor pressure > 5.2 kPa but < 76.6 kPa or with a design capacity > 75 m3 but < 151 m3 containing a VOL that, as stored, has a maximum true vapor pressure > 27.6 kPa but less than 76.7 kPa. The emissions from the storage vessel must be monitored and be less than 500 parts per million.

40 CFR 60.113b (c)
This regulation allows the owner or operator of the storage vessel equipped with a closed vent system and control device to be exempt from the requirements of 40 CFR 60.8 (General Provisions). The source owner or operator must provide documentation that the control device will achieve the required control efficiency during maximum loading conditions.

40 CFR 60.115b (c)
This regulation requires the owner or operator to keep records of the operating plan and record the measured values of the parameters monitored for the closed vent system.

40 CFR 60.116b (b)
Owners or operators of affected storage tanks with capacities greater than or equal to 10,000 gallons must keep records of the tanks dimensions and an analysis of its capacity for the life of the tank. If the tank's capacity is less than 20,000 gallons, then it is subject to no other provisions of this subpart.

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

40 CFR 60.13 (a)
This regulation specifies that all New Source Performance Standard (NSPS) affected sources that are required to have continuous monitoring systems (CMS) are subject to the requirements of Appendix B of 40 CFR Part 60 and if the CMS is used to demonstrate compliance with emission limits on a continuous basis, then it is also subject to Appendix F of 40 CFR Part 60.

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

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

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

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

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

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

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

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

40 CFR 60.7 (f)
This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40 CFR 61.145

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

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

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

40 CFR 63.1023 (a)

This citation states the requirements for instrument and sensory monitoring for leaks.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

40 CFR 63.1031 (f)
This citation states the alternative requirements for compressors.

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

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

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

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

alternatives.

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

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

40 CFR 63.1039 (a)
This citation states the requirements for the initial compliance status report.

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

40 CFR 63.105
This condition requires that the facility prepare a plan on how to manage the wastewater containing organic hazardous air pollutants that is generated during process unit maintenance or shutdown. This plan should include every task that creates this type of wastewater and how best to handle the water to minimize the amount of organic hazardous air pollutants that get released to the atmosphere.

40 CFR 63.114 (a) (1) (i)
This citation requires a temperature monitoring device for incinerator other than catalytic incinerators.

40 CFR 63.114 (a) (4) (i)
This citation states the requirement to install a continuous recorder to monitor pH of scrubber effluent.

40 CFR 63.114 (a) (4) (ii)
This citation states the requirement to install a flow meter equipped with a continuous recorder at the scrubber influent.

40 CFR 63.1253

This citation states the requirements for storage tanks.

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

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

40 CFR 63.133 (a) (2)
This citation states the emission control techniques for wastewater tanks.

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

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

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

40 CFR 63.135 (e)
This citation states the inspection requirements for containers.

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

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

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

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

40 CFR 63.139 (b)
This citation states that control devices must be operated when organic HAP are vented to them.

40 CFR 63.139 (c)
This citation states the design and operation requirements for control devices.

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

40 CFR 63.140
This citation states the provisions to delay repair of equipment.

40 CFR 63.143 (e)
This citation states the requirements for control devices.

40 CFR 63.143 (g)
This citation states the installation, calibration, and maintenance requirements for monitoring equipment.

40 CFR 63.146 (b)
This citation states the contents of the notification of compliance status for process wastewater.

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

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

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

40 CFR 63.2450 (b)
This citation states the requirement to determine if an emission stream is a halogenated vent stream.

40 CFR 63.2450 (e)
This citation states the requirements for control devices.

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

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

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

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

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

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

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

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

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

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

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

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

40 CFR 63.2460 (c)

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

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

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

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

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

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

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

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

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

40 CFR 63.2520 (c)

This citation states the requirements for a precompliance report.

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

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

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

40 CFR 63.2540
This citation states the applicability of the General Provisions to Part 63.

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

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

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

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

control practice for minimizing emissions.

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

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

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

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

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

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

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

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

40 CFR 63.983 (c)

This citation states the closed vent system inspection procedures.

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

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

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

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

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

40 CFR 63.994 (a) (2)
This citation states the requirement to operate halogen scrubbers and other halogen reduction devices.

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

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

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

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

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

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

40 CFR 63.998 (c) (2)
This citation states the recordkeeping requirements for combustion control and halogen reduction device monitoring records.

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

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

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

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

reporting of greenhouse gases.

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

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

6 NYCRR 211.1
This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212-1.3
Based upon the following requirements, all air contaminants will assigned an Environmental Rating from A to D.

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

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

6 NYCRR 212-2.1

Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point are restricted as follows:
(a) For an air contaminant listed in section 212-2.2 table 2 – high toxicity air contaminant list, of this Subpart, the facility owner or operator shall either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants, of this Subpart for the environmental rating assigned to the contaminant by the department.
(b) For any air contaminant not listed on table 2, unless it is a solid particulate described in subdivision (c) of this section, the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in subdivision 212-2.3(a), table 3 – degree of air cleaning required for criteria air contaminants of this Subpart, or subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants of this Subpart, as applicable, for the environmental rating assigned to the contaminant by the department.
(c) For a solid particulate assigned an environmental rating of B or C emitted from a process emission source, the facility owner or operator shall not allow emissions of particulate to exceed the requirements specified in section 212-2.4 of this Subpart.

6 NYCRR 212-2.3 (b)

Table 4 of 212-2.3 describes the reduction in emissions required for a non-criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 212-3.1 (a) (2)

This provision states that owners and/or operators of facilities located outside of the the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury or New York City metropolitan area with an annual potential to emit of 100 tons or more of NOx or 50 tons or more of VOCs must comply with the requirements of this section.

6 NYCRR 212-3.1 (c) (4) (i)
This provision states that owners and/or operators of emission points subject to Part 212-3 operating prior to October 20, 1994 must submit a compliance plan to the department. The compliance plan must demonstrate that the VOC emission points are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent.

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

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

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

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

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

6 NYCRR 227-2.6
This regulation establishes the compliance testing, monitoring, and reporting requirements for NOx RACT affected stationary combustion installations.

6 NYCRR 229.3 (e) (2) (iv)
This section requires a tank with submerged fill for storage of volatile organic liquids

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

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

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

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

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

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

Compliance Certification
Summary of monitoring activities at MOMENTIVE PERFORMANCE MATERIALS:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	74	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
FACILITY	78	record keeping/maintenance procedures
FACILITY	79	record keeping/maintenance procedures
FACILITY	80	record keeping/maintenance procedures
FACILITY	81	record keeping/maintenance procedures

FACILITY	82	record keeping/maintenance procedures
FACILITY	87	record keeping/maintenance procedures
FACILITY	173	record keeping/maintenance procedures
FACILITY	174	record keeping/maintenance procedures
FACILITY	175	record keeping/maintenance procedures
FACILITY	176	record keeping/maintenance procedures
FACILITY	88	record keeping/maintenance procedures
FACILITY	178	record keeping/maintenance procedures
FACILITY	179	monitoring of process or control device parameters as surrogate
FACILITY	180	record keeping/maintenance procedures
FACILITY	183	record keeping/maintenance procedures
FACILITY	184	record keeping/maintenance procedures
FACILITY	185	record keeping/maintenance procedures
FACILITY	186	record keeping/maintenance procedures
FACILITY	189	record keeping/maintenance procedures
FACILITY	190	monitoring of process or control device parameters as surrogate
FACILITY	191	monitoring of process or control device parameters as surrogate
FACILITY	192	monitoring of process or control device parameters as surrogate
FACILITY	193	monitoring of process or control device parameters as surrogate
FACILITY	194	record keeping/maintenance procedures
FACILITY	195	intermittent emission testing
FACILITY	196	monitoring of process or control device parameters as surrogate
FACILITY	197	monitoring of process or control device parameters as surrogate
FACILITY	198	record keeping/maintenance procedures
FACILITY	199	record keeping/maintenance procedures
FACILITY	200	record keeping/maintenance procedures
FACILITY	201	monitoring of process or control device parameters as surrogate
FACILITY	202	monitoring of process or control device parameters as surrogate
FACILITY	203	monitoring of process or control device parameters as surrogate
FACILITY	204	record keeping/maintenance procedures
FACILITY	205	record keeping/maintenance procedures
FACILITY	206	record keeping/maintenance procedures
FACILITY	207	record keeping/maintenance procedures
FACILITY	208	record keeping/maintenance procedures
FACILITY	210	record keeping/maintenance procedures
FACILITY	211	record keeping/maintenance procedures
FACILITY	213	record keeping/maintenance procedures
FACILITY	89	monitoring of process or control device parameters as surrogate
FACILITY	90	monitoring of process or control device parameters as surrogate
FACILITY	91	monitoring of process or control device parameters as surrogate
FACILITY	92	monitoring of process or control device parameters as surrogate
FACILITY	93	monitoring of process or control device parameters as surrogate
FACILITY	94	monitoring of process or control device parameters as surrogate
FACILITY	95	record keeping/maintenance procedures
FACILITY	96	record keeping/maintenance procedures
FACILITY	97	record keeping/maintenance procedures
FACILITY	98	record keeping/maintenance procedures
FACILITY	99	record keeping/maintenance procedures
FACILITY	100	record keeping/maintenance procedures

FACILITY	101	record keeping/maintenance procedures
FACILITY	102	record keeping/maintenance procedures
FACILITY	103	record keeping/maintenance procedures
FACILITY	104	record keeping/maintenance procedures
FACILITY	105	record keeping/maintenance procedures
FACILITY	106	record keeping/maintenance procedures
FACILITY	107	record keeping/maintenance procedures
FACILITY	108	record keeping/maintenance procedures
FACILITY	109	record keeping/maintenance procedures
FACILITY	110	monitoring of process or control device parameters as surrogate
FACILITY	111	record keeping/maintenance procedures
FACILITY	112	record keeping/maintenance procedures
FACILITY	113	record keeping/maintenance procedures
FACILITY	114	record keeping/maintenance procedures
FACILITY	115	record keeping/maintenance procedures
FACILITY	116	record keeping/maintenance procedures
FACILITY	117	record keeping/maintenance procedures
FACILITY	216	record keeping/maintenance procedures
FACILITY	217	record keeping/maintenance procedures
FACILITY	118	record keeping/maintenance procedures
FACILITY	119	record keeping/maintenance procedures
FACILITY	120	record keeping/maintenance procedures
FACILITY	121	record keeping/maintenance procedures
FACILITY	122	record keeping/maintenance procedures
FACILITY	123	record keeping/maintenance procedures
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FACILITY	125	record keeping/maintenance procedures
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FACILITY	150	record keeping/maintenance procedures
FACILITY	151	record keeping/maintenance procedures
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FACILITY	153	record keeping/maintenance procedures
FACILITY	154	record keeping/maintenance procedures
FACILITY	155	record keeping/maintenance procedures
FACILITY	156	record keeping/maintenance procedures
FACILITY	157	record keeping/maintenance procedures
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FACILITY	161	record keeping/maintenance procedures
FACILITY	162	record keeping/maintenance procedures

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FACILITY	170	record keeping/maintenance procedures
FACILITY	171	record keeping/maintenance procedures
FACILITY	172	record keeping/maintenance procedures
FACILITY	218	record keeping/maintenance procedures
FACILITY	219	record keeping/maintenance procedures
FACILITY	220	record keeping/maintenance procedures
FACILITY	221	record keeping/maintenance procedures
FACILITY	19	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	227	record keeping/maintenance procedures
FACILITY	228	record keeping/maintenance procedures
FACILITY	229	record keeping/maintenance procedures
FACILITY	230	record keeping/maintenance procedures
FACILITY	231	monitoring of process or control device parameters as surrogate
FACILITY	232	monitoring of process or control device parameters as surrogate
FACILITY	233	monitoring of process or control device parameters as surrogate
FACILITY	234	monitoring of process or control device parameters as surrogate
FACILITY	235	monitoring of process or control device parameters as surrogate
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FACILITY	238	monitoring of process or control device parameters as surrogate
FACILITY	239	monitoring of process or control device parameters as surrogate
FACILITY	240	monitoring of process or control device parameters as surrogate
FACILITY	241	monitoring of process or control device parameters as surrogate
FACILITY	32	monitoring of process or control device parameters as surrogate
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	35	monitoring of process or control device parameters as surrogate
FACILITY	36	monitoring of process or control device parameters as surrogate
FACILITY	37	monitoring of process or control device parameters as surrogate

FACILITY	38	monitoring of process or control device parameters as surrogate
FACILITY	242	intermittent emission testing
FACILITY	243	monitoring of process or control device parameters as surrogate
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	monitoring of process or control device parameters as surrogate
FACILITY	42	monitoring of process or control device parameters as surrogate
FACILITY	43	monitoring of process or control device parameters as surrogate
FACILITY	44	monitoring of process or control device parameters as surrogate
FACILITY	45	record keeping/maintenance procedures
FACILITY	46	monitoring of process or control device parameters as surrogate
FACILITY	47	monitoring of process or control device parameters as surrogate
FACILITY	48	monitoring of process or control device parameters as surrogate
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	monitoring of process or control device parameters as surrogate
FACILITY	51	monitoring of process or control device parameters as surrogate
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	monitoring of process or control device parameters as surrogate
FACILITY	57	continuous emission monitoring (cem)
FACILITY	58	intermittent emission testing
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
FACILITY	62	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures

Basis for Monitoring

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

Boilers - There is one very large boiler (>250 million Btu/hour), 2 large boilers and one medium boiler. The boilers are subject to 6NYCRR Part 227 NOx RACT (Reasonably Available Control Technology) and the very large boiler is also subject to 40 CFR 60 Subpart Db. To comply, the very large boiler operates continuous emissions monitors for Nitrogen Oxides and Oxygen. The other boilers have stack tests for Nitrogen Oxides every 5 years. The boilers are subject to Part 227 opacity requirements but since they burn natural gas, there is no expectation of excessive opacity and there is no opacity monitoring required.

The boilers have a PM-10 emission limit of 15.5 tpy under 6 NYCRR Part 201-7. fuel use will be monitored continuously, and emission will be calculated based on 12 month rolling basis to avoid being subject to 40 CFR 52.21.
The total NOx emissions from emission unit U28002 which include boiler 18 and boiler 13 may not exceed 143 tpy on an annual rolled monthly basis. emission shall be based on the rate demonstrated in the last stack test of the affected boilers. To comply with the NOx RACT, plan annual tune up will be performed on the boiler #18. NOx RACT plan must be revaluated prior to the use of oil for boiler #18. The total emissions of NOx from emission units consisting of all 4 boilers may not exceed 223.5 tpy on a rolling 12-month basis.

6 NYCRR 212-2.1

The miscellaneous organic chemical manufacturing process units consisting of the systems which are used to make products that include HAPs subject to 40 CFR 63, Subpart FFFF as well as non-MON MACT (Miscellaneous Organic NESHAP Maximum Achievable Control Technology) products. These products including HAPs and VOCs tracked under monthly MON MACT batch tracking. The vapors from each process are captured through vapor recovery system (which include condensers, hooding, & other enclosures). Each condenser's outlet temperature at the limit will be monitored to ensure sufficient control efficiency. Engineering calculation will be used as evidence of compliance with contaminant control efficiency when the measured temperature rises above the upper limit. Also, these units have control devices such as packed Gas Absorption system, high acid scrubber, wet scrubber, and spray tower to control VOC and non-VOCs. In order to compliance with all process batch operations the volumetric flow rate of the control devises will be monitored at lower limit to ensure sufficient control efficiency to be in compliance with RACT and BACT.

6 NYCRR 212-2.3 (b)

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

6 NYCRR 212-2.4 (b)
Group 1 batch vent system subject to the regulations of 40 CFR 63, Subpart FFFF. These process emission sources have bag house to control, solid particulate (or particulate matter, PM). The facility shall conduct a performance test of bag house to demonstrate compliance with the PM NAAQS based on the allowable PM emission standard of 0.050 grains per dscf.
PM emitted from these process emission sources/control consists primarily of Cristobalite (SiO2), a non-criteria air contaminant. Determine the environmental rating based on part 212-1.2 in order to demonstrate compliance with the AGC for Cristobalite. The facility shall conduct a performance test within 180-days of the baghouse (ES 97BAG) startup to demonstrate compliance with the PM NAAQS based on the allowable PM emission standard of 0.050 grains per dscf.
Also, the facility shall conduct visual observations of the baghouse exhaust daily when the process is operating to assure continuous compliance with the 0.050 grain per dscf emission standard for B rated solid particulate (or particulate matter, PM). At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safety, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions in accordance with 6 NYCRR Part 212.1.5(g).

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

6 NYCRR 227-2.4
NOx RACT studies for the very large boiler and large boilers established nitrogen oxides (NOx) emission limits. These RACT analyses have been submitted to EPA for approval as single source SIP revisions.

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

40 CFR 63.114 (a)(1) Subpart G
Box Incinerator (FBI) Vent Mode Operation subject to subpart G.
The facility has process vents connected to a combustion device, a recovery device or recapture device with monitoring equipment to comply with the HON (Hazardous Organic NESHAP) NESHAP.
In order to comply with this subpart an incinerator will be equipped with a temperature monitoring device. An incinerator other than a catalytic incinerator is used (FBI Process 430), a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.
A scrubber is used with the FBI. The pH monitoring device equipped with a continuous recorder shall be installed to monitor the minimum pH at 8.4 of the FBI IWS scrubbers.
The countercurrent scrubber flow rate of the fixed box combustor packed tower will be monitored to maintain 1017 gallons per minute.
The countercurrent scrubber flow rate of the fixed box gas absorption system will be monitored through flow meter equipped with continuous recorder to maintain 1,178 gallons per minute. The gas flow rate of the Fixed box gas absorption system will be determined using blower capacity, with appropriate adjustments for pressure drop.
Emissions from the north air stripper and south air stripper will be vented to the Fixed Box #2 incinerator or the MON MACT Thermal Oxidizer. The VOC destruction efficiency of the Fixed Box#2 shall be 95% or greater in order to compliance with Subpart G.

40 CFR 63.24 Subpart FFFF
The facility is subject to Subpart FFFF because it operates miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source of hazardous air pollutants (HAP) emissions as defined in section 112(a) of the Clean Air Act (CAA). In order to demonstrate initial and continuous compliance with this subpart, the facility shall establish emission limit, operating limit and work practice standards.
To assure compliance with emission limit, the facility shall reduce Collective uncontrolled organic HAP emission by equal to or greater than 98 percent by weight by venting emissions from a sufficient number of the vents through a closed-vent system to

the pre-scrubbers and then to Thermal Oxidizer (97OXI) or Fixed Box #2 Incinerator. The thermal oxidizer and a fixed box incinerator shall operate at a minimum daily average temperature of 1480 degrees F and 1796 F respectively, until/unless a new operating limit is established to comply with NESHAP for miscellaneous organic chemical manufacturing. The temperature monitoring device shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. The continuous parameter monitoring system (CPMS) shall be install, operational and the data verified by conducting performance tests. This monitoring requirement also applies to Group 1 (PR 715, 023 - 026) and Group 2 (PR 083) batch process vents to assure compliance with 6 NYCRR 212-3.1(c)(4)(i) -VOC RACT. In addition, this monitoring condition assures compliance with 6 NYCRR 212-2.3(b). CASH scrubber (which is a MON MACT Group 1 control device), high acid scrubber, spray tower flow rate will be monitored at all stages to ensure sufficient control efficiency to demonstrate compliance with all process batch operations under 6 NYCRR 212-3.1 for VOC and with subpart FFFF for HAPs.