

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 9-2911-00112/00234    Renewal Number: 1**



**12/13/2006**

**Facility Identification Data**

Name: OXYCHEM NIAGARA - MAIN PLANT  
Address: 47TH ST & BUFFALO AVE  
NIAGARA FALLS, NY 14302-0344

**Owner/Firm**

Name: OCCIDENTAL CHEMICAL CORP  
Address: 5005 LBJ FREEWAY  
DALLAS, TX 75244, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
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BUFFALO, NY 14203-2999

Division of Air Resources:  
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Air Permitting Contact:  
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Address: OCCIDENTAL CHEMICAL CORPORATION  
47TH ST AND BUFFALO AVE  
NIAGARA FALLS, NY 14302-0344  
Phone:7162787534

**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

Application for renewal of Air Title V Facility.

**Attainment Status**

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OXYCHEM NIAGARA - MAIN PLANT is located in the town of NIAGARA FALLS in the county of NIAGARA.

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.)

<b>Criteria Pollutant</b>	<b>Attainment Status</b>
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

\* 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**

Occidental Chemical Corporation's Niagara Falls Facility consists of two main sections: chlorine/caustic production and the specialty chemicals/chlorine derivatives production.

This permit is a renewal of the existing Title V permit.

This permit is for the specialty chemicals/chlorine derivatives production portion of the facility which primarily manufactures various halogenated aromatic organic compounds.

Emission units associated with plant operations are as follows:

- A00001 Facility Refrigeration Systems
- A00002 Facility Fugitive Emissions
- A00003 Potable/Semi Permanent Vacuum Units
- A00008 Transfer Operations not regulated by the HON.
- A00009 Miscellaneous Exempt Combustion Sources
- C00002 "C" Area Ventilation System
- C00003 "C" Area Organic Storage Tanks
- C00004 C45 Kill System
- C00005 "C" Area Product Drum Filling Station



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D00002	"D" Area Dechlorane Plus Dust Collector System
F00001	"F" Area Groundwater Storage and Treatment System
M00001	"M" Area Process Scrubbers
M00002	"M" Area Process Storage Tanks
M00003	Dechlorane Plus Process Vents
M00004	"Mc Area Ventilation System
M00005	Miscellaneous Nitrile Process Emission Points
M00006	"M" Area Waste Water Tanks
M00007	"M" Area Drum Filling Tanks Emission Points
U0000A	"U" Area Waste Water Tanks

Support facilities at the plant are as follows:

- 1) Waste storage
- 2) General building ventilation systems
- 3) Product loading/packaging
- 4) Maintenance facilities

Also, plant remedial activities are conducted on site.

The facility is permitted primarily under the following regulations:

- 1) 6 NYCRR Part 201-6 requires the facility to obtain a Title V permit
- 2) 6 NYCRR Part 212 requires process sources to install air emission control devices depending on the type of contaminant emitted and the emission rate potential.
- 3) 6 NYCRR Part 229 regulates volatile organic liquid storage tanks
- 4) 40 CFR 61 Subpart FF National Emission Standards for Benzene Waste Operations

### Permit Structure and Description of Operations

The Title V permit for OXYCHEM NIAGARA - MAIN PLANT 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

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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.

OXYCHEM NIAGARA - MAIN PLANT is defined by the following emission unit(s):

Emission unit D00002 - "D" Area Dechlorane Plus Dust Collector System

The Dechlorane Plus Process includes equipment for conveying, grinding, classifying, storing, and packaging of Dechlorane Plus product. The potential for dust generation is created during these operations. The potential for particulate emissions is mitigated by utilization of point source ventilation and particulate emission control equipment.

Emission unit D00002 is associated with the following emission points (EP):

D0101, D0102, D0104

It is further defined by the following process(es):

Process: D03 is located at 1ST & 4TH, Building D210 -

Unground Dechlorane plus is transferred from the Dechlorane Plus dryer (located in Bldg. M22) to a storage hopper located in Bldg. D-210. The hopper is equipped with a vent bag collector. The unground Dechlorane Plus is fed at a controlled rate from the storage hopper to a pulverizer. The ground and classified product is transferred by an airveyor system to the product storage hopper from which it is packed out. The top of the product storage hopper is equipped with a dust collector system for removal of particulates from the airveyor prior to discharge to the atmosphere.

Process: D04 is located at 4TH, Building D210 -

A point source ventilation system is utilized to minimize particulate emissions to the ambient air from the Dechlorane Plus Process grinding, pack out, and check scale systems located in Bldg. No. D210. The ventilation air is exhausted through a baghouse for removal of particulates prior to discharge to the atmosphere. Recovered Dechlorane Plus is recycled into the product stream.

Emission unit F00001 - "F" Area Ground Water Storage and Treatment System

The "F" Area Ground Water Storage and Treatment System consists of ground water storage, an organic phase separator, air stripper, regenerative thermal oxidizer and activated carbon treatment system. Ground water is collected using pumps in a series of bedrock wells. Phased organics are removed using a decanter system. The decanter's aqueous phase is passed through an air stripper for removal of solubilized organics. The stripper's aqueous discharge receives further treatment using activated carbon for additional organics removal. The organics contaminated air stream from the air stripper is fed to a regenerative thermal oxidation unit for thermal destruction to CO<sub>2</sub> and H<sub>2</sub>O.

Emission unit F00001 is associated with the following emission points (EP):

F5201, F5202

It is further defined by the following process(es):

Process: F01 is located at 1ST, Building BLDG F52 -

Ground water in the "F" Area is pumped by a series of collection wells into a storage tank. The

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contaminated ground water is fed from this storage tank at a controlled rate to the ground water treatment system.

Process: F02 is located at GROUND, Building BLDG F52 -

The "F" Area ground water treatment system includes an organic phase separator, air stripper, regenerative thermal oxidizer, and activated carbon system. The contaminated air stream from the air stripper is fed to the regenerative thermal oxidation unit for destruction of organics.

Emission unit M00002 - "M" Area Organic Storage Tanks

Several organic storage tanks are located in "M" Area. These multiple service tanks are utilized primarily for storage of organic raw materials and chlorinated compounds. Each tank is properly equipped to satisfy requirements of applicable regulations.

Emission unit M00002 is associated with the following emission points (EP):

M0204, M0205, M0515

It is further defined by the following process(es):

Process: M04

Emission unit M00002 contains several volatile organic (VOC) storage tanks which are associated with the Dechlorane Plus Process. Compliance must be maintained with 6NYCRR Part 229 (Petroleum and Volatile Organic Liquid Storage and Transfer)

Emission unit M00003 - Dechlorane Plus Process Vents

Process equipment contained in the Dechlorane Plus Process is vented through refrigerated condensers. The vents from the Dechlorane Plus dryer and process vent condensers are vented through the same emission point. The Dechlorane Plus dryer vent refrigerated condenser condenses organics from the excess air steam which is vented from the Dechlorane Plus dryer system. The Dechlorane Plus process vent refrigerated condenser condenses organics from a common system which vents various vessels and process equipment (reactors, C-56 treater tank, centrifuge feed tank, residue storage tank, recycle liquor tank, perchloroethylene feed tank) utilized in the production of Dechlorane Plus. The combined vents from the refrigerated condensers may be discharged, if necessary, through activated carbon system prior to atmospheric discharge to satisfy organic removal requirements.

This process equipment may be utilized to produce additional organic compounds during the term of the facilities Title V permit.

Emission unit M00003 is associated with the following emission points (EP):

M2205

It is further defined by the following process(es):

Process: M08 is located at Building BLDG M22 -

The Dechlorane Plus process equipment is vented through refrigerated vent condensers. The vents from the Dechlorane Plus dryer and process vent condensers are vented through the same emission point. The Dechlorane plus dryer vent refrigerated condenser condenses organics from the excess air stream which is vented from the Dechlorane Plus dryer system. The Dechlorane Plus process vent refrigerated condenser condenses organics from a common system which vents various vessels and process equipment (reactors, C-56 treater tank, centrifuge feed tank, residue storage tank, recycle liquor tank, perchloroethylene storage tanks) utilized in the production of Dechlorane Plus. The discharges from the refrigerated vent condensers are tied together and can be passed through an activated carbon system prior

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to atmospheric discharge. Note: Emission Source/Control M1005 (ACTIVATED CARBON ADSORPTION) can also vent through this process.

Emission unit M00004 - "M" Area Building Ventilation

Building M-15 and M-22 have general building ventilation systems, which include spot ventilation duct work. In addition, ventilation air from the Nitrile drumming station is vented through the building exhaust ventilation system.

Emission unit M00004 is associated with the following emission points (EP):  
M2209

It is further defined by the following process(es):

Process: M10 is located at Building M22 -

Building M22 has a general building ventilation system which includes spot ventilation duct work.

Emission unit U0000A - "U" Area Waste Water Tanks

The "U" Area Wastewater Treatment System includes several tanks ( a 100,000 gallon wastewater storage tank, a 25,000 gallon wastewater decant tank, 2- 3,500 gallon pH adjustment tanks, and a storage tank for pH adjusted wastewater prior to feeding it into a Calgon activated carbon system. The vents from the wastewater storage and decanting tanks are vented through activated carbon vent sorb drums.

Emission unit U0000A is associated with the following emission points (EP):  
U6001, U6003

It is further defined by the following process(es):

Process: U0AThe "U" Area Wastewater Treatment System included several tanks (Wastewater storage - 100,000 gallons., wastewater decant tank - 25,000 gallons, 2 pH adjustment tanks - 3,500 gallons each, and storage tank for pH adjusted wastewater prior to feeding into Calgon activated carbon system). The vents from the wastewater storage and decanting tanks are vented through activated carbon vent sorb drums.

Emission unit D00001 - "D" Area Organic Storage Tanks

Several organic storage tanks are located in "D" Area. These multiple service tanks are utilized primarily for storage of raw materials and chlorinated compounds. Each tank is properly equipped to satisfy the requirements of applicable regulations (including the Hazardous Organic NESHAPs as appropriate).

Emission unit D00001 is associated with the following emission points (EP):

D0002

It is further defined by the following process(es):

Process: D01

Emission unit D00001 contains several volatile organic storage tanks. Compliance must be maintained with NYCRR Part 229 (Petroleum and Volatile Organics Liquid Storage and Transfer).

Process: D02

Emission unit D00001 contains several volatile organic storage tanks. When the organic stored in a tank is not a regulated HAPs compound and is either not used as a raw material by a Hazardous Organic NESHAPs (HON) process or is not produced as a product in a HON regulated process, the tank's construction and operation is not regulated under the HON. However, compliance must be maintained

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with NYCRR Part 229 (Petroleum and Volatile Organics Liquid Storage and Transfer).

**Title V/Major Source Status**

OXYCHEM NIAGARA - MAIN PLANT is subject to Title V requirements. This determination is based on the following information:

Oxychem is a major source (greater than 10 tons/yr) of a speciated hazardous air pollutant (HAP), namely, hydrogen chloride, as well as a major source (greater than 25 tons/yr emission) of various other HAP's.

**Program Applicability**

The following chart summarizes the applicability of OXYCHEM NIAGARA - MAIN PLANT with regards to the principal air pollution regulatory programs:

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

**NOTES:**

**PSD**            Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NSR**            New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality

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Standards (NAAQS) for specified pollutants.

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

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

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

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

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

**RACT**        Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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

**Compliance Status**

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Facility is in compliance with all requirements

### SIC Codes

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

SIC Code	Description
2869	INDUSTRIAL ORGANIC CHEMICALS, NEC

### SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to 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
3-01-258-80	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - BENZENE/TOLUENE/AROMATICS/XYLENES FUGITIVE EMISSIONS (AROMATICS)
3-01-888-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUGITIVE EMISSIONS Specify in Comments Field
3-01-830-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Storage/Transfer
3-01-820-03	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - WASTEWATER AGGREGATE WASTEWATER TREATMENT
4-90-002-02	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION WASTE SOLVENT RECOVERY OPERATIONS Condenser Vent
5-04-001-51	SITE REMEDIATION  WASTE DISPOSAL: GENERAL PROCESSES: LIQUID WASTE: GENERAL: TRANSFER
5-04-105-60	SITE REMEDIATION SITE REMEDIATION - THERMAL DESTRUCTION WASTE DISPOSAL

### Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every

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chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
012125-02-9	AMMONIUM CHLORIDE		> 0 but < 2.5 tpy
000071-43-2	BENZENE (HAP)		> 0 but < 10 tpy
000098-07-7	BENZENE, TRICHLOROMETHYL (HAP)		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
000056-23-5	CARBON TETRACHLORIDE (HAP)		> 0 but < 10 tpy
007782-50-5	CHLORINE (HAP)		>= 10 tpy
0NY100-00-0	HAP	49800	
000077-47-4	HEXACHLOROCYCLOPENTADIENE (HAP)	19800	
007647-01-0	HYDROGEN CHLORIDE (HAP)		>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE (HAP)		> 0 but < 10 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 10 tpy but < 25 tpy
000098-56-6	PARACHLOROENZOTRIFLUORIDE		>= 100 tpy but < 250 tpy
0NY075-00-0	PARTICULATES		>= 10 tpy but < 25 tpy
000127-18-4	PERCHLOROETHYLENE (HAP)	19800	
007803-51-2	PHOSPHINE (HAP)		> 0 but < 10 tpy
007664-38-2	PHOSPHORIC ACID		>= 25 tpy but < 40 tpy
0NY075-00-5	PM-10		>= 10 tpy but < 25 tpy
001310-73-2	SODIUM HYDROXIDE		> 0 but < 2.5 tpy
010025-67-9	SULFUR CHLORIDE CL2S2		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		>= 10 tpy but < 25 tpy
007446-11-9	SULFUR TRIOXIDE		>= 2.5 tpy but < 10 tpy
007664-93-9	SULFURIC ACID		> 0 but < 2.5 tpy
007791-25-5	SULFURYL CHLORIDE		>= 2.5 tpy but < 10 tpy
000108-88-3	TOLUENE (HAP)		>= 10 tpy
0NY998-00-0	VOC		>= 250 tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

An emergency constitutes an affirmative defense to an action brought

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for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

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

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

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

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

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

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

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

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

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this

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permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

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

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

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

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit

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

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

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

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

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

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establishing the emissions standards or other terms or conditions of the permit.

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

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

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

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

**Item L:**

**Permit Exclusion - ECL 19-0305**

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

**Item M:**

**Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit,

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specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>	<b>Condition</b>
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	47
FACILITY	40CFR 61-A	General Provisions - applicability of part 61	32
FACILITY	40CFR 61-FF	Benzene Emissions from Benzene waste operations	33
FACILITY	40CFR 63-FFFF	National Emission Standards for Hazardous Air Pollutants:	26, 27, 28
FACILITY	40CFR 68	Miscellaneous Organic Chemical Manufacturing Chemical accident prevention provisions	20
FACILITY	40CFR 68-A.10 (d)	Applicability	34
FACILITY	40CFR 82-B	Protection of Stratospheric Ozone - servicing of motor vehicle air conditioners	35

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FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	21
FACILITY	40CFR 82-G	Protection of Stratospheric Ozone - significant new alternatives policy program	36
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	48
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	22
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	12
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	13
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 24, 37, 38
FACILITY	6NYCRR 201-6.5(a) (4)	General conditions	14
FACILITY	6NYCRR 201-6.5(a) (7)	General conditions	
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FACILITY	6NYCRR 201-6.5(a) (8)	General conditions	15
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(d) (5)	Compliance schedules	16
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5(f) (6)	Off Permit Changes	17
FACILITY	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	25, 26, 27, 28
FACILITY	6NYCRR 202-1.1	Required emissions tests.	18
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	49, 50
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	19
F-00001/F5202/F02	6NYCRR 212.11(b) (1)	Sampling and monitoring	43
D-00002/D0101/D04	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or	39

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D-00002/D0102/D03	6NYCRR 212.4 (c)	modifications General Process Emission Sources - emissions from new processes and/or modifications	40
D-00002/D0104/D03	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	41
FACILITY	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	29
FACILITY	6NYCRR 212.9 (b)	General Process Emission Sources - tables	30
F-00001/-/F01	6NYCRR 212.9 (b)	General Process Emission Sources - tables	42
M-00002/-/M04	6NYCRR 212.9 (b)	General Process Emission Sources - tables	44
M-00003/-/M08	6NYCRR 212.9 (b)	General Process Emission Sources - tables	45
U-0000A/-/U0A	6NYCRR 212.9 (b)	General Process Emission Sources - tables	46
FACILITY	6NYCRR 215	Open Fires	9
FACILITY	6NYCRR 229.3	Control requirements.	31

**Applicability Discussion:**

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

ECL 19-301.

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

6NYCRR Part 200-6

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

6NYCRR Part 200-7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

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Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-6

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

6NYCRR 201-6.5(a)(4)

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

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6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

6NYCRR Part 201-6.5(c)(2)

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

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

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6NYCRR 201-6.5(f)(6)

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

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their 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.



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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, OXYCHEM NIAGARA - MAIN PLANT has been determined to be subject to the following regulations:

#### 40CFR 61-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.

#### 40CFR 61-FF

This Subpart regulates the emission standards for benzene waste operations.

#### 40CFR 63-FFFF

This regulation is the Miscellaneous Organic NESHAP (40 CFR 63 Subpart FFFF)(MON MACT).

#### 40CFR 68-A.10 (d)

This describes the elements of the accidental release plan that is required to be included in the application for the Title V permit of this facility. Certain manufacturing processes are subject to these requirements as well as processes subject to OSHA 's safety management standards.

#### 40CFR 82-B

Subpart B of 40 CFR Part 82 implements section 609 of the Clean Air Act Amendments of 1990, as regarding the servicing of motor vehicle air conditioners (MVACs). It also implements section 608 of the Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances. The regulation applies to any person performing service on a motor vehicle as it involves the refrigerant in the motor vehicle air conditioner.

#### 40CFR 82-G

The purpose of this subpart is to implement section 612 of the Clean Air Act Amendments of 1990 regarding the safe alternatives policy on the acceptability of substitutes for ozone-depleting compounds. This program is referred to as the "Significant New Alternatives Policy" (SNAP) program. The objectives of this program are to identify substitutes for ozone-depleting compounds, to evaluate the acceptability of those substitutes, to promote the use of those substitutes believed to present lower overall risks to human health and the environment, relative to the class I and class II compounds being replaced, as well as to other substitutes for the same end-use, and to prohibit the use of

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those substitutes found, based on the same comparisons, to increase overall risks.

The regulations in this subpart describe persons and substitutes subject to reporting requirements under the SNAP program and explain preparation and submission of notices and petitions on substitutes. The regulations also establish Agency procedures for reviewing and processing EPA's determinations regarding notices and petitions on substitutes. Finally, the regulations prohibit the use of alternatives which EPA has determined may have adverse effects on human health or the environment where EPA has identified alternatives in particular industrial use sectors that on an overall basis, reduce risk to human health and the environment and are currently or potentially available. EPA will only prohibit substitutes where it has identified other substitutes for a specific application that are acceptable and are currently or potentially available.

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6NYCRR 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6NYCRR 212 .11 (b) (1)

This regulation lists alternative process monitoring methods that may be employed with department approval.

6NYCRR 212 .4 (c)

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

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 212 .9 (b)

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

6NYCRR 229 .3

This section contains the control requirements for petroleum and volatile organic liquid storage and transfer operations.

**Compliance Certification**

Summary of monitoring activities at OXYCHEM NIAGARA - MAIN PLANT:

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FACILITY	record keeping/maintenance procedures	32
FACILITY	record keeping/maintenance procedures	33
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	work practice involving specific operations	26
FACILITY	work practice involving specific operations	27
FACILITY	work practice involving specific operations	28
FACILITY	record keeping/maintenance procedures	7
FACILITY	record keeping/maintenance procedures	50
F-00001/F5202/F02	monitoring of process or control device parameters as surrogate	43
D-00002/D0101/D04	monitoring of process or control device parameters as surrogate	39
D-00002/D0102/D03	monitoring of process or control device parameters as surrogate	40
D-00002/D0104/D03	monitoring of process or control device parameters as surrogate	41
FACILITY	monitoring of process or control device parameters as surrogate	29
FACILITY	record keeping/maintenance procedures	30
F-00001/-/F01	monitoring of process or control device parameters as surrogate	42
M-00002/-/M04	monitoring of process or control device parameters as surrogate	44
M-00003/-/M08	monitoring of process or control device parameters as surrogate	45
U-0000A/-/U0A	monitoring of process or control device parameters as surrogate	46
FACILITY	record keeping/maintenance procedures	31

**Basis for Monitoring**

Temperature monitoring for a thermal oxidizer, change in pressure readings for baghouse discharges, and use of organic vapor detector for readings from discharge of carbon canisters emitting organic contaminants are the basis for monitoring in the specialty chemicals/chlorine derivatives plant.