



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-2911-00112/00234
Effective Date: 03/14/2014 Expiration Date: 03/13/2019

Permit Issued To: OCCIDENTAL CHEMICAL CORP
5005 LBJ FREEWAY
DALLAS, TX 75244

Contact: OXYCHEM NIAGARA
OCCIDENTAL CHEMICAL CORP
PO BOX 344
NIAGARA FALLS, NY 14302-0344
(716) 278-7534

Facility: OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT
BUFFALO AVE AND 47TH ST
NIAGARA FALLS, NY 14302-0344

Contact: JAMES J CZAPLA
OCCIDENTAL CHEMICAL CORPORATION
PO BOX 344
NIAGARA FALLS, NY 14302-0344
(716) 278-7534

Description:

Occidental Chemical Corporation's Niagara Falls Facility consists of two main sections: chlorine/caustic production and Dechlorane Plus production/Remedial Areas. Each of these two main sections is covered by a separate Title V Permit. The other specialty chemicals facilities and liquid waste incinerator formerly operated by the facility have been shut down and demolished, and the plant remedial activities which were previously included in the chlorine/caustic production permit are now grouped with the Dechlorane Plus production activities. Permit application 9-2911-00112/00233 is for the chlorine/caustic production portion.

This permit, Permit application 9-2911-00112/00234, is a renewal of the existing Title V Permit for the Dechlorane Plus production portion of the facility (formerly known as the Chemical Derivatives portion). This renewal permit also covers remedial activities at the facility. As part of this permit action, in order to continue to cap the facility out of major status for the applicability of 40 CFR 63 Subpart FFFF, facility-wide emission limits continue for Total HAPs, perchloroethylene, and hexachlorocyclopentadiene, and have been added for hydrogen chloride.

Emission units associated with plant operations in this portion of the facility are as follows:
A-00001 Facility Refrigeration Systems
A-00002 Facility Fugitive Emissions

New York State Department of Environmental Conservation
Facility DEC ID: 9291100112



A-00003 Portable/Semi Permanent Vacuum Units
A-00009 Miscellaneous Exempt Combustion Sources
D-00002 "D" Area Dechlorane Plus Dust Collector System
F-00001 "F" Area Groundwater Storage and Treatment System
M-00002 "M" Area Process Storage Tanks
M-00003 Dechlorane Plus Process Vents
M-00004 "M" Area Building Ventilation

Emission unit A-00008, Transfer operations not regulated by the Hazardous Organic NESHAP (HON), has been removed as a separate emission unit because the HON no longer applies to this facility. Emission unit U-0000A, "U" Area Waste Water Tank, has been shut down and cleaned/closed.

Support facilities at the plant are as follows:

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

This portion of 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
- 5) 6 NYCRR Part 201-7.1 governs facility-wide emission limits (addressed in DEC ID 9-2911-00112/00234) for Total HAPs, perchloroethylene, hexachlorocyclopentadiene, and hydrogen chloride to cap the facility out of major status for the applicability of 40 CFR 63 Subpart FFFF. The following is a list of Emission Units that contribute to each emission cap:

Total HAPs

Permit 233: B-00002, C-00001, C-00006, E-00001, J-00001, Z-00002, Z-00003, Z-00004
Permit 234: A-00002, A-00003, A-00009, D-00002, F-00001, M-00002, M-00003.

The individual HAPs which contribute to total HAP emissions include the three HAPs for which individual caps are included in this permit (perchloroethylene, hexachlorocyclopentadiene, and hydrogen chloride) as well as other HAPs for which potential emissions are below the individual 10 tons/year threshold (including but not limited to chlorine, asbestos, benzene, hydrogen fluoride, and lead).

Perchloroethylene

Permit 233: Z-00003
Permit 234: A-00002, A-00003, D-00002, M-00002, M-00003.

Hexachlorocyclopentadiene

Permit 233: Z-00003
Permit 234: A-00002, A-00003, D-00002, M-00002, M-00003.

Hydrogen Chloride

Permit 233: B-00002, C-00001, C-00006, E-00001, Z-00002, Z-00003
Permit 234: A-00003, F-00001.



HCl emissions from Permit 234 sources are minor and are tracked for EU F-00001 - "F" Area Ground Water Storage and Treatment System through records of quantities and chemical analyses of groundwater that is processed and for EU A-00003 - Portable/Semi-Permanent Vacuum Units through records of material processed. HCl emissions from Permit 233 sources associated with the HCl Synthesis Unit (Emission Units C-00006 and E-00001) are primarily limited by the control efficiency and emission rate limitations of the "C" Area, "E" Area and Tails Tower Scrubbers as well as the "E" Area loading and unloading limit of 163,000 tons per year of acid as specified in permit conditions cited under 6 NYCRR Part 212.9(b). Additional permit conditions address specific operating requirements for these scrubbers, as well as for existing scrubbers in Emission Units B-00002 and C-00001. Scrubber liquor characteristics such as temperature, specific gravity, and concentration, and operating parameters such as scrubber liquor flow rate and pump pressure are monitored and adjusted as needed to maintain operation within established ranges. The facility implements an extensive program of standard operating and maintenance procedures to ensure permit compliance. Compliance with these conditions and procedures ensures that the 9.9 tons per year emissions cap is not exceeded.

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

Permit Administrator: DOUGLAS E BORSCHEL
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



DEC GENERAL CONDITIONS

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

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-2911-00112/00234

Facility DEC ID: 9291100112



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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5005 LBJ FREEWAY
DALLAS, TX 75244

Facility: OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT
BUFFALO AVE AND 47TH ST
NIAGARA FALLS, NY 14302-0344

Authorized Activity By Standard Industrial Classification Code:
2812 - ALKALIES AND CHLORINE
2869 - INDUSTRIAL ORGANIC CHEMICALS, NEC

Permit Effective Date: 03/14/2014

Permit Expiration Date: 03/13/2019



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR Subpart 201-6: Compliance Certification
- 23 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 24 6 NYCRR 201-7.1: Facility Permissible Emissions
- *25 6 NYCRR 201-7.1: Capping Monitoring Condition
- *26 6 NYCRR 201-7.1: Capping Monitoring Condition
- *27 6 NYCRR 201-7.1: Capping Monitoring Condition
- *28 6 NYCRR 201-7.1: Capping Monitoring Condition
- 29 6 NYCRR 211.1: Air pollution prohibited
- 30 6 NYCRR 212.6 (a): Compliance Certification
- 31 6 NYCRR 212.9 (b): Compliance Certification
- 32 6 NYCRR 229.3: Compliance Certification
- 33 40CFR 61, NESHAP Subpart A: Compliance Certification
- 34 40CFR 61, NESHAP Subpart FF: Compliance Certification
- 35 40CFR 63, Subpart ZZZZ: Compliance Certification
- 36 40CFR 68.10(d), Subpart A: Program 3 - applicability
- 37 40CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC)
- 38 40CFR 82, Subpart G: Significant New Alternatives Policy Program

Emission Unit Level

- 39 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 40 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=D-00002,EP=D0101,Proc=D04



41 6 NYCRR 212.4 (c): Compliance Certification

EU=D-00002,EP=D0102,Proc=D03

42 6 NYCRR 212.4 (c): Compliance Certification

EU=D-00002,EP=D0104,Proc=D03

43 6 NYCRR 212.4 (c): Compliance Certification

EU=F-00001,Proc=F01

44 6 NYCRR 212.9 (b): Compliance Certification

EU=F-00001,EP=F5202,Proc=F02

45 6 NYCRR 212.11 (b) (1): Compliance Certification

EU=M-00002,Proc=M04

46 6 NYCRR 212.9 (b): Compliance Certification

EU=M-00003,Proc=M08

47 6 NYCRR 212.9 (b): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

48 ECL 19-0301: Contaminant List

49 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

50 6 NYCRR 211.2: Visible Emissions Limited

51 6 NYCRR 211.2: Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

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

Item A: Emergency Defense - 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 B: 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 C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 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 D: Certification by a Responsible Official - 6 NYCRR 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 E: Requirement to Comply With All Conditions - 6 NYCRR 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 F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 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 G: 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 H: 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 I: Severability - 6 NYCRR 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 J: Permit Shield - 6 NYCRR 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 K: Reopening for Cause - 6 NYCRR 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 201-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

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

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

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 201-6.4 (c)



Item 3.1:

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

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

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 03/14/2014 and 03/13/2019**

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 5: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019**

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



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

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

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill



Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).



Condition 6: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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Permit ID: 9-2911-00112/00234

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

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

NYSDEC Region 9 Headquarters
270 Michigan Avenue
Buffalo, NY 14203-2915

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

Monitoring Frequency: ANNUALLY



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

Condition 8: Recordkeeping requirements
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

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

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

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

Condition 9: Open Fires - Prohibitions
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

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

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.



- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

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



Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 03/14/2014 and 03/13/2019

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

Item 13.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 03/14/2014 and 03/13/2019

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

Item 14.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15: Requirement to Provide Information

Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 15.1:

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

Condition 16: Right to Inspect

Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)



Item 21.1:

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

Emission Unit: D-00002

Emission Unit Description:

"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 air emissions is mitigated by utilization of point source ventilation and particulate emission control equipment.

Building(s): D210

Item 21.2:

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

Emission Unit: F-00001

Emission Unit Description:

"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, filter, air stripper, regenerative thermal oxidizer and activated carbon treatment system. Ground water is collected using pumps in a series of bedrock wells and overburden collection system. 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 CO₂ and H₂O. Hydrogen chloride is also discharged from the vent.

Building(s): BLDG F52

Item 21.3:

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

Emission Unit: M-00002

Emission Unit Description:

"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.

Building(s): BLDG M22
M15 TK FM
W OF M22



Item 21.4:

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

Emission Unit: M-00003

Emission Unit Description:

Dechlorane Plus Process Vents

The M22 Dechlorane Plus process equipment is vented through a vent condenser, which uses chilled water or chilled glycol for cooling and condensing of organics from the vent gas. Then the vent gas discharges through the activated carbon system. The activated carbon system has two beds in series. When the M22 Dechlorane Plus process is in operation the activated carbon system is monitored for breakthrough with a portable hydrocarbon instrument on a daily basis. If the hydrocarbon reading at the outlet of the second bed is 300 ppm or greater both beds will be replaced. The Dechlorane Plus vent condenser condenses organics that are normally contained in the air or nitrogen vent streams from: the Dechlorane Plus Dryer system, the Dech Plus reactors, and from various other process tanks that are connected to the common vent header system.

Building(s): BLDG M22

Item 21.5:

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

Emission Unit: M-00004

Emission Unit Description:

"M" Area Building Ventilation

Building M-22 has general building ventilation systems, which include spot ventilation duct work.

Building(s): M22

Condition 22: Compliance Certification

Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 22.1:

The Compliance Certification activity will be performed for the Facility.

Item 22.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

1) Facility Refrigeration Systems - Emission Unit



A00001

Class I and Class II substances (e.g., R12 , R22) are utilized as refrigerants in the facility's processing, administrative and remedial operations. Class I and Class II refrigerant emissions at the facility are primarily fugitive in nature and occur as incidental losses. The amount of such emissions is based on material balance. Records maintained by the facility in conjunction with those provided by service contractors indicate the amount of refrigerant added to the various systems and the amounts recycled or recovered. The amount of refrigerant added to the refrigeration system is assumed to be equal to the amount lost to the atmosphere unless additional information indicates otherwise.

The facility will comply with all the applicable requirements under 40 CFR 82 (Stratospheric Ozone Depleting Substances). This will include (as applicable) product labeling, maintenance, service, repair, and disposal of refrigerant containing equipment, appliances, and motor vehicles; leak repair requirements; and recordkeeping requirements for refrigerant purchased.

Buildings: Plantwide

2) Facility Fugitive Emissions - Emission Unit A00002

The facility contains a variety of potential sources for fugitive emissions. A portion of these sources (primarily relating to leaks of VOCs and various HAPs compounds) are regulated under New York State and Federal LDAR programs.

These programs are focused on the loss of volatile compounds due to leakage from pumps, valves, flanges, etc. This emission unit includes these losses except where the emissions are included in point source emissions (e.g. fugitives which are included in the emissions from building ventilation systems) For the purpose of inventory completeness additional fugitives resulting from various maintenance activities (equipment opening, welding, painting, sandblasting, degreasing and chemical cleaning, etc.) and spills may be included in this emission unit. Also includes leaks from piping, refrigeration units, equipment, valves, connectors, compressors, pumps, portable scrubber tanks, rectifiers, back pressure, adsorbers, and other leaks of a fugitive nature.

The facility is currently not subject to any LDAR program with the exception of RCRA Subpart BB and Subpart CC that are not covered by this permit.



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

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

**Condition 24: Facility Permissible Emissions
Effective between the dates of 03/14/2014 and 03/13/2019**

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 24.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000077-47-4 PTE: 19,800 pounds per year
Name: HEXACHLOROCYCLOPENTADIENE

CAS No: 000127-18-4 PTE: 19,800 pounds per year
Name: PERCHLOROETHYLENE

CAS No: 007647-01-0 PTE: 19,800 pounds per year
Name: HYDROGEN CHLORIDE

CAS No: 0NY100-00-0 PTE: 49,800 pounds per year
Name: TOTAL HAP

**Condition 25: Capping Monitoring Condition
Effective between the dates of 03/14/2014 and 03/13/2019**

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 25.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart FFFF

Item 25.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 25.3:

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.

Item 25.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 25.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 25.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 25.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The emissions of any individual Hazardous Air Pollutant (HAP) from the facility shall not exceed 9.9 tons per year during any consecutive 12 month period. At the beginning of each month, the facility shall calculate total individual HAP emissions for the previous 12 month period.

For each calendar year that this permit is in effect, the monthly records of annual maximum individual HAP emissions must be submitted to the Department within 30 days of the end of a calendar year.

The hydrogen chloride emissions cap applies to the emission units of both Title V permits (Permit IDs 9-2911-00112/00233 and 9-2911-00112/00234) held by the facility. The following is a list of emission units that contribute to the hydrogen chloride emissions cap:
Permit 233: B-00002, C-00001, C-00006, E-00001, Z-00002, Z-00003
Permit 234: A-00003, F-00001.

HCl emissions from Permit 234 sources are minor and are tracked for EU F-00001 - "F" Area Ground Water Storage and Treatment System through records of quantities and chemical analyses of groundwater that is processed and for EU A-00003 - Portable/Semi-Permanent Vacuum Units through



records of material processed.

HCl emissions from Permit 233 sources associated with the HCl Synthesis Unit (Emission Units C-00006 and E-00001) are primarily limited by the control efficiency and emission rate limitations of the "C" Area, "E" Area and Tails Tower Scrubbers as well as the "E" Area loading and unloading limit of 163,000 tons per year of acid as specified in permit conditions cited under 6 NYCRR Part 212.9(b). Additional permit conditions address specific operating requirements for these scrubbers, as well as for existing scrubbers in Emission Units B-00002 and C-00001. Scrubber liquor characteristics such as temperature, specific gravity, and concentration, and operating parameters such as scrubber liquor flow rate and pump pressure are monitored and adjusted as needed to maintain operation within established ranges. The facility implements an extensive program of standard operating and maintenance procedures to ensure permit compliance. Compliance with these conditions and procedures ensures that the 9.9 tons per year emissions cap is not exceeded.

By maintaining actual emissions below the major source thresholds of 10 tons per year of any individual HAP, the facility is not subject to the Miscellaneous Organic NESHAP (40 CFR 63 Subpart FFFF) (MON MACT).

Parameter Monitored: HYDROGEN CHLORIDE
Upper Permit Limit: 9.9 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 26: Capping Monitoring Condition
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 26.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart FFFF

Item 26.2:

Operation of this facility shall take place in accordance with the approved criteria, emission



limits, terms, conditions and standards in this permit.

Item 26.3:

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.

Item 26.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 26.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 26.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 26.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The total Hazardous Air Pollutant (HAP) emissions from the facility shall not exceed 24.9 tons per year during any consecutive 12 month period. At the beginning of each month the facility shall calculate total HAP emissions for the previous 12 month period. For each calendar year that this permit is in effect, the monthly records of annual maximum total emissions of HAPs must be submitted to the Department within 30 days of the end of a calendar year.

The total HAP emissions cap applies to the emission units of both Title V permits (Permit IDs 9-2911-00112/00233 and 9-2911-00112/00234) held by the facility. The following is a list of emission units that contribute to the total HAP emissions cap:
Permit 233: B-00002, C-00001, C-00006, E-00001, J-00001, Z-00002, Z-00003, Z-00004

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Permit 234: A-00002, A-00003, A-00009, D-00002, F-00001, M-00002, M-00003.

The individual HAPs which contribute to total HAP emissions include the three HAPs for which individual caps are included in this permit (perchloroethylene, hexachlorocyclopentadiene, and hydrogen chloride) as well as other HAPs for which potential emissions are below the individual 10 tons/year threshold (including but not limited to chlorine, asbestos, benzene, hydrogen fluoride, and lead).

By maintaining actual emissions below the major source threshold 25 tons per year of total HAPs, the facility is not subject to the Miscellaneous Organic NESHAP (40 CFR 63 Subpart FFFF) (MON MACT).

Parameter Monitored: TOTAL HAP
Upper Permit Limit: 24.9 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Capping Monitoring Condition
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 27.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart FFFF

Item 27.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 27.3:

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.

Item 27.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an



emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 27.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 27.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000127-18-4 PERCHLOROETHYLENE

Item 27.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The emissions of any individual Hazardous Air Pollutant (HAP) from the facility shall not exceed 9.9 tons per year during any consecutive 12 month period. At the beginning of each month, the facility shall calculate total individual HAP emissions for the previous 12 month period.

For each calendar year that this permit is in effect, the monthly records of annual total individual HAP emissions must be submitted to the Department within 30 days of the end of a calendar year.

The perchloroethylene emissions cap applies to the emission units of both Title V permits (Permit IDs 9-2911-00112/00233 and 9-2911-00112/00234) held by the facility. The following is a list of emission units that contribute to the perchloroethylene emissions cap:
Permit 233: Z-00003
Permit 234: A-00002, A-00003, D-00002, M-00002, M-00003.

The facility shall submit a plan to the Department within one year after permit issuance to verify perchloroethylene emissions from the facility including emissions information from storage tank vents, process emission points, and fugitive sources. Confirmation of emissions from specific sources may require material or process testing.

By maintaining actual emissions below the major source



thresholds of 10 tons per year of any individual HAP, the facility is not subject to the Miscellaneous Organic NESHAP (40 CFR 63 Subpart FFFF) (MON MACT).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: PERCHLOROETHYLENE

Upper Permit Limit: 9.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

Condition 28: Capping Monitoring Condition
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 28.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart FFFF

Item 28.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 28.3:

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.

Item 28.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 28.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.



Item 28.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000077-47-4 HEXACHLOROCYCLOPENTADIENE

Item 28.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The emissions of any individual Hazardous Air Pollutant (HAP) from the facility shall not exceed 9.9 tons per year during any consecutive 12 month period. At the beginning of each month, the facility shall calculate total individual HAP emissions for the previous 12 month period. For each calendar year that this permit is in effect, the monthly records of annual total individual HAP emissions must be submitted to the Department within 30 days of the end of a calendar year.

The hexachlorocyclopentadiene emissions cap applies to the emission units of both Title V permits (Permit IDs 9-2911-00112/00233 and 9-2911-00112/00234) held by the facility. The following is a list of emission units that contribute to the hexachlorocyclopentadiene emissions cap:
Permit 233: Z-00003
Permit 234: A-00002, A-00003, D-00002, M-00002, M-00003.

By maintaining actual emissions below the major source thresholds of 10 tons per year of any individual HAP, the facility is not subject to the Miscellaneous Organic NESHAP (40 CFR 63 Subpart FFFF) (MON MACT).

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: SOLVENT
Parameter Monitored: HEXACHLOROCYCLOPENTADIENE
Upper Permit Limit: 9.9 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Air pollution prohibited
Effective between the dates of 03/14/2014 and 03/13/2019



Applicable Federal Requirement:6 NYCRR 211.1

Item 29.1:

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

Condition 30: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance with this requirement shall be determined by the facility owner/operator conducting daily survey (non-method 9 observation, non-quantitative opacity reading) of visible emissions from facility operating sources. If any atypical visible emissions are identified, corrective action is required as appropriate for the source. Records of daily survey of visible emissions must be retained for five years. The Department reserves the right to perform or require the performance of a method 9 opacity evaluation by firm representative.

Emission points that must be visual inspected daily include:

| Emiss Pt. | Description |
|-----------|-------------|
|-----------|-------------|

| | |
|----------|--|
| EP-D0101 | Dechlorane Plus Point Source Ventilation |
|----------|--|

| | |
|----------|---|
| EP-D0102 | Dechlorane Plus Crude Storage Hopper Vent |
|----------|---|

| | |
|----------|---|
| EP-D0104 | Dechlorane Plus Product Storage Hopper Vent |
|----------|---|

The following emission points are very minor sources that

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do not require daily visual observation of the stacks:

| Emiss. Pt. | Description |
|------------|---|
| EP-M0204 | Perchloroethylene Storage Tank |
| EP-M0205 | Hexachloropentadiene (C56) Storage Tank |
| EP-M0515 | Cyclo-Octadiene (COD) Storage Tank |
| EP-M2209 | M22 General Ventilation |
| EP-M2205 | Dechlorane Plus Vent Condenser |

The following sources, which were listed in the previous renewal of this permit, have been shut down and are no longer in use:

| | |
|----------|--|
| EP-D0002 | 24,000 gal Hexachlorocyclopentadiene (56) Storage Tank |
| EP-U6001 | Common Vent from Wastewater Storage |
| EP-U6003 | Vent from pH Adjustment Tank (6,185 Gal) |

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 31.1:
The Compliance Certification activity will be performed for the Facility.

Item 31.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility uses vacuum units to perform a variety of functions to ensure a safe and environmentally secure work place. Examples of these activities include the following:

1) Maintenance activities which require: a) fugitive emission control during a line break; evacuation of a vessel before entry; and/or, providing vacuum on a system.



- 2) Fugitive emission control during maintenance activities, process upset conditions, and sampling activities.
- 3) Material transfer operations (e.g. , residue drum loading, trailer loading) where industrial hygiene, odor or other environmental or safety concerns which require additional controls.
- 4) Emergency response for spills, line breaks, or leaks.

The truck-mounted units are exempt from permitting because they are portable.

However, some of the other units (e.g. trailer and skid-mounted units) may be used at a single plant location for an extended period of time. Furthermore, some of the utilities provided to the units need to be "hard piped" in order to meet facility safety requirements. As such, some units may be viewed as permanent air pollution control devices. The intention of this condition is to cover these units.

Before a vacuum unit is placed into service, a determination will be made as to (1) the type of unit which will be used and (2) the type and quantities of contaminants which may be vented to the unit. Examples of items which will be considered include:

- a) Should the vacuum unit be charged with water or caustic?
- b) Is a carbon bed necessary on the exhaust of the vacuum unit?

If caustic is used in the vacuum unit its concentration will be checked daily when in use. If the total alkalinity is less than 10 grams per liter, additional reagent will be added to adjust the concentration back into the appropriate range and/or the reagent will be removed and the scrubber will be charged with fresh reagent. If carbon is used on the system, its discharge will be checked with a portable VOC instrument on a weekly basis for breakthrough. If the VOC reading is 50 ppm or greater, than the carbon vapor pack will be changed out.

The sampling records will be recorded, retained for five years and will be available for inspection when requested by the agency.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 229.3

Item 32.1:
The Compliance Certification activity will be performed for the Facility.

Item 32.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Conservation Vents in place to meet Part
229(1)(d)(2)(viii) - tanks less than 10,000 gallons and no
other control:
a) Perchloroethylene Storage Tank
EU-M00002 PRO-M04 EP-M0204 ES-M0401 EC-M0402 -
conservation vent

Note: Conservation vents are incorporated into the
facility's preventive maintenance (PM) program and the
maintenance procedures listed in the PM program must be
followed for this equipment.

Tanks with submerged fill lines to meet Part
229(1)(d)(2)(vii):
a) COD tank (15,000 gal)
EU-M00002 PRO-M04 EP-M0515 ES-M0405

Tanks that are <10,000 gal but contain activated carbon
vent sorb technology:
a) M22- C56 storage tank
EU-M00002 PRO-M04 EP-M0205 ES-M0403 EC-M0404

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019



Applicable Federal Requirement:40CFR 61, NESHAP Subpart A

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000071-43-2 BENZENE

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All applicable requirements of 40CFR Part 61 Subpart A
-General Provisions apply to Occidental Chemical Corp.'s
Dechlorane Plus production/Remedial Areas plant section
due to the applicability of the standards of 40CFR Part 61
Subpart M - National Emissions Standards for Asbestos and
40CFR Part 61 Subpart FF - National Emission Standards for
Benzene Waste Operations.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 34: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:40CFR 61, NESHAP Subpart FF

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000071-43-2 BENZENE

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The total annual benzene quantity in the process waste at
the OXY Dechlorane Plus Production/Remedial Areas plant
section is less than 1 Mg/yr (<2200 lbs/ yr). Per 40CFR
Part 61.355 (a)(5)(i) OXY will comply with the record
keeping requirements of 40CFR Part 61.356 and the
reporting requirements of 40CFR Part 61.357. Per 40CFR
Part 61.355(a)(5)(ii), OXY will repeat the determination
of total annual benzene quantity from the facility waste -
whenever there is a change in the process(es) generating
the waste(s) that could cause the total annual benzene

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quantity from the facility to increase to 1 Mg/yr or more. In the event that the total annual amount of benzene changes, the owner will be required to meet the appropriate requirement in 40CFR Part 61.355(a) that apply to that amount and notify the Administrator of the change in applicable requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL TOTAL

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 35: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

| | |
|---------------------|-----------------|
| CAS No: 0NY100-00-0 | TOTAL HAP |
| CAS No: 000630-08-0 | CARBON MONOXIDE |

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In addition to the two 619 HP Caterpillar diesel powered emergency generators which are regulated under the facility's other Title V permit, DEC ID 9-2911-00112/00233, OCC maintains two 460 HP Caterpillar diesel powered fire system pumps that were manufactured in 1998 and have never been overhauled. They are considered to be "existing stationary engine of 500 HP or less at an area source" and are subject to a specific set of emission limits as well as monitoring, recordkeeping, and reporting requirements which are spelled out in an April 29, 2013 addendum to the facility's Title V permit application. OCC will maintain the generator in accordance with manufacturer instructions and will maintain records of maintenance conducted on the engines. OCC will also maintain a logbook which includes hours of operation, recorded through a non-resettable hour meter, reason for operation, and malfunctions. These recordkeeping/maintenance requirements will be incorporated into the facility's Title V Compliance Certifications.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

Condition 36: Program 3 - applicability
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:40CFR 68.10(d), Subpart A

Item 36.1:

Program 3 eligibility requirements. A covered process is subject to Program 3 if the process does not meet the requirements of paragraph (b) of §68.10, and if either of the following conditions is met:

- (1) The process is in SIC code 2611, 2812, 2819, 2821, 2865, 2869, 2873, 2879, or 2911; or
- (2) The process is subject to the OSHA process safety management standard, 29 CFR 1910.119.

The New York State Department of Environmental Conservation is not implementing the Chemical Accident Prevention Program (Part 68). All questions and plan submittals should be sent to the US Environmental Protection Agency, Region 2, New York City.

Condition 37: Servicing of Motor Vehicle Air Conditioners (MVAC)
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:40CFR 82, Subpart B

Item 37.1:

If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

Condition 38: Significant New Alternatives Policy Program
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:40CFR 82, Subpart G

Item 38.1:

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program.

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



Condition 39: Emission Point Definition By Emission Unit
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 39.1:

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

Emission Unit: D-00002

Emission Point: D0101
Height (ft.): 65 Length (in.): 10 Width (in.): 13
NYTMN (km.): 4777.9 NYTME (km.): 171.1 Building: D210

Emission Point: D0102
Height (ft.): 64 Diameter (in.): 12
NYTMN (km.): 4777.9 NYTME (km.): 171.1 Building: D210

Emission Point: D0104
Height (ft.): 69 Diameter (in.): 12
NYTMN (km.): 4777.9 NYTME (km.): 171.1 Building: D210

Item 39.2:

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

Emission Unit: F-00001

Emission Point: F5201
Height (ft.): 12 Diameter (in.): 10
NYTMN (km.): 4777.9 NYTME (km.): 171.1 Building: BLDG F52

Emission Point: F5202
Height (ft.): 50 Diameter (in.): 20
NYTMN (km.): 4777.9 NYTME (km.): 171.1 Building: BLDG F52

Item 39.3:

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

Emission Unit: M-00002

Emission Point: M0204
Height (ft.): 1 Diameter (in.): 2
NYTMN (km.): 4777.9 NYTME (km.): 171.1 Building: W OF M22

Emission Point: M0205
Height (ft.): 1 Diameter (in.): 2
NYTMN (km.): 4777.9 NYTME (km.): 171.1 Building: W OF M22

Emission Point: M0206
Height (ft.): Length (in.): Width (in.):
NYTMN (km.): 4777.567 NYTME (km.): 173.751

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Emission Point: M0515
Height (ft.): 26 Diameter (in.): 5
NYTMN (km.): 4777.4 NYTME (km.): 173.6 Building: BLDG M15

Item 39.4:

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

Emission Unit: M-00003

Emission Point: M2205
Height (ft.): 79 Diameter (in.): 3
NYTMN (km.): 4777.2 NYTME (km.): 173.8 Building: BLDG M22

Item 39.5:

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

Emission Unit: M-00004

Emission Point: M2209
Height (ft.): 93 Diameter (in.): 24
NYTMN (km.): 4777.2 NYTME (km.): 173.8 Building: M22

Condition 40: Process Definition By Emission Unit

Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 40.1:

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

Emission Unit: D-00002
Process: D03 Source Classification Code: 3-01-258-80
Process Description:

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 Dechlorane Plus is fed at a controlled rate from the storage hopper to a pulverizer. The 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.

Emission Source/Control: D0302 - Control
Control Type: FABRIC FILTER

Emission Source/Control: D0304 - Control
Control Type: FABRIC FILTER

Emission Source/Control: D0301 - Process



Emission Source/Control: D0303 - Process

Item 40.2:

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

Emission Unit: D-00002
Process: D04 Source Classification Code: 3-01-258-80
Process Description:

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 Source/Control: D0402 - Control
Control Type: FABRIC FILTER

Emission Source/Control: D0401 - Process

Item 40.3:

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

Emission Unit: F-00001
Process: F01 Source Classification Code: 5-04-001-51
Process Description:

Ground water in the "F" Area is pumped by a series of collection wells into a decanter/storage tank. The vent from the storage tank is controlled through an activated carbon system. The contaminated ground water is fed from this storage tank at a controlled rate to the ground water treatment system.

Emission Source/Control: F0102 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: F0101 - Process

Item 40.4:

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

Emission Unit: F-00001
Process: F02 Source Classification Code: 5-04-105-60
Process Description:

The "F" Area ground water treatment system includes an organic phase separator, filter, air stripper,

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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 Source/Control: F0202 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: F0201 - Process

Item 40.5:

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

Emission Unit: M-00002
Process: M04 Source Classification Code: 3-01-830-01
Process Description:

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 Source/Control: M0402 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: M0404 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: M0408 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: M0401 - Process

Emission Source/Control: M0403 - Process

Emission Source/Control: M0405 - Process

Item 40.6:

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

Emission Unit: M-00003
Process: M08 Source Classification Code: 4-90-002-02
Process Description:

The Dechlorane Plus process equipment is vented through a vent condenser which uses chilled water or chilled glycol for cooling and condensing of organics for recycle back to the system. The Dechlorane Plus process vent 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 vent from the Dechlorane Plus dryer condenser is vented through the same vent condenser. The Dechlorane Plus dryer vent condenser condenses organics from the excess air stream which is vented from the Dechlorane Plus dryer system. The discharge from the vent condensers is passed through an activated carbon system prior to atmospheric discharge.

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

Emission Source/Control: M0704 - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0705 - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0806 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: M0701 - Process

Emission Source/Control: M0702 - Process

Item 40.7:

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

Emission Unit: M-00004
Process: M10 Source Classification Code: 3-01-888-01
Process Description:

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

Emission Source/Control: M1003 - Process

Condition 41: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: D-00002 Emission Point: D0101
Process: D04

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 41.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Unit D00002 "D" Area Dechlorane Plus Vent Dust
Collector Systems
Process Unit D04 - Dec Plus Point Source Ventilation
System for Grinding, Pack Out and Check Scale
System
Emission Point D0101 - Dec Plus Point Source
Ventilation
Emission Control EC-D0402- Dust Collector

A point source ventilation system is utilized to minimize particulate emissions to the ambient air from the Dec Plus process grinding, pack out, and check scale system located in Building 210. The ventilation air is exhausted through a bag house for removal of particulates prior to its discharge to the atmosphere. The dust collector will be in operation whenever the grinding and bagging system is in operation. The pressure drop across the dust collector will be monitored once per shift when in operation and the pressure will be maintained between the approximate range of 1 to 6 inches of water. This pressure drop will be noted in the operating log, retained for five years and will be available for inspection when requested by the agency.

NOTE: BAGHOUSE MONITORING OF PRESSURE CHANGE MUST BE CONDUCTED ONCE PER SHIFT BY OXYCHEM PERSONNEL WHENEVER PROCESS IS IN OPERATION. PRESSURE DROP LIMITS OF MONITORING ARE INTENDED TO BE INDICATORS THAT THE GRAIN LOADING STANDARD, EITHER 0.05 OR 0.15 GR/DSCF AS APPROPRIATE FOR THE SOURCE, IS BEING ACHIEVED. OPERATION OF THE BAGHOUSE OUTSIDE OF THE LIMITS OF MONITORING SHALL TRIGGER INVESTIGATION OF BAGHOUSE PERFORMANCE BY APPROPRIATE OXYCHEM PERSONNEL.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 6 inches of water

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.



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

Condition 42: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: D-00002 Emission Point: D0102
Process: D03

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 42.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Unit D00002 - "D" Area
Dechlorane Plus Dust Collector
Systems
Process Unit D03 - Dec Plus Storage,
Grinding and Packing System
Emission Point D0102 - Dec Plus Crude
Storage Hopper Vent
Emission Control EC-D0302- Dust
Collector

Unground Dechlorane Plus is transferred from the Dechlorane Plus Dryer (located in M-22) to the crude storage hopper located in building D-210. The hopper is equipped with a vent bag collector (EP D0102). The pressure drop across the dust collector will be monitored once per shift when in operation and the pressure will be maintained between the approximate range of 1 to 4 inches of water. This pressure drop will be noted in the operating log, retained for five years and will be available for inspection when requested by the agency.

NOTE: BAGHOUSE MONITORING OF PRESSURE CHANGE MUST BE CONDUCTED ONCE PER SHIFT BY OXYCHEM PERSONNEL WHENEVER PROCESS IS IN OPERATION. PRESSURE DROP LIMITS OF



MONITORING ARE INTENDED TO BE INDICATORS THAT THE GRAIN LOADING STANDARD, EITHER 0.05 OR 0.15 GR/DSCF AS APPROPRIATE FOR THE SOURCE, IS BEING ACHIEVED. OPERATION OF THE BAGHOUSE OUTSIDE OF THE LIMITS OF MONITORING SHALL TRIGGER INVESTIGATION OF BAGHOUSE PERFORMANCE BY APPROPRIATE OXYCHEM PERSONNEL.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 4 inches of water

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

Condition 43: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: D-00002

Emission Point: D0104

Process: D03

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 43.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Unit D00002 - "D" Area Dechlorane Plus Dust Collector Systems

Process Unit D03 - Dec Plus Storage, Grinding and Packing System

Emission Point D0104 - Dec Plus Product Storage Hopper Vent

Emission Control EC-D0304- Dust Collector

The unground Dechlorane Plus is fed at a controlled rate from the crude 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 the removal of particulates from the airveyor air prior to its discharge to the atmosphere. The dust collector (EP-D0104) will be in operation whenever the system is in operation. The pressure drop across the dust collector will be monitored once per shift when in operation and the pressure will be maintained between the approximate range of 1 to 4 inches of water. This pressure drop will be noted in the operating log, retained for five years and be available for inspection when requested by the agency.

NOTE: BAGHOUSE MONITORING OF PRESSURE CHANGE MUST BE CONDUCTED ONCE PER SHIFT BY OXYCHEM PERSONNEL WHENEVER PROCESS IS IN OPERATION. PRESSURE DROP LIMITS OF MONITORING ARE INTENDED TO BE INDICATORS THAT THE GRAIN LOADING STANDARD, EITHER 0.05 OR 0.15 GR/DSCF AS APPROPRIATE FOR THE SOURCE, IS BEING ACHIEVED. OPERATION OF THE BAGHOUSE OUTSIDE OF THE LIMITS OF MONITORING SHALL TRIGGER INVESTIGATION OF BAGHOUSE PERFORMANCE BY APPROPRIATE OXYCHEM PERSONNEL.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 1 inches of water
Upper Permit Limit: 4 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 44: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 44.1:
The Compliance Certification activity will be performed for:

Emission Unit: F-00001
Process: F01

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

New York State Department of Environmental Conservation

Permit ID: 9-2911-00112/00234

Facility DEC ID: 9291100112



Item 44.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Unit F00001 - "F" Area Groundwater Storage and
Treatment System

Process Unit F01 - "F" Area Groundwater Storage

Emission Point F5201 - Groundwater Storage Tank

Emission Control F0102 - Carbon Drum

Ground water in the "F" Area is pumped by a series of collection wells and overburden collection system into a storage tank, ES-F0101, and its associated emission point, EP-F5201. The tank vents to a carbon drum before being exhausted to the atmosphere. The contaminated ground water is fed from this storage tank at a controlled rate to the ground water treatment system. The carbon drum will be sampled with an HNU meter (or similar type organic meter) at least once per month to verify that break through of VOC's has not occurred. If the organic reading is greater than 50 ppm then the carbon drum will be replaced. The sampling records will be retained for five years and be available for inspection when requested by the agency.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOC's

Parameter Monitored: CONCENTRATION

Upper Permit Limit: 50 parts per million (by volume)

Reference Test Method: SEE PERMIT MONITORING DESCRIPTION

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

Condition 45: Compliance Certification

Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement:6 NYCRR 212.11 (b) (1)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: F-00001

Emission Point: F5202

Process: F02

New York State Department of Environmental Conservation

Permit ID: 9-2911-00112/00234

Facility DEC ID: 9291100112



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

Item 45.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Unit F00001 - "F" Area Groundwater Storage and Treatment System
Process Unit F02 - "F" Area Groundwater Treatment System
Emission Point F5202 - Vent from Regenerative Thermal Oxidizer
Emission Control F0202 - Regenerative Thermal Oxidizer

The "F" Area groundwater treatment system includes an organic phase separator, filter, 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 the organics. The temperature of the thermal oxidizer will be continuously monitored at minimum of 15 minute intervals and recorded to maintain the temperature above 1300 deg F. Each day the operator will check that temperature monitoring is operating properly. If the temperature goes out of this range the feed pump of contaminated groundwater to the air stripper is automatically shutoff until the temperature is brought back into range. The monitoring records will be retained for five years and be available for inspection when requested by the agency.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1300 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 46.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00112/00234

Facility DEC ID: 9291100112



Emission Unit: M-00002

Process: M04

Regulated Contaminant(s):

CAS No: 000077-47-4 HEXACHLOROCYCLOPENTADIENE

Item 46.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Unit M00002 - "M" Area Process Storage
Tanks

Process Unit M04 - "M" Area Dechlorane Plus Process
Storage Tanks

Emission Points M0205 and M0206 -
Hexachlorocyclopentadiene

Emission Controls EC-M0404 and EC-M0408 - Activated Carbon
Vent Sorb Drum

This 5,000 gallon storage tank is used to store hexachlorocyclopentadiene which is a raw material in the dechlorane plus process. The activated carbon system will be monitored with a portable hydrocarbon instrument for breakthrough on a monthly basis (if the tanks are in service). If the hydrocarbon reading is 50 ppm or greater, than the activated carbon will be changed. The sampling records will be recorded, retained for five years and will be available for inspection when requested by the agency.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: GASEOUS WASTE

Parameter Monitored: CONCENTRATION

Upper Permit Limit: 50 parts per million (by volume)

Reference Test Method: SEE PERMIT MONITORING DESCRIPTION

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

Condition 47: Compliance Certification

Effective between the dates of 03/14/2014 and 03/13/2019

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 47.1:

The Compliance Certification activity will be performed for:



Emission Unit: M-00003
Process: M08

Regulated Contaminant(s):
CAS No: 000127-18-4 PERCHLOROETHYLENE

Item 47.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission Unit M00003 - Dechlorane Plus Process
Vents
Process Unit M08 - Dechlorane Plus Process with
Refrigerated Condensers and Activated Carbon
Emission Point M2205 - Dechlorane Plus Raw Material
Tanks
Emission Control EC-M0806 - Activated Carbon Vent Sorb
Pack

(Dechlorane Plus Process Vent): The M22 Dechlorane Plus process equipment is vented through a vent condenser, which uses chilled water or chilled glycol for cooling and condensing of organics from the vent gas. Then the vent gas discharges through the activated carbon system. The activated carbon system has two beds in series. When the M22 Dechlorane Plus process is in operation the activated carbon system is monitored for breakthrough with a portable hydrocarbon instrument on a daily basis. If the hydrocarbon reading at the outlet of the second bed is 300 ppm or greater both beds will be replaced. A reading above 300 ppm will be reported as a permit deviation. The sampling records will be maintained for five years and will be available for inspection when requested by the agency.

Note: The Dechlorane Plus vent condenser condenses organics that are normally contained in the air or nitrogen vent streams from: the Dechlorane Plus Dryer system, the Dech Plus reactors, and from various other process tanks that are connected to the common vent header system.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: GASEOUS WASTE
Parameter Monitored: CONCENTRATION
Upper Permit Limit: 300 parts per million (by volume)
Reference Test Method: SEE PERMIT MONITORING DESCRIPTION
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 9-2911-00112/00234

Facility DEC ID: 9291100112



Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

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

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

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

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

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

Condition 48: Contaminant List
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable State Requirement:ECL 19-0301

Item 48.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000071-43-2
Name: BENZENE



CAS No: 000077-47-4
Name: HEXACHLOROCYCLOPENTADIENE

CAS No: 000127-18-4
Name: PERCHLOROETHYLENE

CAS No: 000630-08-0
Name: CARBON MONOXIDE

CAS No: 007647-01-0
Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY100-00-0
Name: TOTAL HAP

CAS No: 0NY998-00-0
Name: VOC

**Condition 49: Malfunctions and start-up/shutdown activities
Effective between the dates of 03/14/2014 and 03/13/2019**

Applicable State Requirement:6 NYCRR 201-1.4

Item 49.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.



(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 50: Visible Emissions Limited
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable State Requirement:6 NYCRR 211.2

Item 50.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 51: Compliance Demonstration
Effective between the dates of 03/14/2014 and 03/13/2019

Applicable State Requirement:6 NYCRR 211.2

Item 51.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 51.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Occidental Chemical's Procedure ER-1 is in place to manage complaints related to air emissions from this facility. The procedure is designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. ER-1 includes the following components:

1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

New York State Department of Environmental Conservation

Permit ID: 9-2911-00112/00234

Facility DEC ID: 9291100112



DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

