



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-2911-00112/00234

Renewal Number: 2

03/17/2014

Facility Identification Data

Name: OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT

Address: BUFFALO AVE AND 47TH ST

NIAGARA FALLS, NY 14302-0344

Owner/Firm

Name: OCCIDENTAL CHEMICAL CORP

Address: 5005 LBJ FREEWAY

DALLAS, TX 75244, USA

Owner Classification: Corporation/Partnership

Permit Contacts

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NIAGARA FALLS, NY 14302-0344

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Permit Description

Introduction

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

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

Attainment Status

OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT is located in the town of NIAGARA FALLS in



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the county of NIAGARA.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

Occidental Chemical Corporation's Niagara Falls Facility consists of two main sections: chlorine/caustic production and 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
- 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



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Emission unit A-00008, Transfer operations not regulated by the HON, has been removed as a separate emission unit because the HON does not apply 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

Permit Structure and Description of Operations

The Title V permit for OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT is defined by the following emission unit(s):

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

The "F" Area Ground Water Storage and Treatment System consists of ground water storage, an organic phase separator, 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.

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



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F5201, F5202

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

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

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

The "F" Area ground water treatment system includes an organic phase separator, 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 organics.

Emission unit M00002 - "M" Area Organic Storage Tanks

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

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

M0204, M0205, M0206, M0515

Process: M04

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

Emission unit M00003 - Dechlorane Plus Process Vents

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.

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

M2205

Process: M08 is located at Building BLDG M22 -

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



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

Emission unit M00004 - "M" Area Building Ventilation

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

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

Process: M10 is located at Building M22 -

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

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

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

Emission unit D00002 is associated with the following emission points (EP):
D0101, D0102, D0104

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

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

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

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

Title V/Major Source Status

OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT is subject to Title V requirements. This determination is based on the following information:

When the facility received its initial Title V permits, it was major for HCl and several chlorinated organic HAPs. Over the last fifteen years numerous production operations have been shut down and removed. The facility is capped out of major status for the applicability of 40 CFR 63 Subpart FFFF by emissions capping in DEC ID 9-1922-00112/00234 for total HAPs, perchloroethylene, hexachlorocyclopentadiene, and hydrogen chloride.

The facility is not major for carbon dioxide or GHG (carbon dioxide equivalents) as the facility wide potential to emit for both is well below the major source threshold of 100,000 tons per year.

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Program Applicability

The following chart summarizes the applicability of OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT with regards to the principal air pollution regulatory programs:

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

NOTES:

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

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

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

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



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known as MACT. The corresponding regulations apply to specific source types and contaminants.

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

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

SIC Code

Description

2812
2869

ALKALIES AND CHLORINE
INDUSTRIAL ORGANIC CHEMICALS, NEC

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution

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emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-01-258-80	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - BENZENE/TOLUENE/AROMATICS/XYLENES FUGITIVE EMISSIONS (AROMATICS)
3-01-830-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Storage/Transfer
3-01-888-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUGITIVE EMISSIONS Specify in Comments Field
4-90-002-02	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION WASTE SOLVENT RECOVERY OPERATIONS Condenser Vent
5-04-001-51	SITE REMEDIATION
5-04-105-60	WASTE DISPOSAL: GENERAL PROCESSES: LIQUID WASTE: GENERAL: TRANSFER SITE REMEDIATION SITE REMEDIATION - THERMAL DESTRUCTION WASTE DISPOSAL

Facility Emissions Summary

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

Cas No.	Contaminant Name	PTE	Range
		lbs/yr	
000071-43-2	BENZENE		> 0 but < 10 tpy
000124-38-9	CARBON DIOXIDE		>= 250 tpy but < 75,000 tpy
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		>= 250 tpy but < 75,000 tpy
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
007782-50-5	CHLORINE		>= 10 tpy



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000077-47-4	HEXACHLOROCYCLOPENTAD IENE	19800	
007647-01-0	HYDROGEN CHLORIDE	19800	
007664-39-3	HYDROGEN FLUORIDE		> 0 but < 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 10 tpy but < 25 tpy
0NY075-00-0	PARTICULATES		>= 10 tpy but < 25 tpy
000127-18-4	PERCHLOROETHYLENE	19800	
0NY075-00-5	PM-10		>= 10 tpy but < 25 tpy
001310-73-2	SODIUM HYDROXIDE		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		>= 10 tpy but < 25 tpy
007664-93-9	SULFURIC ACID		> 0 but < 2.5 tpy
0NY100-00-0	TOTAL HAP	49800	
0NY998-00-0	VOC		>= 250 tpy but < 75,000 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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



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- 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 Part 201-6.2(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item 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 Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)**



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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 Part 201-6.4(i)

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

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



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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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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Permit Review Report



Permit ID: 9-2911-00112/00234
Renewal Number: 2
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FACILITY

6NYCRR 229.3

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Prohibitions
Control requirements.

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the

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compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

6 NYCRR 201-6.4 (c) (3) (ii)

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

6 NYCRR 201-6.4 (d) (5)

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

6 NYCRR 201-6.4 (e)

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



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6 NYCRR 201-6.4 (f) (6)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT has been determined to be subject to the following regulations:

40 CFR 68.10 (d)

This describes the elements of the accidental release plan that is required to be included in the application for the Title V permit of this facility. Certain manufacturing processes are subject to



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these requirements as well as processes subject to OSHA 's safety management standards.

40 CFR Part 61, Subpart A

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

40 CFR Part 61, Subpart FF

This Subpart regulates the emission standards for benzene waste operations.

40 CFR Part 63, Subpart FFFF

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous organic chemical manufacturing and is known as the MON MACT rule. The rule includes emission limits, operating limits and work practice standardards for applicable equipment identified under the rule as miscellaneous organic process units (MCPU).

40 CFR Part 63, Subpart ZZZZ

This regulation addresses the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. It covers 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 generators 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.

40 CFR Part 82, Subpart B

Subpart B of 40 CFR Part 82 implements section 609 of the Clean Air Act Amendments of 1990, as regarding the servicing of motor vehicle air conditioners (MVACs). It also implements section 608 of the Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs

and MVAC-like appliances. The regulation applies to any person performing service on a motor vehicle as it involves the refrigerant in the motor vehicle air conditioner.



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40 CFR Part 82, Subpart G

The purpose of this subpart is to implement section 612 of the Clean Air Act Amendments of 1990 regarding the safe alternatives policy on the acceptability of substitutes for ozone-depleting compounds. This program is referred to as the "Significant New Alternatives Policy" (SNAP) program. The objectives of this program are to identify substitutes for ozone-depleting compounds,

to evaluate the acceptability of those substitutes, to promote the use of those substitutes believed to present lower overall risks to human health and the environment, relative to the class I and class II compounds being replaced, as well as to other substitutes for the same end-use, and to prohibit the use of those substitutes found, based on the same comparisons, to increase overall risks.

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

6 NYCRR 201-7.1

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

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



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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.

6 NYCRR 211.1

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

6 NYCRR 212.11 (b) (1)

Owners and/or operators of any source equipped with the following emissions control equipment must install continuous monitors and data recorders for the required parameter by June 1, 1995. Continuous monitors must be operated at all times when the associated process equipment is operating except during any quality assurance and routine maintenance activities. Each monitor must be operated according to a quality assurance program approved by the department. Alternative monitoring methods may be employed subject to department approval.

6 NYCRR 212.4 (c)

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



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6 NYCRR 212.6 (a)

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

6 NYCRR 212.9 (b)

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

6 NYCRR 229.3

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

Compliance Certification

Summary of monitoring activities at OCCIDENTAL CHEMICAL CORP - NIAGARA PLANT:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	work practice involving specific operations
FACILITY	28	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
F-00001/F5202/F02	45	monitoring of process or control device parameters as surrogate
D-00002/D0101/D04	41	monitoring of process or control device parameters as surrogate
D-00002/D0102/D03	42	monitoring of process or control device parameters as surrogate
D-00002/D0104/D03	43	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	record keeping/maintenance procedures
F-00001/-/F01	44	monitoring of process or control device parameters as surrogate
M-00002/-/M04	46	monitoring of process or control device parameters as surrogate
M-00003/-/M08	47	monitoring of process or control device parameters

