### STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0762-AOP-R28 AFIN: 14-00028

### 1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, Arkansas 72118-5317

### 2. APPLICANT:

Albemarle Corporation—South Plant Highway 79, Approximately 6 Miles South of Magnolia Magnolia, Arkansas 71753

3. PERMIT WRITER:

Elliott Marshall

### 4. NAICS DESCRIPTION AND CODE:

NAICS Description:Other Basic Inorganic Chemical ManufacturingNAICS Code:325180

### 5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
12/16/2019	Minor Mod	Replace the existing SN-16-20 Heat Exchange Heater.

### 6. **REVIEWER'S NOTES**:

This application was submitted to replace the existing SN-16-20 Heat Exchange Heater (4.9 MMBtu/hr) in the NC-17 Unit with a 4.4 MMBtu/hr heater. Permitted emission rates are increasing/decreasing by -0.2 tpy SO<sub>2</sub>, -0.4 tpy VOC, 0.8 tpy CO and -0.2 tpy NO<sub>x</sub>. CO emission increases are attributed to using AP-42 emission factors; previous CO calculations were based on vendor specifications.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was last inspected on June 4-6, 2019; the inspection revealed no violations. There are no pending enforcement actions.

### 8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N If yes, were GHG emission increases significant? N

- b) Is the facility categorized as a major source for PSD? Y
- Single pollutant  $\geq$  100 tpy and on the list of 28 or single pollutant  $\geq$  250 tpy and not on list

If yes for 8(b), explain why this permit modification is not PSD.

Emission increases are below significant emission rates (SER).

### 9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD <u>only]</u>	
Facility	$PM_{10}$ , $SO_2$ , $VOC$ , $CO$ , $NO_X$	PSD	
Facility	VOC	40 CFR Part 82 – Standards for the Protection of Stratospheric Ozone	
Facility	PM/PM <sub>10</sub>	40 CFR Part 61, Subpart M – National Emission Standard for Asbestos	
AB-15	VOC/HAP	40 CFR Part 63, Subpart A – National Emission Standards for Hazardous Air Pollutants for Source Categories, General Provisions	

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD <u>only</u> ]	
		40 CFR Part 63, Subpart F – National Emission Standards for Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	
AB-15 TB-11 TB-25 TB-29 TB-30 WW-01	VOC/HAP	40 CFR Part 63, Subpart G – National Emission Standards for Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	
		40 CFR Part 63, Subpart H – National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	
NC-23 Process MeBr Scenario	Ozone Depleting Substances	40 CFR Part 82, Part A – Protection of Stratospheric Ozone, Production and Consumption Controls	
NC-23 Process MeBr Scenario	Ozone Depleting Substances	40 CFR Part 82, Subpart E – Protection of Stratospheric Ozone, The Labeling of Products Using Ozone-Depleting Substances	
NC-17 CMPU	VOC/HAP	40 CFR Part 63, Subpart A – National Emission Standards for Hazardous Air Pollutants for Source Categories, General Provisions	
NC-17 CMPU	VOC/HAP	40 CFR Part 63, Subpart F – National Emission Standards for Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	
NC-17 CMPU	VOC/HAP	40 CFR Part 63, Subpart G – National Emission Standards for Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	
NC-17 CMPU VOC/HAP		40 CFR Part 63, Subpart H – National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	

Source Pollutant		Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD <u>only]</u>	
21-01 21-02	VOC/HAP	40 CFR Part 61, Subpart A – National Emission Standards for Organic Hazardous Air Pollutants, General Provisions	
21-01 21-02	VOC/HAP	40 CFR Part 61, Subpart J – National Emission Standards for Equipment Leaks (Fugitive Emission Sources) of Benzene	
21-01 21-02	VOC/HAP	40 CFR Part 61, Subpart V – National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	
21-01 21-02	VOC/HAP	40 CFR Part 61, Subpart Y – National Emission Standards for Benzene Emissions from Benzene Storage Vessels	
21-01 21-02	VOC/HAP	40 CFR Part 61, Subpart FF – National Emission Standards for Benzene Waste Operations	
MS-05	VOC/HAP	40 CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations	
Facility	Ozone Depleting Substances	40 CFR Part 82, Subpart E – Protection of Stratospheric Ozone, The Labeling of Products Using Ozone-Depleting Substances	
MCPU's: DMTDA NC-12 NC-15 NC-17 NC-21 NC-23	VOC/HAP	40 CFR Part 63, Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing and Miscellaneous Coating Manufacturing	
CCF All Ethylene Glycol Storage	VOC/HAP	40 CFR Part 63, Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)	

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD <u>only</u> ]
Facility/Engines	VOC, CO, NO <sub>X</sub> , HAPs	40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
Facility/Boilers and Process Heaters	HAPS, CO, Filterable PM	40 CFR Part 63, Subpart DDDDD

### 10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N (Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason	
N/A			

### 11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

### 12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

### a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

No modeling was performed for this revision.

Pollutant	TLV (mg/m <sup>3</sup> )	$\begin{array}{l} \text{PAER (lb/hr)} = \\ 0.11 \times \text{TLV} \end{array}$	Proposed lb/hr	Pass?
Bromine (Br <sub>2</sub> )	0.65	0.0718	11.15	Ν

2<sup>nd</sup> Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

PollutantPAIL $(\mu g/m^3) = 1/100$ of Threshold Limit Value		Modeled Concentration $(\mu g/m^3)$	Pass?
Bromine (Br <sub>2</sub> ) $6.5$		37.811 <sup>1</sup>	Ν

<sup>1</sup>24-hr, H2H value, 2012-2016 Shreveport Met Data.

3<sup>rd</sup> Tier Screening (AEGL-1 and AEGL-2)

A Tier III screening level human health risk assessment was performed to demonstrate that permitted bromine emissions do not result in unacceptable impacts to human health.

For this analysis, modeled impacts are compared to the Level1 and Level 2 Acute Exposure Guideline Levels (AEGL-1 and AEGL-2) as an alternative to PAIL screening levels.

AEGL-1 is the airborne concentration of a substance below which it is not expected that the general population, including susceptible individuals, would experience notable discomfort, irritation, or certain asymptomatic, nonsensory effects.

AEGL-2 is the airborne concentration of a substance below which it is not expected that the general population, including susceptible individuals, would experience irreversible or other serious, long lasting adverse health effects or an impaired ability to escape.

Ambient air concentrations of bromine used to assess risk were predicted using air dispersion modeling. The latest version of the AERMOD modeling system (dated 18081) was used to estimate maximum ground-level concentrations of bromine for 1-hour, 4-hour, and 8-hour averaging periods. Meteorological data for 2012 through 2016 measured at the Shreveport, LA was used in the model. To determine both the 10-minute and 30-minute average concentration, the equation below was used:

$$Cp = Cm (t_m/t_p)^{0.2}$$
 where

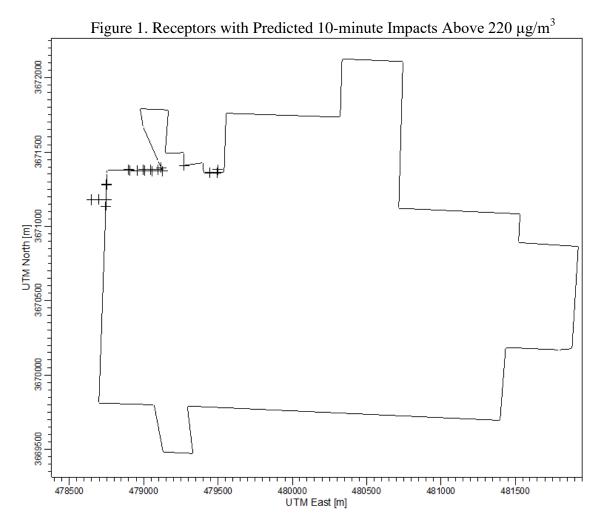
 $\begin{array}{l} Cp = 10 \text{-minute or 30-minute average concentration as appropriate} \\ Cm = 1 \text{-hour average concentration} \\ t_m = \ 60 \ \text{minutes} \\ t_p = 10 \ \text{minutes or 30 minutes as appropriate} \end{array}$ 

The highest predicted acute concentrations occur very near the facility property line. The table below compares the predicted concentrations with the AEGL-1 and AEGL-2 thresholds.

Averaging Period	Highest Modeled Impact (µg/m <sup>3</sup> )	AEGL-1 Value (µg/m <sup>3</sup> )	Percent of AEGL-1	AEGL-2 Value (µg/m <sup>3</sup> )	Percent of AEGL-2
10-minute	251.41	220	114.3%	3600	7.0%
30-minute	201.83	220	91.7%	2200	9.2%
1-hour	175.69	220	79.9%	1600	11.0%
4-hour	134.25	220	61.0%	850	15.8%
8-hour	100.37	220	45.6%	620	16.2%

Predicted concentrations at (and beyond) the facility property line are well below AEGL-2 thresholds for all averaging periods. The areas with predicted 10-minute impacts above the AEGL-1 threshold (Figure 1) are along, or very near, the Albemarle property line. The area surrounding Albemarle's property is densely forested, rural, and uninhabited. Model results at all potentially occupied public "receptors" are less than AEGL-1. Given

that the predicted concentrations above the AEGL-1 10-minute threshold are limited to only the rural, unoccupied area immediately adjacent to Albemarle's property line, it is unlikely that the public would be present in that area. A condition of pollution is not expected from short-term exposure to bromine emissions.



c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards If exempt, explain:

Ν

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H <sub>2</sub> S	20 parts per million	110.0	Y

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
	(5-minute average*)		
	80 parts per billion		
	(8-hour average)	26.2	Y
	residential area		
	100 parts per billion		
	(8-hour average)		
	nonresidential area		

\*To determine the 5-minute average use the following equation

 $Cp = Cm (t_m/t_p)^{0.2}$  where

 $\begin{array}{l} Cp = 5 \text{-minute average concentration} \\ Cm = 1 \text{-hour average concentration} \\ t_m = \ 60 \ \text{minutes} \\ t_p = 5 \ \text{minutes} \end{array}$ 

## 13. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc.)	Emission Factor and units (lbs/ton, lbs/hr, etc.)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc.)
BR-01	Testing	1.5 lb/hr VOC	Scrubber		99% Control for Bromine and Chlorine
BR-04	Testing	3.81 lb/hr VOC			
BR-08	TANKS	0.04 lb/hr HCl			
BR-09	Mass Balance	0.02 lb/hr HBr 0.02 lb/hr Br <sub>2</sub>			
BR-12	Testing	0.10 lb/hr Cl <sub>2</sub> 0.30 lb/hr Br <sub>2</sub>	Scrubber	99.9	
BR-14	SOCMI	0.50 lb/hr VOC			
BR-15	Testing	1.63 lb/hr Halogens			
SL-01	AP-42	See Section 14.1			
SL-02	Mass Balance	0.12 lb/hr VOC			
SR-01	AP-42	See Section 14.1			
SR-02	SOCMI	0.50 lb/hr VOC			
SR-03	Mass Balance	0.42 lb/hr SO <sub>2</sub> 0.22 lb/hr H <sub>2</sub> S			8,760 hr/yr
CB-01	Mass Balance	0.1 lb/hr PM <sub>10</sub>			
CB-04	Mass Balance	26.00 lb/hr VOC			
CB-16	Mass Balance	0.27 lb/hr VOC			
CB-17	SOCMI	1.80 lb/hr VOC			

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SN	Emission Factor Source (AP-42, Testing, etc.)	Emission Factor and units (lbs/ton, lbs/hr, etc.)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc.)
CB-18	Mass Balance	0.1 lb/hr PM <sub>10</sub> 0.06 lb/hr HAP			Baghouse, control is included in emission rate
CB-21	Mass Balance	9.35E-05 lb/hr HAP			
CB-22a	Mass Balance	6.92E-06 lb/hr HAP			
CB-22b	Mass Balance	6.92E-06 lb/hr HAP			
CB-23	Mass Balance	1.97E-03 lb/hr HAP			
CB-23	Mass Balance	5.9 lb MeOH/Batch			Alternate scenario limited to 185 batches/yr
DE-01	Mass Balance	0.5 lb/hr VOC			ADMA Brine Storage Tank (Additional ADMA Storage Scenario)
AD-01	TANKS	0.16 lb/hr VOC			
AD-02	TANKS	0.16 lb/hr VOC			
AD-03	TANKS	0.26 lb/hr VOC			
AD-05	VOC TANKS HCl Mass Balance	0.30 lb/hr VOC 0.10 lb/hr HCl			
AD-07	TANKS	0.05 lb/hr VOC			
AD-07 AD-08	TANKS	0.05 lb/hr VOC			
AD-09	TANKS	0.05 lb/hr VOC			
AD-10	TANKS	0.26 lb/hr VOC			
AD-11	TANKS	0.26 lb/hr VOC			
AD-12	TANKS	0.26 lb/hr VOC			
AD-13	TANKS	0.26 lb/hr VOC			
AD-14	TANKS	0.26 lb/hr VOC			
AD-15	TANKS	0.26 lb/hr VOC			
AD-16	AP-42	See Tables 1.4-1	None	None	3.55 MMBtu/hr
	Sec. 1.4	and 1.4-2			
AD-17	TANKS	0.26 lb/hr VOC			
AD-18 AD-20	TANKS	0.26 lb/hr VOC			
AD-20 AD-21	TANKS TANKS	0.16 lb/hr VOC 3.45 lb/hr VOC			
AD-21 AD-23	TANKS	0.03 lb/hr VOC			
AD-23 AD-24	TANKS	0.03 lb/hr VOC			
AD-24 AD-25	TANKS	0.26 lb/hr VOC			
AD-25 AD-26	AP-42	See Section 14.1		 	
AD-27	TANKS	0.26 lb/hr VOC			
AD-28	TANKS	0.08 lb/hr VOC			
AD-29	TANKS	0.08 lb/hr VOC			

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SN	Emission Factor Source (AP-42, Testing, etc.)	Emission Factor and units (lbs/ton, lbs/hr, etc.)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc.)
AD-32	AP-42 Section 1.4	0.04 lb/hr PM <sub>10</sub> 0.01 lb/hr SO <sub>2</sub> 0.03 lb/hr VOC 0.38 lb/hr CO 0.45 lb/hr NO <sub>X</sub>			4.62 MMBtu/hr
AD-35	See Application	0.22 lb/hr PM <sub>10</sub> 0.15 lb/hr SO <sub>2</sub> 1.22 lb/hr VOC 0.06 lb/hr CO 0.70 lb/hr NO <sub>X</sub>			
AD-36	SOCMI	4.13 lb/hr VOC			
AD-37	TANKS	0.05 lb/hr VOC			
AD-39	Mass Balance	0.1 lb/hr VOC			ADMA Additional Storage Alternate Operating Scenario Loadout Emissions
AD-40	Mass Balance	0.26 lb/hr VOC			
AB-15	Testing	1.20 lb/hr VOC			
AB-16	SOCMI	7.50 lb/hr VOC			
AB-18	EPA Water9	1.44 lb/hr VOC 0.34 lb/hr MeCl			
DB-01	Mass Balance	0.44 lb/hr Halogens 0.10 lb/hr HCl	Scrubber		Includes assumed scrubber efficiency of 99.9% Can also treat HCl emissions from DB-07
DB-02	TANKS	0.10 lb/hr VOC			
DB-04	Manufacturer Specification (combustion) Mass Balance (PM)	1.8 lb/hr PM <sub>10</sub> 0.14 lb/hr SO <sub>2</sub> 0.96 lb/hr VOC 3.6 lb/hr CO 1.6 lb/hr NO <sub>X</sub>			
DB-05	Mass Balance	0.3 lb/hr PM <sub>10</sub>			
DB-06	Mass Balance	0.3 lb/hr PM <sub>10</sub>			
DB-07	Mass Balance	0.10 lb/hr VOC			
DB-08	Mass Balance	1.1 lb/hr $PM_{10}$			
DB-16	SOCMI	1.40 lb/hr VOC			
DB-17	Mass Balance	0.10 lb/hr Halogens			
DB-18	Mass Balance	0.06 g/ft <sup>3</sup> @ 460 ft <sup>3</sup> /min		99.9%	
DB-19	Mass Balance	1.00 lb/hr Br <sub>2</sub> +HBr		40%	
DB-20	Mass Balance	0.9 lb/hr VOC			

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SN	Emission Factor Source (AP-42, Testing, etc.)	Emission Factor and units (lbs/ton, lbs/hr, etc.)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc.)
DB-22	Mass Balance	160 ft <sup>3</sup> /min 2 g solids/ft <sup>3</sup>	Fabric filter	99.93%	
TB-01	TANKS	0.26 lb/hr VOC			
TB-04 (NC- 22)	Mass Balance	0.90 lb/hr PM <sub>10</sub> 0.21 lb/hr VOC			
TB-05	Mass Balance	0.45 lb/hr PM <sub>10</sub>			
TB-08 (NC- 22)	Mass Balance	0.30 lb/hr PM <sub>10</sub>			
TB-11	Mass Balance	0.1 lb/hr VOC			ADMA Brine Storage Tank (Additional ADMA Storage Scenario)
TB-14 (Stabro m)	Mass Balance	0.30 lb/hr Halogens			
TB-14 (NC- 22)	Mass Balance	0.10 lb/hr Halogens			
TB-29 (Stabro m)	SOCMI	0.30 lb/hr Halogens			
TB-29 (NC- 22)	SOCMI	1.45 lb/hr VOC			
TB-41 (NC- 22)	Mass Balance	18.40 lb/hr VOC			
TB-42 (NC-22 C)	TANKS	0.03 lb/hr HBr			
TB-43 (NC- 22)	Mass Balance	0.63 lb/hr VOC			
TB-45 (NC- 22)	TANKS	1.174E-04 lb/hr Hydrazine			
TB-47	Mass Balance	50.5 lb/hr VOC 0.40 lb/hr MeCl <sub>2</sub>			
TB-48	Mass Balance	0.20 lb/hr PM/PM <sub>10</sub>	Fabric Filter	99.9%	
TB-49	Mass Balance	0.30 lb/hr PM/PM <sub>10</sub>			
15-02	Mass Balance	0.20 lb/hr Halogens	Scrubber	99.99%	

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SN	Emission Factor Source (AP-42, Testing, etc.)	Emission Factor and units (lbs/ton, lbs/hr, etc.)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc.)
15-12	Facility Knowledge AP-42	0.101 lb/hr Br <sub>2</sub> +HBr/batches per day See Section 1.4	Scrubber	90%	
15-13	Mass Balance	0.079 lb/hr VOC			
15-14A 15-14B	AP-42 Section 1.4	0.01 lb/hr PM <sub>10</sub> 0.01 lb/hr SO <sub>2</sub> 0.01 lb/hr VOC 0.08 lb/hr CO 0.10 lb/hr NO <sub>X</sub>			1.0 MMBtu/hr, each
15-15	SOCMI	4.23 lb/hr VOC			
15-16	Mass Balance	1.20 lb/hr VOC			
15-17	Mass Balance	0.69 lb/hr VOC			
15-18	Mass Balance	1.10 lb/hr VOC			
15-19	Mass Balance	160 ft <sup>3</sup> /min 2 g solids/ft <sup>3</sup>	Fabric filter	99.93%	
15-20	Mass Balance	6.90 lb/hr VOC			
16-01	Mass Balance	0.50 lb/hr SO <sub>2</sub> 0.10 lb/hr PM <sub>10</sub>			
16-02	Mass Balance	0.40 lb/hr SO <sub>2</sub> 0.10 lb/hr VOC			
16-05	Mass Balance	0.10 lb/hr VOC			
16-06	Mass Balance	0.10 lb/hr VOC 0.40 lb/hr VOC			
16-07	Testing	0.30 lb/hr PM <sub>10</sub>			
16-08	Testing	0.30 lb/hr PM <sub>10</sub>			
16-10	Testing	0.50 lb/hr PM <sub>10</sub>			
16-12	Testing	0.10 lb/hr PM <sub>10</sub>			
16-13	Mass Balance	0.10 lb/hr SO <sub>2</sub>			
16-14	Mass Balance	0.10 lb/hr VOC			
16-15	Mass Balance	0.01 lb/hr VOC			
16-16	Mass Balance	0.10 lb/hr SO <sub>2</sub>			
16-17	Mass Balance	0.02 lb/hr VOC			
16-18	AP-42	See Section 1.4			
16-19	Testing (PM <sub>10</sub> ) Mass Balance (SO2)	0.30 lb/hr PM <sub>10</sub> 0.10 lb/hr SO <sub>2</sub>			

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	Emission	Emission Factor	Control	Control	Comments (Emission
CN	Factor Source	and units	Control	Control	factor
SN	(AP-42,	(lbs/ton, lbs/hr,	Equipment	Equipment	controlled/uncontrolled,
	Testing, etc.)	etc.)	Type (if any)	Efficiency	etc.)
		7.6 lb/MMscf			
		$PM_{10}$			
		0.60 lb/MMscf			
		SO <sub>2</sub>			
		100 lb/MMscf			
16-20	AP-42	NO <sub>X</sub>			
		84 lb/MMscf			
		СО			
		5.5 lb/MMscf			
		VOC			
	Testing				
16.01	(PM10)	0.20 lb/hr PM <sub>10</sub>			
16-21	Mass Balance	0.40 lb/hr VOC			
	(VOC)				
16-22	Mass Balance	0.01 lb/hr PM <sub>10</sub>			
		0.01 lb/hr VOC			
16-23	SOCMI	6.60 lb/hr VOC			
16-24	Mass Balance	1.80 lb/hr SO <sub>3</sub>			
16-28	Mass Balance	0.10 lb/hr SO <sub>2</sub>			
16-30	AP-42	See Tables 1.4-1			1.2 MMBtu/hr
	Sec. 1.4	and 1.4-2			8,760 hr/yr
16-31	Mass Balance	3.83 lb/hr VOC			
16-33	Mass Balance	0.19 lb/hr SO <sub>2</sub>			8,760 hr/yr
10.55		0.10 lb/hr H <sub>2</sub> S			0,700 m/yr
	Testing	2.59 lb/hr PM <sub>10</sub>			
	$(SO_2, VOC,$	5.60 lb/hr SO <sub>2</sub>			Emission rates are for each
BH-01	$NO_X, CO)$	1.87 lb/hr VOC			boiler except $SO_2$ . The
BH-02	AP-42	13.60 lb/hr CO			emission rate for $SO_2$ is
	$(PM_{10})$	47.60 lb/hr NO <sub>x</sub>			bubbled for both sources.
	Tactina	0.10 lb/hr PM <sub>10</sub>			
	Testing (PM <sub>10</sub> )	$0.10 \text{ lb/hr PM}_{10}$ 0.01 lb/hr SO <sub>2</sub>			
21-01	(PM <sub>10</sub> ) Mass Balance	1.71 lb/hr VOC			Emissions are calculated
21-01		3.80 lb/hr VOC			every six months.
	(VOC, SO <sub>2</sub> , CO, NO <sub>X</sub> )	$0.50 \text{ lb/hr NO}_{X}$			
21-02	SOCMI	3.79 lb/hr VOC			
					Emissions are calculated
21-03	Mass Balance	0.01 lb/hr VOC			annually.
21-04	Testing	2.16 lb/hr VOC			

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	Emission	Emission Factor			Comments (Emission
	Factor Source	and units	Control	Control	factor
SN	(AP-42,	(lbs/ton, lbs/hr,	Equipment	Equipment	controlled/uncontrolled,
	Testing, etc.)	etc.)	Type (if any)	Efficiency	etc.)
		NC-23 Scenario			
		1.12 lb/hr VOC			
		1.12 I0/III VOC			
23-01	SOCMI	MeBr Scenario			
25 01	Social	2.33 lb/hr VOC			
		0.97 lb/hr MeOH			
		0.97 lb/hr MeBr			
23-02	Mass Balance	$0.10 \text{ lb/hr PM}_{10}$			
23 02		NC-23 Scenario			
	NC-23 Scenario	0.35 lb/hr VOC			
	Testing	0.55 10/11 1000			
23-03		MeBr Scenario			
	MeBr Scenario	27.37 lb/hr VOC			
	Mass Balance	27.37 lb/hr MeOH			
23-04	Mass Balance	0.44 lb/hr VOC			
		NC-23 Scenario			
	NC-23 Scenario	2.90 lb/hr VOC			
	Testing				
23-05	8	MeBr Scenario			
	MeBr Scenario	1.60 lb/hr VOC			
	Mass Balance	0.40 lb/hr MeOH			
		0.90 lb/hr MeBr			
22.00	Mass Balance				
23-06	$(PM_{10})$	0.30 lb/hr PM <sub>10</sub>			
23-07	Testing	3.80 lb/hr VOC			
23-08	(VOC)				
23-09	Mass Balance	0.10 lb/hr PM <sub>10</sub>			
23-10	Mass Balance	0.10 lb/hr PM <sub>10</sub>			
23-11A	Maga Dalamat				
23-11B	Mass Balance	0.10 lb/hr PM <sub>10</sub>			
23-12A	Maga Dalamas	0.10.1 h/h $m$ DM			
23-12B	Mass Balance	0.10 lb/hr PM <sub>10</sub>			
23-13	Mass Balance	0.10 lb/hr PM <sub>10</sub>			
22.16	Maga Dalarra	0.10 lb/hr MeOH			
23-16	Mass Balance	0.01 lb/hr H <sub>2</sub> SO <sub>4</sub>			
22.17	Maga Dalamas	0.01 lb/hr			
23-17	Mass Balance	Ethylene Glycol			
22 10	Maga Dalamas	0.01 lb/hr			
23-18	Mass Balance	Ethylene Glycol			
<b>PT</b> 01	Mass Palanas	0.01 lb/hr VOC			
BT-01	Mass Balance	0.14 lb/hr H <sub>2</sub> S			

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SN	Emission Factor Source (AP-42, Testing, etc.)	Emission Factor and units (lbs/ton, lbs/hr, etc.)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc.)
BT-11 BT-13	Mass Balance	0.01 lb/hr VOC 0.01 lb/hr H <sub>2</sub> S 0.20 lb/hr NH <sub>3</sub> 0.03 lb/hr Halogens			Emission rates for each source.
BT-12, BT-23, BT-24, BT-25, BT-26, BT-27, BT-28	Mass Balance	0.01 lb/hr VOC 0.20 lb/hr NH <sub>3</sub> 0.03 lb/hr Halogens			Emission rates for each source.
BT-16	Mass Balance	30.00 lb/hr VOC 0.01 lb/hr H <sub>2</sub> S			Emission rates for each source.
BT-17	TANKS	16.40 lb/hr VOC 0.01 lb/hr H <sub>2</sub> S			
BT-21	Mass Balance	4.12 lb/hr PM <sub>10</sub> 3.37 lb/hr VOC			
BT-22	Engineering Estimate	0.02 lb/hr VOC			
DM-01	TANKS	0.03 lb/hr VOC			
DM-02	AP-42 Section 1.4	0.50 lb/hr PM <sub>10</sub> 6.00 lb/hr SO <sub>2</sub> 0.10 lb/hr VOC 0.10 lb/hr CO 0.31 lb/hr NO <sub>X</sub>			1.12 MMBtu/hr SO <sub>2</sub> Determined by mass balance PM <sub>10</sub> EF is from stack testing
DM-03 DM-06	TANKS	$0.81 \text{ lb/hr } \text{H}_2\text{O}_2$			Emission rates for each source.
DM-07	SOCMI	4.10 lb/hr VOC			
MS-01	Water9	6.00 lb/hr VOC			Calculate emission rate once every six months
MS-02	Mass Balance	0.10 lb/hr VOC			Calculate emission rate once every six months
MS-03	Test Sample Data	0.1 lb/hr VOC			
MS-05	Mass Balance	0.67 lb/hr VOC			
MS-06	Mass Balance	0.50 lb/hr SO2 7.00 lb/hr VOC			
MS-07	TANKS	47.70 lb/hr VOC			

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SN	Emission Factor Source (AP-42, Testing, etc.)	Emission Factor and units (lbs/ton, lbs/hr, etc.)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc.)
MS-08 -01 -02 -03 -04 -05 -06 -07 -08 -09	AP-42	See AP-42 Sections 3.2 3.3			Emission rates are based on worst case fuel combustion. VOC emission rate includes an estimate for non-combustion emissions (evaporation, crankcase, and refueling losses).
MS-12	SOCMI	1.06 lb/hr Refrigerant			Combined all Non- VOC/Non-HAP Refrigerant emissions for the entire facility
24-01	Mass Balance	48.5 lb/hr VOC 0.10 lb/hr HBr 0.10 lb/hr Acetone 0.10 lb/hr HCl0.1 lb/hr 1,2- Epoxybutane			Primary Operating VOC emissions from the reactor before flaring are 48.5 lb/hr
24-01	Mass Balance	48.5 lb/hr VOC 0.10 lb/hr HBr 0.10 lb/hr Acetone 0.10 lb/hr HCl 0.1 lb/hr			VOC missions are not sent to a flare but emitted directly to the atmosphere HBr and HCl are scrubbed out by the wash column.
24-02	SOCMI	1.2 lb/hr VOC 0.1 lb/hr HBr 0.1 lb/hr Acetone 0.1 lb/hr HCl 0.1 lb/hr 1,2- Epoxybutane 0.2 lb/hr Ethylene Glycol			

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SN	Emission Factor Source (AP-42, Testing, etc.)	Emission Factor and units (lbs/ton, lbs/hr, etc.)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc.)
33-01	Mass Balance ChemCAD Manufacturer HCl Stack Test	$\begin{array}{c} 1.90 \ \mathrm{PM_{10}} \ \mathrm{lb/hr} \\ 0.10 \ \mathrm{lb/hr} \ \mathrm{SO_2} \\ 5.15 \ \mathrm{lb/hr} \ \mathrm{VOC} \\ 1.68 \ \mathrm{lb/hr} \ \mathrm{VOC} \\ 1.68 \ \mathrm{lb/hr} \ \mathrm{VOC} \\ 1.60 \ \mathrm{lb/hr} \ \mathrm{NO_X} \\ 1.60 \ \mathrm{lb/hr} \ \mathrm{H_2S} \\ 1.00 \ \mathrm{lb/hr} \ \mathrm{H_2S} \\ 1.00 \ \mathrm{lb/hr} \ \mathrm{H_2S} \\ 0.10 \ \mathrm{lb/hr} \ \mathrm{HBr} \\ 0.20 \ \mathrm{lb/hr} \ \mathrm{HCl} \\ 1.04 \ \mathrm{lb/hr} \\ \mathrm{Benzene} \\ 0.01 \ \mathrm{lb/hr} \\ \mathrm{Bromoform} \\ 1.28 \ \mathrm{lb/hr} \ \mathrm{Xylene} \\ 0.01 \ \mathrm{lb/hr} \ \mathrm{Phenol} \\ 1.29 \ \mathrm{lb/hr} \ \mathrm{Toluene} \end{array}$		99.9% VOC	Emission factors are based on maximum feed rate 1,380 lb/hr brominated VOC compounds
33-02	SOCMI	5.15E-05 lb/hr Benzene 9.14E-03 lb/hr Bromoform 4.08E-05 lb/hr Hexane 1.29E-05 lb/hr Isooctane 2.75E-04 lb/hr Phenol 1.01E-04 lb/hr Toluene 4.59E-04 lb/hr Xylene			
33-03	Mass Balance	0.10 lb/hr PM <sub>10</sub>	Fabric Filter	99.93%	<3 micron
33-04	Mass Balance	1.17E-04 lb/hr N <sub>2</sub> H <sub>4</sub>			

# 14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
BR-01 BR-04	VOC	18/25A	5 year	Compliance Verification

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SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
BR-01 BR-04 BR-12	Br <sub>2</sub> Cl <sub>2</sub>	26A	5 year	Compliance Verification
SR-01	$SO_2$	6C	5 year	Compliance Verification
CB-16	$Br_2$	26A	5 year	Compliance Verification
CB-16 (Alternate)	VOC	18 or 25A	Every 365 days operation	Compliance Verification
AD-05	VOC HBr	18 or 25A 26A	5 year	Compliance Verification
AD-35	PM <sub>10</sub> SO <sub>2</sub> VOC CO NO <sub>X</sub>	5 6C 18/25A 10B 7E	2 years	Compliance Verification
AD-35	Br <sub>2</sub>	26A	5 year	Compliance Verification
DB-01	Br <sub>2</sub>	26A	5 year	Compliance Verification
DB-04	Br <sub>2</sub>	26A	5 year	Compliance Verification
TB-14 (Stabrom)	$\begin{array}{c} Br_2\\BrCl\\Cl_2\end{array}$	26A 26A 26A	5 year	Compliance Verification
15-12	VOC	18 or 25A	2 year	Compliance Verification
15-12	$PM_{10}$	5	2 year	Compliance Verification
15-12	$Br_2$	26A	5 year	Compliance Verification
15-16	$PM_{10}$	5	2 year	Compliance Verification
16-02	$Br_2$	26A	5 year	Compliance Verification
16-24	$SO_2$	Approved Method	5 year	Compliance Verification
BH-01 BH-02	SO <sub>2</sub> VOC CO NO <sub>X</sub>	6C 18/25A 10B 7E	5 year	Compliance Verification
21-04	VOC	Approved Method	5 year after initial compliance	Compliance Verification
23-03	VOC	18	5 year	Compliance Verification
23-05	VOC	18	5 year	Compliance Verification
23-06 23-07 23-08	VOC	18	5 year, one silo, must be in receiving mode	Compliance Verification
23-06 23-07 23-08	HBr	26A	5 year, one silo, must be in receiving mode	Compliance Verification

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
DM-02	PM <sub>10</sub> VOC CO NO <sub>X</sub>	5 18 10B 7E	5 year	Compliance Verification
DM-02	$SO_2$	6C	2 year	Compliance Verification
33-01	Br <sub>2</sub>	26A	5 year	Compliance Verification

## 15. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency	Report (Y/N)
BR-01 BR-04	Flow Rate	Flow Rate Monitor Alarm	Continuously	Y
SR-01	Temperature	Thermocouple	Continuously	N
AD-05	Scrubber Media Flow Rate	Flow Rate Monitor	Continuously	Ν
AD-35	Temperature	Thermocouple	Continuously	N
23-05	Liquid to Gas Mass Flow Rate	Flow Rate Monitor	Continuously	Ν
23-05	Stripper Temperature	Thermocouple	Continuously	Ν
TB-25 (NC-24)	Coolant Temperature	Thermocouple de		N
15-02	Br <sub>2</sub>	CEM	Continuously	N
15-12	Br <sub>2</sub>	CEM	Continuously	N
16-01	Scrubber Media Flow Rate	Flow Rate Monitor	Every 3 hours	N
16-01	Scrubber Media pH	pH Monitor	Every 3 hours	N
16-02	Scrubber Media Flow Rate	Flow Rate Monitor	Every 3 hours	Ν
16-02	Scrubber Media pH	pH Monitor	Every 3 hours	N
16-05	Scrubber Media		Every 3 hours	N
16-05	Scrubber Media pH	pH Monitor	Every 3 hours	N
16-06	Scrubber Media Flow Rate	Flow Rate Monitor	Every 3 hours	N
16-06	Scrubber Media pH	pH Monitor	Every 3 hours	N
16-13	Scrubber Media Flow Rate	Flow Rate Monitor	Every 3 hours	N

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency	Report (Y/N)
16-24	Scrubber Media Flow Rate	Flow Rate Monitor	Every 3 hours	Ν
BH-01 BH-02	H <sub>2</sub> S Concentration / Gas Flow Rate	H <sub>2</sub> S Concentration Monitor / Flow Rate Monitor	Continuously for concentration Once every six hours for flow rate	N
21-01	Process Gas Flow Rate into Oxidizer	Flow Rate Monitor	Continuously	Ν
21-01	Combustion Zone Temperature	Thermocouple	Continuously	Ν
23-03	Scrubber media Flow Rate	Flow Rate Monitor Alarm	Continuously	Ν
23-05	Scrubber media Flow Rate	Flow Rate Monitor Alarm	Continuously	Ν
DM-02	Combustion Zone Temperature	Thermocouple	Continuously	N
	Water Flow Rate	Flow Rate Monitor		
24-01	Chilled Water Temperature	Thermocouple	Continuously	Ν
	Combustion Zone Temperature	Thermocouple	Continuously	Ν
	Scrubber Media Flow Rate	Flow Rate Meter	Continuously	Ν
33-01	Evaporative Cooling Water Flow Rate	Flow Rate Meter	Continuously	Ν
55-01	Solids Concentration in Evaporative Cooling Water	Sampling	Weekly	N
	Brue Feed Tank Feed Rate	Flow Meter	Continuously	Y

## 16. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
BR-01 BR-04	Brine Solution Flow Rate	Established according to most recent satisfactory test	Per Alarm Incident	Y

SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
BR-12	Pump Discharge Valve Position and Run Light	Established according to most recent satisfactory test	3 hours	Y
BR-12	Caustic Concentration of Scrubber Media	Strength of caustic solution as established according to most recent satisfactory test	Each RailCar/Truck Unloading	Y
SR-01	Incinerator Temperature 1200 °F or above		Continuous	Ν
CB-04	Methanol Throughput	10 <sup>6</sup> gallon per consecutive 12 months	Monthly	Y
CB-16	Batch Production (Alternate Scenario)	185 batches per consecutive 12 months	Monthly	Y
CB-18	Raw Material Baghouse Products	Identity of each compound, TLV, amount of each compound	Per Batch	Ν
AD-05	Scrubber Media Flow Rate	Established according to most recent satisfactory test	4 hour	Ν
AD-05	05 Caustic Concentration of Scrubber Media Strength of caustic solution and change out as established according to most recent satisfactory test		12 hour	Ν
AD-21	Period of Storage of C8 Olefin	Not to exceed 4380 hours		Ν
AD-35	Incinerator Temperature	1500 °F or above	Continuous	Ν
AD-39	Duration of each Alternate Scenario Event and Vapor Pressure	2.9 tpy VOC as calculated from mass balance and records	Per Event	Ν
AB-15	Carbon Bed Regeneration/Carbon Replacement	rbon Bed ration/Carbon Regenerate every 12 hours Replace Every 10 220		Ν
	Caustic Concentration of	Must measure greater than 5%	12 hour	Ν
DB-01	Scrubber Media	Replace caustic when concentration falls below 5%	As Needed	Ν
	Scrubber Media Pumps	Visual Inspections	Once Per Day	Ν
DB-07	Dried Tanks of Diphenyl Oxide	150 tanks per year	Monthly	Ν
23-05	Liquid to Gas Mass Flow Rate Ratio	L/G ≥ 5.7	Continuous	N
23-05	Stripper Temperature	170 °F or above	Continuous	Y
TB-25 (NC-24)	Glycol Coolant Temperature	Maximum Daily Ave 40 °F	Daily	Ν

SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
TB-47 (NC-22)	Tons of off-spec product processed	660 tons/12 month	Monthly	Y
15-18 15-20	DPE Production By-Product Generation	140,000 lbs/week By- Product Throughput	Weekly	Ν
16-01	Scrubber Media Flow Rate	6 gpm	3 hours	Ν
16-01	Scrubber Media pH	Established according to most recent satisfactory test	3 hours	Ν
16-02	Scrubber Media Flow Rate	60 gpm	3 hours	N
16-02	Scrubber Media pH	Established according to most recent satisfactory test	3 hours	Ν
16-05	Scrubber Media Flow Rate	4 gpm	3 hours	N
16-05	Scrubber Media pH	Established according to most recent satisfactory test	3 hours	Ν
16-06	Scrubber Media Flow Rate	6 gpm	3 hours	Ν
16-06	Scrubber Media pH Established according to most recent satisfactory test		3 hours	Ν
16-13	Scrubber Media Flow Rate	4 gpm	3 hours	N
16-14	Carbon Canister Replacement	Once every year	Annually	N
16-15	Carbon Canister Replacement	Once every year	Annually	Ν
16-22	Carbon Canister Replacement	Once every year	Annually	N
16-24	Hours of Operation	1,752 hours per year	Per Event	Ν
16-24	Scrubber Media Flow Rate	6 gpm	3 hours	Ν
16-31	Phthalic Anhydride Throughput	18.25 MM lb per consecutive 12 months	Monthly	Y
BH-01 BH-02	H <sub>2</sub> S Concentration in fuel	Established according to most recent satisfactory test for SO <sub>2</sub>	6 hours	Ν
BH-01 BH-02	Fuel Flow Rate	Established according to most recent satisfactory test	6 hours	Ν
21-01	Combustion Zone Temperature	1400 °F Min.	Continuous	Ν
NC-22 Unit	Number of Batches Produced	3,137 batches per consecutive 12 months	Monthly	Y
23-03	Scrubber Media Flow Rate	Minimum flow rate set point established according to most recent satisfactory test.	Per Alarm Incident	Ν
23-04	By-Product Drum Turnovers	96 turnovers per day	Daily	N
23-05	Scrubber Media Flow Rate	Minimum flow rate set point established according to most recent satisfactory test.	Per Alarm Incident	Ν

SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)	
23-14	Classing Cooles	If less than 75 cycles per year then monthly recordkeeping of number of cycles.	Monthly	Y	
23-14	Cleaning Cycles	If more than 75 cycles per year then compliance demonstrated through emission calculations.	Monthly	Ĩ	
NC-23 CMPU	Primary Reactor Throughput for ABRM11.725 Million Pounds of ABRM1 per year		Monthly	Y	
DM-02	Combustion Zone Temperature	1200 °F or above	24 hours	Ν	
MS-02	Amount of Solids Transferred to Landfill (MS-06)	Based on Semi-Annual Emission Calculations	Monthly	N	
MS-03	Amount of Water Recovered	82.0 million gallons per year (total)	Monthly	Ν	
MS-05	Coating and Adhesives Usage	100 gallons per year	Monthly	N	
MS-06	All Matter Disposed	24 million pounds per consecutive 12 months	Monthly	Ν	
MS-07	Gasoline Throughput	200,000 gallons per consecutive 12 months	Monthly	N	
MS-08 -01 -02 -03 -04 -05 -06 -07 -08 -09	Hours of Operation Reason of Operation ( <i>i.e.</i> testing, readiness checks, emergency, <i>etc.</i> )	Non-Emergency: 100 hr per calendar year per engine Emergency: No Limit	Monthly	Y	
24-01	Water Flow Rate	Minimum Daily Ave. 1,700 lb/hr	Daily	N	
	Chilled Water Temperature	Maximum Daily Ave. 60 °F	,		
24-01	Duration of each event while operating in alternate Scenario 0.60 tpy VOC calculated based on mass balance and recordkeeping				
	Gallons of Product	2,800,000 gallons per year			
	1,2-Epoxybutane Usage	50,000 gallons per year			
NC-24 Unit	Venting to SN-AD-26	24-hours per consecutive 12 months. If venting exceeds 24 hours calculate emissions for each event.	Monthly	Y	

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SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
	Feed Tank Feed Rate to Thermal Oxidizer	1,380 lb/hr	Monthly	Y
	Thermal Oxidizer Temperature	Minimum 1,750 °F	Continuously	Y
33-01	Scrubber Media (Brine) Flow Rate	350 gpm	Continuously	Ν
	Evaporative Cooling Water Flow Rate	20 gpm	Continuously	Ν
	Evaporative Cooling Water Solids (including TDS)	183 mg/l	Weekly	Ν

## 17. OPACITY:

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
BR-01	5	Department Guidance	Inspector's Observation
BR-04	5	Department Guidance	Inspector's Observation
BR-09	5	Department Guidance	Inspector's Observation
BR-12	5	Department Guidance	Inspector's Observation
SL-01	5	Department Guidance	Inspector's Observation
SR-01	5	Department Guidance	Inspector's Observation
CB-01	5	Department Guidance	Inspector's Observation
CB-16	5	Department Guidance	Inspector's Observation
CB-18	5	Department Guidance	Inspector's Observation
AD-05	5	Department Guidance	Inspector's Observation
AD-16	5	Department Guidance	Inspector's Observation
AD-26	5	Department Guidance	Inspector's Observation
AD-35	5	Department Guidance	Inspector's Observation
DB-01	5	Department Guidance	Inspector's Observation
DB-04	5	Department Guidance	Inspector's Observation
DB-05	5	Department Guidance	Inspector's Observation
DB-06	5	Department Guidance	Inspector's Observation
DB-08	5	Department Guidance	Inspector's Observation
DB-17	5	Department Guidance	Inspector's Observation
DB-19	5	Department Guidance	Inspector's Observation
DB-22	5	Department Guidance	Inspector's Observation
TB-04	5	Department Guidance	Inspector's Observation
TB-05	5	Department Guidance	Inspector's Observation
TB-08	5	Department Guidance	Inspector's Observation
TB-14	5	Department Guidance	Inspector's Observation
15-02	5	Department Guidance	Inspector's Observation

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SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
15-12	5	Department Guidance	Inspector's Observation
15-16	5	Department Guidance	Inspector's Observation
15-19	5	Department Guidance	Inspector's Observation
16-01	5	Department Guidance	Inspector's Observation
16-02	5	Department Guidance	Inspector's Observation
16-06	5	Department Guidance	Inspector's Observation
16-07	5	Department Guidance	Inspector's Observation
16-08	5	Department Guidance	Inspector's Observation
16-10	5	Department Guidance	Inspector's Observation
16-12	5	Department Guidance	Inspector's Observation
16-18	5	Department Guidance	Inspector's Observation
16-19	5	Department Guidance	Inspector's Observation
16-20	5	Department Guidance	Inspector's Observation
16-21	5	Department Guidance	Inspector's Observation
16-22	5	Department Guidance	Inspector's Observation
16-29	5	Department Guidance	Inspector's Observation
16-30	5	Department Guidance	Inspector's Observation
BH-01	5	Department Guidance	Inspector's Observation
BH-02	5	Department Guidance	Inspector's Observation
21-01	5	Department Guidance	Inspector's Observation
23-02	5	Department Guidance	Inspector's Observation
23-06	5	Department Guidance	Inspector's Observation
23-11A	5	Department Guidance	Inspector's Observation
23-11B	5	Department Guidance	Inspector's Observation
23-12A	5	Department Guidance	Inspector's Observation
23-12B	5	Department Guidance	Inspector's Observation
23-13	5	Department Guidance	Inspector's Observation
BT-11	5	Department Guidance	Inspector's Observation
BT-12	5	Department Guidance	Inspector's Observation
BT-13	5	Department Guidance	Inspector's Observation
BT-21	5	Department Guidance	Inspector's Observation
DM-02	5	Department Guidance	Inspector's Observation
MS-08- X	20/5	§19.503 and Part 52, Subpart E	Inspector's Observation
33-01	5	Department Guidance	Inspector's Observation

## 18. DELETED CONDITIONS:

Former SC	Justification for removal
	None

## 19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

INSIGNIFICANT ACTIVITIES					
SN	Description	Category	Pollutant	ton/yr	
			VOC	< 0.01	
			Bromoform	< 0.01	
DD 05	Recovered Groundwater	A 1 2	Ethylene Dibromide	< 0.01	
BR-05	Storage Tank, T-3045	A13	Ethylene Dichloride	< 0.01	
			Toluene	< 0.01	
			$Br_2$	< 0.01	
BR-16	C-12 Olefin Storage (up to 10,000 gal total capacity)	A3	VOC	0.07	
SL-03	Sulfinol Storage Sump (S-	A3	Sulfolane	< 0.01	
	1901)		DIPA	< 0.01	
SL-04	MDEA Storage Tank (T-5001)	A3	MDEA	< 0.01	
			VOC	< 0.10	
CB-10	Wash Water Tank	A13	HCl	< 0.10	
CD 10	wash water rank	1115	HBr	< 0.10	
			Acetone	< 0.10	
CB-20	Formic Acid Storage Bins	A13	Formic Acid	< 0.01	
DE-05	Pressure Vessel	A13	No Emissions	N/A	
DB-23	DPE Heavies	A3	VCO	< 0.01	
AD-38	Alcohol Addition System	A13	VOC	0.02	
AB-17	T-703 Ethylene Glycol Storage Tank	A3	Ethylene Glycol	0.001	
TB-08	Polymer Transfer	A13	PM	0.14	
1D-00	Torymer Transfer	AIS	$PM_{10}$	0.07	
TB-13	Refrigerant Storage Tank	A3	VOC	< 0.01	
1D-13	Kenngerant Storage Tank	AS	Ethylene Glycol	< 0.01	
	Sulfuric Acid Storage Tank		VOC	0.04	
TB-26	Alternate Use: Ethylene Glycol	A3	$H_2SO_4$	0.05	
	Storage		Ethylene Glycol	0.04	
TB-27	Refrigerant Storage Tank	A3	Ethylene Glycol	< 0.01	
TB-36	Water Scrubber Tank	A3	VOC	0.03	
TB-40	Raw Material Weigh Vessel	A13	PM/PM <sub>10</sub>	0.44	
TB-43	During NC-22 Scenario B	A13	VOC	0.10	
	Heating System Expansion Tank	A13	VOC	<0.01	
	Hot Water Tank 67-65-1	A13	Methanol	0.02	
	Area Safety Relief Knockout Pot D-9505	A13	Non-VOC Caustic	N/A	
	Antifoam Storage Tank, T- 95107	A13	Org. Liqs., 3.5 psia	N/A	

	INSIG	NIFICANT A	CTIVITIES	
SN	Description	Category	Pollutant	ton/yr
	Hot Water Tank, T-602	A13	VOC	0.02
	Pressurized Ethylene Glycol Storage Tank, (D-9972)	A13	None	N/A
16-09	EBTBP Ambient Dust Collector SF9398	A13	PM/PM <sub>10</sub>	0.3
	Ethylene Glycol Tanks, T- 93952, T-9393, T-9351, T- 9359, T-9392	A3	Ethylene Glycol	<0.01
	Hot Oil Expansion Tank / Heat Transfer fluid Tank, T-9354	A2	VOC	0.95
	Hot Oil Surge Tank, D-3490	A13	VOC	< 0.01
BT-02	Purchased Brine Surge Tank, T-3017	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-03	Brine/Oil Separator OS-3002	A13	VOC H <sub>2</sub> S	0.05 0.09
BT-04	Feed Brine Pump Suction Header Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-05	Overflow Line Vent	A13	VÕC H <sub>2</sub> S	0.05 0.05
BT-06	Overflow Line Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-07	Feed Brine Pump Suction Header Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-08	Brine/Oil Separator Outlet Line Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-09	Overflow Line Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-10	Brine/Oil Separator Outlet Line Vent (OS-3002)	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-14	Vacuum Pump Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-15	Overflow Line Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-18	Brine Underflow Line Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-19	Brine Underflow Line Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-20	Brine Underflow Line Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
BT-30	Brine Management Line Vent	A13	VOC H <sub>2</sub> S	0.05 0.05
DM-04	Catalyst Loading	A13	PM/PM <sub>10</sub>	0.23
DM-05	Stabilizer Hopper	A13	PM/PM <sub>10</sub>	0.13
	Solid Waste Vault No. 2	A13	PM/PM <sub>10</sub> VOC	Trace Trace
	Outfall 002 Bioreactor	A13	Chlorine	Trace
	PSV-1 Sumps	A13	VOC	1.51
MS-09	Diesel fuel Storage Tanks (up to 10,000 gallons total capacity)	A3	VOC	0.12

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INSIGNIFICANT ACTIVITIES						
SN	Description	Category	Pollutant	ton/yr		
MS-10	Gasoline Storage Tanks (up to 2,000 gallons total capacity)	A13	VOC HAPs	1.30 0.07		
MS-11	Cooling Towers (Maintenance/Support Facilities)	A13	PM/PM <sub>10</sub> Chlorine	3.29 Trace		
	Drinking Water Treatment and Distribution	A13	N/A	N/A		
	Quality Control Laboratory	A5	N/A	N/A		
	A-12 Emergency Systems Generators – Phone System and Admin Bldg Backup, Emergency Fire Pumps (2), Potable Water Supply Backup, Material Analyzer Backup, Outfall Flow Monitor Battery Backup	A12	N/A	N/A		
	200 gallon Hot Oil Tank (CP-6000-68)	A3	VOC	<1.00E-7		
	pH Adjustment Bag Dumping	A13	$PM/PM_{10}$	0.009		
	Totals for Category A2		VOC	0.95		
Totals for Category A3			VOC H <sub>2</sub> SO <sub>4</sub> Sulfolane DIPA MDEA Any Single HAP Total HAP	0.80 0.05 0.01 0.01 0.01 0.07 0.07		
	Totals for Category A13		VOC PM PM <sub>10</sub> SO <sub>2</sub> H <sub>2</sub> S Br <sub>2</sub> HCl HBr Acetone Formic Acid Any Single HAP Total HAP	$\begin{array}{c} 4.92 \\ 4.55 \\ 4.47 \\ 2.61 \\ 2.13 \\ 0.01 \\ < 0.10 \\ < 0.10 \\ < 0.10 \\ < 0.10 \\ 0.01 \\ 0.06 \\ 0.12 \end{array}$		

## 20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #	
0762-AOP-R27	

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

### Fee Calculation for Major Source

#### Facility Name: Albemarle Corporation - South Plant Permit Number: 0762-AOP-R28 AFIN: 14-00028

\$/ton factor Permit Type	23.93 Minor Mod	Annual Chargeable Emissions (tpy) Permit Fee \$	<u>4589.55</u> 500
Minor Modification Fee \$ Minimum Modification Fee \$ Renewal with Minor Modification \$ Check if Facility Holds an Active Minor Source or Mino	500 1000 500		
Check II Facility Holds an Active Minor Source of Minor Source General Permit If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ Total Permit Fee Chargeable Emissions (tpy) Initial Title V Permit Fee Chargeable Emissions (tpy)	0 -0.8		

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

Revised 03-11-16

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
РМ		127.5	127.5	0	0	127.5
PM <sub>10</sub>		116.5	116.5	0		
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		3295.6	3295.4	-0.2	-0.2	3295.4
VOC		494.5	494.1	-0.4	-0.4	494.1
со		182.1	182.9	0.8		
NO <sub>X</sub>		495.8	495.6	-0.2	-0.2	495.6
Acetone	•	0.4	0.4	0	0	0.4

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Ammonia		47.23	47.23	0	0	47.23
Br2		34.97	34.97	0	0	34.97
Br2+HBr	•	17.33	17.33	0	0	17.33
BrCl	•	0.88	0.88	0	0	0.88
H2O2	•	7.54	7.54	0	0	7.54
H2S	•	13.7	13.7	0	0	13.7
H2SO4	•	0.32	0.32	0	0	0.32
HBr		25.05	25.05	0	0	25.05
Non-VOC/Non-HAP Refrigerant		9.62	9.62	0	0	9.62
				0		
Benzene		18.09	18.09	0		
Br2+Cl2	•	0.1	0.1	0	0	0.1
Cl2		4.03	4.03	0	0	4.03
Cl2 or Halogens		0.62	0.62	0	0	0.62
нсі		8.87	8.87	0	0	8.87
Hydrazine	•	0.46	0.46	0	0	0.46
Methanol		21.31	21.31	0		
Methyl Bromide		9.54	9.54	0		
Methylene Chloride		5.83	5.83	0	0	5.83