

# Permit to Modify



**R13-2050G**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

*Issued to:*

**Clearon Corporation**  
**South Charleston Chlorinated Dry Bleach Plant**  
**039-00011**

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*William F. Durham*  
*Director*

*Issued: **DRAFT***

This permit will supercede and replace Permit R13-2050F.

Facility Location: 95 MacCorkle Avenue  
South Charleston, Kanawha County, West Virginia  
Mailing Address: Same as Above  
Facility Description: Chemical Manufacturing  
NAICS Codes: 325180  
UTM Coordinates: 438.4 km Easting • 4,246.6 km Northing • Zone 17  
Permit Type: Modification  
Description of Change: This action is for the replacement of Tank T-1003 at the facility.

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.*

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*The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.*

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**1.0. Emission Units**

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
F-1801	ST-1808	F-1801 Kiln D Offgas to D-1801 Urea Scrubber	1997	13 cu Ft	F-1804
		T-151 Urea Dissolution Tank	1997	10,000 gal	
		T-191 Urea Dissolution Tank	1997	10,000 gal	
		T-1001 Urea Dissolution Tank	1997	40,000 gal	
		T-381 Ammonia Removal Tank to partial condenser	1986	2,000 gal	
		T-382 Ammonia Removal Tank to partial condenser	1986	2,000 gal	
		T-156A Captive Water Tank	1976	28,000 gal	
		T-157A Demister Water Tank	1976	500 gal	
		T-126 Ammonia Sump (Relined in 2010)	2010	1,500 gal	
		T-103 Crude CA Storage Tank	1997	178,000 gal	
		T-1826 Sump Tank	1997	1,066 cu. Ft	
		T-1802 D Kiln Recycle Bin	1997	624 cu. Ft	
		C-1811 D Kiln Discharge Screw	1997	27,000 lbs/hr	
		C-1812 D Kiln Feed Screw	1997	63,000 lbs/hr	
		C-1801 D Kiln Elevator	1997	624 cu. Ft	
		C-1813 D Kiln Recycle Feed Bin	1997	660 cu. Ft/hr	
		C-1806 Receiver Bin Discharge Conveyor	1997	660 cu. Ft/hr	
		C-1814 D Kiln Screw Conveyor	1997	624 cu. Ft/hr	
C-1803 D Kiln Receiver Conveyor	1997	624 cu. Ft/hr			
	ST-1802	F-1801 D Kiln Zones A, B, & C	1997	27,000 lbs/hr	None
T-151	F-176	T-151 Urea Dissolution Tank	1997	10,000 gal	S-151-A
T-191		T-191 Dissolution Tank	1997	10,000 gal	S-195
	D-222	T-285 Digester or T-275 Spare Digester to T-203 or T-245 High Pressure Flash Tanks	1996	21,000 gal	H-204**

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
H-204		H-204 Digestion Barometric Condenser	1989	12 ¾" Diameter	D-232**
T-230		T-230 Slurry Tank	1983	2,500 gal	
T-350		T-350 Acid Mix Tank	1986	11,000 gal	
T-233		T-233 Spare Digester	1969	11,000 gal	
D-232		D-232 Venturi Water Scrubber	1988	18" Diameter	D-222
T-349		T-349 Cold Acid Purge Tank	1986	550 gal	
T-334		T-334 Recycle Acid Tank	1995	3,800 gal	
T-387		T-387 Purge Acid Cooling Tank	1986	2,800 gal	
CE-301		Centrifuge	1962	48" Diameter x 24"	
CE-302		Centrifuge	1997	60" Diameter x 24"	
CE-321		Centrifuge	1972		
CE-322		Centrifuge	1995		
CE-324, S-343		S-301, S-302, S-321, S-322, S-324, S-343 Centrifuges	1973	355 cubic feet per hour	
T-1204 & T-234		T-1204 & T-234 Centrifuge Feed Tanks			
T-1003	T-1003	Sulfuric Acid Storage Tank	2016	3,031 gallons	None
T-1007	T-1007	Sulfuric Acid Storage Tank	1983	18,000 gallons	None
EG-100	EG-100	Diesel Fired Emergency Generator Set Mfg: Cummins	1997	1,340 hp	None

\*\* - Product/Process Recovery Device

Table 1.1 Control devices	
F-1804	Ammonia Incinerator
S-151-A	Fabric Filter Baghouse
S-195	Fabric Filter Baghouse
D-222	Packed Bed Water Scrubber

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the “West Virginia Air Pollution Control Act” or the “Air Pollution Control Act” mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The “Clean Air Act” means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. “Secretary” means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary’s designated representative for the purposes of this permit.

2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>CBI</b>	Confidential Business Information	<b>NSPS</b>	New Source Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>2.5</sub></b>	Particulate Matter less than 2.5 μm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>PM<sub>10</sub></b>	Particulate Matter less than 10μm in diameter
<b>CO</b>	Carbon Monoxide	<b>Ppb</b>	Pounds per Batch
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>Pph</b>	Pounds per Hour
<b>DAQ</b>	Division of Air Quality	<b>Ppm</b>	Parts per Million
<b>DEP</b>	Department of Environmental Protection	<b>Ppmv or ppmv</b>	Parts per Million by Volume
<b>dscm</b>	Dry Standard Cubic Meter	<b>PSD</b>	Prevention of Significant Deterioration
<b>FOIA</b>	Freedom of Information Act	<b>Psi</b>	Pounds per Square Inch
<b>HAP</b>	Hazardous Air Pollutant	<b>SIC</b>	Standard Industrial Classification
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>M</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>MDHI</b>	Maximum Design Heat Input	<b>USEPA</b>	United States Environmental Protection Agency
<b>MM</b>	Million	<b>UTM</b>	Universal Transverse Mercator
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet per Hour	<b>VOC</b>	Volatile Organic Compounds
<b>NA</b>	Not Applicable	<b>VOL</b>	Volatile Organic Liquids
<b>NAAQS</b>	National Ambient Air Quality Standards		

**NESHAPS** National Emissions Standards  
for Hazardous Air Pollutants

### **2.3. Authority**

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

### **2.4. Term and Renewal**

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-2050F. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

### **2.5. Duty to Comply**

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-185, R13-474, R13-1462, R13-2050, R13-2050A, R13-2050B, R13-2050C, R13-2050D, R13-2050E, R13-2050F, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;  
**[45CSR§§13-5.11 and 10.3.]**
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

### **2.6. Duty to Provide Information**

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of

confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.



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**2.7. Duty to Supplement and Correct Information**

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

**2.8. Administrative Update**

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.  
[45CSR§13-4.]

**2.9. Permit Modification**

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.  
[45CSR§13-5.4.]

**2.10 Major Permit Modification**

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.  
[45CSR§13-5.1]

**2.11. Inspection and Entry**

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

## **2.12. Emergency**

- 2.12.1. An “emergency” means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

## **2.13. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

## **2.14. Suspension of Activities**

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

**2.15. Property Rights**

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

**2.16. Severability**

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

**2.17. Transferability**

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

**2.18. Notification Requirements**

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

**2.19. Credible Evidence**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

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### 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.  
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.  
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.  
[45CSR§11-5.2.]

#### 3.2. Monitoring Requirements

*[Reserved]*

### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
  - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
  - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
  - d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary

of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

### 3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§4. *State Enforceable Only.*]

### 3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**If to the DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street  
Charleston, WV 25304-2345

**If to the US EPA:**

Associate Director  
Office of Air Enforcement and Compliance Assistance  
(3AP20)  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

**3.5.4. Operating Fee**

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

## 4.0. Source-Specific Requirements

### 4.1. Limitations and Standards

- 4.1.1. The emissions from F-1804 Ammonia Incinerator shall not exceed the following emission limits, as well as the venting arrangements, set forth in Table 1.0 of this permit. Any reference to an annual limit in this permit refers to any consecutive twelve (12) month period.
- a. NO<sub>x</sub> emissions from the incinerator shall not exceed 6.90 pounds per hour and 30.2 tpy.
  - b. CO emissions from the incinerator 0.78 pounds per hour and 3.40 tpy.
  - c. VOC emissions from the incinerator 0.06 pounds per hour and 0.27 tpy.
  - d. PM emissions from the incinerator 0.30 pounds per hour and 1.33 tpy.  
[45 CSR §6-4.1.]
  - e. SO<sub>2</sub> emissions from the incinerator 0.01 pounds per hour and 0.06 tpy.
  - f. Ammonia emissions from the incinerator 28 pounds per hour and 122.6 tpy.
  - g. The incinerator shall not exhibit visible emissions of twenty (20) percent opacity of greater on a six minute average.  
[45 CSR §6-4.3.]
- 4.1.2. The permittee shall vent the emission units to the Ammonia Incinerator, F-1804 as indicated in Table 1.0 at all times except when no process-generated emissions are occurring. In the event of an unavoidable malfunction such as a power outage, or during periods of routine on-line rodding out, process generated emissions to the atmosphere shall be minimized by the permittee taking the following actions:
- a. Continue to operate the Ammonia Incinerator, F-1804, if practical.
  - b. If the Ammonia Incinerator, F-1804, operating temperature falls below 950°C or rises above 1050°C, then the permittee shall:
    - i. Halt urea feed to the urea Kiln D, F-1801.
    - ii. Minimize process-generated emissions by switching quench sprays on the D-1801 Urea Scrubber to captive water.
- 4.1.3. The maximum hourly amount of urea fed to Kiln D (F-1801) shall not exceed 6,200 pounds urea (dry weight basis) per hour from storage.
- 4.1.4. The maximum hourly and annual plant wide production of cyanuric acid (CA) from Kilns A, B, C, and D shall not exceed 11,900 pounds per hour and 52,122 tons per year.



- 4.1.5. The maximum natural gas usage for Kiln D shall not exceed 13,075 scf/hr and 114.5 MMscf/yr.
- 4.1.6. The permittee shall install, calibrate, and maintain a device to continuously monitor and record the operating temperature of Ammonia Incinerator F-1804. Except during startup/shutdown of Ammonia Incinerator F-1804, or as allowed by Condition 4.1.2. of this permit, the operating temperature of Ammonia Incinerator F-1804 shall be maintained at the following conditions while process-generated emissions from units as indicted to be vent to the Ammonia Incinerator in Table 1.0 are occurring:
- a. The minimum operating temperature shall be 950°C.
  - b. The maximum operating temperature shall be 1,050°C.
- 4.1.7. Ammonia incinerator F-1804 shall maintain a minimum ammonia destruction efficiency of 98.7%.
- 4.1.8. A maximum of 1,200,000 lb/day urea shall be unloaded via railcar or truck to the facility. Rail car and truck unloading operations shall not occur simultaneously.
- 4.1.9. The maximum of annual quantity of materials delivered to the facility shall not exceed the following:
- a. 83,000 tons of urea per year via railcars or trucks; and
  - b. 25,000 tons of crude cyanuric acid per year via railcars.
- 4.1.10. Particulate matter emissions from emission point F-176 shall not exceed 0.22 pounds per hour and 0.38 tons per year. Compliance with these limits is based on proper operation of the associated control devices (S-151-A and S-195). The permittee shall install, calibrate, and maintain monitoring equipment to demonstrate that the following parameters are met during all times of operation for the following baghouses:

Baghouse Identification	Minimum Static Pressure Drop (inches water column)
S-151-A	2.0
S-195	2.0

- a. Monitoring and recordkeeping for each baghouse and for each parameter listed above shall be performed at a minimum of once per week to determine compliance with the permitted limits.
  - b. The permittee shall be granted exception from this requirement for 24 hours following new bag(s) startup.
- 4.1.11. The permittee shall install, calibrate, and maintain monitoring equipment on-site to demonstrate, at the permittee's discretion or upon request of Division of Air Quality personnel, that the following parameters are met during the operation of the following baghouses:

Baghouse Identification	Maximum Air Flow Rate (acfm)
S-151-A	1,290
S-195	1,290

- 4.1.12. The maximum concentration of sulfuric acid mist from the venturi water scrubber D-222 (emission point D-222) shall not exceed 70 mg/dscm, which equates to concentration of 17.2 ppmvd. Sulfur acid emissions from emission point D-222 shall not exceed 0.42 pounds per hour and 1.80 tons per year.  
**[45 CSR §7-4.2. and Table 45-7B of 45 CSR 7]**
- 4.1.13. The maximum concentration of sulfuric acid mist from Tanks T-1003 and T-1007 shall not exceed 35 mg/dscm, which equates to a concentration of 8.6 ppmvd. Compliance with limit is satisfied by storing sulfuric acid in the vessel of a concentration at or less than 93% by weight.  
**[45 CSR §7-4.2. and Table 45-7B of 45 CSR 7]**
- 4.1.14. Hourly and annual emissions from the EG-100 Emergency Generator shall not exceed the maximum limits given in the table below.

Pollutant	Emission Factors <sup>1</sup> (lb/hp-hr) (power output)	Uncontrolled Maximum Emissions	
		(lb/hr)	(TPY <sup>2</sup> )
PM	0.0007	0.938	0.23
VOC	0.000705	0.945	0.24
CO	0.0055	7.37	1.84
NO <sub>x</sub>	0.024	32.16	8.04
SO <sub>2</sub> <sup>3</sup>	0.00809	10.84	2.71

1	Emission factors from EPA’s AP-42, Chapter 3.4 “Large Stationary Diesel and All Stationary Dual-fuel Engines,” Table 3.4-1 “Gaseous Emission Factors for Large Stationary Diesel and All Stationary Dual-Fuel Engines.”
2	Based on operating the EG-100 emergency generator 500 hours per year.
3	Clearon calculated the SO <sub>2</sub> emission factor based on 1% by weight sulfur in #2 fuel oil (diesel).

- 4.1.15. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.  
**[45CSR§13-5.11.]**

## 4.2. Monitoring Requirements

- 4.2.1. To determine compliance with permitted natural gas fuel use limits, raw material (urea) limits, product (purified CA) limits, and vendor received crude cyanuric acid limits, the permittee shall maintain records of daily, monthly, and annual throughputs. In addition the permittee shall maintain records of air pollution control devices to show compliance with the parameters identified of Conditions 4.1.1. of this permit. Such records must be maintained in accordance with Condition 3.4.1.
- 4.2.2. For the purpose of determining compliance with the maximum emission rate limitations established for the emergency generator/diesel engine as set forth in Condition 4.1.14., the permittee shall keep daily, monthly, and annual records of hours of operation, and any and all maintenance work performed on the generator/engine. Such records must be maintained in accordance with Condition 3.4.1.

## 4.3. Testing Requirements

*[Reserved]*

## 4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
  - a. The equipment involved.
  - b. Steps taken to minimize emissions during the event.
  - c. The duration of the event.
  - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
  - f. Steps taken to correct the malfunction.
  - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.4.4. For the purpose of complying with Condition 4.1.13., the permittee shall maintain records of concentration of the sulfuric acid received by the facility and stored either in T-1003 or T-1007 or other documentation that demonstrates that the sulfuric acid stored in Tanks T-1003 and T-1007 does not exceed the sulfuric acid mist concentration standard stated in Condition 4.1.13. Such records shall be maintained in accordance with Condition 3.4.1.

#### **4.5. Reporting Requirements**

*[Reserved]*

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### CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup> \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title \_\_\_\_\_  
(please print or type) Name Title

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

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<sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
  - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
  - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.