

# DRAFT

## OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

### MEMORANDUM

June 13, 2011

**TO:** Phillip Fielder, P.E., Permits and Engineering Group Manager

**THROUGH:** Kendal Stegmann, Senior Environmental Manager  
Compliance and Enforcement

**THROUGH:** Phil Martin, P.E., New Source Permits Section

**THROUGH:** Peer Review

**FROM:** Eric L. Milligan, P.E., Engineering Section

**SUBJECT:** Evaluation of Permit Application No. **2011-141-TVR2**  
Xerox Corporation  
Xerox Photocopier Supplies Manufacturing Facility (SIC 3861)  
100 North Mustang Road, Yukon  
Section 34, T12N, R5W, Canadian County, Oklahoma  
Latitude: 35.4691; Longitude: -97.7190  
Located north of I-40 at Mustang Road Exit

### SECTION I. INTRODUCTION

Xerox has requested renewal of their current Part 70 permit. The AMAT Plant and Extruded Toner Plant will be removed from the permit since they are no longer in operation. The Extruded Toner Plant has been removed from the facility. The existing emergency engines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart ZZZZ, Reciprocating Internal Combustion Engines and all applicable requirements will be incorporated into the permit. The facility will be limiting operation of the existing boilers to natural gas except for during periods of gas curtailment, gas supply emergencies, or periodic testing. The boilers will be subject to NESHAP, Subpart DDDDD, Industrial, Commercial, and Institutional Boilers and Process Heaters and all applicable requirements will be incorporated into the permit. The facility is currently operating under Permit. No. 2005-111-TVR which was issued on September 1, 2006. The permit will also be updated to reflect all current rules and regulations.

## SECTION II. FACILITY DESCRIPTION

Xerox Corporation operates a photocopier supplies manufacturing facility consisting of an XP-808 Plant, a LEX Plant, an XP-454 Plant, and other emission units at its Yukon, Oklahoma facility. Below is a process description for the base operating scenarios. There are two operating scenarios for the facility. For Scenario I, the boilers will be fueled with pipeline grade natural gas. For Scenario II, only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel, the boilers will be fueled with distillate fuel with a maximum sulfur content of 0.05% by weight.

### **XP-808 Plant**

The XP-808 Plant is a process that utilizes a polymerization reaction to form a butadiene styrene polymer from raw material monomers. The resin produced in the XP-808 Plant is used in the manufacture of toner. The liquid monomers are stored in bulk storage tanks and pumped into weigh tanks with other raw materials in the first step of the process. After the correct amounts of raw materials are weighed out in the weigh tanks, the contents are blended together in a mix tank. The unreacted monomers are then pumped into one of the two parallel operating reactors. The reactors are then heated to the desired temperature and the aqueous monomer solution is polymerized into the resin product. The resin product is then separated from the aqueous phase and dried before storage in tote bags. The liquid wash undergoes on-site neutralization and waste treatment before disposal. Particulate emissions are controlled by dual operating cyclones.

### **LEX Plant**

The Linear Extrusion Resin (LEX) Plant produces a resin that is used as a feed to produce photocopier toner. The solid raw materials are first blended to a consistent mixture. This mixture is processed through an extruder where it is mixed with additional resin to produce LEX resin in a taffy-like texture. The mixture is heated within the extruder to produce the desired texture. The LEX resin is then cooled, flattened and milled into fine particles for packaging. Particulate emissions from this plant are controlled by multiple filters and cyclones.

### **XP-454 Plant**

XP-454 is a submicron conductive polymethylmethacrylate (PMMA) resin that is used as an ingredient in photocopier developer production. The XP-454 process actually contains two separate processes. The first is a carbon black (CB) flushing procedure employing solution polymerization (SOLP). The second process, designated "Semi-Suspension Polymerization" (SSP), uses the material produced in SOLP process to prepare conductive PMMA/CB particles.

### **Plant Utilities**

In addition to the processing operations at the Oklahoma City Facility, Xerox operates several support systems. Xerox operates three process steam boilers, nine No. 2 fuel oil storage tanks, two engines used to run the fire-water booster pumps, and three engines used for emergency generators.

**Binder Tape Plant**

The binder tape plant produces reels of adhesive strips used for binding the spine of documents. The raw glue pellets are processed through an electric applicator onto continuous strips of foil backed paper. These strips are cut to specification and packaged for distribution. Emissions from this process are captured and vented uncontrolled through the roof and are considered insignificant.

Many of the sources at the facility have actual emissions below the insignificance level of five tons per year with the control devices operational. These emission points are listed as emission units but a facility wide or plant wide emission limit will be established and use of control devices will be specified in the specific conditions. Since some of the sources are subject to an applicable requirement they do not qualify as insignificant activities and will be addressed in the Title V permit.

Since the facility emits more than 10/25 TPY of a hazardous air pollutant (HAP), it is subject to Title V permitting requirements. Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) in the “Equipment” section. Due to the complexity of the facility, only a summary of the emission points has been included. The permit application contained a comprehensive listing of all emission points.

**SECTION III. EQUIPMENT**

**EUG 1 Facility Wide**

<b>Major Process Operation</b>	<b>Emission Unit Groups</b>
XP-808 Resin Plant	808-EQU 808-VENTS 808-MATERIAL 808-TANKS
Linear Extrusion Resin (LEX) Plant	LEX-MATERIAL LEX-EXTRUDER
XP-454 Resin Plant	454-PROCESS 454-TANKS
Plant Utilities	BOILERS UST PUMPS EMER-GEN
Binder Tape Plant	BINDER TAPE

## EUG 5 XP-808 Resin Plant

EU	Name	Const. Date
<b>808-EQU</b>		
RSTYRENE	Resin Plant Styrene Tank Equipment Leaks*	1979
RBUTA	Resin Plant Butadiene Tank Equipment Leaks*	1979
RREACT	Resin Plant Reactors Equipment Leaks*	1979
RMIX1	Mix Tanks for Reactors Equipment Leaks*	1979
RHOLDING	Polymer Holding Tanks Equipment Leaks*	1979
RMIX2	Weigh Mix Tank for Reactors Equipment Leaks	1979
<b>808-VENTS</b>		
RVENT1	Resin Plant Process	1979
RVENT2	Resin Plant Process	1979
EMVENT1	Emergency Pressure Relief Vent	1979
EMVENT2	Emergency Pressure Relief Vent	1979
EMVENT3	Reactor Emergency Rupture Disc	1979
EMVENT4	Reactor Emergency Rupture Disc	1979
EMVENT5	Process Vessel Emergency Rupture Disc	1979
EMVENT6	Process Vessel Emergency Rupture Disc	1979
<b>808-MATERIAL</b>		
RHOPPER	Product Hopper Controlled by Cyclone*	1979
RDRYER	Resin Plant Resin Dryer Controlled by Cyclone*	1979
<b>808-TANKS</b>		
RSTYRENE	Resin Plant Styrene Storage Tank	1979
RN-BMA	Resin Plant Butadiene Storage Tank*	1979
RBUTA	Resin Plant Butadiene Storage Tank Rupture Disk	1979

## EUG 6 LEX Resin Plant

EU	Name	Const. Date
<b>LEX-MATERIAL</b>		
LEXNUIS	Nuisance Dust Collector: Raw Resin Feed, Linear Feeder, Pin Mill, and LEX Product Bins A & B*	2006
LEX BLEND	Resin Blender*	1998
LEXHOP	Resin Process Hopper*	1998
LEXPRU	Product Receiving Unit*	1998
LEXPEROXIDE	Nuisance Pick-up Points, Wash Water Collection Tank, and Organic Peroxide Hopper	1998
LEXUPLOAD	Storage Tank, Resin Weigh Hopper, Resin Raw Material Hopper*	2002
<b>LEX-EXTRUDER</b>		
LEXEX	LEX Process Extruder*	1997-1998

**EUG 7 XP-454 Resin Plant**

<b>EU</b>	<b>Name/Model</b>	<b>Const. Date</b>
<b>454-PROCESS</b>		
XHOP	Hopper Vent (SOLP CB Hopper)*	1998
XHOP2	Hopper Vent (SSP PMMA/CB Hopper)*	1998
XDRYER	SOLP/SSP Product Dryer/Hopper Vent (SSP Final Dryer/Hopper/Product Bin)*	1998
XVENT1	Vent Header No. 1: SOLP CB Mix Tank, SOLP Initiator Mix Tank, SOLP Reactor, SOLP Aqueous Recycle, SOLP Distillation/Condenser, SOLP Centrifuge, SOLP Toluene Recovery Separators, and SOLP Backmixer; and the SSP Organic Phase Reactor, SSP Particle Formation Reactor/Homogenizer, SSP Semi Suspension Reactor, SSP Reslurry Reactor, SSP Centrifuge, SSP Reslurry Tank, SSP MeOH/Water Washes, and SSP Backmixer*	1998
XVENT2	Vent Header No. 2: SSP Centrifuge, SOLP Reactor, SSP Semi-Suspension Reactor, SOLP Backmixer, SSP Reslurry Reactor, SSP MeOH/Water Washes	1998
XVENT3	Vent Header No. 3: Material Weigh-Up Hood, SOLP CB Mix Tank, CB Conveyor, SOLP Initiator Mix Tank, and SOLP Product Bin/SOLP Product Tote; SSP Product Bin/SSP Product Tote, the SSP Organic Phase Reactor, and SSP Aqueous Phase Tank.*	1998/2006
<b>454-TANKS</b>		
XMMA	MMA Tank*	1998
XTOL	Toluene Recycle Tank Vent*	1998
XMETH7	Methanol Waste Tank Vent*	1998
XMETH8	Methanol Storage Tank Vent*	1998

**EUG 8 Plant Utilities**

<b>EU</b>	<b>Name/Model</b>	<b>Const. Date</b>
<b>BOILERS</b>		
P-U-04	Boiler No. 1/Babcock & Wilcox [National Board # 24219]	1976
P-U-05	Boiler No. 2/Babcock & Wilcox [National Board # 24217]	1976
P-U-06	Boiler No. 3/Babcock & Wilcox [National Board # 24218]	1975
<b>UST</b>		
E-U-M1	Underground Storage Tank #1 - Fuel Oil (20,000 gallons)*	1976
E-U-M2	Underground Storage Tank #2 - Fuel Oil (20,000 gallons)*	1976
E-U-M3	Underground Storage Tank #3 - Fuel Oil (20,000 gallons)*	1976
E-U-M4	Underground Storage Tank #4 - Fuel Oil (20,000 gallons)*	1976

**EUG 8 Plant Utilities (Continued)**

<b>PUMPS</b>		
E-U-07	215 HP Emergency Fire Booster Pump - South Pump House (Allis-Chalmers Centrifugal Pump, Cummins Engine Company - N-855-F)*	1975
FT-03	Above Ground Storage Tank - Fuel Oil (275 gallons) South Pump House*	1975
E-U-08	340 HP Emergency Fire Booster Pump - North Pump House (Allis-Chalmers Centrifugal Pump, Cummins Engine Company - N-855-F2)*	1975
FT-04	Above Ground Storage Tank - Fuel Oil (550 gallons) North Pump House*	1975
<b>EMER-GEN</b>		
E-R-ENG01	180 HP Kohler Emergency Generator, White Engine*	1980
FT-01	Underground Storage Tank - Fuel Oil (600 gallons)*	1999
E-X-ENG02	195 HP Kohler 135 Emergency Generator, John Deere Engine*	1996
FT-02	Above Ground Storage Tank - Fuel Oil (275 gallons)*	1996
E-R-ENG03	81 HP Generac Emergency Generator, Daewoo Engine*	2005
FT-05	Above Ground Storage Tank - Fuel Oil (84 gallons)*	2005
<b>LAB</b>		
QCH	Laboratory Hoods in QC Labs for Resin Manufacturing*	1977

**EUG 9 Binder Tape Plant**

EU	Name/Model	Const. Date
<b>BINDER TAPE</b>		
Binder	Spine Tank, Spine Applicator, Flap Tank, and Flap Applicator*	1989

\* - All emissions from these emission units are below 5 TPY.

**SECTION IV. EMISSIONS**

**XP-808 Resin Plant**

Emissions from the XP-808 plant are based on stack test data taken by Environmental Engineering Services in September of 1989, cyclone efficiency testing in 1980, and the production rate of 7,100 TPY. Maximum hourly emissions assume a batch process and emissions during 2,500 hours per year even though the facility will be permitted to operate 8,760 hours per year. The emissions from RVENT-1 and RVENT-2 are regulated under the NESHAP, Subpart JJJ and emissions are required to be calculated in accordance with that subpart. Emissions from RVENT-1 and RVENT-2 are calculated in accordance with § 63.1323. Estimated emissions for the styrene tank are based on AP-42 (1/95), Chapter 7.1. Estimated emissions for the 1,3-butadiene tank are based on engineering estimates. Fugitive equipment

VOC emissions are based on EPA's 1995 *Protocol for Equipment Leak Emission Estimates* (EPA-453/R-95-017).

#### EUG 5 Potential XP-808 Resin Plant HAP Emissions

HAP	CAS #	lb/hr	TPY
1,3-Butadiene	106-99-0	6.47	10.10
Styrene	100-42-5	1.85	2.89
<b>Totals</b>		<b>8.32</b>	<b>12.99</b>

#### LEX Plant

The emissions are calculated using the design throughput rate of 3,000 pounds per hour and 8,760 hours per year operation. The equipment is controlled by a fabric filter particulate control device followed by a pleated paper after-filter with an overall efficiency of at least 99.9%. The blender also has a fabric filter particulate control device followed by a pleated paper after-filter. It was assumed in all cases that 50% of the total input to each step of the process enters the control devices. This is a very high assumption that results in the maximum emission calculations. The extruder also emits VOC, which are not controlled. Emission calculations are based on stack tests conducted by CETCON, Inc., on January 28, 2003. The applicant has requested confidential treatment of the identity of the VOC emitted. The LEX Plant does not process, use, or produce HAP.

#### XP-454 Resin Plant

Emissions from some, but not all, of the sources in the XP-454 Plant are controlled by one or more means. In several cases, different sources pass through a common air pollution control device, or through a common discharge point. Emission calculations are based on stack tests conducted by CETCON, Inc., on June 6<sup>th</sup> thru the 9<sup>th</sup> and 13<sup>th</sup> thru the 16<sup>th</sup>, 2005. Estimated emissions for the tanks are based on AP-42 (1/95), Chapter 7.1. Fugitive equipment VOC emissions are based on EPA's 1995 *Protocol for Equipment Leak Emission Estimates* (EPA-453/R-95-017). Although the PTE is greater than 5 TPY of HAP the facility will be limited to 5 TPY of HAP to keep the process vents from being Group 1 process vents as defined by NESHAP, Subpart FFFF.

#### EUG 5 Potential XP-454 Plant HAP Emissions

HAP	CAS #	lb/hr	TPY
Methanol	67-56-1	4.09	4.44
Methyl Methacrylate	80-62-6	0.22	0.20
Toluene	108-88-3	0.59	0.29
<b>Totals</b>		<b>4.90</b>	<b>4.93</b>

**Plant Utilities**

Potential emissions of CO, VOC, PM<sub>10</sub>, and SO<sub>2</sub> emissions for combustion of natural gas in the boilers were based on AP-42 (7/1998), Section 1.4. Potential emissions of CO, VOC, and SO<sub>2</sub> from combustion of fuel oil No. 2, with a maximum sulfur content of 0.05 % weight, in the boilers were based on AP-42 (05/2010), Section 1.3. Potential emissions of NO<sub>x</sub> emissions for combustion of natural gas and fuel oil were based on the applicable emission limits contained in Subchapter 33. Potential emissions of PM<sub>10</sub> from combustion of fuel oil in the boilers were based on an emission factor of 0.11 lb/MMBTU. Potential emissions of all criteria pollutants from the emergency pumps and generators combusting fuel oil were based on AP-42 (10/1996), Section 3.3, 500 hours of operation per year, and their maximum rating, except for SO<sub>2</sub> emissions which are based on AP-42 (10/1996), Section 3.4, and a maximum sulfur content of 0.05% weight. Estimated emissions for the tanks are based on AP-42 (1/1995), Section 7.1. All PM emissions from these combustion sources are assumed to be PM<sub>10</sub>. Emissions from Scenario II are overestimated due to the fact that fuel oil No. 2 is only used as an emergency backup fuel.

**Actual Emissions / 2010 Emission Inventory**

	<b>VOC</b>	<b>HAP</b>	<b>PM<sub>10</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>
<b>Plant/EU</b>	<b>TPY</b>	<b>TPY</b>	<b>TPY</b>	<b>TPY</b>	<b>TPY</b>	<b>TPY</b>
XP-808	3.78	3.78	0.01	----	----	----
LEX	0.25	----	0.00	----	----	----
XP-454	0.45	0.45	0.00	----	----	----
Utilities	0.25	0.05	0.25	3.29	2.35	0.10
Remediation	0.75	0.75	----	----	----	----
<b>TOTAL</b>	<b>5.48</b>	<b>5.03</b>	<b>0.26</b>	<b>3.29</b>	<b>2.35</b>	<b>0.10</b>

**Facility Wide Emissions Except for Utilities**

	<b>VOC</b>		<b>HAP</b>		<b>PM<sub>10</sub></b>	
<b>Plant</b>	<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>
XP-808	8.32	12.99	8.32	12.99	----	<5.00
LEX	----	<5.00	----	----	----	<5.00
XP-454	4.90	<5.00	4.90	<5.00	----	<5.00
<b>TOTAL</b>	<b>13.22</b>	<b>22.99</b>	<b>13.22</b>	<b>17.99</b>	<b>0.00</b>	<b>15.00</b>



**Utilities Emissions (Scenario I – Boilers Fired with Natural Gas)**

EU	NO <sub>x</sub>		CO		SO <sub>2</sub>		VOC		PM <sub>10</sub>	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
P-U-04	16.00	70.08	6.59	28.87	0.05	0.21	0.43	1.89	0.60	2.61
P-U-05	16.00	70.08	6.59	28.87	0.05	0.21	0.43	1.89	0.60	2.61
P-U-06	16.00	70.08	6.59	28.87	0.05	0.21	0.43	1.89	0.60	2.61
E-U-08	10.54	2.64	2.27	0.57	1.38	0.34	0.84	0.21	0.75	0.19
E-U-07	6.67	1.67	1.44	0.36	0.87	0.22	0.53	0.13	0.47	0.12
TANKS	----	----	----	----	----	----	0.01	0.06	----	----
E-R-ENG01	5.58	1.40	1.20	0.30	0.73	0.18	0.44	0.11	0.40	0.10
E-X-ENG02	6.05	1.51	1.30	0.33	0.79	0.20	0.48	0.12	0.43	0.11
E-R-ENG03	1.05	0.26	0.21	0.05	0.33	0.08	0.03	0.01	0.04	0.01
<b>TOTAL</b>	<b>77.89</b>	<b>217.72</b>	<b>26.19</b>	<b>88.22</b>	<b>4.25</b>	<b>1.65</b>	<b>3.62</b>	<b>6.31</b>	<b>3.89</b>	<b>8.36</b>

**Utilities Emissions (Scenario II – Boilers Fired with Fuel Oil With 0.05 % Sulfur by Weight)**

EU	NO <sub>x</sub>		CO		SO <sub>2</sub>		VOC		PM <sub>10</sub>	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
P-U-04	24.00	105.12	2.86	12.51	4.06	17.77	0.19	0.85	8.80	38.54
P-U-05	24.00	105.12	2.86	12.51	4.06	17.77	0.19	0.85	8.80	38.54
P-U-06	24.00	105.12	2.86	12.51	4.06	17.77	0.19	0.85	8.80	38.54
E-U-08	10.54	2.64	2.27	0.57	0.14	0.03	0.84	0.21	0.75	0.19
E-U-07	6.67	1.67	1.44	0.36	0.09	0.02	0.53	0.13	0.47	0.12
TANKS	----	----	----	----	----	----	0.01	0.06	----	----
E-R-ENG01	5.58	1.40	1.20	0.30	0.07	0.02	0.44	0.11	0.40	0.10
E-X-ENG02	6.05	1.51	1.30	0.33	0.08	0.02	0.48	0.12	0.43	0.11
E-R-ENG03	1.05	0.26	0.21	0.05	0.03	0.01	0.03	0.01	0.04	0.01
<b>TOTAL</b>	<b>101.89</b>	<b>322.84</b>	<b>14.82</b>	<b>38.39</b>	<b>12.59</b>	<b>53.41</b>	<b>2.66</b>	<b>2.11</b>	<b>28.49</b>	<b>116.15</b>

**SECTION V. INSIGNIFICANT ACTIVITIES**

The insignificant activities identified and justified in the application are duplicated below. Activities requiring records of hours, quantity, or capacity to verify emissions are below the de minimis are identified below with an asterisk “\*”. Appropriate recordkeeping conditions are specified in the Specific Conditions.

1. \* Stationary reciprocating engines burning natural gas, gasoline, aircraft fuels, or diesel fuel which are either used exclusively for emergency power generation or for peaking power service not exceeding 500 hours/year. There are three emergency generators that are used at the facility and others may be used in the future.
2. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTU/hr heat input (commercial natural gas). Some small heaters used as water heaters and other types of heaters are at the facility but qualify as trivial emission units but others may be used in the future.
3. Emissions from stationary internal combustion engines rated less than 50 hp output. None identified but they may be used in the future.
4. \* Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. The nitric acid and diesel storage tanks are below 39,894 gallons and store products with vapor pressures less than 1.5 psia. The nine fuel oil storage tanks have capacities less than 39,894 gallons and store VOC with a vapor pressure of less than 1.5 psia.
5. Cold degreasing operations utilizing solvents that are denser than air. None identified but they may be used in the future.
6. \* Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes. Welding and soldering are conducted at the facility but are conducted as a part of routine maintenance and is considered a trivial activity and recordkeeping will not be required in the Specific Conditions.
7. \* Torch cutting and welding of under 200,000 tons of steel fabricated per year. Torch cutting and welding are conducted at the facility but are conducted as a part of routine maintenance and are considered a trivial activity and recordkeeping will not be required in the Specific Conditions.
8. Emissions from the operation of groundwater remediation wells including but not limited to emissions from venting, pumping, and collecting activities subject to de minimis limits for air toxics (252:100-41-43) and HAPs (§ 112(b) of CAAA90). Xerox operates a groundwater remediation system and based on water contaminant levels emit less than 2 TPY of toluene.

9. Hazardous waste and hazardous materials drum staging areas. Xerox has a central hazardous materials collection system and satellite collection locations throughout the process areas.
10. Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas. Xerox maintains storage cabinets and rooms with room exhaust points for chemicals and solvents. Xerox also maintains hazardous waste accumulation areas at various locations within the Facility.
11. \* Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant.
  - The fire booster pump engine are utilized for emergency fire fighting. Although permitted for 4,750 hours per year, actual operation is less than 500 hours.
  - Laboratory Hoods are utilized infrequently and based on best engineering estimates of use emissions are negligible.
  - The Binder Tape Plant uses glues that do not contain VOC or HAP.
  - Other activities have actual emissions below 5 TPY but are subject to State applicable requirements and can not be included on this list.
  - Others may be identified and used in the future.

## SECTION VI. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]  
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]  
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]  
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emission Inventory, and Annual Operating Fees) [Applicable]  
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories have been submitted and fees paid for the past years.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]  
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities mean individual emission units that either are on the list in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits:

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for single HAP that the EPA may establish by rule

All emission limits have been incorporated from the previous permit (Permit No. 2005-111- TVR) or based on information in the permit application.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]  
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for affirmative defense, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]  
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]  
This subchapter specifies a particulate matter (PM) emissions limitation of 0.6 lb/MMBTU from new fuel-burning equipment with a rated heat input of 10 MMBTUH or less. New fuel-burning equipment with a rated heat input of 80 MMBTUH are limited to 0.37 lb/MMBTU. AP-42 (7/1998), Section 1.4 lists the total PM emissions for natural gas to be 7.6 lb/MMft<sup>3</sup> or about 0.0076 lb/MMBTU. AP-42 (5/2010), Section 1.3 lists the total PM emissions for distillate fuel oil to be 3.3 lb/10<sup>3</sup> gallons or about 0.024 lb/MMBTU. AP-42 (10/1996), Section 3.3 lists the total PM emissions for diesel fired industrial engines less than 600-hp to be 0.0022 lb/MMBTU. These emission factors are in compliance with this subchapter. The original permit allowed a PM emission limit of 0.11 lb/MMBTU when burning fuel oil in the boilers and emission limits in the Title V permit are based on the same emission factor. The permit will require the use of natural gas or distillate fuel oil for the boilers and distillate fuel (fuel oil No. 2) for the industrial engines used on the pumps and generators to ensure compliance with Subchapter 19.

This subchapter also limits emissions of particulate matter from processes other than fuel-burning equipment based upon their process weight rates. The emission rate in pounds per hour (E) is not to exceed the rate calculated using the process weight rate in tons per hour (P), for process rates up to 60,000 lb/hr the formula in appendix G is ( $E = 4.10 * P^{(0.67)}$ ).

Process rates from the different processes are considered confidential. Therefore a specific condition requiring compliance with the emission rates based on the formula in Subchapter 19 and the process weight rates will be established and recorded at the facility. Emissions have been determined to be well below the emission limits established by Subchapter 19 with the control devices in operation. Another specific condition will also be established to ensure that the control devices are operated and maintained.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]  
No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity.

OAC 252:100-29 (Fugitive Dust) [Applicable]  
No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards.

The facility has numerous drop points and material processes. Normal operation of the facility with the control devices (baghouses and fabric filters) in operation should not cause a problem in this area. However, reasonable precautions to control fugitive dust emissions from the operations will be stated in the permit.

OAC 252:100-31 (Sulfur Compounds) [Applicable]  
Part 5 limits sulfur dioxide emissions from new equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/million BTU heat input. This is equivalent to approximately 0.2 weight percent sulfur in the fuel gas which is equivalent to 2,000 ppm sulfur. AP-42, Table 1.4-2 (7/1998) lists the total SO<sub>2</sub> emissions for natural gas to be 0.6 lb/MMft<sup>3</sup> or about 0.0006 lb/MMBTU. For Scenario I, the permit requires the use of natural gas for the boilers to ensure compliance with Subchapter 31.  
For liquid fuels, the emission limit is 0.8 lb/million BTU heat input. This is equivalent to approximately 0.8 weight percent sulfur in the liquid fuel. Thus, a limitation of 0.05 percent sulfur in the distillate fuel oil supply will be in compliance. For Scenario II, the permit will require the use of distillate fuel oil with a maximum sulfur content of 0.05 percent for the boilers and industrial engines used on the pumps and generators to ensure compliance with Subchapter 31. The permit will also require a record of the fuel sulfur content for the distillate fuel oil used by the facility. The sulfur content shall be determined using an analysis provided by the supplier or the distributor for every shipment received to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Applicable]  
Subchapter 33 establishes a maximum NO<sub>x</sub> emission rate for gas-fired, liquid-fired, and solid fossil fuel-burning equipment with rated heat inputs of 50 MMBTUH or more. Each of the three gas/fuel oil-fired boilers have a maximum rated heat input of 80 MMBTUH and each is subject to the NO<sub>x</sub> emission limitations which will be used to establish the emission limits for the boilers. When firing natural gas each of the boilers are subject to the NO<sub>x</sub> emission limitation of 0.20 lb/MMBTU (three hour average) based on the heat input. AP-42, Table 1.4-2 (7/1998), lists the total NO<sub>x</sub> emissions for natural gas to be 100 lb/MMft<sup>3</sup> or about 0.10 lb/MMBTU. When firing fuel oil each of the boilers are subject to the NO<sub>x</sub> emission limitation of 0.30 lb/MMBTU (three hour average) based on the heat input. AP-42, Table 1.3-1 (9/1998) lists the total NO<sub>x</sub> emissions for distillate fuel fired boilers to be 20 lb/10<sup>3</sup> gallons or about 0.14 lb/MMBTU. These emission factors are in compliance with this subchapter. The permit will require the boilers to be fired with either natural gas or distillate fuel oil to ensure compliance with this subchapter.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]  
None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]

#### **XP-454 Resin Plant**

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. This applies to the VOC (methanol) storage tanks in the XP-454 Plant. The MMA storage tank and the process tanks are not subject because the vapor pressures for materials stored in these tanks at maximum storage temperature are less than 1.5 psia.

#### **Other Emission Units**

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The diesel storage tanks are not subject because the vapor pressure of diesel at maximum storage temperature is less than 1.5 psia.

Part 7 requires fuel-burning equipment to be operated and maintained so as to minimize emissions of VOCs. Temperature and available air must be sufficient to provide essentially complete combustion.

OAC 252:100-39 (Nonattainment Areas) [Not Applicable]  
This subchapter currently only applies to Tulsa and Oklahoma counties. This facility is located in Canadian County.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]  
 This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]  
 This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

**The following Oklahoma Air Pollution Control Rules are not applicable to this facility:**

OAC 252:100-11	Alternative Emissions Reduction	Not requested
OAC 252:100-15	Mobile Sources	Not in source category
OAC 252:100-17	Incinerators	Not type of emission unit
OAC 252:100-23	Cotton Gins	Not type of emission unit
OAC 252:100-24	Grain Elevators	Not in source category
OAC 252:100-39	Nonattainment Areas	Not in area category
OAC 252:100-47	Municipal Solid Waste Landfills	Not in source category

**SECTION VII. FEDERAL REGULATIONS**

PSD, 40 CFR Part 52 [Not Applicable]  
 Total potential emissions of NO<sub>x</sub> are greater than the level of significance of 250 TPY. Any future increases of emissions must be evaluated for PSD if they exceed a significance level.

NSPS, 40 CFR Part 60

[Not Applicable]

Subparts Db, Dc, Small Steam Generating Units. The three large boilers located on-site were installed in 1974 and are not subject because they were constructed prior to the promulgation of the standards (June 19, 1984; June 9, 1989).

Subparts D, Da, Electric Utility Steam Generating Units. The boilers are not used to generate electricity. (August 17, 1971; September 18, 1978).

Subparts K, Ka, Kb, VOL Storage Vessels. The 20,000 gallon fuel oil storage tanks are not subject because they were constructed prior to the effective date of Subpart Kb (July 23, 1984) and they are below the de minimis amount of 40,000 gallons for Subparts K and Ka. All of the other fuel oil storage tanks are smaller than the de minimis of Subpart Kb of 19,813 gallons.

Subpart Kb regulates the tanks larger than 19,813 gallons that were constructed after July 23, 1984. The 2,000-gallon methanol tank, the 1,500-gallon methyl methacrylate monomer tank, and 2,000-gallon toluene tank are below the 19,813 gallon de minimis.

Subpart QQ, Graphic Arts Industry: Publication Rotogravure Printing. This subpart affects facilities with a publication rotogravure printing press. There are no publication rotogravure printing presses at this facility.

Subpart RR, Pressure Sensitive Tape and Label Surface Coating. This subpart affects each coating line used to manufacture pressure sensitive tape and labels. This Binder Tape Plant or any other plant at the facility does not manufacture pressure sensitive tape and labels.

Subpart TT, Metal Coil Surface Coating. This subpart affects each coating line used to coat metal coils. This facility does not coat metal coils.

Subpart VV, Equipment Leaks of VOC in the SOCOMI. This subpart affects facilities that produce, as intermediates or final products, one or more of the chemicals listed in § 60.489. This facility does not produce any of the listed compounds.

Subpart DDD, VOC Emissions from the Polymer Manufacturing Industry. This subpart affects facilities that manufacture polyethylene, polypropylene, polystyrene, and polyethylene terephthalate. This facility does not produce any of the listed compounds.

Subpart FFF, Flexible Vinyl And Urethane Coating and Printing. This subpart affects facilities that use rotogravure printing lines to print or coat flexible vinyl or urethane products. The facility does not print or coat flexible vinyl or urethane products; the material is polyester, not vinyl or urethane.

Subpart III, VOC Emissions from SOCOMI Air Oxidation Unit Processes. This subpart affects facilities with air oxidation reactors that produce, as a product, co-product, by-product, or intermediate, any of the chemicals listed in § 60.617. This facility does not produce any of the listed chemicals and does not have an air oxidation reactor.

Subpart NNN, VOC Emissions from SOCOMI Distillation Operations. This subpart affects facilities that are a part of a process unit that produce, as a product, co-product, by-product, or intermediate, any of the chemicals listed in § 60.667. This facility does not produce any of the listed chemicals.

Subpart SSS, Magnetic Tape Coating Facilities. This subpart applies to each magnetic tape coating operation; and each piece of coating mix preparation equipment. The facility does not produce magnetic tape used for audio or video recording or information storage.



Subpart TTT, Industrial Surface Coating: Plastic Parts for Business Machines. This subpart applies to each spray booth used to coat plastic parts for use in manufacturing business machines. The facility does not have any spray booths which are used to coat plastic parts for use in manufacturing business machines.

Subpart VVV, Polymeric Coating of Supporting Substrates Facilities. This subpart applies to each polymeric coating operation that uses a web coating process that applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil and any on-site coating mix preparation equipment. The facility does not apply elastomers, polymers, or prepolymers to a supporting web and is not applicable.

Subpart IIII, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). This subpart affects CI ICE manufactured after 2007. There are no CI ICE manufactured after 2007 at this facility.

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene only affects process streams which contain more than 10% benzene by weight. All process streams at this facility are below this threshold.

NESHAP, 40 CFR Part 63

[Subparts H, JJJ, FFFF, ZZZZ, and DDDDD are Applicable]

Subpart H, Organic Hazardous Air Pollutants Equipment Leaks. The provisions of this subpart apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or systems required by this subpart that are intended to operate in organic hazardous air pollutant service 300 hours or more during the calendar year within a source subject to the provisions of a specific subpart in 40 CFR Part 63 that references this subpart. The affected equipment located within the XP-808 and XP-454 plants are subject to the requirements of this subpart as required by 40 CFR Part 63, Subpart JJJ, § 63.1331(a) and 40 CFR Part 63, Subpart FFFF, § 63.2480(a). The permit will require compliance with all applicable requirements through compliance with Subpart JJJ and Subpart FFFF.

Subpart T, Halogenated Solvent Cleaning. This subpart sets standards for each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The three ultrasonic batch cold cleaning machines located in the AMAT plant were subject to this subpart based upon use of methylene chloride as a cleaning solvent. The ultrasonic batch cold cleaning machines have been removed.

Subparts TT and UU, Equipment Leaks Control Level 1 and 2. These air emission standards for equipment leaks only apply to those owners and operators of facilities subject to the referencing subpart and only to equipment in HAP service 300 hours per year or more and that are not in vacuum service or do not contain process fluids. Subpart FFFF, § 63.2480(a), & Table 6 requires equipment in organic HAP service that is part of an MCPU at an existing facility with no continuous process vents to comply with either Subpart TT, Subpart UU or 40 CFR Part 65

Subpart FF. The permit will require compliance with all applicable requirements through compliance with Subpart FFFF.

Subpart JJJ, Group IV Polymers and Resins. This subpart applies to each thermoplastic product process unit (TPPU) which uses as a reactant, process solvent, or produces as a by-product or co-product any organic HAP and which is located at a major source of HAP. The resin plant has a TPPU which uses an organic HAP as a reactant and process solvent and the Xerox facility is a major source of HAP. Therefore, the XP-808 Plant TPPU is subject to the requirements of this subpart. Subpart JJJ requires that the process equipment in the XP-808 Plant comply with Subpart H. The permit will require compliance with all applicable requirements.

Subpart FFFF, Miscellaneous Organic Chemical Manufacturing. This subpart affects miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source of HAP. An MCPU includes equipment necessary to operate a MCPU, including any assigned storage tanks and product transfer racks; equipment in open systems that is used to convey or store water having the same concentration and flow characteristics as wastewater; and components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems that are used to manufacture any of the regulated materials or family of materials. Xerox has a MCPU (XP-454 Resin Plant), is a major source of HAP, and is subject to this subpart. The XP-454 Plant is subject to the LDAR requirements of this subpart. The permit will require compliance with all applicable requirements.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions. Owners and operators of the following new or reconstructed RICE must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines):

- 1) Stationary RICE located at an area source;
- 2) The following Stationary RICE located at a major source of HAP emissions:
  - i) 2SLB and 4SRB stationary RICE with a site rating of  $\leq 500$  brake HP;
  - ii) 4SLB stationary RICE with a site rating of  $< 250$  brake HP;
  - iii) Stationary RICE with a site rating of  $\leq 500$  brake HP which combust landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis;
  - iv) Emergency or limited use stationary RICE with a site rating of  $\leq 500$  brake HP; and
  - v) CI stationary RICE with a site rating of  $\leq 500$  brake HP.

No further requirements apply for engines subject to NSPS under this part. This facility is a major source of HAP and the following existing engines are subject to this subpart.

**Existing CI RICE**

215 HP Emergency Fire Booster Pump - South Pump House (Allis-Chalmers Centrifugal Pump, Cummins Engine Company - N-855-F)
340 HP Emergency Fire Booster Pump - North Pump House (Allis-Chalmers Centrifugal Pump, Cummins Engine Company - N-855-F2)
180 HP Kohler Emergency Generator, White Engine
195 HP Kohler 135 Emergency Generator, John Deere Engine
81 HP Generac Emergency Generator, Daewoo Engine

Facilities with existing stationary CI RICE located at a major source of HAP emissions must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. Existing emergency stationary CI RICE at major sources must comply with the following management practices:

- Change oil and filter every 500 hours of operation or annually, whichever comes first;
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
- Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

Sources have the option to utilize an oil analysis program as described in § 63.6625(i) in order to extend the specified oil change requirement. Additionally, there are limitations on the hours that an emergency engine may operate. Total operating hours are limited to 100 hours/year for maintenance and readiness checks unless Federal, State, or local standards require maintenance and testing beyond 100 hours per year. The 100 hours/year includes up to 50 hours of non-emergency operations. The 50 hours cannot include peak shaving or other income generating power production. The 50 hours includes up to 15 hours of power generation as part of a demand response program in the event of a potential electrical blackout situation. All applicable requirements have been incorporated into the permit.

Subpart DDDDD, Industrial, Commercial, and Institutional Boilers and Process Heaters. EPA has published various actions regarding implementation of this rule as detailed following:

- September 13, 2004, EPA promulgated standards for major sources;
- June 19, 2007, US Court of Appeals for the district of Columbia vacated and remanded the standards;
- March 21, 2011, EPA promulgated new standards; and
- May 18, 2011, EPA published notice of delay of the effective dates until judicial review or EPA reconsideration is completed, whichever is earlier.

Section 112(j) of the Clean Air Act addresses situations where EPA has failed to promulgate a standard as required under 112(e) (1) and (3). 112(j) requires case-by-case MACT determination applications to be submitted to the permitting authority within specified time frames. Since 112(j) appears to only address situations where EPA has failed to promulgate standards and not situations in which complete rules are subsequently vacated, confusion exists as to the requirements for these sources. On March 30, 2010, EPA proposed a rule to amend 112(j) to clarify what applies under 112(j). In the proposed rule, EPA clarifies that the intent was that vacated sources should be treated similar to sources where EPA has failed to promulgate a standard. The rule, as proposed, will require case-by-case MACT applications to be submitted to the permitting authority within 90 days after promulgation of these amendments or by the date which the source's permitting authority requests such application. Final action on the amendment is scheduled for the fall of 2011. Compliance with this subpart will be determined based on the requirements of the amended 112(j).

As proposed on March 21, 2011, this subpart establishes emission limitations and work practice standards for HAP emitted from industrial, commercial, and institutional boilers and process heaters within a fuel subcategory located at major sources of HAP. A boiler or process heater is new or reconstructed if it commenced construction or reconstruction after June 4, 2010. In the proposed regulation, a new or existing boiler or process heater with a heat input capacity of less than 10 MMBTUH or a limited use boiler or process heater must conduct a tune-up of the boiler or process heater biennially as specified in § 63.7540. Also proposed in the regulation, a new or existing boiler or process heater in the gaseous fuel 1 subcategory with heat input capacity of 10 MMBTUH or greater must conduct a tune-up of the boiler or process heater annually as specified in § 63.7540. Gaseous fuel 1 category includes, but is not limited to, natural gas, process gas, landfill gas, coal derived gas, refinery gas, and biogas. Hot water heaters with a capacity of less than 120-gallons are not subject to this subpart. An existing boiler or process heater located at a major source facility must have a one-time energy assessment performed by a qualified energy assessor. As proposed, the existing boilers will be subject to the annual tune up requirements and the requirement to do the energy assessment. The permit will require compliance with all applicable requirements following the finalized compliance deadline.

CAM, 40 CFR Part 64

[Not Applicable]

Compliance Assurance Monitoring (CAM), as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all of the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of to be classified as a major source.

PM emission units located throughout the facility are subject to emission limits and will use control devices to achieve compliance with the emission limits. None of the emission units have the potential to emit PM, prior to control, in excess of major source levels (100 TPY). The Resin Plant and the XP-454 Plant have VOC and HAP emission limits and use condensers to achieve compliance with their emission limits. The condensers are considered inherent process equipment. There are no other pollutant specific emission control devices at the facility.

Chemical Accident Prevention Provisions, 40 CFR Part 68

[Applicable]

This facility has the ability to store more than the applicable threshold quantity of 1,3-butadiene (14,500 gallons) and was required to submit the applicable risk management plan to the U.S. EPA by June 21, 1999. Xerox has submitted their plan, which was given EPA No. 1378 for EPA Facility No. 10000016886. More information on this federal program is available on the web page: [www.epa.gov/ceppo](http://www.epa.gov/ceppo).

Stratospheric Ozone Protection, 40 CFR Part 82

[Subparts A and F are Applicable]

These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor

vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The standard conditions of the permit address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; § 82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

## **SECTION VIII. COMPLIANCE**

### **Inspection**

On June 28, 2010, Rick Groshong of Air Quality performed a full compliance evaluation inspection. Mr. Matt Mohr for Xerox Corporation was present for the inspection. The facility exists as described in the permit application and supplemental materials.

### **Tier Classification**

This application has been determined to be Tier II based on the request for a Part 70 renewal permit. The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the land.

**Public Review**

The applicant published the “Notice of Filing a Tier II Application” in the *Yukon Review*, a semi-weekly newspaper, in Canadian County, on May 28, 2011. The notice stated that the application was available for public review at the Mabel C. Fry Public Library located at 1200 lakeshore Drive, Yukon, Oklahoma or at the AQD main office. The applicant will publish the “Notice of Draft Permit” in the *Yukon Review* a semi-weekly newspaper, in Canadian County. The notice will state that the draft permit is available for review at the Mabel C. Fry Public Library located at 1200 lakeshore Drive, Yukon, Oklahoma for a period of 30 days. The notice will also state that the draft permit will also be available for public review at the AQD main office and on the DEQ web page at <http://www.deq.state.ok.us>. This permit has been approved for concurrent public and EPA review.

**State Review**

This facility is not located within 50 miles of the border of Oklahoma and any other state.

**EPA Review**

This permit has been approved for concurrent public and EPA review. The draft permit will be forwarded to the EPA for a 45-day review period. As long as no comments are received from the public the draft permit will be deemed the proposed permit.

**Fees Paid**

Part 70 source operating permit renewal application fee of \$1,000.

**SECTION IX. SUMMARY**

The facility is operated as stated in the application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility. Issuance of the renewal operating permit is recommended, contingent on public and EPA review.

# DRAFT

## PERMIT TO OPERATE AIR POLLUTION CONTROL FACILITY SPECIFIC CONDITIONS

**Xerox Corporation**  
**Xerox Photocopier Supplies Manufacturing Facility**

**Permit Number 2011-141-TVR2**

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on September 14, 1998, June 11, 2002, June 1, 2005, December 5, 2005, March 5, 2011, and all supplemental materials. The Evaluation Memorandum, dated June 13, 2011, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and limitations for each point: [OAC 252:100-8-6(a)(1)]

### **EUG 1 Facility-wide**

- a. Xerox shall be authorized to operate the following major process operations:  
[OAC 252:100-8-6(a)(1)]

<b>Major Process Operation</b>	<b>Emission Unit Groups</b>
XP-808 Plant	808-EQU 808-VENTS 808-MATERIAL 808-TANKS
Linear Extrusion Resin (LEX) Plant	LEX-MATERIAL LEX-EXTRUDER
XP-454 Plant	454-PROCESS 454-TANKS
Plant Utilities	BOILERS UST PUMPS EMER-GEN
Binder Tape Plant	BINDER TAPE

- b. The permittee shall conduct weekly visual observations of the exhausts associated with particulate emitting operations and keep records of these observations. If visible emissions are detected, then the permittee shall conduct a six-minute opacity reading in accordance with EPA Reference Method #9 within the next 24-hours, and also verify that the emissions units are operating according to design procedures to assure that compliance is met. The permittee shall maintain records of the date and time of the inspection, plant identification, operational status of the plant, observed results and conclusions, and the results of any Method #9 determination if required.

- (1) If a Method 9 observation exceeds 20% opacity the permittee shall conduct at least two additional Method 9 observations within the next 24-hours.
- (2) If more than one six-minute Method 9 observation exceeds 20% opacity in any consecutive 60 minutes; or more than three six-minute Method 9 observations in any consecutive 24 hours exceeds 20% opacity; or if any six-minute Method 9 observation exceeds 60% opacity; the owner or operator shall comply with the provisions for excess emissions during start-up, shut-down, and malfunction of air pollution control equipment. [OAC 252:100-25]
- c. The permittee shall be authorized to operate the facility continuously (24 hours per day, every day of the year) up to the following production rates:

Major Plant	Maximum Production Rate	Averaging Period
XP-808 Plant	8,800 TPY of raw material	Rolling Annual Total
LEX Plant	3,000 pounds per hour	Monthly Average

- d. The bag filters, cyclones, and/or cartridge filters used for particulate control and/or product recovery shall be maintained in good working order. Performance shall be based on manufacturer’s data. Particulate emissions from the emission units shall be limited to the limitations, based on process weight rate, in OAC 252:100-19-12 and Appendix G. [OAC 252:100-19-12]

**EUG 5 XP-808 PLANT:** Emission limitations and specific conditions for the XP-808 Plant. EUG 808-EQU, 808-VENTS, 808-MATERIAL, 808-TANKS.

- a. XP-808 Plant emission limitations (808-EQU, 808-VENTS, 808-MATERIAL, 808-TANKS):

Pollutants	Units*	Limits
Total HAP	TPY	12.99
PM <sub>10</sub>	TPY	4.99

\* - Compliance with the TPY limits shall be based on a twelve month rolling total.

- b. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6(a)(3)]
  - (1) Purchase records for styrene and 1,3-butadiene,
  - (2) Total throughput of raw materials in tons (monthly and 12-month rolling totals),
  - (3) Number of batches of primary product produced.
  - (4) Emission calculations (monthly and 12-month rolling totals).
- c. The owner/operator shall comply with all applicable requirements of the NESHAP Emissions: Group IV Polymers and Resins, Subpart JJJ, for each affected TPPU located in the Resin Plant including but not limited to: [40 CFR 63.1310 to 63.1335]
  - (1) Affected sources are required to achieve compliance on or before the dates specified in § 63.1311(b) through (d). [§ 63.1311(a)]



- i) Existing affected sources shall be in compliance with this subpart (except for § 63.1331 for which compliance is covered by § 63.1311(d)) no later than June 19, 2001, as provided in § 63.6(c), unless an extension has been granted as specified in § 63.1311(e). [§ 63.1311(c)]
  - ii) Except as provided for in § 63.1311(d)(1) through (d)(6), existing affected sources shall be in compliance with § 63.1331 no later than June 19, 2001, unless an extension has been granted pursuant to § 63.1311(e). [§ 63.1311(d)]
- (2) The owner/operator shall comply with all applicable requirements of the General Provisions of the NESHAP Subpart A, for the Resin Plant as specified in Table 1 of Subpart JJJ. [§ 63.1311(f)]
- (3) Except as allowed under § 63.1313(b) through (d), the owner/operator of an existing or new affected source shall comply with the following provisions as applicable: [§ 63.1313(a)]
- i) For storage vessels, the owner/operator shall comply with § 63.1314; [§ 63.1313(a)(1)]
    - (A) This section applies to each storage vessel that belongs to an affected source, as determined by § 63.1310(g). Except as provided in §§ 63.1314(b) through (d), the owner/operator of said storage vessels shall comply with the requirements of §§ 63.119 through 63.123 and 63.148, with the differences noted in § 63.1314(a)(1) through (a)(16) for the purposes of this subpart. [§ 63.1314(a)]
    - (B) The provisions of NESHAP, Subpart JJJ do not apply to storage vessels containing ethylene glycol at existing or new affected sources and storage vessels containing styrene at existing affected sources. [§ 63.1314(d)]
  - ii) For batch process vents, the owner/operator shall comply with § 63.1321; [§ 63.1313(a)(3)]
    - (A) Except as specified in § 63.1321 (b) through (d), owners/operators of new and existing affected sources with batch process vents shall comply with the requirements in §§ 63.1322 through 63.1327. The batch process vent group status shall be determined in accordance with § 63.1323. All Group 2 batch process vents shall comply with the applicable reference control technology requirements in § 63.1322, the recordkeeping requirements in § 63.1326, and the reporting requirements in § 63.1327. [§ 63.1321(a)]
      - (I) The owner/operator of a Group 2 batch process vent with annual emissions less than the level specified in § 63.1323(d) shall comply with § 63.1322(g)(1), (g)(2), (g)(3), or (g)(4). [§ 63.1322(g)]
      - (II) The owner/operator shall comply with the requirements of § 63.1322(h). [§ 63.1322(g)(4)]
      - (III) Owners/operators of Group 2 batch process vents are not required to establish a batch mass input limitation if the batch process vent is Group 2 at the conditions specified in § 63.1322(h)(1) and (h)(2) and if the owner/operator complies

- with the recordkeeping provisions in §§ 63.1326(a)(1) through (3), 63.1326(a)(9), and 63.1326(a)(4) through (6) as applicable, and the reporting requirements in § 63.1327(a)(5), (a)(6), and (b). [§ 63.1322(h)]
- iii) The owner/operator shall comply with the recordkeeping requirements of §§ 63.1326(a)(1) through (3), 63.1326(a)(9), and 63.1326(a)(4) through (6), as applicable, [§ 63.1322(h)]
- (A) The owner/operator of a batch process vent or aggregate batch vent stream at an affected source shall submit the information specified in § 63.1326(a)(1) through (a)(6), as appropriate, as part of the Notification of Compliance Status specified in § 63.1335(e)(5). [§ 63.1326(a)]
- (I) An identification of each unique product that has emissions from one or more batch emission episodes venting from the batch process vent, along with an identification of the single highest-HAP recipe for each product and the mass of HAP fed to the reactor for that recipe. [§ 63.1326(a)(1)]
- (II) A description of, and an emission estimate for, each batch emission episode, and the total emissions associated with one batch cycle, as described in either § 63.1326(a)(2)(i) or (a)(2)(ii), as appropriate. [§ 63.1326(a)(2)]
- (III) Total annual uncontrolled TOC or organic HAP emissions, determined at the exit from the batch unit operation before any control device, determined in accordance with § 63.1323(b). [§ 63.1326(a)(3)]
- (IV) The results of the batch process vent group determination, conducted in accordance with § 63.1323(g), as applicable. [§ 63.1326(a)(6)]
- (B) For each Group 2 batch process vent that is exempt from the batch mass input limitation provisions because it meets the criteria of § 63.1322(h), the records specified in § 63.1326(a)(9)(i) and (ii) shall be maintained. [§ 63.1326(a)(9)]
- (I) Documentation of the maximum design capacity of the TPPU; and [§ 63.1326(a)(9)(i)]
- (II) The mass of HAP or material that can be charged annually to the batch unit operation at the maximum design capacity. [§ 63.1326(a)(9)(ii)]
- iv) The owner/operator shall comply with the reporting requirements in § 63.1327(a) and (b). [§ 63.1327(a)]
- (A) For each Group 2 batch process vent that is exempt from the batch mass input limitation provisions because it meets the criteria of § 63.1322(h), the information specified in § 63.1326(a)(1) through (3), and the information specified in § 63.1326(a)(4) through (6), as applicable, calculated at the conditions specified in § 63.1322(h). [§ 63.1327(a)(5)]

- (B) When engineering assessment has been used to estimate emissions from a batch emissions episode and the criteria specified in § 63.1323(b)(6)(i)(A) or (B) have been met, the owner/operator shall submit the information demonstrating that the criteria specified in § 63.1323(b)(6)(i)(A) or (B) have been met as part of the Notification of Compliance Status required by § 63.1335(e)(5). [§ 63.1327(a)(6)]
- (C) Whenever a process change, as defined in § 63.1323(i)(1), is made that causes a Group 2 batch process vent to become a Group 1 batch process vent, the owner/operator shall notify the Administrator and submit a description of the process change within 180 days after the process change is made or with the next Periodic Report, whichever is later. The owner/operator of an affected source shall comply with the Group 1 batch process vent provisions in §§ 63.1321 through 63.1327 in accordance with § 63.1310(i)(2)(ii). [§ 63.1327(b)]
- v) For equipment leaks, the owner/operator shall comply with § 63.1331; [§ 63.1313(a)(7)]
  - (A) Except as provided for in paragraphs § 63.1331(b) and (c), the owner/operator of each affected source shall comply with the requirements of 40 CFR Part 63, Subpart H with the differences noted in paragraphs § 63.1331(a)(1) through (a)(13). [§ 63.1329(a)]
- vi) The owner/operator of each affected source shall comply with the general recordkeeping and reporting requirements, as applicable, of § 63.1335. [§ 63.1313(a)(10)]
  - (A) Unless otherwise specified in this subpart, the owner/operator of an affected source shall keep copies of all applicable records and reports required by 40 CFR Part 63, Subpart JJJ for at least 5 years, as specified in § 63.1335(a)(1), with the exception listed in § 63.1335(a)(2). [§ 63.1335(a)]
  - (B) The owner/operator of an affected source shall comply with the applicable recordkeeping and reporting requirements in 40 CFR Part 63, Subpart A as specified in Table 1 of 40 CFR Part 63, Subpart JJJ. These requirements include, but are not limited to, the requirements specified in § 63.1335(b)(1) and (b)(2). [§ 63.1335(b)]
  - (C) In addition to the reports and notifications required by 40 CFR Part 63, Subpart A as specified in Table 1 of 40 CFR Part 63, Subpart JJJ, the owner/operator of an affected source shall prepare and submit the reports listed in § 63.1335(e)(3) through (e)(8), as applicable. All reports required by 40 CFR Part 63, Subpart JJJ, and the schedule for their submittal, are listed in Table 9 of 40 CFR Part 63, Subpart JJJ. [§ 63.1335(e)]
  - (D) For any parameter with respect to any item of equipment, the owner/operator may implement the recordkeeping requirements specified in § 63.1335(h)(1) or (h)(2) as alternatives to the provisions specified in § 63.1314 for storage vessels, § 63.1321 for batch process vents and aggregate batch vent streams, or § 63.1330 for

wastewater. The owner/operator shall retain for a period of 5 years each record required by § 63.1335(h)(1) or (h)(2). [§ 63.1335(h)]

**EUG 6 LEX PLANT:** Emission limitations and specific conditions for the LEX Plant. EUG LEX-MATERIAL and LEX-EXTRUDER.

- a. LEX Plant emission limitations (LEX-MATERIAL and LEX-EXTRUDER):

<b>Pollutants</b>	<b>Units*</b>	<b>Limits</b>
<b>VOC</b>	<b>TPY</b>	4.99
<b>PM<sub>10</sub></b>	<b>TPY</b>	4.99

\* - Compliance with the TPY limits shall be based on a twelve month rolling total.

- b. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6(a)(3)]
  - (1) Throughput in pounds for the plant (daily and monthly average).
  - (2) Material safety data sheet for each resin which documents the polymer content expressed in percent by weight of each raw material.
  - (3) Emission calculations (monthly and 12-month rolling totals).

**EUG 7 XP-454 PLANT:** Emission limitations and specific conditions for the XP-454 Plant. EUG 454-PROCESS and 454-TANKS.

- a. XP-454 emissions Limitations (454-PROCESS and 454-TANKS):

<b>Pollutants</b>	<b>Units*</b>	<b>Limits</b>
<b>Total HAP</b>	<b>TPY</b>	4.99
<b>PM<sub>10</sub></b>	<b>TPY</b>	4.99

\* - Compliance with the TPY limits shall be based on a twelve month rolling total.

- b. The owner/operator shall comply with all applicable requirements of the NESHAP: Miscellaneous Organic Chemical Manufacturing, Subpart FFFF, for each affected facility (XP-454 Plant) including but not limited to: [40 CFR 63.2430 to 63.2550]
  - (1) The owner/operator shall comply with the requirements for existing sources no later than May 10, 2008. [§ 63.2445(b)]
  - (2) The owner/operator shall meet the notification requirements in § 63.2515 according to the schedule in § 63.2515 and in 40 CFR Part 63, Subpart A. Some of the notifications must be submitted before the facility is required to comply with the emission limits, operating limits, and work practice standards of 40 CFR Part 63, Subpart FFFF. [§ 63.2445(c)]
  - (3) The owner/operator shall be in compliance with the emission limits and work practice standards in Tables 1 through 7 of 40 CFR Part 63, Subpart FFFF at all

- times, except during periods of startup, shutdown, and malfunction (SSM), and you must meet the requirements specified in §§ 63.2455 through 63.2490 (or the alternative means of compliance in § 63.2495, § 63.2500, or § 63.2505), except as specified in § 63.2450(b) through (s). The owner/operator shall meet the notification, reporting, and recordkeeping requirements specified in §§ 63.2515, 63.2520, and 63.2525. [§ 63.2450(a)]
- (4) Startup, shutdown, and malfunction. § 63.152(f)(7)(ii) through (iv) and § 63.998(b)(2)(iii) and (b)(6)(i)(A), which apply to the exclusion of monitoring data collected during periods of SSM from daily averages, do not apply for the purposes of 40 CFR Part 63, Subpart FFFF. [§ 63.2450(l)]
  - (5) When §§ 63.2455 through 63.2490 reference other subparts in 40 CFR Part 63 that use the term “periodic report,” it means “compliance report” for the purposes of 40 CFR Part 63, Subpart FFFF. The compliance report shall include the information specified in § 63.2520(e), as well as the information specified in referenced subparts. [§ 63.2450(m)(1)]
  - (6) When there are conflicts between 40 CFR Part 63, Subpart FFFF and referenced subparts for the due dates of reports required by 40 CFR Part 63, Subpart FFFF, reports shall be submitted according to the due dates presented in 40 CFR Part 63, Subpart FFFF. [§ 63.2450(m)(2)]
  - (7) Opening a safety device, as defined in § 63.2550, is allowed at any time conditions require it to avoid unsafe conditions. [§ 63.2450(p)]
  - (8) If a process has batch process vents, as defined in § 63.2550, the owner/operator shall determine the group status of the batch process vents by determining and summing the uncontrolled organic HAP emissions from each of the batch process vents within the process using the procedures specified in § 63.1257(d)(2)(i) and (ii), except as specified in § 63.2460(b)(1) through (4). [§ 63.2460(b)]
  - (9) The owner/operator shall meet each requirement in Table 6 of 40 CFR Part 63, Subpart FFFF that applies to equipment leaks, except as specified in § 63.2580(b) and (d). [§ 63.2480(a)]
  - (10) For equipment that is in applicable organic HAP service, the owner/operator shall comply with one of the following:
    - i) The applicable requirements of 40 CFR Part 63, Subpart H except as specified in § 63.2580(b) and (d); or
    - ii) The applicable requirements of 40 CFR Part 63, Subpart UU except as specified in § 63.2580(b) and (d); or
    - iii) The applicable requirements of 40 CFR Part 65, Subpart F except as specified in § 63.2580(b) and (d). [40 CFR Part 63, Subpart FFFF, Table 6]
  - (11) The requirements for pressure testing in § 63.1036(b) may be applied to all processes, not just batch processes. [§ 63.2480(b)]
  - (12) For the purposes of 40 CFR Part 63, Subpart FFFF, pressure testing for leaks in accordance with § 63.1036(b) is not required after reconfiguration of an equipment train if flexible hose connections are the only disturbed equipment. [§ 63.2480(b)(2)]
  - (13) The owner/operator may elect to comply with the pollution prevention alternative requirements specified in § 63.2495(a)(1) and (2) in lieu of the

- emission limitations and work practice standards contained in Tables 1 through 7 of 40 CFR Part 63, Subpart FFFF for any MCPU for which initial startup occurred before April 4, 2002. [§ 63.2495(a)]
- (14) As an alternative to complying with the emission limits and work practice standards for process vents and storage tanks in Tables 1 through 4 of 40 CFR Part 63, Subpart FFFF and the requirements in §§ 63.2455 through 63.2470, The owner/operator may comply with the emission limits in § 63.2505(a) of this section and demonstrate compliance in accordance with the requirements in § 63.2505(b). [§ 63.2505(a) & (b)]
- (15) The owner/operator shall submit all of the notifications in §§ 63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply by the dates specified. [§ 63.2515(a)]
- (16) The owner/operator shall submit each report in Table 11 of 40 CFR Part 63, Subpart FFFF that applies. [§ 63.2520(a)]
- (17) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), the owner/operator shall submit each report by the date in Table 11 of 40 CFR Part 63, Subpart FFFF and according to § 63.2520(b)(1) through (5). [§ 63.2520(b)]
- (18) Notification of compliance status report. The owner/operator shall submit a notification of compliance status report according to the schedule in § 63.2520(d)(1), and the notification of compliance status report must contain the information specified in § 63.2520(d)(2). [§ 63.2520(d)]
- (19) Compliance report. The compliance report shall contain the information specified in § 63.2520(e)(1) through (10). [§ 63.2520(e)]
- (20) The owner/operator shall keep the records specified in § 63.2525(a) through (k). [§ 63.2525]
- i) Each applicable record required by 40 CFR Part 63, Subpart A and in referenced subparts of 40 CFR Part 63, Subpart F, G, SS, UU, WW, and GGG. [§ 63.2525(a)]
  - ii) A schedule or log of operating scenarios updated each time a different operating scenario is put into operation. [§ 63.2525(c)]
  - iii) The information specified in § 63.2525(e)(1) through (4) for each process with Group 2 batch process vents. [§ 63.2525(e)]
  - iv) A record of each time a safety device is opened to avoid unsafe conditions in accordance with § 63.2450(s). [§ 63.2525(f)]
  - v) In the SSMP required by § 63.6(e)(3), you are not required to include Group 2 emission points, unless those emission points are used in an emissions average. For equipment leaks, the SSMP requirement is limited to control devices and is optional for other equipment. [§ 63.2525(j)]
- (21) Table 12 of 40 CFR Part 63, Subpart FFFF shows which parts of the General Provisions in §§ 63.1 through 63.15 that apply. [§ 63.2540]
- c. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6(a)(3)]
- (1) Production of XP-454 (monthly and cumulative average)

- (2) Inspection and maintenance of particulate removal devices (weekly when in operation)
- (3) Material Safety Data Sheet showing the weight percent of the volatile organic compounds (VOC) of each liquid raw material used.
- (4) Dimensions of all storage vessels, and analysis showing their capacity for the life of each vessel, and date each vessel was constructed. The records shall be kept for the life of the vessel.
- (5) Emission calculations (monthly and 12-month rolling totals).

**EUG 8 Plant Utilities:** Emission limitations and specific conditions for Plant Utilities. EU BOILERS, UST, PUMPS, EMER-GEN.

- a. Emission limitations for EU BOILERS.

**Scenario I (Natural Gas)**

<b>Emission Unit</b>			
	<b>Units</b>	<b>NO<sub>x</sub></b>	<b>CO</b>
P-U-04 80 MMBTUH Boiler	<b>lb/hr</b>	16.00	6.59
	<b>TPY</b>	70.08	28.87
	<b>lb/MMBTU</b>	0.20	
P-U-05 80 MMBTUH Boiler	<b>lb/hr</b>	16.00	6.59
	<b>TPY</b>	70.08	28.87
	<b>lb/MMBTU</b>	0.20	
P-U-06 80 MMBTUH Boiler	<b>lb/hr</b>	16.00	6.59
	<b>TPY</b>	70.08	28.87
	<b>lb/MMBTU</b>	0.20	

**Scenario II (Fuel Oil - Maximum 0.05% S by weight)**

<b>Emission Unit</b>					
	<b>Units</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>
P-U-04 80 MMBTUH Boiler	<b>lb/hr</b>	24.00	2.86	8.80	4.06
	<b>TPY</b>	105.12	12.51	38.54	17.77
	<b>lb/MMBTU</b>	0.30		0.11	
P-U-05 80 MMBTUH Boiler	<b>lb/hr</b>	24.00	2.86	8.80	4.06
	<b>TPY</b>	105.12	12.51	38.54	17.77
	<b>lb/MMBTU</b>	0.30		0.11	
P-U-06 80 MMBTUH Boiler	<b>lb/hr</b>	24.00	2.86	8.80	4.06
	<b>TPY</b>	105.12	12.51	38.54	17.77
	<b>lb/MMBTU</b>	0.30		0.11	

- b. The boilers shall be fueled with commercial-grade natural gas except during a period of natural gas curtailment, supply interruption, or gas supply emergencies when the boilers may be fueled with distillate fuel oil containing 0.05% sulfur by weight or less. [OAC 252:100-31]

- c. Each boiler at the facility shall have a permanent identification plate attached which shows the make, model number, and serial number. [OAC 252:100-45]
- d. The permittee shall conduct daily visual observations of the opacity from the boiler exhausts while burning fuel oil No. 2 for more than 4 continuous hours and keep a record of these observations. In no case, shall the observation period be less than six minutes in duration. If visible emissions are observed for six minutes in duration for any observation period and such emissions are not the result of a malfunction, then the permittee shall conduct, within 24 hours, a visual observation of emissions, in accordance with 40 CFR Part 60, Appendix A, Method 9. [OAC 252:100-25-3]
  - (1) When five consecutive daily visible emission observations or Method 9 observations show no visible emissions, or no emissions of a shade or density greater than twenty (20) percent equivalent opacity, respectively, the frequency may be reduced to weekly visual observations, as above. Likewise, when the following two consecutive weekly observations show compliance, the observation frequency may be reduced to biweekly observations. Upon any showing of non-compliance the observation frequency shall revert to daily.
  - (2) If a Method 9 observation exceeds 20% opacity the permittee shall conduct at least two additional Method 9 observations within the next 24-hours.
  - (3) If more than one six-minute Method 9 observation exceeds 20% opacity in any consecutive 60 minutes; or more than three six-minute Method 9 observations in any consecutive 24 hours exceeds 20% opacity; or if any six-minute Method 9 observation exceeds 60% opacity; the owner or operator shall comply with the provisions for excess emissions during start-up, shut-down, and malfunction of air pollution control equipment. [OAC 252:100-25-3]
- e. The owner/operator shall comply with all applicable requirements of the NESHAP: Industrial, Commercial, and Institutional Boilers and Process Heaters, Subpart DDDDD, no later than the date specified in the finalized subpart.
- f. Emissions from EU EMERG-GEN, UST, and PUMPS are based on the existing equipment.

<b>UST</b>	
E-U-M1	Underground Storage Tank #1 - Fuel Oil (20,000 gallons)
E-U-M2	Underground Storage Tank #2 - Fuel Oil (20,000 gallons)
E-U-M3	Underground Storage Tank #3 - Fuel Oil (20,000 gallons)
E-U-M4	Underground Storage Tank #4 - Fuel Oil (20,000 gallons)

<b>PUMPS</b>	
E-U-07	215 HP Emergency Fire Booster Pump - South Pump House (Allis-Chalmers Centrifugal Pump, Cummins Engine Company - N-855-F)
FT-03	Above Ground Storage Tank - Fuel Oil (275 gallons) South Pump House
E-U-08	340 HP Emergency Fire Booster Pump - North Pump House (Allis-Chalmers Centrifugal Pump, Cummins Engine Company - N-855-F2)



<b>PUMPS</b>	
FT-04	Above Ground Storage Tank - Fuel Oil (550 gallons) North Pump House

<b>EMER-GEN</b>	
E-R-ENG01	180 HP Kohler Emergency Generator, White Engine
FT-01	Underground Storage Tank - Fuel Oil (600 gallons)
E-X-ENG02	195 HP Kohler 135 Emergency Generator, John Deere Engine
FT-02	Above Ground Storage Tank - Fuel Oil (275 gallons)
E-R-ENG03	81 HP Generac Emergency Generator, Daewoo Engine
FT-05	Above Ground Storage Tank - Fuel Oil (84 gallons)

- g. The permittee shall use Fuel Oil No. 2 or its equivalent containing 0.05% by weight or less of sulfur in the Utility Booster Pumps (EUG PUMPS) and emergency generators (EUG EMER-GEN). [OAC 252:100-31]
- h. The owner/operator shall comply with all applicable requirements of the NESHAP: Reciprocating Internal Combustion Engines, Subpart ZZZZ, no later than May 3, 2013, for each affected facility including but not limited to:

What This Subpart Covers

- (1) § 63.6580 What is the purpose of subpart ZZZZ?
- (2) § 63.6585 Am I subject to this subpart?
- (3) § 63.6590 What parts of my plant does this subpart cover?
- (4) § 63.6595 When do I have to comply with this subpart?
  - (i) If you have an existing stationary CI RICE with a site rating of less than or equal to 500-brake hp located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§ 63.6595(a)(1)]

Emission and Operating Limitations

- (5) § 63.6602 What emission limitations must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?
  - (i) If you own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions, you must comply with the emission limitations in Table 2c of Subpart ZZZZ which apply to you. [§ 63.6603(a)]
    - (A) Change oil and filter every 500 hours of operation or annually, whichever comes first or utilize an oil analysis program as described in § 63.6625(i) in order to extend the specified oil change requirement. [Table 2c, 40 CFR part 63, Subpart ZZZZ]
    - (B) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and [Table 2c, 40 CFR part 63, Subpart ZZZZ]
    - (C) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [Table 2c, 40 CFR part 63, Subpart ZZZZ]

General Compliance Requirements

(6) § 63.6605 What are my general requirements for complying with this subpart?

Testing and Initial Compliance Requirements

(7) § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?

- (i) You must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§ 63.6625(e)(2)]
- (ii) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, you must install a non-resettable hour meter if one is not already installed. [§ 63.6625(f)]
- (iii) If you operate an existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§ 63.6625(h)]
- (iv) You have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2c of 40 CFR Part 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c of 40 CFR Part 63, Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [§ 63.6625(i)]

(8) § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?

Continuous Compliance Requirements

(9) § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

- (i) You must demonstrate continuous compliance with each emission limitation and operating limitation in Table 2c of 40 CFR Part 63, Subpart

ZZZZ that apply to you according to methods specified in Table 6 of 40 CFR Part 63, Subpart ZZZZ. [§ 63.6640(a)]

- (ii) If you own or operate an existing emergency stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in § 63.6640(f)(1)(i) through (iii). Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in § 63.6640(f)(1)(i) through (iii), is prohibited. If you do not operate the engine according to the requirements in § 63.6640(f)(1)(i) through (iii), the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines. [§ 63.6640(f)(1)]
  - (A) There is no time limit on the use of emergency stationary RICE in emergency situations. [§ 63.6640(f)(1)(i)]
  - (B) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. [§ 63.6640(f)(1)(ii)]
  - (C) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The

supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by § 63.6640(f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power. [§ 63.6640(f)(1)(iii)]

Notifications, Reports, and Records

(10) § 63.6655 What records must I keep?

- (i) You must keep the records required in Table 6 of 40 CFR Part 63, Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to you. [§ 63.6655(d)]
- (ii) if you own or operate an existing emergency stationary RICE, you must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. [§ 63.6655(e)(3)]
- (iii) If you own or operate an existing emergency stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [§ 63.6655(f)(1)]

(11) § 63.6660 In what form and how long must I keep my records?

- (i) Your records must be in a form suitable and readily available for expeditious review according to § 63.10(b)(1). [§ 63.6660(a)]
- (ii) As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§ 63.6660(b)]
- (iii) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). [§ 63.6660(c)]

Other Requirements and Information

(12) § 63.6665 What parts of the General Provisions apply to me?

- (i) Table 8 of 40 CFR Part 63, Subpart ZZZZ shows which parts of the General Provisions in §§ 63.1 through 63.15 apply to you. [§ 63.6665(a)]

(13) § 63.6670 Who implements and enforces this subpart?

(14) § 63.6675 What definitions apply to this subpart?

<b>LAB</b>	
<b>QCH</b>	Laboratory Hoods in QC Labs for Resin Manufacturing

**EUG 9 BINDER TAPE PLANT:** Emission limitations and specific conditions for the Binder Tape Plant. EU Binder.

<b>EU</b>	<b>Name/Model</b>
<b>BINDER TAPE</b>	
Binder	Spine Tank, Spine Applicator, Flap Tank, and Flap Applicator

- a. The owner/operator shall comply with all applicable requirements of the NESHAP: Paper and Other Web Coating, Subpart JJJJ, for each affected facility (web coating line) located in the Binder Tape Plant including but not limited to:
  - [40 CFR 63.3290 to 63.3420]
  - (1) The owner/operator shall comply with the requirements for existing sources on and after the compliance dates as specified in § 63.3330. [§ 63.3320(a)]
    - i) The owner/operator shall comply with the provisions of 40 CFR Part 63, Subpart JJJJ by December 5, 2005. [§ 63.3330(a)]
  - (2) The owner/operator shall limit organic HAP emissions to the level specified in § 63.3320(b)(2) or (3). [§ 63.3320(b)]
    - i) The owner/operator shall limit organic HAP emissions to no more than 4 percent of the mass of coating material applied for each month; or [§ 63.3320(b)(2)]
    - ii) The owner/operator shall limit organic HAP emissions to no more than 20 percent of the mass of coating solids applied for each month. [§ 63.3320(b)(3)]
  - (3) The owner/operator shall demonstrate compliance with 40 CFR Part 63, Subpart JJJJ by the procedures in § 63.3370. [§ 63.3320(c)]
  - (4) The owner/operator shall comply with the provisions of 40 CFR Part 63, Subpart A as specified in Table 2 of 40 CFR Part 63, Subpart JJJJ. [§ 63.3340(a)]
  - (5) The owner/operator shall determine the organic HAP or volatile matter and coating solids content of coating materials according to procedures in § 63.3360(c). [§ 63.3360(a)(1)]
    - i) *Organic HAP content.* If you determine compliance with the emission standards in § 63.3320 by means other than determining the overall organic HAP control efficiency of a control device, you must determine the organic HAP mass fraction of each coating material “as-purchased” by following one of the procedures in § 63.3360(c)(1) through (3). [§ 63.3360(c)]
  - (6) *As-purchased “compliant” coating materials.* If you comply by using coating materials that individually meet the emission standards in § 63.3320(b)(2) or (3), you must demonstrate that each coating material applied during the month at an existing affected source contains no more than 0.04 mass fraction organic

HAP or 0.2 kg organic HAP per kg coating solids on an as-purchased basis as determined in accordance with § 63.3360(c). [§ 63.3370(b)(1)]

- i) You are in compliance with emission standards in § 63.3320(b)(2) and (3) if each coating material applied at an existing affected source is applied as-purchased and contains no more than 0.04 kg organic HAP per kg coating material or 0.2 kg organic HAP per kg coating solids [§ 63.3370(b)(2)]
- (7) The owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must submit the reports specified in § 63.3400(b), (c), and (e) to the Administrator. [§ 63.3400(a)]
- i) The owner/operator shall submit a semiannual compliance report according to § 63.3400(c)(1) and (2). [§ 63.3400(c)]
    - (A) Compliance report dates. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in § 63.3400(c)(1)(i) through (iv). [§ 63.3400(c)(1)(v)]
    - ii) The compliance report must contain the information in § 63.3400(c)(2)(i) through (v). [§ 63.3400(c)(2)]
    - iii) You must submit a Notification of Compliance Status as specified in § 63.9(h). [§ 63.3400(e)]
- (8) The owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ shall maintain the records specified in § 63.3410(a)(1) on a monthly basis in accordance with the requirements of § 63.10(b)(1). [§ 63.3410(a)]
- i) Records specified in § 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including: [§ 63.3410(a)(1)]
    - (A) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of § 63.3360(c); [§ 63.3410(a)(1)(iii)]
    - (B) Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of § 63.3360(d); [§ 63.3410(a)(1)(iv)]
    - (C) Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of § 63.3370(b), (c), and (d). [§ 63.3410(a)(1)(vi)]

2. The permittee shall keep operation and maintenance (O&M) records for all emission units which have not been modified. Such records shall at a minimum include the dates of operation, and maintenance, type of work performed, and the increase, if any, in emissions as a result.

[OAC 252:100-8-6 (a)(3)(B)]

3. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations, which qualify as Trivial Activities.

[OAC 252:100-8-6 (a)(3)(B)]

- a. For stationary reciprocating engines used exclusively for emergency power generation or for peaking power service: records of the size of engines, type of fuel used, and number of hours operated (annual).
- b. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia: records of the capacity of the tanks and the contents.
- c. For activities (except for trivial activities) that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: the type of activity and the amount of emissions or a surrogate measure of the activity (annual).

4. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request.

[OAC 252:100-8-6 (a)(3)(B)]

- a. Total natural gas and distillate fuel oil usage for each boiler (monthly and cumulative annual).
- b. Operation, maintenance, and inspection log for each emission unit.
- c. Inspection and maintenance of particulate removal devices,
- d. Sulfur content of the distillate fuel oil (for each delivery).
- e. Records of the date and time of visual emission observations, plant observed, operational status of the plant, observed results and conclusions, and results of any Reference Method No. 9 testing conducted, as required.
- f. Records required by NESHAP Subparts JJJ, FFFF, JJJJ, ZZZZ, and DDDDD, as applicable.

5. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (November 30, 2000), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit.

6. This permit supersedes all other Air Quality permits for this facility, which are now null and void.

7. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility, or the listed plants and emissions unit groups:

[OAC 252:100-8-6(d)(2)]

- a. Facility Wide
  - (1) 40 CFR Part 63, NESHAP, Subpart GGGGG, Site Remediation
- b. XP-808 Plant
  - (1) 40 CFR Part 60, NSPS, Subpart K, Petroleum Liquid Storage (6/11/73 - 5/19/78)
  - (2) 40 CFR Part 60, NSPS, Subpart Ka, Petroleum Liquid Storage (5/18/78 -

7/23/84)

- (3) 40 CFR Part 60, NSPS, Subpart Kb, VOL Storage Vessels (after 7/23/84)
  - (4) 40 CFR Part 60, NSPS, Subpart VV, Equipment Leaks
  - (5) 40 CFR Part 60, NSPS, Subpart DDD, Polymer Manufacturing
  - (6) 40 CFR Part 60, NSPS, Subpart III, SOCOMI Air Oxidation Units
  - (7) 40 CFR Part 60, NSPS, Subpart NNN, SOCOMI Distillation Units
  - (8) 40 CFR Part 60, NSPS, Subpart VVV, Polymeric Coating
  - (9) 40 CFR Part 61, NESHAP, Subpart V (61.240 through 61.247), Equipment Leaks
  - (10) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins §§ 63.1315 through 63.1320 Continuous Process Vents
  - (11) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1329 Process Contact Cooling Towers
  - (12) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1330 Wastewater Provisions
  - (13) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1332 Emissions Averaging
  - (14) 40 CFR Part 63, NESHAP, SOCOMI/HOC §§ 63.104 Heat Exchange Requirements
  - (15) 40 CFR Part 63, NESHAP, SOCOMI/HOC § 63.113-118 Continuous Process Vents
  - (16) 40 CFR Part 63, NESHAP, SOCOMI/HOC § 63.131-147 Wastewater Provisions
  - (17) 40 CFR Part 63, NESHAP, SOCOMI/HOC § 63.164 Compressors
- c. 808-EQU
- (1) 40 CFR Part 60, NSPS, Subpart DDD, Polymer Manufacturing
  - (2) 40 CFR Part 60, NSPS, Subpart III, SOCOMI Air Oxidation Units
  - (3) 40 CFR Part 60, NSPS, Subpart NNN, SOCOMI Distillation Units
  - (4) 40 CFR Part 60, NSPS, Subpart VVV, Polymeric Coating
  - (5) OAC 252:100-39 Emissions of VOC in Nonattainment Areas and Former Nonattainment Areas
  - (6) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1328 Heat Exchangers
  - (7) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1329 Process Contact Cooling Towers
  - (8) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1330 Wastewater Provisions
  - (9) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1332 Emissions Averaging
  - (10) 40 CFR Part 63, NESHAP, SOCOMI/HOC §§ 63.104 Heat Exchange Requirements
  - (11) 40 CFR Part 63, NESHAP, SOCOMI/HOC § 63.131-147 Wastewater Provisions
  - (12) 40 CFR Part 63, NESHAP, SOCOMI/HOC § 63.164 Compressors
  - (13) Permit No. 80-036-O (OCCHD)
- d. 808-VENTS
- (1) 40 CFR Part 60, NSPS, Subpart VV, Equipment Leaks
  - (2) 40 CFR Part 60, NSPS, Subpart DDD, Polymer Manufacturing



- (3) 40 CFR Part 60, NSPS, Subpart III, SOCOMI Air Oxidation Units
  - (4) 40 CFR Part 60, NSPS, Subpart NNN, SOCOMI Distillation Units
  - (5) 40 CFR Part 60, NSPS, Subpart VVV, Polymeric Coating
  - (6) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins §§ 63.1315 through 63.1320 Continuous Process Vents
  - (7) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1329 Process Contact Cooling Towers
  - (8) 40 CFR Part 63, NESHAP, Subpart JJJ, Group VI Polymer and Resins § 63.1332 Emissions Averaging
  - (9) 40 CFR Part 63, NESHAP, SOCOMI/HOC §§ 63.104 Heat Exchange Requirements
  - (10) 40 CFR Part 63, NESHAP, SOCOMI/HOC § 63.113-118 Continuous Process Vents
  - (11) 40 CFR Part 63, NESHAP, SOCOMI/HOC § 63.164 Compressors
  - (12) OAC 252:100-39 Emissions of VOC in Nonattainment Areas and Former Nonattainment Areas
  - (13) Permit No. 80-036-O (OCCHD)
- e. 808-MATERIAL
- (1) 40 CFR Part 60, NSPS
  - (2) 40 CFR Part 63, NESHAP, Subpart A
  - (3) 40 CFR Part 63, NESHAP, Subpart JJJ
  - (4) Permit No. 80-037-O (OCCHD)
- f. 808-TANKS
- (1) OAC 252:100-37-15, 16, 35-38
  - (2) OAC 252:100-39 Emissions of VOC in Nonattainment Areas and Former Nonattainment Areas
- g. LEX-MATERIAL
- (1) 40 CFR Part 60, NSPS, Subpart DDD, Polymer Manufacturing
  - (2) 40 CFR Part 63, NESHAP, Subpart FFFF, Miscellaneous Organic Chemical Production and Processes
  - (3) OAC 252:100-37 VOC
- h. LEX-EXTRUDER
- (1) 40 CFR Part 60, NSPS, Subpart DDD, Polymer Manufacturing
  - (2) 40 CFR Part 63, NESHAP, Subpart FFFF, Miscellaneous Organic Chemical Production and Processes
  - (3) OAC 252:100-37 VOC
- i. 454-PROCESS
- (1) 40 CFR Part 60, NSPS
- j. 454-TANKS
- k. BOILERS
- (1) 40 CFR Part 60, NSPS, Subpart D, Fossil-Fuel Fired Steam Generators (after 8/17/71)
  - (2) 40 CFR Part 60, NSPS, Subpart Da, Electric Utility Steam Generating Units (after 9/18/78)
  - (3) 40 CFR Part 60, NSPS, Subpart Db, Industrial-Commercial-Institutional Steam Generating Units

- (4) 40 CFR Part 60, NSPS, Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units
- (5) OAC 252:100-35 CO
- l. UST
  - (1) 40 CFR Part 60, NSPS, Subpart K, Petroleum Liquid Storage (6/11/73 - 5/19/78)
  - (2) 40 CFR Part 60, NSPS, Subpart Ka, Petroleum Liquid Storage (5/18/78 - 7/23/84)
  - (3) 40 CFR Part 60, NSPS, Subpart Kb, VOL Storage Vessels (after 7/23/84)
  - (4) OAC 252:100-37-15 Storage of VOC
  - (5) OAC 252:100-39 Emissions of VOC in Nonattainment Areas and Former Nonattainment Areas
- m. PUMPS
  - (1) 40 CFR Part 60, NSPS, Subpart D, Fossil-Fuel Fired Steam Generators (after 8/17/71)
  - (2) 40 CFR Part 60, NSPS, Subpart Da, Electric Utility Steam Generating Units (after 9/18/78)
  - (3) 40 CFR Part 60, NSPS, Subpart Db, Industrial-Commercial-Institutional Steam Generating Units
  - (4) 40 CFR Part 60, NSPS, Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units
  - (5) OAC 252:100-33 NO<sub>x</sub>
  - (6) OAC 252:100-35 CO
- n. EMER-GEN

**MAJOR SOURCE AIR QUALITY PERMIT  
STANDARD CONDITIONS  
(July 21, 2009)**

**SECTION I. DUTY TO COMPLY**

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the 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 assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

**SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS**

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

**SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING**

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

[OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

[OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards (“NSPS”) under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants (“NESHAPs”) under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM<sub>10</sub>). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

#### **SECTION IV. COMPLIANCE CERTIFICATIONS**

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

#### **SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM**

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6(c)(6)]

#### **SECTION VI. PERMIT SHIELD**

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

[OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

[OAC 252:100-8-6(d)(2)]

**SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT**

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

**SECTION VIII. TERM OF PERMIT**

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

**SECTION IX. SEVERABILITY**

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[OAC 252:100-8-6 (a)(6)]

**SECTION X. PROPERTY RIGHTS**

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

[OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

**SECTION XI. DUTY TO PROVIDE INFORMATION**

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the

DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

## SECTION XII. REOPENING, MODIFICATION & REVOCATION

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

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances:

[OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
- (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d).

[OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The



notification should include any changes which may alter the status of a "grandfathered source," as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

### SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(18) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

### SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably 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 this 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 preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
- (2) the permitted facility was at the time being properly operated;
- (3) 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 this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

#### **SECTION XV. RISK MANAGEMENT PLAN**

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

#### **SECTION XVI. INSIGNIFICANT ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

#### **SECTION XVII. TRIVIAL ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

**SECTION XVIII. OPERATIONAL FLEXIBILITY**

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

**SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS**

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
  - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
  - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
  - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
  - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and

the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.

- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

## SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must

- comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
  - (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
  - (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
  - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

## **SECTION XXI. TITLE V APPROVAL LANGUAGE**

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by

DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

## **SECTION XXII. CREDIBLE EVIDENCE**

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]



# PART 70 PERMIT

AIR QUALITY DIVISION  
STATE OF OKLAHOMA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
707 NORTH ROBINSON, SUITE 4100  
P.O. BOX 1677  
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2011-141-TVR2

Xerox Corporation,

having complied with the requirements of the law, is hereby granted permission to operate the Xerox Photocopier Supplies Manufacturing Facility located at 100 Mustang Road, Mustang, Canadian County, Oklahoma, subject to the following conditions, attached:

Standard Conditions dated July 1, 2005

Specific Conditions

This permit shall expire five years from the date of issuance, except as authorized under Section VIII of the Standard Conditions.

\_\_\_\_\_  
Division Director, Air Quality Division

\_\_\_\_\_  
Date

XEROX Corporation  
Attn: Mr. Ted Beer  
P.O. Box 26588  
OKC, OK 73126-0588

SUBJECT: Permit No. 2011-141-TVR2  
Facility: Xerox Photocopier Supplies Manufacturing Facility  
Location: 100 Mustang Road, Mustang, Canadian County, Oklahoma

Dear Mr. Beer:

Air Quality has received the permit application for the referenced facility and completed initial review. This application is a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c) the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instructions enclosed)
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility.
3. Send AQD a written affidavit of publication for the notices from Item #1 above together with any additional comments or requested changes, which you may have for the permit application within 20 days of publication.

The permit review time is hereby tolled pending the receipt of the affidavit of publication. Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at [eric.milligan@deq.ok.gov](mailto:eric.milligan@deq.ok.gov) or at (405) 702-4217.

Sincerely,

Phillip Fielder, P.E.  
Permits and Engineering Group Manager  
**AIR QUALITY DIVISION**

Enclosures