

# Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-01-2 Effective Date: July 7, 2004

Facility Name: SNF – Riceboro

Facility Address: Chemical Plant Road  
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250  
Riceboro, Georgia 31323

Parent/Holding Company: SNF Holding Corporation

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The addition of Dispersant Product Lines DP01 – DP04 with scrubber SE3A/B and Tanks T624 – T631; the change in control device for Emulsion Lines EM51 – EM62; the addition of Tank TAC9; the addition of Emulsion Line EM31; the update of the permit with respect to 40 CFR 60 Subpart Kb and 40 CFR 63 Subpart G applicability; the change in contents of Tanks BT1 and BT2; the increase in the allowable emission rate of acrylic acid from Emulsion Plant Stack (SE19); the update in methanol test methods for Boiler B2; the addition of general applicability statements for 40 CFR 63 Subpart FFFF; the update of template conditions 4.1.1, 4.1.2, and 8.14.1; and the update of the insignificant activity lists in Appendix B of the permit.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-01-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 14721 dated September 7, 2003 and January 15, 2004; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-01-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 17 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2899-179-0011-V-01-0.

---

Director  
Environmental Protection Division

**Table of Contents**

**PART 1.0 FACILITY DESCRIPTION .....1**  
 1.3 Process Description of Modification..... 1  
**PART 3.0 REQUIREMENTS FOR EMISSION UNITS .....2**  
 3.1.2 Emission Units .....2  
 3.2 Equipment Emission Caps and Operating Limits.....8  
 3.3 Equipment Federal Rule Standards .....8  
 3.4 Equipment SIP Rule Standards.....9  
**PART 4.0 REQUIREMENTS FOR TESTING .....10**  
 4.1 General Testing Requirements .....10  
 4.2 Specific Testing Requirements .....10  
**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection) .....12**  
 5.2 Specific Monitoring Requirements .....12  
**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS .....13**  
 6.1 General Record Keeping and Reporting Requirements.....13  
 6.2 Specific Record Keeping and Reporting Requirements .....14  
**PART 7.0 OTHER SPECIFIC REQUIREMENTS .....15**  
 7.4 Insignificant Activities Associated with this Amendment .....15  
**PART 8.0 GENERAL PROVISIONS.....16**  
 8.14 Compliance Requirements .....16  
**Attachments .....17**  
 B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic  
 Emission Groups

**PART 1.0 FACILITY DESCRIPTION**

**1.3 Process Description of Modification**

This amendment is for the following changes:

- a. The installation and operation of the Dispersant Product manufacturing lines (Source Codes DP01 through DP04) with associated storage tanks (Source Codes T624 through T631) and 2-stage scrubber (Source Code SE3A/B);
- b. The change in contents for storage tanks BT1 and BT2;
- c. The installation and operation of storage tank TAC9;
- d. The update of the equipment list and deletion of conditions associated with 40 CFR 60 Subpart Kb;
- e. The update of the equipment list and conditions associated with 40 CFR 63 Subpart F and G;
- f. The installation and operation of Emulsion Line EM31;
- g. The change in scrubber assignment for Emulsion Lines EM51 – EM62 from scrubber CES3 to SE3A/B;
- h. The increase in the allowable acrylic acid limit for Stack SE19;
- i. The update of methanol test methods;
- j. The addition of general applicability statements for 40 CFR 63 Subpart FFFF;
- k. The update of template conditions 4.1.1, 4.1.2, and 8.14.1; and
- l. The update of the “Insignificant Activities Checklist” and the “Insignificant Activities Based On Emission Levels” table.

## Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-01-2

### PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1.2 Emission Units <sup>†</sup>

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
<b>MULTI-PLANT EQUIPMENT</b>					
<b>BLRS</b>	<b>Boilers – Chemtall Plant</b>				
B7CH B8CH B9CH B10C B11C	Boilers	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.3.1, 3.3.2, 3.4.1 through 3.4.3, 5.2.2, 5.3.1, 6.1.7, 6.2.1 through 6.2.3, and 6.2.7*	None	None
<b>BLRS</b>	<b>Boilers – Flocryl Plant (Cationic Monomer Plant)</b>				
B1, B3 through B7	Boilers	40 CFR 60 Subpart Dc 391-3-1-.02(2)(a) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.3.1, 3.3.2, 3.4.1 through 3.4.3, 5.2.2, 5.3.1, 6.1.7, 6.2.1 through 6.2.3, and 6.2.8*	None	None
B2	Boiler	40 CFR 60 Subpart Dc 391-3-1-.02(2)(a) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.3.1, 3.3.2, 3.4.1 through 3.4.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1 through 6.2.3, and 6.2.8*	None	None
<b>TNKS</b>	<b>Tanks – Chemtall Plant</b>				
ACR, ACR2, AM11 through AM18, TA10, TAM1 through TAM9	Acrylamide Tanks	391-3-1-.02(2)(a)	6.2.7*	None	None
FOT1 FOT2	Formaldehyde Tanks	391-3-1-.02(2)(a)	5.2.2, 5.3.1, 6.1.7, and 6.2.7*	SC1	PT Scrubber
TAC1, TAC2, TAC5 through TAC9	Acrylic Acid Tanks	391-3-1-.02(2)(a)	6.2.7*	None	None
OIL1 through OIL5	Oil Tanks	391-3-1-.02(2)(a)	6.2.7*	None	None
BT1 BT2	Isopar K Telura 619	391-3-1-.02(2)(a)	6.2.7*	None	None
BT3 through BT11	Recovered Oil Tanks	391-3-1-.02(2)(a)	6.2.7*	None	None
BT12 through BT14	Return Oil Tanks	391-3-1-.02(2)(a)	6.2.7*	None	None
TO11 through TO13	Oil Tanks	391-3-1-.02(2)(a)	6.2.7*	None	None

## Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-01-2

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
TAC3 TAC4	Acrylic Acid Tanks	391-3-1-.02(2)(a)	6.2.7*	None	None
<b>TNKS</b>	<b>Tanks – Flocryl Plant (Cationic Monomer Plant)</b>				
T200 T404	MMA Tanks	None	None*	None	None
T406	ADAM Shutdown Tank	None	None*	None	None
T220 T221	Methanol Co-Product Tanks	None	None*	None	None
T620 T621	Methanol-Water Tank Methanol-Acrylate Tank	None	None*	None	None
T202 T203 T402 T405 T512 T513	DMOH Tanks	None	None*	None	None
T201 T206 T401 T510 T511	MA Tanks	None	None*	None	None
T204	Hexane Tank	None	None	None	None
<b>N/A</b>	<b>Roadways and Fugitive Dust Sources</b>	391-3-1-.02(2)(n)	3.4.4, 3.4.5, and 6.2.4*	None	None
<b>CHEMTALL PLANT</b>					
<b>CM</b>	<b>Chloromethylation Plant</b>				
CM1 through CM7	Batch Plant Lines 1 through 5 and Continuous Plant Lines 6 and 7	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.6 through 3.4.10, 5.2.2, 5.2.4, 5.3.1, 5.3.2, 6.1.7, and 6.2.7*	CMI2 CMS2 CMI1 CMS1	Incinerator Venturi/PT Scrubber Incinerator (backup) Venturi/PT Scrubber (backup)
<b>PP</b>	<b>Powder Plant</b>				
P1	Powder Plant Line 1	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CP1A CP1B CP1C CP1D	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse
P2	Powder Plant Line 2	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CP2A CP2B CP2C CP2D CP2E	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse Bulk Truck Loading Baghouse
P3	Powder Plant Line 3	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.11, 3.4.12, 4.2.7, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CP3A CP3B CP3C CP3D	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse
P4	Powder Plant Line 4	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CP4A CP4B CP4C CP4D	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse
P5	Powder Plant Line 5	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CP5A CP5B CP5C CP5D	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse
P6	Powder Plant Line 6	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CP6A CP6B CP6C CP6D	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse

## Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-01-2

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P7	Powder Plant Line 7	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.3, 3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7	CP7A CP7B CP7C CP7D	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse
P8	Powder Plant Line 8	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.4, 3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CP8A CP8B CP8C CP8D	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse
P9	Powder Plant Line 9	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CP9A CP9B CP9C CP9D	Cyclone Baghouse 1 Cyclone Baghouse 2 Fines Baghouse Bagging Baghouse
<b>EM</b>	<b>Emulsion Plant</b>				
EM1, EM4 through EM9	Phase I Emulsion Plant Lines 1, 4 – 9	391-3-1-.02(2)(a)	3.2.5 and 6.2.7*	None	None
EM10 through EM12, EM14 through EM16	Phase I Emulsion Plant Lines 10 – 12, 14 – 16	391-3-1-.02(2)(a)	6.2.7*	None	None
EM17 through EM20	Phase II Emulsion Plant Lines 17 – 20	391-3-1-.02(2)(a)	5.2.2, 5.3.1, 6.1.7, and 6.2.7*	CES1	PT Scrubber
EM21 through EM24, EM27 through EM29, EM31	Phase II Emulsion Plant Lines 21 – 24, 27 – 29, and 31	391-3-1-.02(2)(a)	3.2.6, 4.2.8, 5.2.2, 5.3.1, 6.1.7, and 6.2.7*	CES2	PT Scrubber
EM25 through EM26	Phase II Emulsion Plant Lines 25 – 26	391-3-1-.02(2)(a)	6.2.7*	None	None
EM33 EM34	Emulsion Plant Lines 33 and 34	391-3-1-.02(2)(a)	6.2.7*	None	None
EM41 through EM45	Emulsion Plant Mix Tanks 41 – 45	391-3-1-.02(2)(a)	3.2.5 and 6.2.7*	None	None
EM51 through EM62	Phase II Emulsion Plant Lines 51 – 62	391-3-1-.02(2)(a)	4.2.1, 5.2.2, 5.3.1, 6.1.7, and 6.2.7*	SE3A SE3B	PT Scrubber (2-Stage)
<b>BP</b>	<b>Bead Plant</b>				
BP1	Bead Plant Line 1	391-3-1-.02(2)(a)	5.2.2, 5.3.1, 6.1.7, and 6.2.7*	SB1	PT Scrubber
BP2	Bead Plant Line 2	391-3-1-.02(2)(a)	5.2.2, 5.3.1, 6.1.7, and 6.2.7*	SB2	PT Scrubber
BP3	Bead Plant Line 3	391-3-1-.02(2)(a)	5.2.2, 5.3.1, 6.1.7, and 6.2.7*	SB3	PT Scrubber
<b>DP</b>	<b>Dispersant Product Lines</b>				
DP01 through DP04	Dispersant Product Lines 1 – 4	391-3-1-.02(2)(a) 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.7, 3.4.13, 3.4.14, 4.2.9, 5.2.2, 5.3.1, 6.1.7, and 6.2.7*	SE3A SE3B	PT Scrubber (2-Stage)
<b>N/A</b>	<b>Other</b>				
RNMA	NMA Reactor	391-3-1-.02(2)(a)	5.2.2, 5.3.1, 6.1.7, and 6.2.7*	SC2	PT Scrubber
MAN	Mannich Polymer Production	391-3-1-.02(2)(a)	5.2.2, 5.3.1, 6.1.7, and 6.2.7*	SC1 SC2	PT Scrubbers

## Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-01-2

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CED1	Spray Dryer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.11, 3.4.12, 5.2.2, 5.2.5, 5.3.1, 5.3.3, 6.1.7, and 6.2.7*	CEB1	Baghouse
FGC	Fugitive Emissions from equipment leaks	391-3-1-.02(2)(a)	6.2.7*	None	None
<b>FLOCRYL PLANT (CATIONIC MONOMER PLANT)</b>					
<b>NCFB</b>	<b>Batch Process Operations</b>				
R1 R2 R3 R4	Trains 1 through 4 - Batch Reactor Process	391-3-1-02(2)(a)	6.2.8*	None	None
D1 D2 D3 D4	Trains 1 through 4 – Product Distillation Process	391-3-1-02(2)(a)	6.2.8*	None	None
IN1	Train 1 – Inhibitor Pots (T414, T415, T416)	391-3-1-02(2)(a)	5.2.7, 5.3.1, 5.3.4, 6.1.7, and 6.2.8*	CI1	Carbon Bed (drum)
IN2	Train 2 – Inhibitor Pots (T514, T515, T516)	391-3-1-02(2)(a)	5.2.7, 5.3.1, 5.3.4, 6.1.7, and 6.2.8*	CI2	Carbon Bed (drum)
IN3	Train 3 – Inhibitor Pots (T614, T615, T616)	391-3-1-02(2)(a)	5.2.7, 5.3.1, 5.3.4, 6.1.7, and 6.2.8*	CI3	Carbon Bed (drum)
IN4	Train 4 – Inhibitor Pots (T714, T715, T716)	391-3-1-02(2)(a)	5.2.7, 5.3.1, 5.3.4, 6.1.7, and 6.2.8*	CI4	Carbon Bed (drum)
M1 M2	No. 1 and 2 Methanol Purification Processes	391-3-1-02(2)(a)	6.2.8*	None	None
408A 408B	Train 1 – Process Tanks, Product	391-3-1-02(2)(a)	6.2.8*	None	None
508A 508B	Train 2 – Process Tanks, Product	391-3-1-02(2)(a)	6.2.8*	None	None
608A 608B	Train 3 – Process Tanks, Product	391-3-1-02(2)(a)	6.2.8*	None	None
708A 708B	Train 4 – Process Tanks, Product	391-3-1-02(2)(a)	6.2.8*	None	None
T300	Methanol-Water Tank	391-3-1-02(2)(a)	6.2.8*	None	None
T303	Methanol-Acrylate Tank	391-3-1-02(2)(a)	6.2.8*	None	None
T304	Methanol Co-Product Tank	391-3-1-02(2)(a)	6.2.8*	None	None
T306	Methanol Wash Tank	391-3-1-02(2)(a)	6.2.8*	None	None
FVL FVO FPL FPO FRL FRO FFL FFO	LDAR: Valves, pumps, pressure relief devices, and flanges in volatile organic service	40 CFR 60 Subpart VV 391-3-1-02(2)(a)	3.3.6, 5.2.6, 5.3.1, 5.3.6, and 6.2.8*	None	None
<b>NCFC</b>	<b>Continuous Process Operations</b>				
R501	Transesterification Reactor / Column (including decanting)	40 CFR 63 Subpart B (G2) 40 CFR 60 Subpart NNN 40 CFR 60 Subpart RRR	3.3.7, 3.3.8, 4.2.2, 4.2.3, 5.2.1, 5.2.8, 5.3.1, 5.3.5, 6.1.7, and 6.2.9*	C51B	Condenser
R502	Transesterification Reactor / Column (including decanting)	40 CFR 63 Subpart B (G2) 40 CFR 60 Subpart NNN 40 CFR 60 Subpart RRR	3.3.7, 3.3.8, 4.2.2, 4.2.3, 5.2.1, 5.2.8, 5.3.1, 5.3.5, 6.1.7, and 6.2.9*	C52B	Condenser
D503	Product Distillation	40 CFR 63 Subpart B (G2)	None*	None	None
R500	Saponification Reactor and Methanol Recovery	40 CFR 63 Subpart B (G2) 40 CFR 60 Subpart NNN 40 CFR 60 Subpart RRR	3.3.7, 3.3.8, 4.2.2, 4.2.3, 5.2.1, 5.2.8, 5.3.1, 5.3.5, 6.1.7, and 6.2.9*	C522	Condenser

## Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-01-2

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
T520	Crude Ester Tank	40 CFR 63 Subpart B (40 CFR 63 Subpart G - G1) 40 CFR 60 Subpart Kb	3.3.10, 3.3.14, 5.2.8, 5.2.10 through 5.2.12, 5.3.1, 5.3.5, 6.1.7, 6.2.6, 6.2.10, and 6.2.11*	C520	Condenser
T522	Azeotrope Tank	40 CFR 63 Subpart B (40 CFR 63 Subpart G - G2)	3.3.14, 5.2.1, 5.2.8, 5.3.1, 5.3.5, 6.1.7, 6.2.6, and 6.2.9	C522	Condenser
T523	Recycle Reactant Tank	40 CFR 63 Subpart B (40 CFR 63 Subpart G - G2) 40 CFR 60 Subpart Kb	3.3.14, 5.2.8, 5.3.1, 5.3.5, and 6.2.6*	None	None
T540	Methanol Co-Product Tank	40 CFR 63 Subpart B (40 CFR 63 Subpart G - G2) 40 CFR 60 Subpart Kb	3.3.11, 3.3.14, 5.2.1, 5.2.8, 5.3.1, 5.3.5, 6.1.7, and 6.2.6*	None	None
FVLN FVON FPLN FRVN FFLN FVLH FPLH FRVH FFLH FBH FALH	LDAR: Valves, pumps, pressure relief devices, flanges, bottoms receivers, and agitators in volatile organic service	40 CFR 63 Subpart B (40 CFR 63 Subpart UU) 391-3-1-.02(9)(b)(16)	3.3.9, 5.2.8, 5.2.9, 5.3.1, and 5.3.5*	None	None
N/A	Process Wastewaters	40 CFR 63 Subpart B (40 CFR 63 Subpart G - G2)	3.3.12 and 6.2.12*	None	None
N/A	Maintenance Wastewaters	40 CFR 63 Subpart B (40 CFR 63 Subpart F)	3.3.13 and 6.2.13*	None	None
N/A	Open System Liquid Streams	40 CFR 63 Subpart B (40 CFR 63 Subpart G Avoidance)	5.2.8, 5.3.1, and 5.3.5*	None	None
<b>FLOCRYL PLANT (ACRYLAMIDE PLANT)</b>					
<b>BIOF</b>	<b>Flocryl Processes</b>				
V1	Acrylamide Production Train 1	40 CFR 63 Subpart F 40 CFR 63 Subpart G – G2 40 CFR 63 Subpart H	3.3.15 through 3.3.19, 3.3.39, 5.2.2, 5.3.1, 6.1.7, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	C301 C302	PT Scrubber 301 PT Scrubber 302
V2	Acrylamide Production Train 2	40 CFR 63 Subpart F 40 CFR 63 Subpart G – G2 40 CFR 63 Subpart H	3.3.15 through 3.3.19, 3.3.39, 5.2.2, 5.3.1, 6.1.7, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	C303 C304	PT Scrubber 303 PT Scrubber 304
V3	Acrylamide Production Train 3	40 CFR 63 Subpart F 40 CFR 63 Subpart G – G2 40 CFR 63 Subpart H	3.3.15 through 3.3.19, 3.3.39, 5.2.2, 5.3.1, 6.1.7, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	C305 C306	PT Scrubber 305 PT Scrubber 306
V4	Acrylamide Production Train 4	40 CFR 63 Subpart F 40 CFR 63 Subpart G – G2 40 CFR 63 Subpart H	3.3.15 through 3.3.19, 3.3.39, 5.2.2, 5.3.1, 6.1.7, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	C307 C308	PT Scrubber 307 PT Scrubber 308
<b>N/A</b>	<b>OTHER</b>				
V404 V408 V410 V412 V414	Acrylamide Product Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G - G2	3.3.15 through 3.3.19, 3.3.42, 5.2.2, 5.3.1, 6.1.7, 6.2.6, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	CAPS	PT Scrubber APS

## Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-01-2

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
V416 V418 V420 V422 V424	Acrylamide Product Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G - G2	3.3.15 through 3.3.19, 3.3.42, 5.2.2, 5.3.1, 6.1.7, 6.2.6, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	CAPS	PT Scrubber APS
V417 V419 V421 V423 V425 V427 V429	Day Storage Acrylamide Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G - G2	3.3.15 through 3.3.19, 3.3.42, 5.2.2, 5.3.1, 6.1.7, 6.2.6, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	None	None
V431 V433 V435 V437 V439 V441 V443 V445 V447	Day Storage Acrylamide Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G - G2	3.3.15 through 3.3.19, 3.3.42, 5.2.2, 5.3.1, 6.1.7, 6.2.6, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	None	None
EG10 EG11	Ethylene Glycol Tanks	40 CFR 63 Subpart F 40 CFR 63 Subpart G - G2	3.3.15 through 3.3.19, 3.3.42, 5.2.2, 5.3.1, 6.1.7, 6.2.6, 6.2.14 through 6.2.18, and 6.2.21 through 6.2.24*	None	None
FVLB FVOB FPLB FPOB FRVB FFLB FFOB FAOB	LDAR: Pumps, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and agitators	40 CFR 63 Subpart F 40 CFR 63 Subpart H	3.3.15 through 3.3.38, 4.2.4 through 4.2.6, 5.2.13, 5.3.1, 5.3.7 through 5.3.14, 6.1.7, and 6.2.21 through 6.2.23*	None	None
N/A	Transfer Rack Operations for Acrylamide	40 CFR 63 Subpart F 40 CFR 63 Subpart G - G2	3.3.15 through 3.3.19, 3.3.40, 6.1.7, 6.2.19, and 6.2.21 through 6.2.24*	None	None
N/A	Wastewaters: Acrylamide Equipment and Plant Maintenance, Catalyst Rinse Process Maintenance	40 CFR 63 Subpart F	3.3.15 through 3.3.19, 3.3.41, 6.1.7, and 6.2.20 through 6.2.24*	None	None
N/A	Acrylonitrile Unloading, Storm water and fire fighting deluge	None	None	None	None

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

†Table 3.1.2 replaces Tables 3.1 and 3.1.1 found in Air Quality Permit Nos. 2899-179-0011-V-01-0 and 2899-179-0011-V-01-1, respectively.

**3.2 Equipment Emission Caps and Operating Limits**

**CHEMTALL PLANT**

EM – Emulsion Plant

3.2.6 The Permittee shall not discharge or cause the discharge into the atmosphere from Emulsion Lines EM21 through EM24, EM27 through EM29, and EM31 through Stack SE19 any gases which:  
[391-3-1-.02(2)(a)]

- a. Contain acrylamide in excess of 0.0051 pounds per hour.
- b. Contain acrylic acid in excess of 0.187 pounds per hour.

DP – Dispersant Product Lines

3.2.7 The Permittee shall not discharge or cause the discharge into the atmosphere from Dispersant Product Lines DP01 through DP04 through Stack SE51 any gases which contain acrylic acid in excess of 0.0114 pounds per hour.  
[391-3-1-.02(2)(a)]

**3.3 Equipment Federal Rule Standards**

**MULTI-PLANT EQUIPMENT**

Equipment Group TNKS

3.3.3 Deleted.

**FLOCRYL PLANT (ACRYLAMIDE PLANT)**

Tanks Subject to 40 CFR 63 Subpart G

3.3.42 The Permittee shall comply with all applicable provisions of 40 CFR 63.123(a) for storage tanks V404, V408, V410, V412, V414, V416 through V425, V427, V429, V431, V433, V435, V437, V439, V441, V443, V445, V447, EG10, and EG11.  
[40 CFR 63 Subpart F; 40 CFR 63 Subpart G for Group 2 Tanks]

**CHEMTALL PLANT AND FLOCRYL PLANT (CATIONIC MONOMER PLANT)**

3.3.43 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart FFFF – National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing for the operation of the Flocryl Cationic Monomer Plant and the operation of the Chemtall Plant. The facilities shall be in compliance with all provisions of 40 CFR 63 Subpart FFFF no later than November 10, 2006.  
[40 CFR 63 Subpart FFFF]

- 3.3.44 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart A – General Provisions as specified in Table 12 of 40 CFR 63 Subpart FFFF.  
[40 CFR 63 Subpart A]

**3.4 Equipment SIP Rule Standards**

**CHEMTALL PLANT**

DP – Dispersant Product Lines

- 3.4.13 The Permittee shall not discharge or cause the discharge into the atmosphere from the Dispersant Product Lines (Source Codes DP01 through DP04) particulate emissions in the amount equal to or greater than the emission limit determined by the following formula:  
[391-3-1-.02(2)(e)]

$$E = 4.1(P)^{0.67}$$

E = Emission limit in pounds per hour.

P = Process input weight rate in tons per hour.

- 3.4.14 The Permittee shall not cause, let, suffer, permit, or allow emissions from the Dispersant Product Lines (Source Codes DP01 through DP04) vented to the atmosphere the opacity of which is equal to or greater than forty (40) percent.  
[391-3-1-.02(2)(b)]

**PART 4.0 REQUIREMENTS FOR TESTING****4.1 General Testing Requirements**

4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division ("Division"). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.

[391-3-1-.02(6)(b)1(i)]

4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

[391-3-1-.02(3)(a)]

4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

j. U.S. EPA SW-846 Methods 8260 and 8270 for the determination of methanol purity.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

**4.2 Specific Testing Requirements****CHEMTALL PLANT****EM – Emulsion Plant**

4.2.8 Within 60 days after achieving the maximum production rate at which Emulsion Plant Line EM31 will be operated, but no later than 180 days after start up, the Permittee shall conduct acrylamide and acrylic acid performance tests on Stack SE19 for Emulsion Plant Lines EM21 through EM24, EM27 through EM29, and EM31. The results of the performance test shall be submitted to the Division within 60 days of the completion of testing.

[391-3-1-.02(2)(a)]

DP – Dispersant Product Lines

- 4.2.9 Within 60 days after achieving the maximum production rate at which the Dispersant Product Lines DP01 through DP04 will be operated, but no later than 180 days, the Permittee shall conduct acrylic acid performance tests on Stack SE51. The results of the performance test shall be submitted to the Division within 60 days of the completion of testing.  
[391-3-1-.02(2)(a)]

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**

**5.2 Specific Monitoring Requirements**

- 5.2.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

**CHEMTALL PLANT**

EM – Emulsion Plant

- e. Deleted.

EM – Emulsion Plant and DP – Dispersant Product Lines

- l. Pressure drop (Stages A and B combined), scrubbant flow rate, and scrubbant pH (for each stage) for the Emulsion Plant / Dispersant Product Scrubber SE3A/B. Data shall be recorded once per shift.  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

**MULTI-PLANT EQUIPMENT**

Equipment Group BLRS – Boiler B2

- 5.2.3 At a minimum of once every 12 months, the Permittee shall analyze a sample of the methanol burned in Boiler B2 to demonstrate that it is 97% pure. The Permittee shall also analyze the sample using U.S. EPA SW-846 Methods 8260 and 8270 to demonstrate that the methanol contains no hazardous constituents as defined by 40 CFR Part 261 Appendix VIII.  
[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

**CHEMTALL PLANT**EM – Emulsion Plant

- v. Any three consecutive readings during which an operating parameter for EM Plant Scrubber CES1 or CES2 measured and recorded in accordance with Condition 5.2.2.f is less than or outside the range of following values:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

(A) Scrubbant pH for Scrubbers CES1 and CES2: 5.0 to 9.0.

(B) Deleted.

(C) Deleted.

EM – Emulsion Plant and DP – Dispersant Products

- xiii. Any three consecutive readings during which an operating parameter for EM Plant/Dispersant Product Scrubber SE3A/B measured and recorded in accordance with Condition 5.2.2.1 is less than or outside the range of following values:

(A) Scrubbant pH (Stage A): 8 to 12.

(B) Scrubbant pH (Stage B): 2 to 6.

(C) Pressure drop (Stages A and B combined): 1 – 9 inches of water.

(D) Scrubbant flow rate (Stages A and B combined): 19 gpm.

**6.2 Specific Record Keeping and Reporting Requirements**

**MULTI-PLANT EQUIPMENT**

Equipment Group TNKS

6.2.5 Deleted.

Tanks Subject to 40 CFR 63 Subpart G

6.2.6 In accordance with 40 CFR 60.123(a), for storage tanks T520, T522, T523, T540, V404, V408, V410, V412, V414, V416 through V425, V427, V429, V431, V433, V435, V437, V439, V441, V443, V445, V447, EG10, and EG11. The Permittee shall maintain a record of the dimensions of each storage tank and an analysis showing the capacity of said tank shall be maintained for the life of the source. These records shall be available for inspection by or submittal to the Division.  
[40 CFR 63 Subpart B based on 40 CFR 63.123(a) for Group 1 and 2 Tanks; 40 CFR 63 Subpart G; 40 CFR 60 Subpart Kb fulfilled by Subpart G]

**PART 7.0 OTHER SPECIFIC REQUIREMENTS**

**7.4 Insignificant Activities Associated with this Amendment**

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

**PART 8.0 GENERAL PROVISIONS****8.14 Compliance Requirements**

## 8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than January 30 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and
- e. Any additional requirements specified by the Division.

**Attachments**

- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups

## Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-01-2

### ATTACHMENT B

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

#### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Combustion Equipment</b>	4. Stationary engines burning:	12
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators;	
<b>Laboratories and Testing Storage Tanks and Equipment</b>	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	35
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	185

#### INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Multi-Plant Equipment – Fugitive emissions from unloading and loading of volatile organic materials	Facility - Wide
Multi-Plant Equipment – Emissions from addition of powder inhibitors and catalysts	Facility - Wide
Multi-Plant Equipment – Emissions from surface coating of miscellaneous metal parts	Facility - Wide
Chemtall – Methyl Chloride pressurized storage tank	2
Chemtall – Surfactant Manufacturing	2
Chemtall – Emulsion Concentration (EV1 and EV2)	2
Chemtall – Emulsion Line – 1 Ton Unit (EM29)	1
Chemtall – Emulsion Line – 2 Ton Unit (EM28)	1
Chemtall – Emulsion Line – 2 Ton Unit (EM30)	1
Chemtall – NMA tanks (NMT1 – NMT4)	4
Chemtall – ALUM/Ferric Chloride Polymer Blending	1
Chemtall – DMA pressurized storage tank	1
Chemtall – Glyoxal storage tank	1
Chemtall – Formaldehyde tank, 10,000 gallon (FOR)	1
Chemtall – Hydrochloric Acid Storage Tanks (HC01)	1
Chemtall – Miscellaneous Waste Water Treatment Chemical Process Line DE01 with Tank T623	1
Chemtall – Miscellaneous Waste Water Treatment Chemical Process Lines MF01 and MF02 with Tanks HC01 and T623	1
Chemtall – Miscellaneous Waste Water Treatment Chemical Process Line TN01 with Tank T622	1
Chemtall – ADAM/MADAM quat Tanks (CM29 - CM36, CM38 - CM40)	11

## Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-01-2

### INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Chemtall – ADAM/MADAM Tank (CM37)	1
Chemtall – Ethylene Glycol Tanks (EG01 – EG06)	6
Chemtall – Emulsion Tanks (T102 – T113, EVT1 and EVT2)	14
Chemtall – ADAM/MADAM Tanks (TC10 – TC15, TCM7 – TCM9)	9
Chemtall – Dispersant Product Tanks (T624 – T631)	8
Flocryl (Cationic Monomer Plant) – Recycle Catalyst Distillation Process (RC1 through RC4)	4
Flocryl (Cationic Monomer Plant) – Residue Tank (T099)	1
Flocryl (Cationic Monomer Plant) – ADAM/MADAM Tank (T400)	1
Flocryl (Cationic Monomer Plant) – ADAM Tanks (T532)	1
Flocryl (Cationic Monomer Plant) – ADAM Tanks (T533)	1
Flocryl (Acrylamide Plant) – Acrylamide / Copper blend tank	1
Flocryl (Acrylamide Plant) – Acrylonitrile pressurized storage tanks (T101, T102, T103, and T104)	4
Flocryl (Acrylamide Plant) – Catalyst Cleaning (V103A/B/C, V105A/B/C)	6