

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

December 14, 2022

PERMIT TO INSTALL
157-10D

ISSUED TO
Capital Resin Corporation Michigan

LOCATED AT
17350 Ryan Road
Detroit, Michigan 48212

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
B2927

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: December 13, 2022	
DATE PERMIT TO INSTALL APPROVED: December 14, 2022	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUBOILER1	Natural gas fired boiler rated at 16 MMBtu/hr or less.	2012	
EUBACKUPGEN	500 kW (or less) natural gas fired emergency generator	2011	
EUT-120	Formerly called EUFORMALIN1. A 15,000-gallon storage tank used for the storage of an acetone-based intermediate under a nitrogen blanket.	2013 / 12-14-2022	FGTANKS
EUT-121	Formerly called EUFORMALIN2. A 15,000-gallon storage tank used for the storage of an acetone-based intermediate under a nitrogen blanket.	2013 / 12-14-2022	FGTANKS
EUT-206	A 20,000-gallon storage tank used for the storage of acetone. This tank has a conservation vent.	1993 / 12-14-2022	FGTANKS
EURESIN5	A coating manufacturing process consisting of one 6,500-gallon reactor and two glycol-chilled process condensers.	2013 / 12-14-2022	FGRESIN
EURESIN6	A coating manufacturing process consisting of one 6,500-gallon reactor and two glycol-chilled process condensers.	2013 / 12-14-2022	FGRESIN
EUDISTILLATE	Formerly EUREACTOR4. A 6,800-gallon storage vessel for distillate from the coating resin manufacturing process.	1993 / 12-14-2022	FGRESIN
EUT-112	A 25,000-gallon storage tank used for the storage of manufactured resin.	1993 / 12-14-2022	FGRESIN
EUT-113	A 25,000-gallon storage tank used for the storage of waste from the resin manufacturing process.	1993 / 12-14-2022	FGRESIN

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

EUBOILER1 EMISSION UNIT CONDITIONS

DESCRIPTION

Natural gas fired boiler rated at 16 MMBtu/hr or less.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall burn only natural gas in EUBOILER1. **(R 336.1205, R 336.1225, R 336.1702, R 336.1901, 40 CFR 52.21(c) & (d), 40 CFR Part 60 Subparts Dc)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The heat input capacity of EUBOILER1 shall not exceed a maximum of 16.0 MM BTU per hour. **(R 336.1205, 40 CFR 52.21(c) & (d), 40 CFR Part 60 Subpart Dc)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall monitor, in a satisfactory manner, the natural gas usage rate for EUBOILER1 on a monthly basis. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d), 40 CFR 60.48c(g))**
2. The permittee shall keep, in a satisfactory manner, all monthly fuel use records for EUBOILER1, as required by SC VI.1., on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d), 40 CFR 60.48c(g))**
3. The permittee shall monitor emissions, operating information, and keep records for EUBOILER1 in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc. The permittee shall make all records available to the Department upon request. **(40 CFR Part 60 Subparts A and Dc)**

VII. REPORTING

1. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. **(40 CFR 60.7)**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOILER1	36	28.6	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc, as they apply to EUBOILER1. **(40 CFR Part 60 Subparts A & Dc)**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

EUBACKUPGEN EMISSION UNIT CONDITIONS

DESCRIPTION

500 kW (or less) natural gas fired emergency generator

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. The permittee shall demonstrate compliance for EUBACKUPGEN with the emission limits under 40 CFR Part 60, Subpart JJJJ. **(40 CFR 60 Subpart JJJJ)**

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in EUBACKUPGEN. **(R 336.1205(3), R 336.1225, 40 CFR 60.4230)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUBACKUPGEN greater than 500 hours per year, based on a 12-month rolling time period. **(R 336.1205(3), R 336.1225, 40 CFR 52.21 (c) & (d))**
2. The permittee may operate EUBACKUPGEN for no more than 100 hours per 12-month rolling time period as determined at the end of each calendar month for the purpose of necessary 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. Permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per year. **(40 CFR 60.4243(d))**
3. The permittee shall install, maintain, and operate EUBACKUPGEN and any control device according to the manufacturer's emission-related written instructions, over the entire life of the engine. In addition, the permittee may only change those settings that are permitted by the manufacturer. The permittee shall also meet the applicable requirements of 40 CFR part 1068. **((R 336.1205(1)(a) & (3), R 336.1225, R 336.1910, 40 CFR 52.21(c) & (d), 40 CFR 60.4234, 40 CFR 60.4243(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a non-resettable device to monitor and record the hours of operation for EUBACKUPGEN. **(R 336.1205(3), R 336.1225, 40 CFR 52.21 (c) & (d), 40 CFR 60.4237)**
2. The nameplate capacity of EUBACKUPGEN shall not exceed 500 kW, as certified by the equipment manufacturer. **(R 336.1205(1)(a) & (3), 40 CFR 60.4230(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Upon request of the AQD District Supervisor, the permittee shall verify NO_x, CO, and VOC emission rates from EUBACKUPGEN, by testing at owner's expense, in accordance with Department requirements or by providing manufacturer certification documentation as required in SC VI.2. If testing is to be performed, the permittee must submit a complete stack-testing plan to the AQD. No less than 60 days prior to testing, the permittee must submit a complete stack-testing plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.4244, 40 CFR 60.4245(a))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(1)(a) & (3), 40 CFR 52.21 (c) & (d))**
2. The permittee shall keep, in a satisfactory manner, a record of testing required in SC V.1 or manufacturer certification documentation indicating that EUBACKUPGEN meets the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subpart JJJJ. The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4245(a))**
3. The permittee shall monitor and record the hours of operation of EUBACKUPGEN during emergencies and non-emergencies, on a monthly and 12-month rolling time period basis, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall record the time of operation of EUBACKUPGEN and the reason it was in operation during that time. **(R 336.1205(1)(a) & (3), 40 CFR 60.4243(d))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBACKUPGEN	12	28.6	R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and JJJJ, as they apply to EUBACKUPGEN. **(40 CFR Part 60 Subparts A & JJJJ)**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGTANKS	Three storage tanks. One for storage of acetone and two for acetone-based intermediates.	EUT-120, EUT-121, EUT-206
FGRESIN	Two coating resin manufacturing processes, each consisting of one reactor and two glycol-chilled process condensers; one distillate storage vessel; one product storage tank; and one waste storage tank. All equipment is exhausted to a wet scrubber.	EUREACTOR5, EUREACTOR6, EUDISTILLATE, EUT-112, EUT-113

FGTANKS FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Three storage tanks. One for storage of acetone and two for acetone-based intermediates.

Emission Unit: EUT-120, EUT-121, EUT-206

POLLUTION CONTROL EQUIPMENT

Conservation vent on each tank

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not store any materials in EUT-206 except for acetone (CAS No. 67-64-1).¹ **(R 336.1224, R 336.1225)**
2. The permittee shall not store any materials in EUT-120 except for acetone-based intermediates with a maximum acetone content of 25 wt%.¹ **(R 336.1224, R 336.1225)**
3. The permittee shall not store any materials in EUT-121 except for acetone-based intermediates with a maximum acetone content of 50 wt%.¹ **(R 336.1224, R 336.1225)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not store any materials in EUT-120, EUT-121, or EUT-206 unless its respective fixed roof and conservation vent is installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall install and operate EUT-120 and EUT-121 within an enclosed building. **(R 336.1224, R 336.1225, R 336.1702)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FG-RESIN FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two coating resin manufacturing processes, each consisting of one reactor and two glycol-chilled process condensers; one distillate storage vessel; one product storage tank; and one waste storage tank. All equipment is exhausted to a wet scrubber.

Emission Unit: EUREACTOR5, EUREACTOR6, EUDISTILLATE, EUT-112, EUT-113

POLLUTION CONTROL EQUIPMENT

Wet scrubber

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGRESIN unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 45 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGRESIN unless the wet scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the wet scrubber includes, but is not limited to, maintaining a minimum pressure drop across the plate of 0.7 inches water gauge and meeting the requirements of the MAP required by SC III.1. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)
2. The permittee shall equip the wet scrubber with a device to monitor pressure drop on a continuous basis. (R 336.1224, R 336.1225, R 336.1702, R 336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall perform inspections of the wet scrubber as follows: **(R 336.1224, R 336.1225, R 336.1702, R 336.1910)**
 - a) Determine the pressure drop across the wet scrubber on a daily basis during operation. If the pressure drop across the control varies by more than the recommended range as specified by the MAP, the permittee shall document the variation, and review the operation and maintenance procedures. The permittee shall document any corrective action.
 - b) Visually inspect the wet scrubber, on a quarterly basis, to ensure there is proper drainage and no evidence of chemical attack on the structural integrity of the control device.
 - c) Visually inspect ductwork from reactors and tanks to the wet scrubber, on a quarterly basis, to ensure there are no leaks.
 - d) Perform all maintenance on the wet scrubber in accordance with the MAP.
2. The permittee shall keep daily records of the pressure drop for the wet scrubber. The permittee shall also keep records of all operating and maintenance information, as required in SC VI.1. All records shall be kept on file at the facility and made available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702, R 336.1910)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSCRUBBER	10	58	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. Within 30 days of permit issuance, the permittee shall identify each reactor, storage vessel/tank, and condenser in a manner acceptable to the AQD District Supervisor (label, diagram, etc.). **(R 336.1201(3))**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).