

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

August 15, 2023

**PERMIT TO INSTALL
30-21B**

ISSUED TO

Pharmacia & Upjohn Company LLC, a Subsidiary of Pfizer, Inc.

LOCATED AT

7000 Portage Road
Kalamazoo, Michigan 49001

**IN THE COUNTY OF
Kalamazoo**

**STATE REGISTRATION NUMBER
B3610**

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: July 13, 2023	
DATE PERMIT TO INSTALL APPROVED: August 15, 2023	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 conditions 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
EUCR3173-S3	All equipment in or around Building 173, located in KAPI Region III.	01-01-1967/ 06-14-1995/ 08-13-19 07-16-2021 TBD	FGCRALLPART-S3 FGCRALLTOX-S3 FGCFUG-S3 FGPHARMAMACT-S3

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.

**EUCR3173-S3
 EMISSION UNIT CONDITIONS**

DESCRIPTION

All equipment in or around Building 173, located in KAPI Region III.

Flexible Group ID: FGCRALLPART-S3, FGCRALLTOX-S3, FGCFUG-S3, FGPHARMAMACT-S3

POLLUTION CONTROL EQUIPMENT

W-Rotoclones on EX6, EX25, EX34; Particle Scrubber on SCRB1002; Exhaust Fans on FANS3345, FANS3346; Scrubbers, connected to TOX; Condensers, connected to TOX.

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	240 lbs ¹	Per month	All process vents combined	SC V.1, SC VI.2	R 336.1225, R 336.1227(2)
2. PM	Limits in the table below:	Hourly	EU3173-S3	SC V.1	R 336.1225, R 336.1331(c)

Exhaust ID	Lbs Particulate Per Hour By Size Category			Lbs Particulate Per 1000 Lbs of Dry Exhaust Gas			Maximum Gas Flow Rate (dscfm)
	A	B	C	A	B	C	
3. EX-6	0.69	0.17	0.17	0.08	0.02	0.02	2,000
4. EX-25	1.37	0.34	0.34	0.08	0.02	0.02	4,000
5. EX-34	0.93	0.23	0.23	0.08	0.02	0.02	2,700
6. SCRB1002	1.17	0.58	0.29	0.008	0.004	0.002	34,000
7. FANS3345	-	0.29	0.17	-	0.10	0.06	670
8. FANS3346	-	0.29	0.17	-	0.10	0.06	670

II. MATERIAL LIMITS

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Lots of product produced in TSP processes.	150 lots ¹	Per month	EUCR3173-S3	SC VI.2	R 336.1225, R 336.1227(2)

III. PROCESS/OPERATIONAL RESTRICTIONS

- The permittee shall not operate equipment located in EUCR3173-S3 in vacuum service, while processing a VOC, unless a vacuum pump connected to the thermal oxidizer control is installed and operated properly. **(R 336.1702, R 336.1910)**
- The permittee shall capture all waste materials from the solvent cleaning of the solids drum charging glove boxes and shall store them in closed containers. The permittee shall dispose of all these materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1225, R 336.1702(a))**

- The permittee shall handle all materials for EUCR3173-S3 activities containing volatile compounds other than water in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- Upon request of the AQD District Supervisor, the permittee shall verify the PM emission rates from EUCR3173-S3 by testing at the owner’s expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and/or Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1225, R 336.1331, R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- The permittee shall complete all required records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1702(a), R 336.1910)**
- The permittee shall calculate and record the actual particulate emission rates on a monthly basis using a method similar to that described in Appendix 4-S3. **(R 336.1225, R 336.1227(2), R 336.1331(c))**

See Appendix 4-S3

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVC173HBEX6	10	42	R 336.1225, 40 CFR 52.21(c)&(d)
2. SVC173HBEX25	14	45	R 336.1225, 40 CFR 52.21(c)&(d)
3. SVC173HBEX34	13	40	R 336.1225, 40 CFR 52.21(c)&(d)
4. SVC173HBSCR1002	38	66	R 336.1225, 40 CFR 52.21(c)&(d)
5. SVC173HBFANS3345*	13	36	R 336.1225, 40 CFR 52.21(c)&(d)

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
6. SVC173HBFANS3346*	13	36	R 336.1225, 40 CFR 52.21(c)&(d)

* may have rain caps

IX. OTHER REQUIREMENT(S)

NA

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
FGCRALLTOX-S3	All of the equipment located in Region I, Process Buildings 38, 127, 155, 195; Region II, Process Buildings 44, 149; Region III, Process Buildings 73, 173, 207, 225; Region IV, Process Buildings 66, 76, 91 commercial, 172, 335; and Region VI process Building 38 that is "connected" to the regional TOX.	EUCR138-S3 EUCR1127-S3 EUCR1155-S3 EUCR1195-S3 EUCR244-S3 EUCR2149-S3 EUCR373-S3 EUCR3173-S3 EUCR3207-S3 EUCR3225-S3 EUCR466-S3 EUCR476-S3 EUCR491COM-S3 EUCR4172-S3 EUCR4335-S3 EUC38R6ALL-S3

**FGCRALLTOX-S3
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

All of the equipment located in Region I process Buildings 38, 127, 155, 195; Region II process Buildings 44, 149; Region III process Buildings 73, 173, 207, 225; Region IV process Buildings 66, 76, 91 commercial, 172, 335; and Region VI process Building 38 that is “connected” to the regional TOX.

Emission Units: EUCR138-S3, EUCR1127-S3, EUCR1155-S3, EUCR1195-S3, EUCR244-S3, EUCR2149-S3, EUCR373-S3, EUCR3173-S3, EUCR3207-S3, EUCR3225-S3, EUCR466-S3, EUCR476-S3, EUCR491COM-S3, EUCR4172-S3, EUCR4335-S3, EUC38R6ALL-S3

POLLUTION CONTROL EQUIPMENT

Thermal Oxidizer System - (two parallel thermal oxidizer, quench, and scrubber trains-one in use and one as a backup).

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Other VOC (VOCs, Methylene Chloride and Acetone)	20 ppmv TOC as methane	24-hour average	Thermal oxidizer	SC VI.8	R 336.1225, R 336.1702(a), R 336.1901, 40 CFR 63.1258(b)(8)(iii)
2. Other VOC	37 tons	12-month rolling time period as determined at the end of each calendar month	Thermal oxidizer	SC VI.9	40 CFR 52.21
3. OVC (toxic air contaminants, as defined in Rule 120, other than methylene chloride, acetone and other VOC)	16 pph ¹	Before control with a thermal oxidizer	All Region I buildings combined	SC VI.10	R 336.1224, R 336.1225
4. OVC	30 pph ¹	Hourly, Before control with a thermal oxidizer	All Region II buildings combined	SC VI.10	R 336.1224, R 336.1225
5. OVC	113 pph ¹	Hourly, Before control with a thermal oxidizer	All Region III buildings combined	SC VI.10	R 336.1224, R 336.1225
6. OVC	38 pph ¹	Hourly, Before control with a thermal oxidizer	All Region IV buildings combined	SC VI.10	R 336.1224, R 336.1225
7. OVC	21 pph ¹	Hourly, After control	Thermal oxidizer	SC VI.8	R 336.1224, R 336.1225
8. HCl	27 pph ¹	Hourly, After control	Thermal oxidizer, scrubber	SC VI.8	R 336.1225
9. HCl	95% reduction in emissions	Hourly	Thermal oxidizer, scrubber	SC VI.8	40 CFR 63.1252(g)(1)
10. Halogens	95% reduction in emissions	Hourly	Thermal oxidizer, scrubber	SC VI.8	40 CFR 63.1252(g)(1)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
11. Total Dioxins and Furans (total polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans, tetrachloro- through octachloro- isomers, measured as toxic equivalents of 2,3,7,8-tetrachlorodibenzo-p-dioxin)	0.050 microgram per second after control ¹	Hourly	Thermal oxidizer	SC VI.8	R 336.1901
12. Total Dioxins and Furans	15.3 nanograms per cubic meter, corrected to 70°F and 29.92 inches Hg, after control ¹	Hourly	Thermal oxidizer	SC VI.8	R 336.1901

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate the equipment “connected” to the TOX while processing a VOC or OVC unless all provisions of Rule 910 are met. **(R 336.1910)**
2. The permittee shall not operate the connected equipment included in FGCRALLTOX-S3 while processing a VOC or an OVC unless a minimum temperature of 1,635°F and a minimum retention time of 0.75 second is maintained in the operating thermal oxidizer. **(R 336.1910, 40 CFR 63.1258(b)(5)(ii))**
3. The permittee shall not operate the connected equipment included in FGCRALLTOX-S3 while processing a VOC or an OVC if the inlet gas flow rate to the thermal oxidizer system is greater than 5200 scfm. **(R 336.1910)**
4. The permittee shall not operate the connected equipment included in FGCRALLTOX-S3 while processing a halogenated compound unless a minimum water flow rate of 750 gal/min, as averaged over the calendar day, is maintained to the top of the operating caustic scrubber. **(R 336.1224, R 336.1910, 40 CFR 63.1258(b))**
5. The permittee shall not operate the connected equipment included in FGCRALLTOX-S3 while processing a halogenated compound unless a minimum daily average pH of 7.0 is maintained in the scrubber liquid effluent. **(R 336.1224, R 336.1910, 40 CFR 63.1258(b))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain the inlet to the thermal oxidizer system with a gas flow rate indicator acceptable to the AQD. **(R 336.1225, R 336.1910)**
2. The permittee shall equip and maintain each thermal oxidizer with a combustion temperature indicator acceptable to the AQD. **(R 336.1225, R 336.1910)**

3. The permittee shall equip and maintain the fresh water make-up and recirculation lines on each quench section with in-line water flow gauges and audible low-flow alarms acceptable to the AQD. Each water flow gauge shall be capable of measuring the flow rate in gallons per minute for the entire design flow rate range of the water line it serves. **(R 336.1225, R 336.1910)**
4. The permittee shall equip and maintain the fresh water make-up and recirculation lines on each scrubber with in-line water flow gauges and audible low-flow alarms acceptable to the AQD. Each water flow gauge shall be capable of measuring the flow rate in gallons per minute for the entire design flow rate range of the water line it serves. **(R 336.1225, R 336.1910)**
5. The permittee shall equip and maintain the thermal oxidizer system with audible and/or visible alarms that will activate when the inlet gas flow rate to the thermal oxidizer is greater than 4680 scfm. **(R 336.1224, R 336.1910)**
6. The permittee shall maintain the TOC CEMs according to 40 CFR 63.1258(b)(x). **(40 CFR 63.1258(b)(x))**
7. The permittee shall equip and maintain all open top vessels, tanks, and other equipment containing VOCs with a top which is closed during normal operations. **(R 336.1702(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For all storage vessels subject to 40 CFR Part 60, Subpart Kb; records shall be kept of the operating plan and of the measured values of the parameters monitored in accordance with the plan. **(40 CFR 60.115b(c))**
2. For all storage vessels subject to 40 CFR Part 60, Subpart Kb; records shall be kept for the life of the source showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. **(40 CFR 60.116b(b))**
3. The permittee shall monitor and record the combined inlet gas flow rate to the thermal oxidizer system on a continuous basis and with instrumentation acceptable to the AQD. **(R 336.1224, R 336.1910)**
4. The permittee shall keep calendar quarterly records of the following:² **(R 336.1224, R 336.1910)**
 - a. Duration in minutes of each alarm occurrence whereby the design flow rate for the thermal oxidizer was exceeded.
 - b. The reason for each alarm occurrence.
 - c. The corrective action taken to rectify each alarm occurrence that is associated with process equipment malfunctions, operator error, control equipment malfunction, or exceedance of the design flow rate.
5. The permittee shall monitor and record the combustion temperature in each operating thermal oxidizer train on a continuous basis and with instrumentation acceptable to the AQD. **(R 336.1910)**
6. The permittee shall monitor and record the total water flow rate to the top of the caustic scrubber on a continuous basis and with instrumentation acceptable to the AQD. **(R 336.1910)**
7. The permittee shall monitor and record the pH of the scrubber liquid effluent on a continuous basis and with instrumentation acceptable to the AQD. **(R 336.1910)**
8. The permittee shall keep records of the pounds per hour and method of calculation for each toxic air contaminant (including HCl), Other VOC, and OVC, after control by a thermal oxidizer.¹ **(R 336.1225)**

9. The permittee shall calculate other VOC (Volatile Organic Compounds and Methylene Chloride and Acetone) emissions after control per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1225, R 336.1702(a), R 336.1901, 40 CFR 63.1258(b)(8)(iii))**
10. For connected equipment the permittee shall keep records of the calculated emission rates prior to thermal oxidizer control in pounds per lot and pounds per hour of OVC other than methylene chloride, acetone and other VOC and the method of calculation. **(R 336.1227(2), R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

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 Dimensions(inches)	Minimum Height Above Ground(feet)	Underlying Applicable Requirements
1. SVCTOX1	36 ¹	135 ¹	R 336.1225, R 336.901
2. SVCTOX2	36 ¹	135 ¹	R 336.1225, R 336.901

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable requirements of the NSPS general provisions and storage tank regulations in 40 CFR Part 60, Subparts A, K, Ka, and Kb. **(40 CFR Part 60, Subparts A, K, Ka, and Kb)**
2. The permittee shall implement the corrective actions detailed in Appendix 11-S3 upon activation of the alarm required in SC IV.6. **(R 336.1224, R 336.1910)**

Footnotes:

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

Appendix 4-S3. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EUCR3173-S3. Alternative formats must be approved by the AQD District Supervisor. An alternative format has been approved.

MONTHLY RECORDKEEPING FORMAT- REGION III TSP PROCESSES			
Process Building	Particulate Maximum (lbs/lot)	Actual Number of lots/month	Estimated Particulate Emissions (lbs/month)
173	1.6		

Appendix 11-S3. Regional Control Device Alarm Response Program

The permittee shall use the following procedures for the Regional Control Device Alarm Response Program requirements referenced in Table FGCRALLTOX-S3.

Alarming of the regional control device and common vent header will be handled in a two-phase approach. Each building venting to the common vent header will have a message display located in an appropriate place within the production area. This message display will provide information on airflow for the building's vents header. In addition to the message display, a common audible and/or visual alarm will be located in the production area. All alarming parameters will be centrally monitored in the building 76 control room, which will be staffed 24 hours a day.

The response to a peak regional flow alarm will be as follows:

1. The Building 76 operator will acknowledge the alarm.
2. The Building 76 operator will check the various building flows to determine which building(s) are contributing significantly to the alarm condition.
3. The Building 76 operator will contact the supervisor(s) of the building(s) in question to inform them that some operations must be slowed or discontinued (in a safe manner) so that the regional flow can be kept below 2000 scfm.
4. The Building 76 operator will then monitor the situation to ensure that the alarm condition is corrected and will make additional contacts of the building supervisors if needed.