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

August 30, 2019

**PERMIT TO INSTALL**
29-07C

**ISSUED TO**
Dow Silicones Corporation

**LOCATED AT**
3901 South Saginaw Road
Midland, Michigan

**IN THE COUNTY OF**
Midland

**STATE REGISTRATION NUMBER**
A4043

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:<br>**August 12, 2019** | |
| DATE PERMIT TO INSTALL APPROVED:<br>**August 30, 2019** | 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 |
| $CO_2e$ | 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 |
| $H_2S$ | 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 |
|---|---|---|---|
| EU356-01 | Hydrochloric Acid (HCl) production plant with a packed bed scrubber (24388), capable of producing either anhydrous HCl or aqueous HCl. Production and storage of liquid HCl product at a concentration of 30 weight percent or greater during normal operations is subject to the requirements of the Hydrochloric Acid Production NESHAP, 40 CFR Part 63, Subpart NNNNN.<br><br>The most recent PTI for this emission unit is PTI No. 29-07C. | 2008, 2013, 2019 | FGHCLMACT |
| EU356-02 | Rail car transfer station No. 9E with packed bed scrubber (24401), capable of either loading rail cars with aqueous HCl or unloading aqueous HCl from rail cars. Loading rail cars with liquid HCl product at a concentration of 30 weight percent or greater during normal operations is subject to the requirements of the Hydrochloric Acid Production NESHAP, 40 CFR Part 63, Subpart NNNNN.<br><br>The most recent PTI for this emission unit is PTI No. 29-07C. | 2008, 2013 | FGHCLMACT |
| EU356-03 | Rail car unloading station No. 10E with packed bed scrubber (24344), capable of unloading aqueous HCl from rail cars.<br><br>The most recent PTI for this emission unit is PTI No. 29-07C. | 2008, 2013 | NA |

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.

# EU356-01
# EMISSION UNIT CONDITIONS

## DESCRIPTION

Hydrochloric Acid (HCl) production plant with a packed bed scrubber (24388), capable of producing either anhydrous HCl or aqueous HCl. Production and storage of liquid HCl product at a concentration of 30 weight percent or greater during normal operations is subject to the requirements of the Hydrochloric Acid Production NESHAP, 40 CFR Part 63, Subpart NNNNN.

The most recent PTI for this emission unit is PTI No. 29-07C.

**Flexible Group ID:** FGHCLMACT

## POLLUTION CONTROL EQUIPMENT

Packed bed scrubber (24388)

## I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU356-01 unless packed bed scrubber 24388 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining a minimum liquid flow rate of 1,000 lbs/hr in the packed bed scrubber. **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall equip and maintain packed bed scrubber 24388 with a liquid flow meter. **(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 monitor, in a satisfactory manner, the liquid flow rate of scrubber 24388 on a continuous basis. Unless otherwise specified in this permit, monitoring and recording of data “on a continuous basis” is defined as an instantaneous data point recorded at least once every 15 minutes. The permittee may record block average values for 15 minute or shorter periods calculated from all measured data values during each period. In the event the continuous monitoring and recording system is inoperable, the permittee shall record at least one data point per shift for each data point that is required to be monitored on a continuous basis. **(R 336.1910)**

2. The permittee shall keep, in a satisfactory manner, records of the flow rate for scrubber 24388. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(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. SV356-001[+] | 4 | 103 | R 336.1225, 40 CFR 52.21(c)&(d) |
| [+] This vent may discharge horizontally. | | | |

## IX. OTHER REQUIREMENT(S)

NA

**Footnotes:**
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

# EU356-02
# EMISSION UNIT CONDITIONS

## DESCRIPTION

Rail car transfer station No. 9E with packed bed scrubber (24401), capable of either loading rail cars with aqueous HCl or unloading aqueous HCl from rail cars. Loading rail cars with liquid HCl product at a concentration of 30 weight percent or greater during normal operations is subject to the requirements of the Hydrochloric Acid Production NESHAP, 40 CFR Part 63, Subpart NNNNN.

The most recent PTI for this emission unit is PTI No. 29-07C.

**Flexible Group ID:** FGHCLMACT

## POLLUTION CONTROL EQUIPMENT

Packed bed scrubber (24401)

## I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU356-02 unless packed bed scrubber 24401 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining a minimum liquid flow rate of 2,500 lbs/hr in the packed bed scrubber. **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall equip and maintain packed bed scrubber 24401 with a liquid flow meter. **(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 monitor, in a satisfactory manner, the liquid flow rate of scrubber 24401 on a continuous basis whenever EU356-02 operates. Unless otherwise specified in this permit, monitoring and recording of data “on a continuous basis” is defined as an instantaneous data point recorded at least once every 15 minutes. The permittee may record block average values for 15 minute or shorter periods calculated from all measured data values during each period. In the event the continuous monitoring and recording system is inoperable, the permittee shall record at least one data point per shift for each data point that is required to be monitored on a continuous basis. **(R 336.1910)**

2. The permittee shall keep, in a satisfactory manner, records of the flow rate for scrubber 24401 as required by SC IV.1. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(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. SV356-002 | 4[1] | 20[1] | R 336.1225 |

## IX. OTHER REQUIREMENT(S)

NA

**Footnotes:**
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

# EU356-03
# EMISSION UNIT CONDITIONS

## DESCRIPTION

Rail car unloading station No. 10E with packed bed scrubber (24344), capable of unloading aqueous HCl from rail cars.

The most recent PTI for this emission unit is PTI No. 29-07C.

**Flexible Group ID:** FGHCLMACT

## POLLUTION CONTROL EQUIPMENT

Packed bed scrubber (24344)

## I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU356-03 unless packed bed scrubber 24344 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining a minimum liquid flow rate of 2,500 lbs/hr in the packed bed scrubber. **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall equip and maintain packed bed scrubber 24344 with a liquid flow meter. **(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 monitor, in a satisfactory manner, the liquid flow rate of scrubber 24344 on a continuous basis whenever EU356-03 operates. Unless otherwise specified in this permit, monitoring and recording of data “on a continuous basis” is defined as an instantaneous data point recorded at least once every 15 minutes. The permittee may record block average values for 15 minute or shorter periods calculated from all measured data values during each period. In the event the continuous monitoring and recording system is inoperable, the permittee shall record at least one data point per shift for each data point that is required to be monitored on a continuous basis. **(R 336.1910)**

2. The permittee shall keep, in a satisfactory manner, records of the flow rate for scrubber 24344. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(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. SV356-003 | 4[1] | 20[1] | R 336.1225 |

## 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 |
|---|---|---|
| FGHCLMACT | HCl production facility: the collection of unit operations and equipment associated with the production of liquid HCl product at a concentration of 30 weight percent or greater during normal operations that is located at, or is part of, a major source of hazardous air pollutant emissions. See 40 CFR 63.8985(a). | EU356-01, EU356-02 |

# FGHCLMACT
# FLEXIBLE GROUP CONDITIONS

## DESCRIPTION

HCl production facility: the collection of unit operations and equipment associated with the production of liquid HCl product at a concentration of 30 weight percent or greater during normal operations that is located at, or is part of, a major source of hazardous air pollutant emissions. See 40 CFR 63.8985(a).

**Emission Unit:** EU356-01, EU356-02

## POLLUTION CONTROL EQUIPMENT

- Packed bed scrubber (24388)
- Packed bed scrubber (24401)

## I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period / Operating Scenario | Equipment | Monitoring / Testing Method | Underlying Applicable Requirements |
|---|---|---|---|---|---|
| 1. Hydrogen Chloride (HCl) | 12 ppmv or at least 99.4 percent reduction | Hourly | Emission stream from each HCl process vent in FGHCLMACT | SC V.1 & V.2 | 40 CFR 63.9000(a) |
| 2. HCl | 12 ppmv or at least 99.9 percent reduction | Hourly | Emission stream from each HCl storage tank in FGHCLMACT | SC V.1 & V.2 | 40 CFR 63.9000(a) |
| 3. HCl | 120 ppmv or at least 99 percent reduction | Hourly | Emission stream from each HCl transfer operation in FGHCLMACT | SC V.1, V.2, & V.3 | 40 CFR 63.9000(a) |

[a] The emission limits in SC I.1 through SC I.3 apply while producing liquid HCl product at a concentration of 30 weight percent or greater during normal operations in FGHCLMACT.

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not produce liquid HCl product at a concentration of 30 weight percent or greater during normal operations in FGHCLMACT unless the leak detection and repair (LDAR) plan required by 40 CFR 63.9000 is implemented and maintained. **(40 CFR 63.9000(a))**

2. The permittee shall not produce liquid HCl product at a concentration of 30 weight percent or greater during normal operations in FGHCLMACT unless the monitoring plan required by 40 CFR 63.9025 is implemented and maintained. **(40 CFR 63.8, 40 CFR 63.9025)**

## IV. DESIGN/EQUIPMENT PARAMETER(S)

Special Conditions IV.1, IV.2, and IV.3 apply while producing liquid HCl product at a concentration of 30 weight percent or greater during normal operations in FGHCLMACT.

1. The permittee shall equip and maintain scrubber 24388 and scrubber 24401 with the equipment listed below. **(40 CFR 63.9000(b))**

a. For each scrubber, a device to monitor the liquid flow rate to the packed bed.
b. For each scrubber, a device to monitor the scrubber effluent pH, unless an alternative is approved pursuant to 40 CFR 63.8(f).

2. The permittee shall not produce liquid HCl product at a concentration of 30 weight percent or greater during normal operations in FGHCLMACT unless scrubber 24388 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the liquid flow rate to the packed bed and the scrubber effluent pH in the ranges identified in the monitoring plan as constituting satisfactory operation. Scrubber effluent pH monitoring is not required if an alternative is approved pursuant to 40 CFR 63.8(f). **(40 CFR 63.9000(b))**

3. The permittee shall not load rail cars with liquid HCl product at a concentration of 30 weight percent or greater during normal operations in FGHCLMACT unless scrubber 24401 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the liquid flow rate to the packed bed and the scrubber effluent pH in the ranges identified in the monitoring plan as constituting satisfactory operation. Scrubber effluent pH monitoring is not required if an alternative is approved pursuant to 40 CFR 63.8(f). **(40 CFR 63.9000(b))**

## V. TESTING/SAMPLING

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

1. Within 180 days after initial startup of production of liquid HCl product at a concentration of 30 weight percent or greater during normal operations in equipment in FGHCLMACT, the permittee shall verify HCl emission rates from FGHCLMACT, by testing at owner's expense, in accordance with 40 CFR Part 63, Subpart A and NNNNN. The permittee shall notify the AQD District Supervisor in writing of the intention to conduct a performance test, at least 60 calendar days before the testing is scheduled to begin, in accordance with 40 CFR 63.9045(d). Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 63, Appendix A. No less than 30 days prior to testing, the permittee shall submit a complete plan to the AQD Technical Programs Unit and the District Office. The AQD must approve the final plan prior to testing. The permittee shall 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. **(40 CFR Part 63, Subpart NNNNN)**

2. The permittee shall conduct periodic performance tests while producing liquid HCl product at a concentration of 30 weight percent or greater during normal operations in equipment in FGHCLMACT, as required in 40 CFR 63.9015. Advance notification and reporting of results shall be as required in SC V.1 and in 40 CFR Part 63, Subparts A and NNNNN. **(40 CFR Part 63, Subparts A and NNNNN)**

3. For an emission stream from an HCl transfer operation in FGHCLMACT that meets the requirements of 40 CFR 63.9020(c), the permittee may submit a design evaluation to the AQD in lieu of any performance test required by SC V.1 or V.2. The design evaluation will meet the requirements of 40 CFR 63.9020(c). The permittee shall submit the design evaluation to the AQD District Supervisor no later than the date by which the performance test is required to be complete. **(40 CFR 63.9020(c))**

## VI. MONITORING/RECORDKEEPING

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

Special Conditions VI.1 and VI.2 apply while producing liquid HCl at a concentration of 30 weight percent or greater during normal operations in FGHCLMACT.

1. The permittee shall keep a record, in a satisfactory manner, of the time periods during which liquid HCl product at a concentration of 30 weight percent or greater during normal operations in FGHCLMACT. The permittee shall keep the record on a daily basis. **(40 CFR Part 63, Subparts A and NNNNN)**

2. The permittee shall monitor and record, in a satisfactory manner and on a daily basis, all of the operating parameters listed below: **(40 CFR 63.9000(b), 40 CFR 63.9025)**

a. The daily average liquid flow rate to the packed bed.
b. The daily average scrubber effluent pH for scrubber 24388 and scrubber 24401, unless an alternative is approved pursuant to 40 CFR 63.8(f).

## VII. REPORTING

1. No later than 7 calendar days after startup of production of liquid HCl at concentrations of 30 weight percent or greater during normal operations in FGHCLMACT, the permittee shall notify the AQD District Supervisor in writing of the startup date. **(40 CFR Part 63, Subparts A and NNNNN)**

2. With each Notification of Compliance Status required for equipment in FGHCLMACT, the permittee shall submit the following plans to the AQD District Supervisor:
   a. An updated LDAR plan for FGHCLMACT, for comment, as required by 40 CFR 63.9000(a).
   b. An updated monitoring plan for FGHCLMACT, as required by 40 CFR 63.9025.
   **(40 CFR 63.9(h)(3))**

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

1. While producing liquid HCl product at a concentration of 30 weight percent or greater during normal operations in equipment in FGHCLMACT the permittee shall comply with all provisions of the National Emissions Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and NNNNN, as they apply to FGHCLMACT. **(40 CFR Part 63, Subparts A and NNNNN)**

**Footnotes:**
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).