

Notice of Final Permit Issuance and Response to Comments

The Tennessee Department of Environment and Conservation, Division of Air Pollution Control has completed the reopening for cause of an existing major source operating permit issued to **BAE Systems Ordnance Systems Inc. (BAE)**, subject to the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations and has responded in writing to comments submitted during the public comment period.

The Title V operating permit subject to the reopening is identified as follows: Division identification number 37-0028/568188. Copies of the final permit, statement of basis, and response to comments are attached to this notice.

Attachment #3: Response to Comments
BAE Systems Ordnance Systems, Inc., Holston Army Ammunition Plant (37-0028)
Reopen for Cause #1 to Title V Operating Permit 568188

I. Public Comments

Comment #1 – Open Burning of PFAS

Multiple commenters submitted comments opposing the open burning of PFAS (Per- and Polyfluoroalkyl Substances) at Holston Army Ammunition Plant, as summarized below.

I am writing out of concern regarding the burning of toxic chemicals at Holston Army Ammunition Plant. I ask you to consider the extremely harmful ramification of burning many of these listed below. As I am sure you know, PFOAs are "forever chemicals", and are known to cause birth defects and cancers. The citizens of the town of Hoosick Falls in NY state are battling the consequences of PFOAs in their water supply from a factory that manufactures Teflon products from PFOA chemicals. Elsewhere General Electric for many years used PCBs from their plants to cover dusty roads and outdoor cinema parking areas. Most people had now idea that PCBs were so dangerous. These are now contaminated sites. And GE has spent a fortune to dredge PCBs from the Hudson River. No doubt yourself and other staff at the DEC, share concern for the military men and women (and of course local citizens) whose health could and would be compromised by burning any of the below listed military waste. I sincerely hope that you will research any toxic waste constituents considered for burning as munition waste.

The Tennessee Department of Environment and Conservation, Division of Air Pollution Control is reopening two existing major source operating permits issued to BAE Systems Ordnance Systems Inc. (BAE) at Holston Army Ammunition Plant, subject to provisions of the Tennessee Air Pollution Control Regulations. A major source operating permit is required by both the Federal Clean Air Act and the Tennessee Air Pollution Control Regulations. EPA will perform a 45-day review concurrently with the state public comment period. Both agencies are accepting public comment on draft conditions and permit modifications.

The proposed permit modifications include a condition that expressly prohibits open burning of asbestos, which we support, but the condition fails to address other highly toxic waste constituents in this same waste treatment stream, particularly PFAS. Exposure to PFAS has been shown to affect growth and development, reproduction, thyroid function, the immune system, injure the liver and increase risk for certain cancers.

The current permit conditions allow Holston Army Ammunition Plant to annually open burn as much as 1,250,000 pounds of munitions wastes that may contain as much as 15% PFAS by weight. PFAS are not destroyed in an open fire and are therefore widely dispersed to the air and the surrounding environment where they accumulate in people, as well as fish, wildlife and food crops. At higher temperatures, poisonous hydrogen fluoride gas may be generated. Hydrogen fluoride is a listed hazardous air pollutant subject to regulation by U.S. EPA and authorized states under the Clean Air Act, as are other air emissions from open burning at Holston.

At other Department of Defense sites like the Blue Grass Army Depot in Kentucky, the military is expressly prohibited from open burning PFAS and dozens of other toxic wastes. Both Blue Grass and Holston are located in EPA Region 4. And we are adamant that Tennessee residents, workers and environment are afforded the same level of protection as their Kentucky neighbors.

Therefore, we request that the permit condition prohibiting open burning of asbestos (or other appropriate condition) be EXPANDED to include the following which are gleaned from the Blue Grass permit. Specifically, the Permittee shall not treat, by either open burning or open detonation, munitions or wastes that contain any of the items or substances listed below:

- *Hazardous waste from offsite sources*
- *Ammunition that is 0.50 caliber or smaller*
- *Municipal waste*
- *Dunnage*
- *Containerized gases*
- *Oil*
- *Pesticides*
- *Herbicides*
- *Ammonium perchlorates*

- *Dioxins or furans*
- *Titanium tetrachloride*
- *Polychlorinated biphenyls (PCBs)*
- *Flechettes*
- *Rounds containing submunitions*
- *White phosphorus*
- *Red phosphorous*
- *Colored smoke*
- *Hexachloroethane (HC) smoke*
- *Napalm*
- *Riot control agents*
- *Biological agents*
- *Choking agents*
- *Nerve agents*
- *Blood agents*
- *Blister agents*
- *Incapacitating agents*
- *Chemical warfare materiel*
- *Components of liquid filled rounds or chemical warfare materiel*
- *Nuclear components or devices*
- *Naturally occurring radioactive materials*
- *Depleted uranium (DU)*
- *Any liquids or items containing free liquids*
- *Asbestos*
- *Munitions wastes that are a potential source of Per- and polyfluoroalkyl substances (PFAS), including Teflon, Viton, and Viton-A. This also includes both short and long chain PFAS*
- *Waste Military Munitions with a different chemical composition from those already being treated at Holston*

Source document: *Hazardous Waste Facility Permit, Open Burning and Open/Buried Detonation (OB/OD) Section, Blue Grass Army Depot, KY8-213-820-105 AI: 2805 Activity: APE20040007, November 2018.*

Online at <https://cswab.org/wp-content/uploads/2018/12/Bluegrass-Army-Depot-OBOD-Final-Permit-Nov-2018.pdf>

IMPORTANT NOTE: *These public comments are not to be construed as supporting ANY open burning at Holston – the public notice specifies that regulators are only accepting comment on proposed conditions and permit modifications and our comments are submitted in this specific context. Thank your careful consideration of our comments and recommendations.*

Response: The specific conditions related to open burning, which might be applicable to PFAS, are not open for public comment⁵. However, because PFAS is emerging as a substance of concern due to the health effects associated with these substances (see <https://www.epa.gov/pfas/basic-information-pfas#health> for a summary), a general response to the commenters' concerns is appropriate.

The Division's authority to regulate PFAS-related emissions is limited, because PFAS compounds are not criteria pollutants or hazardous air pollutants and are not listed pollutants under Section 111 of the Clean Air Act. Our ability to address PFAS is also limited by the lack of available information on the amount of PFAS used by the facility. One commenter submitted a table showing the PFAS content of various explosives, but we still do not know actual PFAS use. However, EPA has added PFAS to the list of substances that must be reported in the TRI for 2020, and the TRI will better identify the specific compounds emitted at the facility.

In the longer term, Holston Army Ammunition Plant is working to phase out the open burning of explosives and explosive-contaminated materials using new treatment technologies for contaminated materials. The permittee is also assessing the viability of alternative technologies for explosive wastes. Alternative treatment technologies would be subject to additional requirements, such as the hazardous waste combustor MACT (40 CFR 63 Subpart EEE) or the standards of performance for

⁵ TAPCR 1200-03-09-.02(11)(f)6.(ii) states, "Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable."

commercial and industrial solid waste incinerators (40 CFR 60 Subpart CCCC), which would establish standards for products of combustion of PFAS, such as hydrogen fluoride.

Comment #2 – Open Burning of PVC

One commenter requested amendment of the permit to prohibit the open burning of materials that contain polyvinyl chloride (PVC), as follows:

In addition to signing the petition to prohibit open burning of items containing PFAS, etc, we would like to bring another issue to your attention. In the past, we saw a TDEC report that indicated that HSAAP was open burning conduits and perhaps other items which contain Polyvinyl Chloride (PVC). At a meeting with BAE, HSAAP and other attendees, we advised Colonel Ortiz and Joseph Kennedy of the contents of the report (or inspection). They both assured us that PVC was not being open burned at HSAAP and any information the contrary was inaccurate. However, when we asked them if they would agree to voluntarily amend their permits to expressly prohibit such activity, they refused.

We now ask that you include a specific prohibition in the permits to prohibit the open burning of any items contains PVC. As you well know, burning PVC release Vinyl Chloride Monomer, a compound that is extremely dangerous to humans.

Response: Vinyl chloride and some of its products of combustion (chlorine and hydrogen chloride) are hazardous air pollutants subject to regulation under Section 112 of the Clean Air Act, and the Division does have the authority to regulate emissions of these pollutants. As we noted above, amending the permit to prohibit the open burning of vinyl chloride would not be in accordance with the Title V regulations for reopening of a permit, because the requested change is not open for public comment.

The report to which the commenter refers is presumably the December 2018 site visit report. That report noted that PVC containing materials, such as conduit, might be burned in rare cases but that open burning of PVC was uncommon. Since that time, the facility has improved its waste segregation, and it is PVC-containing materials are no longer sent to the burn pile.

II. Comments submitted by U. S. EPA

1. *Conditions E61-16 and E61-17 refer to Attachment 27. Attachment 27 Table for General Provisions Applicability for 40 CFR 63 Subpart DDDDD includes an entry for the applicability of §63.10(d)(5). The table states that this regulation does not apply and refers to §63.7550(c)(11). This later citation does not exist in the code of federal regulations and a different citation should be added to the permit.*

Response: Attachment 27 of the permit was updated to correct the rule citation to §63.7550(c)(5)(xiii) (A compliance report must contain the following information depending on how the facility chooses to comply with the limits set in this rule... If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by you during a malfunction of a boiler, process heater, or associated air pollution control device or CMS to minimize emissions in accordance with §63.7500(a)(3), including actions taken to correct the malfunction).

2. *The permit lists the NO_x emission limit in Condition E61-6 as 3.63 tons during any period of 12 consecutive months. The statement of basis for this condition states, “Increased allowable NO_x emissions from 2.2 tons/year to 3.5 tons/year.” The permitting authority may wish to change the statement of basis to match the permitted limit of 3.63 tons/year.*

Response: The statement of basis was updated to note the correct increase in the emission limit for Condition E61-6.

3. *The statement of basis includes two entries for Condition E61-8 on page 11. The second entry’s emission limit matches the permit. The first entry can likely be deleted.*

Response: The duplicate entry for Condition E61-8 was removed from the statement of basis.

4. *The EPA also recommends removing Table 5 on page 16 in the statement of basis to avoid confusion.*

Response: Table 5 was removed from the statement of basis.

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243



**REOPEN FOR CAUSE #1 TO
OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act**

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of Tennessee Air Pollution Control Regulations (TAPCR) 1200-03-09-.02(11). The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: June 26, 2018

Permit Number: 568188

Modification Date: February 1, 2021

Date Expires: June 25, 2023

Issued To:

Holston Army Ammunition Plant
BAE Systems Ordnance Systems Inc.
(HSAAP Area B Operations)

Installation Address:

4509 West Stone Drive
Kingsport

Installation Description:

Explosives Manufacturing:
Chemical Processing Operations for Preparation of RDX and HMX Explosives;
Source Listing in Table of Contents

Emission Source Reference No.: 37-0028

Renewal Application Due Date: Between September 28, 2022 and December 27, 2022

Primary SIC: 28

Information Relied Upon:

Title V Permit renewal application dated December 16, 2013. Minor Modification Application dated October 24, 2014. Significant Modification #1 application dated April 17, 2017. Application dated January 9, 2020.

(Continued on the next page)


TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

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END OF REOPEN FOR CAUSE #1 TO PERMIT 568188

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ATTACHMENT 2	AP-42 Fifth Edition Table 1.1-1 for Coal Combustion Emission Factors
ATTACHMENT 3	VOC Emissions/ Material Balance Analysis for Filtering, Washing and Weighing of RDX (E-Buildings – Sources 37-0028-17, -28, -77, -78; and 37-1028-35, -36, -37, -38, and -39 , 37-0028-101, -102)
ATTACHMENT 4	Calculation of VOC and Nitric Acid Emission from RDX Production by Nitration (D Buildings - Sources 37-0028-12, -13, -14, -15, -18, -19, -20, -21; and 37-1029-09 , 37-0028-110)
ATTACHMENT 5	Calculation of Particulate Emissions from Recrystallization and Coating of RDX (37-0028-26)
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ATTACHMENT 7	Calculation of VOC Emission from Lacquer Preparation (Building 150 - Sources 37-0028-92, -105)
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ATTACHMENT 10	AP-42 Fifth Edition Tables for Fuel Oil Combustion Emission Factors Revised July, 1998
ATTACHMENT 11	New Source Performance Standards – 40 CFR Part 60 Specific Applicability Determinations Acetic Acid Concentration and Acetic Anhydride Production (Source 37-1029-16 , 37-0028-112)
ATTACHMENT 12	New Source Performance Standards (NSPS) Subpart VVa “Alternative Monitoring Request
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ATTACHMENT 21	National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines - Requirements (40 CFR 63 Subpart YYYY) Specific Applicability Determinations, Source 37-1029-17 , 37-0028-113 (CHP)
ATTACHMENT 22	New Source Performance Standards (NSPS)– 40 CFR Part 60 Specific Applicability Determinations for Weak Acetic Acid Recovery Process and Tanks 16A and 16B (Source 37-1029-24 and -25)
ATTACHMENT 23	Miscellaneous Organic NESHAP (MON) Requirements, 40 CFR 63 Subpart FFFF, Specific Applicability Determinations, All MCPUs contained under Source 37-0028
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ATTACHMENT 27	Specific Applicability Determinations for 40 CFR 60 (NSPS) AND 40 CFR 63 (MACT) TO 37-0028-112
ATTACHMENT 28	Specific Applicability Determinations for 40 CFR 60 (NSPS) AND 40 CFR 63 (MACT) TO 37-0028-117
ATTACHMENT 29	Title V Fee Selection Form APC 36 (CN-1583)

SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act. The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

A8. Fee payment.

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.
2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.
3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM₁₀ shall not be placed in either the regulated HAP category or miscellaneous HAP category.
4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM₁₀, sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.
5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).
6. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

- A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

- (a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

A11. Permit shield.

- (a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:
 - 1. Such applicable requirements are included and are specifically identified in the permit; or
 - 2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- (b) Nothing in this permit shall alter or affect the following:
 - 1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
 - 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
 - 4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
- (c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6

A12 (RC1). Permit renewal and expiration.

- (a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.
- (b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).
- (c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.

- (a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
 - 1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
 - 2. Additional requirements become applicable to an affected source under the acid rain program.
 - 3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - 4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.

2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.

3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).

4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR. 1200-03-09-.02(11)(f)6 and 7.

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

(a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and

(b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

(a) change in air pollution control equipment

(b) change in stack height or diameter

(c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

- A18. Schedule of compliance.** The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. Title VI.

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program(SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

- A20 (RC1). 112 (r).** Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

- B1. Recordkeeping.** Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.
- (a) Where applicable, records of required monitoring information include the following:
1. The date, place as defined in the permit, and time of sampling or measurements;
 2. The date(s) analyses were performed;
 3. The company or entity that performed the analysis;
 4. The analytical techniques or methods used;
 5. The results of such analyses; and
 6. The operating conditions as existing at the time of sampling or measurement.
- (b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.
- TAPCR 1200-03-09-.02(11)(e)1(iii)
- B2. Retention of monitoring data.** The permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
- TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II
- B3. Reporting.** Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.
- TAPCR 1200-03-09-.02(11)(e)1(iii)
- B4. Certification.** Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- TAPCR 1200-03-09-.02(11)(d)4
- B5. Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):
- (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) 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; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
 - (c) 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. The certification shall be based on the method or means designated in B5(b) above. 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 below occurred; and
 - (d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

B6 (RC1). **Submission of compliance certification.** The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	Air Enforcement Branch U. S. EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. **Emergency provisions.** An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-03 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

B8. **Excess emissions reporting.**

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur

over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than 24 hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

B9. Malfunctions, startups and shutdowns - reasonable measures required. The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved.

B11 (SM1). Report required upon the issuance of a notice of violation for excess emissions. The permittee must submit within 20 days after receipt of the notice of violation, the data required below. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same 20 day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
 - (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
 - (c) The time and duration of the emissions;
 - (d) The nature and cause of such emissions;
 - (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
 - (f) The steps taken to limit the excess emissions during the occurrence reported, and
 - (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.
- Failure to submit the required report within the 20-day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C

PERMIT CHANGES

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
 - (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
 - (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
 - (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
 - (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
 - (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

- C2. Section 502(b)(10) changes.**
- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
 - (b) The written notification must be signed by a facility Title V responsible official and include the following:
 - 1. a brief description of the change within the permitted facility;
 - 2. the date on which the change will occur;
 - 3. a declaration and quantification of any change in emissions;
 - 4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
 - 5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
 - (c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

- C3. Administrative amendment.**
- (a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
 - (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.
 - (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

- C4. Minor permit modifications.**
- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).
 - (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.

- (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
- (d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. Significant permit modifications.

- (a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).
- (b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. New construction or modifications.

Future construction at this facility that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

- (a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.
- (b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).
- (c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

SECTION D

GENERAL APPLICABLE REQUIREMENTS

- D1. Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of 20% percent for an aggregate of more than five minutes in any one hour or more than 20 minutes in any 24-hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million Btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of 20% (six-minute average) except for one six minute period per one hour of not more than 40% opacity. Sources constructed or modified after July 7, 1992 shall utilize six-minute averaging.
- Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.
- TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)
- D2. General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.
- TAPCR 1200-03-06-.03(2)
- D3. Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.
- D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.
- TAPCR 1200-03-07-.07(2)
- D5. Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.
- D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.
- D7 (RC1). Fugitive Dust.**
- (a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:
1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 2. Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

- (b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

- D8. Open burning.** The permittee shall comply with the TAPCR 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

- D9. Asbestos.** Where applicable, the permittee shall comply with the requirements of Tenn. Comp. R. and Regs. 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

- D10. Annual certification of compliance.** The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

- D11 (SM1). Emission Standards for Hazardous Air Pollutants.** When applicable, the permittee shall comply with the TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-38

- D12 (SM1). Standards of Performance for New Stationary Sources.** When applicable, the permittee shall comply with the TAPCR 0400-30-39 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-39

- D13 (SM1). Gasoline Dispensing Facilities.** When applicable, the permittee shall comply with the TAPCR 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

- D14 (SM1). Internal Combustion Engines.**

- (a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-38-.01.
- (b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.01.
- (c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.02.

TAPCR 0400-30-38 and 39

SECTION E**SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS**

37-0028	Facility Description:	Holston Army Ammunition Plant (HSAAP) is a Federal Government owned, contractor operated, facility that primarily manufactures RDX and HMX explosives for national defense purposes. The Area A operations in Sullivan County (82-0018) produce acetic anhydride and concentrated acetic acid for use in explosives production at the HSAAP Area B located in Hawkins County (37-0028). The Area B explosives manufacturing operations are supported by steam generating operations at steam plants equipped with coal fired and natural gas fired boilers.
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Conditions E1 through E3 apply to all sources in Section E of this permit unless otherwise noted.

E1 (RC1). **Fee payment:**

Note: for fees facility source nos. 37-0028 (Area B), ~~37-1028~~, ~~37-1029~~ and 82-0018 (Area A) are combined.

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 37-0028, ~~37-1028~~, ~~37-1029~~, and 82-0018

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	145.61 SM1	AEAR	Includes all fee emissions.
PM₁₀	N/A	N/A	
SO₂	9954.64	AEAR	Includes all fee emissions.
VOC	934.91 RC1	AEAR	Includes all fee emissions.
NO_x	1342.35 RC1	AEAR	Includes all fee emissions.
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	N/A	.
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP: Miscellaneous	N/A	N/A	MACT (40 CFR Part 63 Subpart FFFF). MACT(40 CFR 63 Subpart YYYY) Fee emissions are included in VOC above.
NON-VOC GASEOUS GROUP: Gaseous metals and acids - Mercury and Hydrogen Chloride as surrogates.	N/A	N/A	MACT (40 CFR Part 63 Subpart DDDDD). Fee emissions are not included above.
PM FAMILY GROUP: Particulate matter and mercury as surrogates.	N/A	N/A	MACT (40 CFR Part 63 Subpart DDDDD). Fee emissions are included in PM above.
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	NSPS Rule 40 CFR Part 60 Subpart Dc & NSPS Rule 40 CFR Part 60 Subpart IIII NSPS Rule 40 CFR Part 60 Subpart VVa NSPS Rule 40 CFR Part 60 Subparts NNN and RRR NSPS Rule 40 CFR Part 60 KKKK Fee emissions are included above.

NOTES

AAP **AAP** The **Annual Accounting Period (AAP)** is a twelve (12) consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis.** The **Annual Accounting Period** at the time of modification issuance **began January 1, 2020 and ends December 31, 2020.** The next Annual Accounting Period begins **January 1, 2021 and ends December 31, 2021,** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b), the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as Attachment 29 to this permit and available on the Division of Air Pollution Control's website.

N/A **N/A** indicates that no emissions are specified for fee computation.

AEAR If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an **Actual Emissions Analysis** is **Required** to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
- (3) **the Miscellaneous HAP Category,**
- (4) **the Specific HAP Category, and**
- (5) **the NSPS Category**

under consideration during the **Annual Accounting Period.**

* **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation,** the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

** **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation,** each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

*** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC or NO_x** emissions from each source in this permit. **For fee computation,** each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

The permittee shall: (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).

- (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period pursuant to TAPCR 1200-03-26-.02(9)(d).
- (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
- (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).
- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(g) and are dependent on the Responsible Official's choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

Payment of Fee to:

The Tennessee Department of Environment and Conservation
Division of Fiscal Services
Consolidated Fee Section – APC
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 10th Floor
Nashville, Tennessee 37243

and

Actual Emissions Analyses to:
The Tennessee Department of Environment and Conservation
Division of Air Pollution Control
Permit Program
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

or

An electronic copy (PDF) of actual emissions analysis can also be submitted to:

apc.inventory@tn.gov

TAPCR 1200-03-26-.02 (3) and (9), and 1200-03-09-.02(11)(e)1(vii)

E2 (RC1). Reporting requirements.

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **January 1** to **June 30** and from **July 1** through **December 31** and shall be submitted within 60 days after the end of each six-month period. Semiannual reports of this facility (**37-0028**) shall include:
- (1) Any monitoring and recordkeeping required by Conditions **E4-1, E4-2, E4-5, E4-6, E4-7, E4-8, E4-9, E4-10, E4-11, E4-12, E4-13, E4-14, E4-15, E4-16, E5-4, E16-1, E16-2, E18-1, E19-1, E21-2, E21-3, E21-4, E24-1, E24-2, E24-3, E26-4, E34-1, E35-1, E37-1, E40-1, E45-1, E47-2, E49-1, E50-1, E58-2, E58-3, E59-2, E61-1, E61-22, E62-1, E62-2, E62-3, and E63-1** of this permit. A summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
 - (2) The visible emission evaluation readings from Conditions **E4-3, E4-17, E21-1, E24-5, E46-1, E47-3, and E58-1** of this permit if required by the opacity matrix. A summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
 - (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

- (b) **Annual compliance certification** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):
- (1) The identification of each term or condition of the permit that is the basis of the certification;
 - (2) 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; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
 - (3) 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. The certification shall be based on the method or means designated in E2(b)2 above. 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 below occurred; and
 - (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.
- * “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.
- ** “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from **January 1** to **December 31** of each calendar year and shall be submitted within 60 days after the end of each 12-month period.

These certifications shall be submitted to: **TN APCD and EPA**

The Tennessee Department of Environment and Conservation
Johnson City Environmental Field Office
Division of Air Pollution Control
2305 Silverdale Road
Johnson City, TN 37601

and

Air Enforcement Branch
U. S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

As an alternative to submittal of paper copies of the Title V Semiannual Reports, and Title V Annual Compliance certifications by mail or commercial carrier service, the permittee may elect to submit these reports electronically in Adobe Portable Document Format (PDF) to the following e-mail address:

apc.jcefo@tn.gov

The electronically-submitted report must comply with the specified deadlines as required for a paper copy submittal. Also, the electronic report submittal must include a scanned copy of the signature of the responsible official certifying the report. A color copy of the document with blue ink signatures is preferred, but a black-and-white submittal is acceptable. The Air Pollution Control e-mail address will send an automatic reply to verify that the electronic submittal was received. If an automatic reply is not received, you may wish to re-send or confirm that the e-mail submittal was received by contacting the Division of Air Pollution Control at (865) 594-6035.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

- (c) **NESHAP and NSPS Reporting Requirements:** NSPS and NESHAP reports shall cover the six-month periods from **January 1 to June 30** and from **July 1 through December 31** and shall be submitted within 60 days after the end of each six-month period. These reports shall be submitted to:

Technical Secretary
Division of Air Pollution Control
East Tennessee Permit Program
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

As an alternative to submittal of paper copies of the NESHAP and NSPS Reports by mail or commercial carrier service, the permittee may elect to submit these reports electronically in Adobe Portable Document Format (PDF) to the following e-mail address: Air.Pollution.Control@tn.gov.

The electronically-submitted report must comply with the specified deadlines as required for a paper copy submittal. Also, the electronic report submittal must include a scanned copy of the signature of the responsible official certifying the report. A color copy of the document with blue ink signatures is preferred, but a black-and-white submittal is acceptable. The Air Pollution Control e-mail address will send an automatic reply to verify that the electronic submittal was received. If an automatic reply is not received, you may wish to re-send or confirm that the e-mail submittal was received by contacting the Division of Air Pollution Control at (615) 532-0554.

TAPCR 1200-03-09-.03(8); 40 CFR §60.757(f)

- (d) **Reserved.**

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(c) of this permit.

- (e) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

E3-1 (RC1). Identification of Responsible Official, Technical Contact, and Billing Contact of the permitted facility:

- (a) The application that was utilized in the preparation of this permit is dated December 16, 2013. The letter dated January 30, 2019 identifies Mr. Todd Hayes, HSAAP General Manager, as the Responsible Official of the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.
- (b) The application that was utilized in the preparation of this permit is dated December 16, 2013, and identifies James Ogle, Environmental Affairs Specialist as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The application that was utilized in the preparation of this permit is dated December 16, 2013, and identifies Jerry Andrieszyn, Financial Analyst as the Billing Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

TAPCR 1200-03-09-.02(6)

E3-2. Emissions control equipment shall be operating when the sources are operating, except in accordance with TAPCR 1200-03-20 (see condition B8).

E3-3. Recordkeeping: Data Entry Requirements

- (a) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 30 days from the end of the month for which the data is required.
- (b) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the week for which the data is required.
- (c) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the day for which the data is required.

The permittee shall retain this record at the source location for a period of not less than five years and keep this record available for inspection by the Technical Secretary or his representative. TAPCR 1200-03-09-.02(11)(e)1.(iii)

E3-4 (SM1). Visible emissions reading for the following sources are not required for the reason outlined in the tables;

Sources not Requiring a Visible Emission Reading per the Opacity Matrix		
Source Number	Source Description	Reason no Visible Opacity Readings are required according to the Division's Opacity Matrix
37-0028-12	<u>RDX Nitration Process (PES B-D1-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; (2) Scrubbers for Control	Allowable Emission < 10 TPY for each pollutant
37-0028-13	<u>RDX Nitration Process (PES B-D3-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; (2) Scrubbers for Control	Allowable Emission < 10 TPY for each pollutant
37-0028-14	<u>HMX Nitration Process (PES B-D6-1)</u> Nitration, Aging, & Simmering Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, (2) Packed Column Scrubbers for Control	Allowable Emission < 10 TPY for each pollutant
37-0028-15	<u>RDX and HMX Nitration Process (PES B-D7-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; Scrubber for Control	Allowable Emission < 10 TPY for each pollutant
37-0028-17	<u>Filtering and Washing of Crude RDX and HMX (PES B-E3-1)</u> Jet Venturi Fume Scrubber Control	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-18	<u>RDX Nitration Process (PES B-D2-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor, Acetic Acid/RDX Slurry; Scrubber Control	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-19	<u>RDX Nitration Process (PES B-D8-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; Scrubber for Control	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-20	<u>RDX Nitration Process (PES B-D9-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; Scrubber for Control	Allowable Emission < 10 TPY for each pollutant
37-0028-21	<u>RDX and HMX Continuous Nitration Process (PES B-D10-1)</u> Simmering and Aging Process, Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid Hexamine, Acetic Anhydride, Water, Dilution Liquor, Scrubber Control	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-22	<u>Recrystallization of RDX (PES B-G2-1)</u> (5) Solvent Recovery Condensers	Allowable Emission < 10 TPY for each pollutant
37-0028-23	<u>Recrystallization of RDX or HMX (PES B-G7-1)</u> Condenser Control; (4) Primary Condensers & Vent Condenser for Solvent Recovery PSD-LAER	Allowable Emission < 10 TPY for each pollutant
37-0028-24	<u>Removed from Operation</u>	Allowable Emission < 10 TPY for each pollutant
37-0028-25	<u>Recrystallization of RDX (PES B-G9-1)</u> (4) Primary Condensers & Vent Condenser for Solvent Recovery by Distillation; Condenser Vent	Allowable Emission < 10 TPY for each pollutant
37-0028-28	<u>Filtering and Washing of HMX or RDX (PES B-E4-1)</u> Packed Bed Scrubber Control Acetic Acid Recovery	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-49	<u>Removed from Operation</u>	Allowable Emission < 10 TPY for each pollutant
37-0028-67	<u>Ammonium Nitrate/Nitric Acid Solution Manufacturing (PES B-330-1)</u> Ammonia and Nitric Acid Reaction; Scrubber Control	Allowable Emission < 10 TPY for each pollutant
37-0028-75	<u>Recrystallization of HMX (PES B-G5-1)</u> (5) Solvent Recovery Condensers	Allowable Emission < 10 TPY for each pollutant

Sources not Requiring a Visible Emission Reading per the Opacity Matrix		
Source Number	Source Description	Reason no Visible Opacity Readings are required according to the Division's Opacity Matrix
37-0028-76	Coating of HMX (PES B-G5-2) HMX recrystallization in Methyl Ethyl Ketone, n-Octane, Ethyl Acetate, Butyl Acetate, Isobutyl Acetate, Butyl Alcohol, Ethyl Alcohol, or Isopropyl Alcohol; Solvent Recovery	Allowable Emission < 10 TPY for each pollutant
37-0028-78	<u>Filtration and Washing of HMX (PES B-E6-1)</u> Acetic Acid Recovery Jet Venturi Scrubber Control	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-79	<u>Recrystallization and Coating of RDX (PES B-G1-1)</u> (4) Primary Condensers and Vent Condenser for Solvent Recovery	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-80	<u>Removed from Operation</u>	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-81	<u>Removed from Operation</u>	Allowable Emission < 10 TPY for each pollutant
37-0028-82	<u>Removed from Operation</u>	Allowable Emission < 10 TPY for each pollutant
37-0028-83	<u>Recrystallization of RDX (PES B-G4-1)</u> (4) Primary Condensers and Vent Condenser for Solvent Recovery	Allowable Emission < 10 TPY for each pollutant
37-0028-84	<u>Recrystallization of RDX (PES B-G4-2)</u> (2) Condensers for Solvent Recovery	Allowable Emission < 10 TPY for each pollutant
37-0028-85	<u>Coating of RDX (PES B-G4-3)</u> RDX coating with various lacquers containing n-Octane and Distillation of Cyclohexanone Saturated Water Condenser for Solvent Recovery	Allowable Emission < 10 TPY for each pollutant
37-0028-86	<u>Recrystallization of HMX (PES B-G6-1)</u> (5) Condensers for Solvent Recovery	Allowable Emission < 10 TPY for each pollutant
37-0028-87	<u>HMX Recrystallization (PES B-G6-2)</u> Condenser for Solvent Recovery	Allowable Emission < 10 TPY for each pollutant
37-0028-88	<u>Coating of RDX or HMX (PES B-G6-3)</u> Condenser for Solvent Recovery	Allowable Emission < 10 TPY for each pollutant
37-0028-89	<u>Coating of RDX or HMX (PES B-G6-4)</u> Coating of HMX or RDX with Various Solvent-based Lacquers/ Nitroplasticizer Solvent Recovery Condenser	Allowable Emission < 10 TPY for each pollutant
37-0028-92	<u>Lacquer Preparation (PES B-150-1)</u> Solvent and Binder Mixing; Vents A, B, C, D	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-1028-37 37-0028-101	<u>Filtering and Washing of Crude RDX (PES B-E8-1)</u> Packed Scrubber Control	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-1028-39, 37-0028-102	<u>Filtering and Washing of Crude RDX (PES B-E10-1)</u> (2) Packed Scrubbers for Control	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-1028-90 37-0028-103	<u>Coating of RDX or HMX (PES B-G5-3)</u> Solvent Recovery Condenser	Allowable Emission < 10 TPY for each pollutant
37-1028-98 37-0028-105	<u>(4) Lacquer Pots for Lacquer Preparation (PES B-150-4)</u> Mixing of Solvent and Binder; Loading of Lacquer to Lacquer Wagons	Allowable Emission < 10 TPY for each pollutant
37-1029-05 37-0028-108	<u>Removed from Operation</u>	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-1029-06 37-0028-109	<u>Removed from Operation</u>	Allowable Emission < 10 TPY for each pollutant

Sources not Requiring a Visible Emission Reading per the Opacity Matrix		
Source Number	Source Description	Reason no Visible Opacity Readings are required according to the Division's Opacity Matrix
37-1029-14 37-0028-111	<u>Coating of RDX or HMX (PES B-G7-2)</u> Process Inputs: RDX/HMX, Solvents, and Lacquer Mixtures Solvent Recovery Condenser	Allowable Emission < 10 TPY for each pollutant
37-0028-77	<u>Filtration and Washing of Crude RDX/ HMX (PES E-5-1)</u> Acetic Acid Recovery Jet Venturi Scrubber Control	Allowable Emission < 10 TPY for each pollutant
37-1029-17 37-0028-113	<u>Natural gas fired only Steam Generating Units</u> Four low NOx micro boilers rated at 11.54 MMBtu/hr each and combined heat and power (CHP) cogeneration turbine rated at 87 MMBtu/hr in line with a heat recovery steam generator (HRSG) with a 46 MMBtu/hr duct burner and 15 MMBtu/hr superheater.	Natural Gas or No. 2 Oil-fired Combustion Source
37-0028-114	<u>G-8 Nitration Process</u> Organics processing, support, and nitration equipment. One scrubber used for pollution control.	Allowable emissions ≤ 10 tons/year for each pollutant
37-1029-24 37-0028-115	<u>Weak Acetic Acid Recovery Process</u> Two (2) evaporators, a stripping column, and a concentrator used to remove ammonium nitrate and other impurities from weak acetic acid	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-1029-25 37-0028-116	<u>Tanks 16A and 16B for the Weak Acetic Acid Recovery Process</u> Tanks with wet scrubber control	Allowable Emission for each pollutant > 10 TPY from Colorless Pollutants
37-0028-117	Diesel Fuel-Fired Emergency Generators and Pumps	Allowable emissions ≤ 10 tons/year for each pollutant

- E3-5.** All applicable process sources at Holston Army Ammunition Plant not already subject to the 40 CFR 63 Subpart DDDDD or 40 CFR 63 Subparts F, G, and H NESHAP rules that process, use, or generate hazardous air pollutants are subject and must comply with the requirements of 40 CFR 63 Subpart FFFF.

Each MCPU (Miscellaneous Organic Chemical Manufacturing Process) is evaluated against the requirements of 40 CFR 63 Subpart FFFF. The requirements are documented and maintained on file at the facility and are available for inspection. Notification of new MCPUs with summaries of their requirements and summaries of records are included in the semiannual compliance report for each MCPU that operated during the reporting period as noted in Attachment 23. The requirements for each MCPU will vary.

TAPCR 1200-03-09-.03(8)

- E3-6.** This facility shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, federal regulations published under 40 CFR 63 for sources of hazardous air pollutants and 40 CFR 60, New Source Performance Standards. TAPCR 1200-03-09-.03(8).

37-0028-01, 37-0028-02, 37-0028-03, and 37-0028-04**Source Description: Four Coal Fired Boilers (PES B-200)**

These boilers consist of four Babcock & Wilcox Company spreader stoker type boilers: three boilers with a nominal capacity of 191.4 MMBtu/hr with fabric filter control devices with Sorbent Injectors (sources 37-0028-02-04). Each of the 191.4 MMBtu/hr boilers (sources 37-0028-02-04) have two 40 MMBtu/hour natural gas burners. Each of the 191.4 MMBtu/hr boilers use coal or coal and natural gas combined as fuel. One boiler with a nominal capacity of 185 MMBtu/hr with high efficiency cyclone and an Electrostatic Precipitator emissions control (source 37-0028-01). This 185 MMBtu/hr boiler uses coal as fuel.

In addition, limited amounts (less than 5 percent of coal consumption) of oily rags, clean wood, and secure paper documents may be burned in the four Babcock & Wilcox boilers. Total source maximum operated heat input capacity of 567.8 MMBtu/hr. This source is subject to 40 CFR Part 63 Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters).

E4. Conditions E4-1 through E4-17 apply to source 37-0028-01-04

E4-1. Sulfur dioxide (SO₂) emitted from this source shall not exceed 4.0 pounds per million Btu, one-hour average.

TAPCR 1200-03-14-.02(1)(a)

Compliance Method: Compliance with the SO₂ emission limit will be assured by monitoring of the sulfur content of the coal to maintain a maximum coal sulfur content of 1.5 percent (weighted monthly average). The sulfur content of each coal shipment is analyzed by the vendor using ASTM-4239 Method C and the data is furnished to the permittee. A log of the coal sulfur content must be maintained at the facility and kept available for inspection by the Technical Secretary or his representative. Compliance for the SO₂ emission rate is determined by reference to the following emission factors for bituminous coal and fuel oil combustion from and AP-42, Chapter 1, Section 1.

<u>Pollutant</u>	<u>Emission Factor (pounds/ ton of coal)</u>
Sulfur dioxide	38S where S = weight % sulfur in coal
Data from AP-42 Fifth Edition, January 1995, Table 1.1-1 (enclosed as Attachment 2)	

TAPCR 1200-03-09-.02(11)(e)1(iii)

E4-2. The owner or operator of this source with restricted operating capacity must maintain a daily log of operating capacities and keep it available for inspection by Division personnel on request. The owner /operator shall submit by letter on or before January 31 of each year the total operated capacity for the previous calendar year.

TAPCR 1200-03-19-.06

Compliance Method: In lieu of submitting the previous calendar year operated capacity by January 31 of each year, the permittee shall include information of the monitoring of total actual heat input to this fuel burning installation in the semiannual reports and annual compliance certifications of condition E2 of this permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)

E4-3. No person shall cause, suffer, allow or permit discharge of visible emissions from any fugitive dust source with an opacity in excess of 10% for an aggregate of 15 minutes. Readings are to be taken across the narrower direction if the generation site is rectangular or oblong and are to be perpendicular to the wind direction ($\pm 30^\circ$). Readings will be taken approximately every 15 seconds for any consecutive 15-minute period and an arithmetic average used to determine compliance. Any other items not covered here will be in accordance with the general specifications of the reference method as specified in Part 1200-03-16-.01(5)(g)9.

TAPCR 1200-03-08-.02 and 1200-03-19-.05(2)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for VEE Method 2 enclosed as Attachment 1.

TAPCR 1200-03-09-.02(11)(e)1(iii)

E4-4 (RC1). The permittee is subject to 40 CFR part 63 subpart DDDDD because the permittee owns or operates industrial, commercial, or institutional boiler or process heater as defined in 40 CFR §63.7575 that is located at, or is part of, a major source of HAP, except as specified in 40 CFR §63.7491. For purposes of 40 CFR part 63 subpart DDDDD, a major source of HAP is as defined in 40 CFR §63.2. and 40 CFR §63.7485. **40 CFR Part 63, Subpart DDDDD Requirements as follows:**

Boilers and process heaters located at a major source of hazardous air pollutants are subject to 40 CFR Part 63, Subpart DDDDD, **NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR MAJOR SOURCES: INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS**, as summarized in this condition.

- (a) The permittee must meet each applicable emission limit and work practice standard in Tables 1 through 3, and 11 through 13 to subpart DDDDD for each affected unit in accordance with 40 CFR §63.7500.
- (b) Pursuant to 40 CFR §63.7530(f) and 63.7545(a), the permittee must submit all of the notifications in §63.7(b) and (c), §63.8(e), (f)(4) and (6), and §63.9(b) through (h), including the Notification of Compliance Status containing the results of the initial compliance demonstration.
- (c) Pursuant to 40 CFR §63.7550, the permittee must submit annual, biennial, and/or 5-year, 40 CFR 63, Subpart DDDDD compliance reports, whichever are applicable.
- (d) Pursuant to 40 CFR §63.7555 and §63.7560, the permittee must keep records pertaining to 40 CFR 63, Subpart DDDDD in a form suitable and readily available for expeditious review, according to §63.10(b)(1). The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). Records may be kept off site for the remaining 3 years.
- (e) Pursuant to 40 CFR § 63.7510, for each boiler or process heater that is required or that you elect to demonstrate compliance with any of the applicable emission limits in Tables 1 or 2 or 11 through 13 of this subpart through performance (stack) testing, your initial compliance requirements include all the following:
 - (1) Conduct performance tests according to §63.7520 and Table 5 to this subpart.
 - (2) Conduct a fuel analysis for each type of fuel burned in your boiler or process heater according to §63.7521 and Table 6 to this subpart, except as specified in paragraphs (a)(2)(i) through (iii) of this section.
 - (iii) You are not required to conduct a chlorine fuel analysis for any gaseous fuels. You must conduct a fuel analysis for mercury on gaseous fuels unless the fuel is exempted in paragraphs (a)(2)(i) and (ii) of this section.
 - (3) Establish operating limits according to §63.7530 and Table 7 to this subpart.
 - (4) Conduct CMS performance evaluations according to §63.7525.
- (f) For each boiler or process heater that you elect to demonstrate compliance with the applicable emission limits in Tables 1 or 2 or 11 through 13 to this subpart for HCl, mercury, or TSM through fuel analysis, your initial compliance requirement is to conduct a fuel analysis for each type of fuel burned in your boiler or process heater according to §63.7521 and Table 6 to this subpart and establish operating limits according to §63.7530 and Table 8 to this subpart. The fuels described in paragraph (a)(2)(i) and (ii) of this section are exempt from these fuel analysis and operating limit requirements. The fuels described in paragraph (a)(2)(ii) of this section are exempt from the chloride fuel analysis and operating limit requirements. Boilers and process heaters that use a CEMS for mercury or HCl are exempt from

the performance testing and operating limit requirements specified in paragraph (a) of this section for the HAP for which CEMS are used.

- (g) If your boiler or process heater is subject to a carbon monoxide (CO) limit, your initial compliance demonstration for CO is to conduct a performance test for CO according to Table 5 to this subpart or conduct a performance evaluation of your continuous CO monitor, if applicable, according to §63.7525(a). Boilers and process heaters that use a CO CEMS to comply with the applicable alternative CO CEMS emission standard listed in Tables 1, 2, or 11 through 13 to this subpart, as specified in §63.7525(a), are exempt from the initial CO performance testing and oxygen concentration operating limit requirements specified in paragraph (a) of this section.
- (h) If your boiler or process heater is subject to a PM limit, your initial compliance demonstration for PM is to conduct a performance test in accordance with §63.7520 and Table 5 to this subpart.
- (i) For new or reconstructed affected sources (as defined in §63.7490), you must complete the initial compliance demonstration with the emission limits no later than July 30, 2013 or within 180 days after startup of the source, whichever is later. If you are demonstrating compliance with an emission limit in Tables 11 through 13 to this subpart that is less stringent (that is, higher) than the applicable emission limit in Table 1 to this subpart, you must demonstrate compliance with the applicable emission limit in Table 1 no later than July 29, 2016.
- (j) For new or reconstructed affected sources (as defined in §63.7490), you must demonstrate initial compliance with the applicable work practice standards in Table 3 to this subpart within the applicable annual, biennial, or 5-year schedule as specified in §63.7515(d) following the initial compliance date specified in §63.7495(a). Thereafter, you are required to complete the applicable annual, biennial, or 5-year tune-up as specified in §63.7515(d).

[78 FR 7164, Jan. 31, 2013, as amended at 80 FR 72808, Nov. 20, 2015], TAPCR 1200-03-09-.03(8)

- E4-5.** The maximum heat input for each stoker coal fired boilers 2, 3, and 4 (sources 37-0028-02-04) shall not exceed 191.4 MMBtu/hr and the maximum heat input for stoker coal fired boiler 1 (source 37-0028-01) shall not exceed 185 MMBtu/hr. TAPCR 1200-03-09-.02(3)

Compliance Method: Compliance with this limit is demonstrated by the information maintained in the records required by Condition E4-16.

- E4-6.** The maximum heat input for each of the natural gas fired burners shall not exceed 40.00 million Btu per hour. TAPCR 1200-03-09-.02(3)

Compliance Method: Compliance with this limit is demonstrated by the information maintained in the records required by Condition E4-16.

- E4-7.** Only coal and natural gas shall be used as fuels for this source. TAPCR 1200-03-09-.02(3)

Compliance Method: Compliance with this limit is demonstrated by the information maintained in the records required by Condition E4-16.

- E4-8.** The maximum amount of coal usage shall not exceed 60,716 tons per boiler during any period of twelve (12) consecutive months. The sulfur content of the coal shall not exceed 1.5% by weight. TAPCR 1200-03-09-.02(3)

Compliance Method: Compliance with this limit is demonstrated by the information maintained in the records required by Condition E4-16.

- E4-9.** The maximum amount of natural gas usage shall not exceed 687 million cubic feet per boiler during any period of 12 consecutive months. TAPCR 1200-03-09-.02(3)

Compliance Method: Compliance with this limit is demonstrated by the information maintained in the records required by Condition E4-16.

- E4-10.** Particulate Matter (PM) emitted from each boiler shall not exceed 0.04 pounds per MMBtu of heat input. These restrictions are based on the Title V Permit renewal application dated December 16, 2013, and TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance assurance for the particulate emission standard of this source is based upon compliance with the maximum heat input limit specified in condition E4-5; recordkeeping as required by condition E4-16; AP-42, Chapter 1, Section 1, emission factors and 40 CFR Part 63, Subpart DDDDD.

The control device will be operated and maintained in accordance with manufacturer specifications or best management practices. Routine inspections shall be performed on all control devices. Appropriate maintenance records including inspections, and dates on which maintenance is performed shall be recorded in a suitable permanent form and kept available for inspection.

The permittee shall perform stack testing of this fuel burning installation to demonstrate compliance with the applicable particulate emissions limits. Testing shall be performed in accordance with 40 CFR Part 63, Subpart DDDDD, and a particulate source test report shall be filed with the Technical Secretary within 60 days after completion of the testing. Ten days prior to conducting the source test, the permittee shall provide notice of such test to the Technical Secretary to afford him the opportunity to have an observer present. The continuous opacity monitoring system that serves each unit shall be fully operational prior to and during the performance test of that unit. The opacity data generated during this compliance testing shall be incorporated into the test report.

40 CFR Part 63, Subpart DDDDD and TAPCR 1200-03-09-.03(8)

- E4-11.** Nitrogen Oxides (NO_x) emitted from each boiler shall not exceed 0.4 pounds per MMBtu of heat input and 76.6 pounds per hour. Title V Permit renewal application dated December 16, 2013, and calculations using the maximum amount of annual coal combustion and AP-42 emissions factors and construction permit 960510F issued on April 27, 2007.

TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance assurance for the Nitrogen Oxides emission standard of this source is based upon compliance with the maximum heat input limit specified in condition E4-5, record required by condition E4-16, and AP-42, Chapter 1, Section 1, emission factors.

- E4-12.** Carbon monoxide (CO) emitted from each boiler shall not exceed 34.7 pounds per hour.

TAPCR 1200-03-06-.03(2) and construction permit 960510F issued on April 27, 2007

Compliance Method: Compliance with this emission limit is based on compliance with the maximum heat input limit specified in condition E4-5, record required by condition E4-16, and AP-42, Chapter 1, Section 1, emission factors.

- E4-13.** Volatile Organic Compounds (VOC) emitted from each boiler shall not exceed 1.5 pounds per hour. This restriction is based on the Title V Permit renewal application dated December 16, 2013 and calculations using the maximum amount of annual coal combustion and AP-42, Chapter 1, Section 1, emission factors.

TAPCR 1200-3-6-.03(2) and construction permit 960510F issued on April 27, 2007

Compliance Method: Compliance with this emission limit is based on compliance with the maximum heat input limit specified in condition E4-5, record required by condition E4-16, and AP-42, Chapter 1, Section 1, emission factors.

- E4-14.** Hydrogen chloride (HCl) emitted from each boiler shall not exceed 0.022 lb per MMBtu of heat input and 4.2 pounds per hour each. This restriction is based on the Title V Permit renewal application dated December 16, 2013 and calculations using the maximum amount of annual coal combustion and AP-42, Chapter 1, Section 1, emission factors and construction permit 960510F issued on April 27, 2007.

Compliance Method: Compliance assurance for the HCl emission standard of this source is based upon compliance with the maximum heat input limit specified in condition E4-5 and AP-42, Chapter 1, Section 1, emission factors and the requirements of conditions E4-18 and E4-19 of this permit and 40 CFR Part 63, Subpart DDDDD.

- E4-15.** Mercury emitted from each boiler shall not exceed 0.0000057 lb per MMBtu of heat input and 0.0011 pounds per hour each. This restriction is based on the Title V Permit renewal application dated December 16, 2013 and c construction permit 960510F issued on April 27, 2007.

Compliance Method: Compliance assurance for the Mercury emission standard of this source is based upon compliance with the maximum heat input limit specified in condition E4-5, record required by condition E4-16 and 40 CFR Part 63, Subpart DDDDD.

- E4-16.** The permittee shall maintain a record of the type of fuel used (coal, natural gas), fuel usage, and actual heat input at this source, in a form that readily shows compliance with Condition(s) E4-5, E4-6, E4-7, E4-8, and E4-9 must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative in tables that contain the same information as that outlined in the following example tables. The actual heat input for these boilers shall be based upon a heat content of 13,812 Btu per pound of coal and 1,000 Btu per cubic feet of natural gas. All data, including all required calculations, must be entered into the log no later than seven days from the end of the day for which the data is required. All data, including all required calculations, must be entered into the log no later than 30 days from the end of the month for which the data is required. The permittee shall retain this record at the source location for a period of not less than five years and keep this record available for inspection by the Technical Secretary or his representative. TAPCR 1200-03-10-.02(2)(a)

MONTHLY LOG: Source 37-028-01-04, Calculation of Heat Input for Boiler # ----.

Month:			Year:		
Date	Type of Fuel Used	Fuel Usage per Hour	Hours of Operation	Heat Input Rate per Hour*	MMBtu per hour, Daily Average
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

Based on 13,812 Btu per pound of coal or 1,000 Btu per cubic feet of natural gas.

YEARLY FUEL USAGE

MONTH/YEAR	Natural Gas Usage per Boiler (standard cubic feet (scf) per month)	Coal Usage per Boiler (tons per month)
TOTAL		

- E4-17.** Visible emissions from each exhaust stack of this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6), 1200-03-05-.01(1), and 1200-03-10-.02(10)(a)

Compliance Method: Compliance shall be demonstrated by installing, operating, and maintaining continuous opacity monitor systems to meet the requirement of 40 CFR Part 60 Subpart DDDDD as forth in **Condition E4-4**.

Consistent with the requirements of Chapter 1200-03-20 and Rule 1200-03-05-.02, due allowance may be made for visible emissions in excess of that allowed in this permit which are necessary or unavoidable due to routine startup and shutdown conditions

Nothing in this permit is a waiver of or otherwise precludes the permittee from asserting any defense that is available to the permittee under Tennessee law. An exception shall be made for any periods where the source operated above any of the applicable maximum operating limits or below any of the applicable minimum operating limits if the source had a startup, shutdown, or malfunction and the source took actions consistent with an approved startup, shutdown, and malfunction plan. The startup, shutdown, and malfunction plan shall be submitted no later than 60 days before the date intended to demonstrate compliance. It shall include a detailed description of the compliance reports to be submitted and actions to be taken.

37-0028-10	Source Description:	<u>Open Burning of Explosive Contaminated Materials</u>
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E5.	Conditions E5-1 through E5-12 apply to source 37-0028-10
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- E5-1.** This source shall only operate (actively start fires) during the hours between 8:30 AM and 7:30 PM daily and shall not be operated in excess of 400 hours per year.

TAPCR 1200-03-04-.04(1)(k) & 1200-03-19-.05(2)

Compliance Method: Compliance with this condition shall be assured by the recordkeeping of **Condition E5-4**.

TAPCR 1200-03-19-.06

- E5-2.** Two categories of explosive contaminated materials are eligible for open burning. The following procedures shall be adhered to in determining whether or not acceptable pollutant dispersion conditions are present for open burning of these materials:

(a) Daily open burning of trash container waste in the cage receptacle will not be permitted in the instance of an air stagnation advisory in East Tennessee. It will be the responsibility of the permittee to monitor the local National Oceanic and Atmospheric Administration's Weather Service Office bulletins to determine if acceptable pollutant dispersion conditions are present.

(b) Quarterly open burning of explosive contaminated materials not appropriate for burning in the cage receptacle shall be conducted only upon advance approval for each burn from the Division Air Pollution Control's Johnson City Environmental Field Office. Under no circumstances shall the permittee open burn during an air stagnation advisory in East Tennessee.

TAPCR 1200-03-04-.04(1)(k) & 1200-03-19-.05(2)

- E5-3.** Burning is limited to non-radioactive, explosive, shock sensitive, chemically unstable, or highly reactive wastes, packaging, or contaminated or potentially contaminated combustible materials. Priming materials used to facilitate such burning shall be limited to #1 or #2 grade fuel oils, and wood waste.

TAPCR 1200-03-04-.04(1)(k)

- E5-4.** The owner or operator of this source with restricted operating hours must maintain a daily log of operating hours and keep it available for inspection by Division personnel. The owner or operator shall submit by letter on or before January 31 of each year the total hours of operation for the previous calendar year and the maximum daily operation for the calendar year.

TAPCR 1200-03-19-.06

Compliance Method: In lieu of submitting the previous calendar year operating hours by January 31 of each year, the permittee shall include information of the monitoring of operating hours at this source in the semiannual reports and annual compliance certifications of **Condition E2** of this permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)

- E5-5. Removed - The permittee does not accept explosives contaminated waste from other sites** as stated in letter dated October 30, 2017 from the permittee.

- E5-6. Removed-** Barium chloride is no longer used at this facility, as stated in the letter dated February 5, 2018, from the permittee.

- E5-7.** Open burning of triamino-trinitro-benzene contaminated materials is permitted subject to the following restriction:

Explosives contaminated materials containing triamino-trinitro-benzene to be open burned will be limited to 300 fiber drums and liners/month at present and 2100 fiber drums and liners/month in the event of mobilization with the triamino-trinitro-benzene contamination being limited to 0.01% by weight of the fiber drum and liner's weight. The Technical Secretary may require proof of compliance with this condition.

Compliance Method: The permittee shall maintain records of each batch of explosive contaminated materials containing triamino-trinitro-benzene (use of liners and fiber drums). These records shall be kept available on site for inspection by Division Personnel.

TAPCR 1200-03-19-.05

- E5-8 (RC1).** This permit is valid only for the site approved. The burn site shall not be changed without an official approval from the Technical Secretary's representative at the Johnson City Environmental Field Office.

Compliance Method: Any written request to change the approved open burn site shall be submitted electronically (Adobe PDF) to the Johnson City Environmental Field Office at apc.jcefo@tn.gov.

TAPCR 1200-03-19-.05

- E5-9.** The open burning of materials handling and disposal of ash and other waste generated from this burning process must be conducted in accordance with all applicable Tennessee Division of Solid Waste Management regulations.

TAPCR 1200-03-09-.03(8)

- E5-10.** The permittee shall not open burn demolition debris or any other materials that contain PCBs (e.g., pumps, motors, painted piping, painted masonry or wood, caulking, waste oil, etc.) without the approval of the United States Environmental Protection Agency (EPA). The permittee shall not burn material defined as lead hazardous waste under 40 CFR 261.24 Table 1 for D008. The permittee shall not open burn PCB wastes that are regulated for disposal under Subpart D of 40 CFR 761. If items are

determined to be an explosive hazard that is regulated for disposal under Subpart D of 40 CFR 761, then the United States Environmental Protection Agency should be contacted.

Compliance Method: For lead determination, the permittee must test materials suspected of containing lead to ensure no material to be burned contains lead above TCLP hazardous waste limits in accordance with 40 CFR 261.24. All records required by 40 CFR 761 shall be maintained to verify materials suspected of containing regulated levels of PCB are not open burned.

- E5-11.** The facility shall review available information related to alternatives to open burning of explosives and explosive-contaminated and or potentially explosive contaminated combustibles annually, and submit a statement signed by the Responsible Official certifying whether or not there are safe alternatives to open burning these materials. In the event a safe alternative is discovered, the statement shall include a plan and schedule to implement the new method of disposal explosive contaminated materials and explosive waste.

The statement shall be submitted by March 1st of each year beginning March 1, 2019. Hard copies or electronic copies (PDF) of the statement shall be submitted to both the Environmental Field Office and Nashville Central Office at the following addresses:

Hard Copy to:	Adobe Portable Document Format (PDF) Copy to:
Technical Secretary Division of Air Pollution Control Johnson City Environmental Field Office 2305 Silverdale Road Johnson City, TN 37601-2162	APC.JCEFO@tn.gov
Technical Secretary Division of Air Pollution Control William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15 th Floor Nashville, TN 37243	Air.Pollution.Control@tn.gov

TAPCR 1200-03-04-.04(1)(k), 1200-03-10-.02(1)(a)

- E5-12.** Open burning of total potentially explosive-contaminated combustibles material shall not exceed 1,440 tons per year.

TAPCR 1200-3-04-.04(1) and permit application dated December 16, 2013

Compliance Method: The permittee shall maintain records of potentially explosive contaminated combustible materials by weight. Combustible material weight shall be calculated by subtracting noncombustible material weight from the total material weight burned. These records shall be kept available on site for inspection by Division Personnel.

- E5-13 (RC1).** There shall be no asbestos-containing materials during open burning of any explosive-contaminated combustibles material.

TAPCR 1200-03-4-.03(4)

Compliance Method: Consistent with TAPCR 1200-03-11-.02(2)(j), all asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at a waste disposal site operated in accordance with the provisions of 1200-03-11-.02(5), or an EPA-approved site that converts regulated asbestos containing material (RACM) and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of 1200-03-11-.02(6).

37-0028-11 Source Description: Refuse Incineration Units A & B (PES B-230-B)
Combust all Incinerators; Propane Gas Fired; Overfire and Afterfire Burners
Noncontaminated Refuse Incineration
3.69 Million Btu/hr. Nominal Heat Input Capacity Each

Removed from operation

37-0028-12 Source Description: RDX Nitration Process (PES B-D1-1)
Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; (2) Scrubbers for Control

E7. Conditions E7-1 applies to source 37-0028-12

E7-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-13 Source Description: RDX Nitration Process (PES B-D3-1)
Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; (2) Scrubbers for Control

E8. Conditions E8-1 applies to source 37-0028-13

E8-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-14 Source Description: HMX Nitration Process (PES B-D6-1)
Nitration, Aging, & Simmering
Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, (2) Packed Column Scrubbers for Control

E9. Condition E9-1 applies to source 37-0028-14

E9-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-15	Source Description:	<u>RDX and HMX Nitration Process (PES B-D7-1)</u>
Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; Scrubber for Control		

E10.	Condition E10-1 applies to source 37-0028-15
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E10-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-16	Source Description:	<u>Filtering and Washing of Crude RDX (PES B-E1-1)</u>
Packed Scrubber Control		

Removed from operation

37-0028-17	Source Description:	<u>Filtering and Washing of Crude RDX and HMX (PES B-E3-1)</u>
Jet Venturi Fume Scrubber Control		

E12.	Condition E12-1 applies to source 37-0028-17
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E12-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-18 Source Description: <u>RDX Nitration Process (PES B-D2-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor, Acetic Acid/RDX Slurry; Scrubber for Control
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E13. Conditions E13-1 and E13-2 apply to source 37-0028-18

E13-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-19 Source Description: <u>RDX Nitration Process (PES B-D8-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; Scrubber for Control

E14. Conditions E14-1 applies to source 37-0028-19

E14-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1. If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-20 Source Description: <u>RDX Nitration Process (PES B-D9-1)</u> Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; Scrubber for Control

E15. Conditions E15-1 applies to source 37-0028-20

E15-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-21 Source Description: RDX and HMX Continuous Nitration Process (PES B-D10-1)
 Simmering and Aging Processes
 Inputs: Nitric Acid/Ammonium Nitrate, Acetic Acid/Hexamine, Acetic Anhydride, Water, Dilution Liquor; Scrubber for Control

E16. Conditions E16-1 through E16-3 apply to source 37-0028-21

E16-1. Volatile organic compounds emitted from either source shall not exceed 5.47 pounds per hour.

TAPCR 1200-03-07-.07(2)

Compliance Method: (a) A VOC collection efficiency of 80 percent is achieved with a scrubber solution acetic acid content of less than 15 percent. At reactivation of this source, the scrubber solution shall be analyzed once per shift and adjusted as needed to maintain an acetic acid content of less than 15 percent. A parametric relationship between scrubber solution overflow rate and acetic acid content/ scrubber efficiency shall be established. The scrubber solution overflow rate / make-up water flow rate shall be monitored continuously with the PLC system to allow adjustment of the overflow rate / make-up water flow rate ratio. Compliance with this monitoring procedure shall be included in the reports of condition E2.

(b) Production batch records shall be maintained and monitored to correlate production and the calculated maximum VOC emission rate of 1.33 pounds per hour (emission calculation from Chapter 49 application revision of September 8, 2000, page number 49-11 (summarized in Attachment 4), revised November 12, 2004. The results of this monitoring shall be included in the reports of condition E2.

TAPCR 1200-03-09-.02(11)(e)1(iii)

E16-2. Nitrogen oxides (NO_x) emitted from either source shall not exceed 1.9 pounds per hour.

TAPCR 1200-07-.07(2)

Compliance Method: (a) A NO_x collection efficiency of 36 percent is achieved with a scrubber solution acetic acid content of less than 15 percent. At reactivation of this source, the scrubber solution shall be analyzed once per shift and adjusted as needed to maintain an acetic acid content of less than 15 percent. A parametric relationship between scrubber solution overflow rate and acetic acid content/ scrubber efficiency shall be established. The scrubber solution overflow rate / make-up water flow rate shall be monitored continuously with the PLC system to allow adjustment of the overflow rate / make-up water flow rate ratio. Compliance with this monitoring procedure shall be included in the reports of condition E2.

(b) Production batch records shall be maintained and monitored to correlate production and the calculated maximum NO_x emission rate of 1.9 pounds per hour (emission calculation from Chapter 49 application revision of September 8, 2000, page number 49-11 (summarized in Attachment 4)), revised November 12, 2004. The results of this monitoring shall be included in the reports of condition E2.

TAPCR 1200-03-09-.02(11)(e)1(iii)

E16-3. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1(iii)

37-0028-22	Source Description:	<u>Recrystallization of RDX (PES B-G2-1)</u>
(5) Solvent Recovery Condensers		

E17.	Condition E17-1 applies to source 37-0028-22
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E17-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-23	Source Description:	<u>Recrystallization of RDX or HMX (PES B-G7-1)</u>
Condenser Control; (4) Primary Condensers & Vent Condenser for Solvent Recovery		
PSD-LAER		

E18.	Conditions E18-1 through E18-3 apply to source 37-0028-23
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E18-1. a) Volatile organic compounds (VOC) emitted from this source shall not exceed 18.0 pounds per hour.

TAPCR 1200-03-18-.03(2) (regulations when limits were established) leading to 1200-03-09-.01(5)(b)2

b) Volatile organic compounds emitted from this source shall not exceed 9.9 tons per year.

TAPCR 1200-3-26-.02(9)(g)1. fee agreement per permittee's request in permit application revision dated April 16, 1999.

Compliance Method: For a) of this condition, compliance with this limit is determined by monitoring of batch records of production rates and solvent additions to storage tanks and dissolvers associated with this source and material balance calculations based upon this process monitoring. A monthly calculation shall be performed and recorded in a log as follows:

$$\text{VOC emission (lb/hr)} = \text{monthly VOC emission (lb)} / \text{monthly hours of production at this source (hr)}$$

For fee purposes for b) of this condition, the permittee shall submit calculations of VOC emissions (tons per year) for assurance of compliance along with the emissions analysis required by condition E1.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

E18-2. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

- E18-3.** If required by the Technical Secretary, total gaseous nonmethane organic compounds (NMOC) emissions from this source shall be determined by Method 25 outlined in the Federal Register, vol. 45, no. 194, October 3, 1990, beginning on page 65959.

37-0028-24 Source Description: Recrystallization of RDX (PES B-G8-1)
Vapor Recovery on Condenser Vent A; Primary Condenser & Vent Condenser **LAER-PSD**

Removed from operation (RC1)

37-0028-25 Source Description: Recrystallization of RDX (PES B-G9-1)
(4) Primary Condensers & Vent Condenser for Solvent Recovery by Distillation; Condenser Vent

E20. Condition E20-1 applies to source 37-0028-25

- E20-1.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1. If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-26 (Including Sources 37-0028-27 and ~~37-128-39~~, 37-0028-102)
Source Description: Agile Manufacturing (PES B-G10-1, B-G10A-1, and B-E10-1) (Only includes process vessels/tanks (including corresponding emission allowances) utilized in conjunction with 37-0028-26 and -27)

(4) Primary Condensers and (2) Vent Condensers for Solvent Recovery; Condenser Vents (2), Fume Scrubber; and NOx scrubber

Various processing and storage vessels with an interchangeable configuration to accommodate the manufacture of varying products.
The primary products currently manufactured are Dinitroanisole, Dimethyl Dinitrobutane, Triaminotrinitrobenzene, and Nitrotriazolone but the process can be adjusted to manufacture multiple products.

E21. Conditions E21-1 through E21-5 apply to sources 37-0028-26, 37-0028-27, and portions of ~~37-1028-39~~, 37-0028-102

- E21-1.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures of the Division's opacity Matrix dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1. If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

- E21-2.** Particulate matter emitted from this source shall not exceed 5.39 pounds per hour.

TAPCR 1200-03-07-.03(1)

Compliance Method: For RDX Recrystallization and Coating Operations, compliance with this limit shall be determined by recordkeeping of batch production rates and correlated with the calculated maximum emission rate of 0.02 pounds per hour per mix tank (summarized in Attachment 5) at a maximum process capacity of 5,555 pounds per hour of RDX. For other operations, compliance with this limit shall be determined by recordkeeping of batch production rate and correlated with calculated maximum emissions for the respective operations as contained in the permit application (as applicable).

TAPCR 1200-03-09-.02(11)(e)1(iii)

- E21-3.** This source is permitted to operate as a flexible manufacturing facility for any of the processes listed in the source description or other insignificant emission activities and may include the utilization of portions of sources 37-0028-27 and ~~37-1028-39~~, 37-0028-102. TAPCR 1200-03-09-.02(6)

Compliance Method: Compliance with this condition shall be determined by recordkeeping of mode operation and the batch production rates and correlated with calculated maximum emissions rate as contained in the permit application.

- E21-4.** Nitrogen Oxides (NO_x) emitted from this source shall not exceed 15.00 tons per all intervals of twelve consecutive months. TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this emission limit is based on the results of stack emissions testing conducted on May 22-23, 2013 and recordkeeping of the per batch emission rate multiplied by the number of batches manufactured. The permittee shall determine the actual NO_x emissions. Reports and certifications shall be submitted in accordance with Condition E2 of this permit.

- E21-5.** Portion of sources 37-0028-27 and ~~37-1028-39~~, 37-0028-102 including process vessels, tanks, and emission allowances may be utilized in conjunction with source 37-0028-26. TAPCR 1200-03-09-.02(6)

Compliance Method: Compliance with this condition shall be demonstrated by compliance with condition E21-3.

- E21-6.** The source shall comply with the Compliance Assurance Monitoring (CAM) Plan submitted with permit application renewal dated December 16, 2013 (Attachment 25) TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-28	Source Description:	<u>Filtering and Washing of HMX or RDX (PES B-E4-1)</u>
Packed Bed Scrubber Control		
Acetic Acid Recovery		

E22.	Condition E22-1 applies to source 37-0028-28
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- E22-1.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-43	Source Description:	<u>Manufacturing of 61% Nitric Acid by Ammonia Oxidation Process (PES B-302B-7)</u>
Ammonia, Air, & Water Process Inputs, Extended Absorption Column		

Removed from Operation

304 units 1-4 Removed

37-0028-48	Source Description:	<u>Nitric Acid Concentration by Magnesium Nitrate Process (PES B-334-5)</u>
37-0028-63	Source Description:	<u>Nitric Acid Concentration by Magnesium Nitrate Process (PES B-334-6)</u>
37-0028-64	Source Description:	<u>Nitric Acid Concentration by Magnesium Nitrate Process (PES B-334-7)</u>
37-0028-65	Source Description:	<u>Nitric Acid Concentration by Magnesium Nitrate Process (PES B-334-8)</u>

Each source performs the following and contains the following equipment:
Concentration of 61% Nitric Acid to 99% Nitric Acid with $Mg(NO_3)_2$ Catalyst
Evaporation, Condensation, and Scrubbing Processes
Absorption Tower and Steam Ejector Control

E24. Conditions E24-1 through E24-7 apply to sources 37-0028-48, -63, -64, and -65

- E24-1.** Total Nitrogen Oxides (NO_x) emitted from sources 37-0028-48, -63, -64, and -65 shall not exceed 249.0 tons per year on a 12 month rolling average.

This emission limitation is established pursuant to Rule 1200-03-23-.03(2) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated February 6, 2006 from the permittee. The permittee has requested this emission limit in order to avoid the requirements of Best Available Retrofit Technology (BART). Prior to increasing this limit, the permittee must perform a BART determination, as described in Section IV of Appendix Y to 40 CFR Part 51 – Guidelines for BART Determinations Under the Regional Haze Rule.

This limitation 1) removes HSAAP from the list of Best Available Retrofit Technology (BART) eligible sources in Tennessee, and 2) allows the units to remain permitted in standby condition whereby they can be restarted.

Compliance Method: Compliance with this limit shall be determined through performing emissions testing on each source within 180 days of restarting any of these sources. The source owner or operator shall furnish the Technical Secretary with a written report of the results of an emissions performance test for the Nitrogen Oxides (NO_x). At least thirty (30) days prior to the actual testing date, the source owner or operator shall furnish the Technical Secretary with a notice as to the actual date of the testing. Approval of the testing protocol by the Technical Secretary or his representative is required prior to giving the notification of the actual testing date.

The results of each emissions test will be used to determine the actual emissions of each source per a 12 month rolling period. Compliance with the NO_x limit will be demonstrated through maintaining a log of actual emissions for each source and all sources combined. Calculations will be based on the emissions rate determined during each test for each source and the hours of operation for each source.

- E24-2.** The maximum material input rate for each source shall not exceed 10,508 pounds per hour on daily average basis. TAPCR 1200-03-09-.02(3)

Compliance Method: A log of the material input rate, in a form that readily shows compliance with this condition, must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. All data, including all required calculations, must be entered into the log no later than seven days from the end of the day for which the data is required. This log must be retained for a period of not less than five years.

- E24-3.** A record of the hours of operation of each source detailing the start-up and shut down times shall be maintained and used along with the emissions test data to calculate the NO_x emissions for the entire group of sources. TAPCR 1200-03-09-.02(3)

- E24-4.** Each source shall not exceed the allowable NO_x emissions (tons/year) per source as detailed in the February 6, 2006 Significant Modification.

- E24-5.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and 1200-03-05-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 and amended on September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1(iii)

E24-6. Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. TAPCR 1200-03-07-.07(2)

E24-7. Upon the malfunction/failure of any emission control device(s) serving this source, the operation of the process(es) served by the device(s) shall be regulated by Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations.

37-0028-49	Source Description:	<u>Lime Storage and Handling with Baghouse Control (PES B-235-1)</u>
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Removed from operation

37-0028-53	Source Description:	<u>Open Burning of Explosive Waste</u>
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E26.	Conditions E26-1 through E26-10 apply to source 37-0028-53
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E26-1. Open burning of explosive waste shall be conducted between the hours of 12:00 (noon) and 4:00 p.m. unless there is an air stagnation advisory in East Tennessee. In the instance of such an advisory, open burning shall be terminated at once. It will be the responsibility of the permittee to monitor the local National Oceanic and Atmospheric Administration's Weather Service Office bulletins to determine if acceptable pollutant dispersion conditions are present.

TAPCR 1200-03-04-.04(1)(k) & 1200-03-19-.05(2)

Compliance Method: Compliance with the recordkeeping of condition E26-4 is considered compliance with this condition.

TAPCR 1200-03-19-.06

E26-2. This source shall not be operated in excess of 1,300 hours per year.

TAPCR 1200-03-19-.05(2)

Compliance Method: Compliance with this condition is assured by the recordkeeping of condition E26-4.

TAPCR 1200-03-19-.06

E26-3. Burning is limited to non-radioactive, explosive, shock sensitive, chemically unstable, or highly reactive wastes, packaging, or contaminated or potentially contaminated combustible materials including but not limited to explosive formulations, propellants, cellulosic ignition materials, plastic burn pan liners, and any contaminants present in the explosive waste. This limitation is established pursuant to TAPCR 1200-03-04-.04(1)(k) and the information contained in the agreement letter and permit revision application dated February 1, 2005 from the permittee.

Compliance Method: Compliance with this limitation shall be assured by compliance with Condition E26-12.

E26-4. The owner or operator of this source with restricted operating hours must maintain a daily log of operating hours and keep it available for inspection by Division personnel on request. The owner or operator shall submit by letter on or before January 31 of each year the total hours of operation for the previous calendar year and the maximum daily operation for the calendar year. TAPCR 1200-03-19-.06

Compliance Method: In lieu of submitting the previous calendar year operating hours by January 31 of each year, the permittee shall include information of the monitoring of operating hours at this source in the semiannual reports and annual compliance certifications of condition E2 of this permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)

E26-5. This condition removed- The permittee does not accept explosives contaminated waste from other sites, as stated in the letter dated October 30, 2017 from the permittee.

E26-6. This condition removed- Barium chloride is no longer used at this facility, as stated in a letter dated February 5, 2018, from the permittee.

E26-7. Open burning of wastes explosives containing triamino-trinitro-benzene is permitted subject to the following restrictions:

- A. Explosives wastes containing TATB and any other similar material will be burned with easily combustible high explosives (HE) to ensure minimal particulate matter is emitted.
- B. The ratio of the burn will be 60% waste high explosives (typically RDX or HMX mixtures) and 40% TATB or other similar materials. This ratio is derived from the burning of Composition B over the last 70 years at the ratio of 60% RDX and 40% TNT.

Compliance Method: The permittee shall keep the record of the material burned using the explosives waste burning ground records and verify compliance with this ratio. These records shall be kept available on site for inspection by Division Personnel.

E26-8 (RC1). This permit is valid only for the site approved. The burn site shall not be changed without an official approval from the Technical Secretary's representative at the Johnson City Environmental Field Office.

Compliance Method: Any written request to change the approved open burn site shall be submitted electronically (Adobe PDF) to the Johnson City Environmental Field Office at apc.jcefo@tn.gov.

TAPCR 1200-03-09-.03(8)

E26-9. The open burning of materials and the handling and disposal of ash and other waste generated from this burning process must be conducted in accordance with all applicable Tennessee Division of Solid Waste Management regulations.

TAPCR 1200-03-09-.03(8)

E26-10. Removed-Not applicable for this source.

E26-11. The facility shall review available information related to alternatives to open burning of explosives and explosive-contaminated and or potentially explosive contaminated combustibles annually, and submit a statement signed by the Responsible Official certifying whether or not there are safe alternatives to open burning these materials. In the event a safe alternative is available, the statement shall include a plan and schedule to implement the new method of disposal explosive contaminated materials and explosive waste.

The statement shall be submitted by March 1st every year beginning March 1, 2019. Hard copies or electronic copies (PDF) of the statement shall be submitted to both the Environmental Field Office and the Nashville Central Office at the following addresses:

Hard Copy to:	Adobe Portable Document Format (PDF) Copy to:
Technical Secretary Division of Air Pollution Control Johnson City Environmental Field Office 2305 Silverdale Road Johnson City, TN 37601-2162	APC.JCEFO@tn.gov

Hard Copy to:	Adobe Portable Document Format (PDF) Copy to:
Technical Secretary Division of Air Pollution Control William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15 th Floor Nashville, TN 37243	Air.Pollution.Control@tn.gov

TAPCR 1200-03-04-.04(1)(k), 1200-03-10-.02(1)(a)

E26-12. Total materials to be burned such as explosive waste, cellulosic igniters, plastic liners and explosive waste contaminants, shall not exceed 625 tons per year.

TAPCR 1200-3-04-.04(1) and Title V permit application dated December 16, 2013

Compliance method: The permittee shall keep the record of the material burned using the explosives waste burning ground records. These records shall be kept available on site for inspection by Division Personnel.

37-0028-56	Source Description:	<u>Manufacturing of 61% Nitric Acid by Ammonia Oxidation Process (PES B-302B-8)</u>
Ammonia, Air, and Water Process Inputs Extended Absorption Column		

Removed from Operation

37-0028-57	Source Description:	<u>Manufacturing of 61% Nitric Acid by Ammonia Oxidation Process (PES B-302B-9)</u>
Ammonia, Air, and Water Process Inputs Extended Absorption Column		

Removed from Operation

37-0028-58	Source Description:	<u>Manufacturing of 61% Nitric Acid by Ammonia Oxidation Process (PES B-302B-10)</u>
Ammonia, Air, and Water Process Inputs Extended Absorption Column		

Removed from Operation

37-0028-67	Source Description:	<u>Ammonium Nitrate/Nitric Acid Solution Manufacturing (PES B-330-1)</u>
Ammonia and Nitric Acid Reaction; Scrubber Control		

E30.	Conditions E30-1 and E30-2 apply to source 37-0028-67-SIP Permit-Scrubber as control was not applicable at that time
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E30-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-75	Source Description:	<u>Recrystallization of HMX (PES B-G5-1)</u>
(5) Solvent Recovery Condensers		

E31.	Condition E31-1 applies to source 37-0028-75
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E31-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-76	Source Description:	<u>Coating of HMX (PES B-G5-2)</u>
HMX recrystallization in Methyl Ethyl Ketone, n-Octane, Ethyl Acetate, Butyl Acetate, Isobutyl Acetate, Butyl Alcohol, Ethyl Alcohol, or Isopropyl Alcohol; Solvent Recovery		

E32.	Conditions E32-1 through E32-2 apply to source 37-0028-76
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E32-1. Volatile organic compounds emitted from this source shall not exceed 0.8 pounds per hour.

TAPCR 1200-03-07-.07(2)

Compliance Method: This is a process emission source whose potential to emit is less than five tons per year of volatile organic compounds. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i). The permittee shall submit annually compliance certification for source 37-0026-76 (coating of HMX).

TAPCR 1200-03-09-.04(5)(c)3

E32-2. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-78	Source Description:	<u>Filtration and Washing of HMX (PES B-E6-1)</u>
Acetic Acid Recovery		
Jet Venturi Scrubber Control		

E33.	Conditions E33-1 and E33-2 apply to source 37-0028-78
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E33-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-79	Source Description:	<u>Recrystallization and Coating of RDX (PES B-G1-1)</u>
(4) Primary Condensers and Vent Condenser for Solvent Recovery		

E34.	Condition E34-1 through E34-2 apply to source 37-0028-79
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E34-1. Volatile organic compounds emitted from this source shall not exceed 3.4 pounds per hour.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limit shall be determined by monitoring of batch production rate records and correlation with the calculated maximum emission rate at a maximum process capacity of 5,555 pounds per hour of RDX. This calculated maximum emission rate of 2.87 pounds per hour of VOC is referenced on page C-2 of Chapter 56 of the October 16, 1996 application (summarized in Attachment 6).

TAPCR 1200-03-09-.02(11)(e)1.(iii)

E34-2. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-80	Source Description:	<u>Recrystallization of RDX (PES B-G3-1)</u>
Dissolution, Distillation, and Condensation Processes		
2 Primary Condensers and Vent Condenser for Solvent Recovery		

Removed from operation (RC1)

37-0028-81	Source Description:	<u>Coating of RDX (PES G-3-2)</u>
RDX coating with lacquer / solvent mixture, Primary Condenser and Vent Condenser for Solvent Recovery		

Removed from operation (RC1)

37-0028-82	Source Description:	<u>Coating of RDX (PES B-G3-3)</u>
RDX Coating with lacquers containing Methyl Ethyl Ketone, and Distillation of Water Saturated with Cyclohexanone Condenser for Recovery of Solvent		

Removed from operation (RC1)

37-0028-83	Source Description:	<u>Recrystallization of RDX (PES B-G4-1)</u>
(4) Primary Condensers and Vent Condenser for Solvent Recovery		

E38.	Condition E38-1 applies to source 37-0028-83
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E38-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-84	Source Description:	<u>Recrystallization of RDX (PES B-G4-2)</u>
(2) Condensers for Solvent Recovery		

E39.	Condition E39-1 applies to source 37-0028-84
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E39-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-85 Source Description: <u>Coating of RDX (PES B-G4-3)</u> RDX coating with various lacquers containing n-Octane and Distillation of Cyclohexanone Saturated Water Condenser for Solvent Recovery

E40. Conditions E40-1 through E40-2 apply to source 37-0028-85

E40-1. Volatile organic compounds emitted from this source shall not exceed 0.45 tons per month.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limit shall be determined by monitoring of batch production rate records and correlation with the calculated maximum emissions rate at a maximum process capacity of 2,083 pounds of water saturated solvent per hour. The calculated maximum emissions rate of 1.04 pounds per hour for cyclohexanone and 0.001 pounds per hour for n-octane is referenced on page C-2 of Chapter 65 of the October 16, 1996 application (summarized in Attachment 6).

TAPCR 1200-03-09-.02(11)(e)1(iii)

E40-2. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-86 Source Description: <u>Recrystallization of HMX (PES B-G6-1)</u> (5) Condensers for Solvent Recovery

E41. Condition E41-1 applies to source 37-0028-86
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E41-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-87 Source Description: <u>HMX Recrystallization (PES B-G6-2)</u> Condenser for Solvent Recovery

E42. Condition E42-1 applies to source 37-0028-87
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E42-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-88 Source Description: <u>Coating of RDX or HMX (PES B-G6-3)</u> Condenser for Solvent Recovery

E43. Condition E43-1 through E43-2 apply to source 37-0028-88
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E43-1. Volatile organic compounds emitted from this source shall not exceed 1.1 pounds per hour. TAPCR 1200-03-07-.07(2)

This is a process emission source whose potential to emit is less than five tons per year of volatile organic compounds. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-3-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i). The permittee shall submit annually compliance certification for source 37-0028-88 (coating of RDX or HMX).

TAPCR 1200-3-9-.04(5)(c)3

E43-2. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-89 Source Description: <u>Coating of RDX or HMX (PES B-G6-4)</u> Coating of HMX or RDX with Various Solvent-based Lacquers/ Nitroplasticizer Solvent Recovery Condenser
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E44. Condition E44-1 applies to source 37-0028-89
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E44-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall

be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-92	Source Description:	<u>Lacquer Preparation (PES B-150-1)</u>
Solvent and Binder Mixing; Vents A, B, C, D		

E45.	Conditions E45-1 through E45-2 apply to source 37-0028-92
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E45-1. Volatile organic compounds emitted from this source shall not exceed 3.64 pounds per hour per vent, not to exceed a combined total of 7.28 pounds per hour.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limit shall be determined by monitoring of batch production rate records and calculation of the maximum emissions by the method presented on page C-2 of Chapter 37 of the October 16, 1996 application (summarized in Attachment 7).

TAPCR 1200-03-09-.02(11)(e)1.(iii)

E45-2. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-97	Source Description:	<u>Fly Ash Storage Bin (PES B-235-2)</u>
Bagfilter Dust Collector Control		

Removed from operation

37-0028-98	Source Description:	<u>Bulk Lime Silo @ Building 224 (PES B-224-B)</u>
Lime Unloading at Filter Plant		
Bagfilter Control		

E47.	Conditions E47-1 through E47-3 apply to source 37-0028-98
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E47-1. Particulate matter emitted from this source shall not exceed 2.5 pounds per hour. This limit is determined by the calculation contained in the permit application of October 16, 1996 on page C-1 of chapter 25 (summarized in Attachment 9).
TAPCR 1200-03-19-.05(2)

Compliance Method: The fabric filter controls for this source shall be functioning whenever this source is in operation. The filters shall be inspected prior to loading the bulk loading silo and shall be replaced as necessary. A record of the daily inspections and filter replacements shall be kept available for inspection by the Technical Secretary or Division representative for a period of not less than five years.

TAPCR 1200-03-09-.02(11)(e)1(iii)

- E47-2.** This source shall not be operated in excess of 100 hours per year. The owner or operator of this source with restricted operating hours must maintain a log of operating hours and keep it available for inspection by Division personnel on request. The owner or operator shall submit by letter on or before January 31 of each year the total hours of operation for the previous calendar year.

TAPCR 1200-03-19-.05(2) and 1200-03-19-.06

Compliance Method: In lieu of submitting the previous calendar year operating hours by January 31 of each year, the permittee shall include information of the monitoring of operating hours at this source in the semiannual reports and annual compliance certifications of condition E2 of this permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)

- E47-3.** (a) No person shall cause, suffer, allow or permit discharge of visible emissions from any fugitive dust source with an opacity in excess of 10% for an aggregate of 15 minutes. Readings are to be taken across the narrower direction if the generation site is rectangular or oblong and are to be perpendicular to the wind direction ($\pm 30^\circ$). Readings will be taken approximately every 15 seconds for any consecutive fifteen-minute period and an arithmetic average used to determine compliance. Any other items not covered here will be in accordance with the general specifications of the reference method as specified in Part 1200-03-16-.01(5)(g)9.

TAPCR 1200-03-08-.02 and 1200-03-19-.05(2)

(b) Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-1028-29 , 37-0028-100	Source Description:	<u>Sodium Nitrate Recovery Process (PES B-T2-1)</u>
Sodium Nitrate Concentration & Drying; Rotary Dryer; Scrubber Control		

Removed from Operation

37-1028-37 , 37-0028-101	Source Description:	<u>Filtering and Washing of Crude RDX (PES B-E8-1)</u>
Packed Scrubber Control		

E49.	Conditions E49-1 through E49-2 apply to source 37-1028-37 , 37-0028-101
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- E49-1.** Volatile organic compounds emitted from this source shall not exceed 3.0 pounds per hour. TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limit is determined by monitoring batch production rate records and correlation to calculated emissions at a maximum process capacity of 6,300 pounds per hour of RDX. From process material balance emission rate calculation (referenced on page C-1 of Chapter 54 of the October 16, 1996 application (summarized in Attachment 3), the maximum emission rate is 2.4 pounds per hour of VOC.

TAPCR 1200-03-09-.02(11)(e)1(iii)

- E49-2.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-1028-39, 37-0028-102 Source Description: <u>Filtering and Washing of Crude RDX (PES B-E10-1)</u> (2) Packed Scrubbers for Control
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E50. Conditions E50-1 through E50-2 apply to source 37-1028-39, 37-0028-102

- E50-1.** Volatile organic compounds emitted from this source shall not exceed 5.9 pounds per hour (25.9 tons per year).

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limit is determined by monitoring of batch production rate records and correlation to the calculated emissions rate at a maximum process capacity of 6,300 pounds. From process emissions analysis, referenced on page C-2 of Chapter 55 of the October 16, 1996 application (summarized in Attachment 3), the maximum emission rate is 2.64 pounds per hour of VOC and calculated scrubber efficiency is 96% for VOC.

TAPCR 1200-03-09-.02(11)(e)1(iii)

- E50-2.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-1028-90, 37-0028-103 Source Description: <u>Coating of RDX or HMX (PES B-G5-3)</u> Solvent Recovery Condenser
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E51. Condition E51-1 applies to source 37-1028-90, 37-0028-103
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- E51-1.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-1028-96,-37-0028-104	Source Description:	<u>Coal Handling System for Area B (PES B-200-4)</u>
with Conveyors, & Screens Enclosed Conveyors, & Water Spray Controls NSPS, 40 CFR Part 60 Subpart OOO		

E52. Conditions E52-1 through E52-5 apply to source 37-1028-96,-37-0028-104

- E52-1.** Particulate matter emitted from this source shall not exceed 3.5 pounds per hour. TAPCR 1200-03-07-.01(5)

Compliance Method-This is a process emission source whose potential to emit is less than five tons per year of particulate matter. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i). The permittee shall submit annually compliance certification for source ~~37-1028-96, 37-0028-104~~(coal handling system for Area B).

TAPCR 1200-03-09-.04(5)(c)3

- E52-2.** Visible emissions (including fugitive emissions) from this source shall not exhibit greater than 10% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.01(1), 1200-03-10-.02(10)(a), 1200-03-05-.03(6), and the operating permit no. 033633P

Compliance Method: This is a process emission source whose potential to emit is less than five tons per year of particulate matter. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i). The permittee shall submit annually compliance certification for source ~~37-1028-96, 37-0028-104~~ (coal handling system for Area B).

TAPCR 1200-03-09-.04(5)(c)3

- E52-3.** Visible emissions from roads shall meet 10% opacity utilizing Tennessee Visible emission Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982, and as amended on August 24, 1984.

This requirement is from the operating permit no. 033633P. TAPCR 1200-03-09-.03(8)

Compliance Method: This is a process emission source whose potential to emit is less than five tons per year of particulate matter. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i). The permittee shall submit annually compliance certification for source ~~37-1028-96, 37-0028-104~~ (coal handling system for Area B).

TAPCR 1200-03-09-.04(5)(c)3

E52-4 (RC1). The wet suppression system shall be maintained in good working condition in order to provide sufficient water pressure to effectively control fugitive emissions.

TAPCR 1200-03-08-.02

Compliance Method: This is a process emission source whose potential to emit is less than five tons per year of particulate matter. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i). The permittee shall submit annually compliance certification for source ~~37-1028-96~~, 37-0028-104 (coal handling system for Area B).

E52-5 (RC1). Wet suppression shall be applied at the track hopper stockout chute and storage piles as necessary to control fugitive emissions.

TAPCR 1200-03-08-.02

Compliance Method: This is a process emission source whose potential to emit is less than five tons per year of particulate matter. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i). The permittee shall submit annually compliance certification for source ~~37-1028-96~~, 37-0028-104 (coal handling system for Area B).

37-1028-98, 37-0028-105	Source Description:	(4) Lacquer Pots for Lacquer Preparation (PES B-150-4)
Mixing of Solvent and Binder; Loading of Lacquer to Lacquer Wagons		

E53.	Conditions E53-1 through E53-2 apply to source 37-1028-98 , 37-0028-105
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E53-1. Volatile organic compounds emitted from this source shall not exceed 1.0 pounds per hour.

TAPCR 1200-03-07-.07(2)

Compliance Method: This is a process emission source whose potential to emit is less than five tons per year of volatile organic compounds. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of subpart 1200-03-09-.02(11)(e)3.(i). The permittee shall submit annually compliance certification for source ~~37-1028-98~~, 37-0028-105 (lacquer pots for lacquer preparation).

TAPCR 1200-03-09-.04(5)(c)3

E53-2. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-1028-99, 37-0028-106	Source Description:	<u>Sodium Nitrate Sludge Drying Process (PES B-T2-2)</u>
Double Drum Dryer; Scrubber Control		

Removed from Operation

37-1029-03, 37-0028-107 Cyclone Control	Source Description: <u>Plasma Arc Cutting Machine (PES B-551-1)</u>
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Removed from Operation

37-1029-05, 37-0028-108 Solvent Recovery Condensers LAER-PSD	Source Description: <u>Recrystallization of RDX (PES B-G8-2)</u>
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Removed from Operation

37-1029-06, 37-0028-109 Process Inputs: RDX, Solvents, Vistanex, Adipate, Oil Solvent Recovery Condensers LAER-PSD	Source Description: <u>Coating of RDX (PES B-G8-3)</u>
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Removed from Operation

37-1029-09, 37-0028-110 Nitration, Aging and Simmering; (2) Packed Column Scrubbers Process Inputs: Nitric Acid/Ammonium Nitrate, Hexamine/Acetic Acid, Acetic Acid, Acetic Anhydride LAER-PSD	Source Description: <u>RDX and HMX Nitration Process (PES B-D5-1)</u>
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E58. Conditions E58-1 through E58-3 apply to source 37-1029-09, 37-0028-110

E58-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013 that is enclosed as Attachment 1. If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

E58-2. Volatile organic compounds emitted from this source shall not exceed 19.9 pounds per hour.

TAPCR 1200-03-18-.03(2) (regulations when the limit was established) leading to 1200-03-09-.01(5)(b)2

Compliance Method: Compliance with this limit shall be determined by monitoring the scrubber water flowrate two (2) times per shift when the process is in operation and monitoring of batch production rate records and correlation to measured emissions at a maximum process capacity of 2,588 pounds per hour of RDX or 436 pounds per hour of HMX. The scrubbing water flowrate readings shall be recorded in a log to be maintained at the facility. From process emissions testing (results referenced on page C-2 of Chapter 44 of the October 16, 1996 application and summarized in Attachment 4), the maximum emission rate is 0.45 pounds per hour of VOC.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

E58-3. Nitrogen oxides emitted from this source shall not exceed 2.2 pounds per hour. TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limit shall be determined by monitoring of batch production rate records and correlation to the measured emissions rate at a maximum process capacity of 2,588 pounds per hour of RDX or 436 pounds per hour of HMX. From similar process emissions testing (results referenced on page C-2 of Chapter 44 of the October 16, 1996 application and summarized in Attachment 4), the maximum emission rate is 1.81 pounds per hour of nitrogen oxides.

TAPCR 1200-03-09-.02(11)(e)1(iii)

E58-4. The source shall comply with the Compliance Assurance Monitoring (CAM) Plan submitted with permit application renewal dated December 16, 2013 (Attachment 25) TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-1029-14, 37-0028-111	Source Description:	<u>Coating of RDX or HMX (PES B-G7-2)</u>
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Process Inputs: RDX/HMX, Solvents, and Lacquer Mixtures Solvent Recovery Condenser

E59. Conditions E59-1 through E59-2 apply to source 37-1029-14 , 37-0028-111
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E59-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

E59-2. Volatile organic compounds emitted from this source shall not exceed 2.1 pounds per hour.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limit is determined by monitoring of batch production rate records, solvent additions to the storage tank and dissolver still, and process input of lacquers, and calculation of the VOC emissions. The calculation method is similar to the emissions calculations for source 37-0028-82 on pages C-2, C-3, C-4, & C-5 of Chapter 61 of the October 16, 1996 application (summarized in Attachment 6). TAPCR 1200-03-09-.02(11)(e)1(iii)

37-0028-77	Source Description:	<u>Filtration and Washing of Crude RDX/ HMX (PES E-5-1)</u>
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Acetic Acid Recovery Jet Venturi Scrubber Control
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E60. Condition E60-1 applies to source 37-0028-77
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E60-1. Visible emissions from this source shall not exhibit greater than 20% opacity, except for an aggregate of no more than five minutes in any one-hour period, and no more than 20 minutes in any 24-hour period. Visible emissions from this source shall be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984 (aggregate count). TAPCR 1200-3-5-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures specified in the Division's Opacity Matrix for TVEE Method 2 dated June 18, 1996 and amended September 12, 2005 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

37-0028-112	Source Description:	Acetic Anhydride Production and Acetic Acid Concentration –
Four ketene furnaces, flare for alternate pollution control;		40 CFR 60, Subpart VVa
Process equipment and storage tanks, scrubbers used for pollution control		40 CFR 60, Subpart NNN
		40 CFR 60, Subpart RRR
		40 CFR 63, Subpart DDDDD

E61. Condition E61-1 through E61-22 apply to source 37-0028-112

E61-1 (RC1). The total amount of steam used by this source and source 37-0028-114 (Nitration Process) shall not exceed the total amount of steam generated by source 37-0028-113 (Boilers and Cogeneration) during any period of 12 consecutive months.

This operating limit is established pursuant to the information contained in the agreement letter dated August 14, 2013, from the permittee. The permittee has requested this limit in order to avoid PSD review. TAPCR 1200-03-09-.01(l)(d) and the application dated August 15, 2013, Condition E61-1 of construction permit 977452.

Compliance method: The permittee shall determine the amount of steam (in pounds) generated by source 37-0028-113 on a 12-month rolling total basis. This amount shall be compared to the amount of steam used by sources 37-0028-112 and 37-0028-114. A monthly log of the steam used by these sources shall be maintained at the source location and kept available for inspection by the Technical Secretary or Division representative. The monthly log shall be kept in the following format, or an alternative format that provides the same information. This log shall be retained for a period of not less than five years.

Month	Steam Usage (lb)			Total Steam Generated by 37-0028-113 (lb)	Annual Difference (12-Months Generated – 12-Months Used)*
	37-0028-112	37-0028-114	Total		

* Annual difference must be greater than zero.

E61-2 (RC1). The stated heat input capacity of each ketene furnace is 2.38 Million British thermal units per hour (MMBtu/hr). TAPCR 1200-03-09-.01(l)(d) and the application dated August 15, 2013, Condition E61-2 of construction permit 977452.

Compliance Method: Compliance with this condition is based on the information provided with the application dated August 15, 2013. The permittee shall not modify the source to increase the rated heat input capacity without first having applied for and received a construction permit from the Technical Secretary in accordance with TAPCR 1200-03-09-.01(1).

E61-3. Only natural gas and process off-gas shall be used as fuel for the ketene furnaces. TAPCR 1200-03-09-.01(l)(d) and the application dated August 15, 2013, Condition E61-3 of construction permit 977452.

Compliance method: Compliance based on system design and annual certification.

E61-4. Particulate matter (PM) emitted from this source shall not exceed 0.5 pounds per hour (lb/hr) on a daily average basis.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated August 14, 2013, from the permittee. Condition E61-4 of construction permit 977452.

Compliance method: Compliance with this emission limitation shall be assured by compliance with **Conditions E61-2 and E61-3** and using the PM emission factor from AP-42, Chapter 1, Section 1.4, Table 1.4-2 (7.6 pounds PM per million standard cubic feet).

E61-5. Sulfur dioxide (SO₂) emitted from this source shall not exceed 1.0 lb/hr on a daily average basis.

This emission limitation is established pursuant to Rule 1200-03-14-.01(3) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated August 14, 2013, from the permittee. Condition E61-5 of construction permit 977452.

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Conditions E61-2 and E61-3** and using the SO₂ emission factor from AP-42, Chapter 1, Section 1.4, Table 1.4-2 (0.6 pounds SO₂ per million standard cubic feet).

E61-6 (RC1). Nitrogen oxides (NO_x) emitted from this source shall not exceed 3.63 tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2), application dated September 4, 2019, Condition E61-6 of construction permit 977452.

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Conditions E61-2 and E61-3** and using the NO_x emission factor from AP-42, Chapter 1, Section 1.4, Table 1.4-1 (32 pounds NO_x per 10⁶ standard cubic feet) for the furnaces and the NO_x emission factor from AP-42, Chapter 13, Section 5, Table 13.5-1 (0.068 pounds NO_x/MMBtu) for the flare.

E61-7 (RC1). Carbon monoxide (CO) emitted from this source shall not exceed 40.9 tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2), application dated September 4, 2019, Condition E61-7 of construction permit 977452.

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Conditions E61-2, E61-3, E61-16, and E61-17.**

E61-8 (RC1). Volatile organic compounds (VOC) emitted from the furnaces and the flare (Vents B, C, D, E, and H) shall not exceed 6.5 tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2), application dated January 8, 2020.

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Conditions E61-2, E61-3 and E61-16.**

E61-9 (RC1). Volatile organic compounds (VOC) emitted from the weak acetic acid concentration system (Vent A), B7P tank farm (Vent F), sludge recovery system (Vent G), and storage tank T-151 (Vent I) shall not exceed 4.0 tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2), application dated January 28, 2020. PSD avoidance limit.

Compliance Method: Compliance shall be assured as follows:

Vents A, F, and G: Compliance with this emission limitation is based on the emission calculations included with the renewal application dated December 18, 2013 and shall be assured by compliance with **Condition E61-19.**

Vent I: Compliance with this emission limitation is based on the emission calculations included with the renewal application dated December 18, 2013 and shall be assured by annual certification in accordance with **Condition E2(b).**

E61-10 (RC1). Reserved.

E61-11. Reserved – The performance test was conducted for the flare on September 15, 2016.

E61-12 (RC1). Reserved.

E61-13 (RC1). Reserved.

E61-14 (RC1). Reserved.

E61-15 (RC1). Except as otherwise noted in **Condition E61-16** (visible emissions from the NSPS flare), visible emissions from this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.03(6) and 1200-03-05-.01(1)

Compliance Method: Compliance with this emission limitation shall be determined by the procedures of the Division's Opacity Matrix dated June 18, 1996 and amended September 11, 2013 (Attachment 1). If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E61-16 (RC1). New Source Performance Standards (40 CFR Part 60)

This emission source is subject to the NSPS standards identified in **Table E61-16**:

Table E61-16: New Source Performance Standards (40 CFR Part 60)		
NSPS Subpart	Rule	Applies to:
A	General Provisions	37-0028-112
VVa	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After November 7, 2006	37-0028-112
NNN	Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations	37-0028-112
RRR	Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes	37-0028-112

Compliance Method: A listing of specific applicability determinations for 40 CFR Part 60 in effect as of the issuance date of this permit is found in Attachment 27 of this permit. Compliance with this condition shall be assured by compliance with the specific requirements listed in Attachment 27. Changes that result in a change of applicability shall follow the applicable procedures in TAPCR 1200-03-09 and shall include an update to Attachment 27. The permittee shall comply with the applicable portions of the NSPS General Provisions as specified in 40 CFR 60 Subpart A and/or the referencing Subparts.

TAPCR 1200-03-09-.03(8)

E61-17 (RC1). National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63)

This emission source is subject to the MACT standards identified in **Table E61-17**:

Table E61-17: MACT Standards (40 CFR Part 63)		
MACT Subpart	Rule	Applies to:
A	General Provisions	37-0028-112
DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	37-0028-112

Compliance Method: A listing of specific applicability determinations for 40 CFR Part 63 in effect as of the issuance date of this permit is found in Attachment 27 of this permit. Compliance with this condition shall be assured by compliance with the specific requirements listed in Attachment 27. Changes that result in a change of applicability shall follow the applicable procedures in TAPCR 1200-03-09 and shall include an update to Attachment 27. The permittee shall comply with the applicable portions of the MACT General Provisions as specified in 40 CFR 63 Subpart A and/or the referencing Subparts.

TAPCR 1200-03-09-.03(8)

E61-18 Removed - Area A furnaces are no longer included in the Area A permit.**E61-19 (RC1).** The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8), Condition G3 of construction permit 977452

Compliance Method: Appropriate maintenance records including inspections, and dates on which maintenance is performed shall be recorded in a suitable permanent form and kept available for inspection by the Technical Secretary or an authorized representative.**E61-20 (RC1).** Reserved.**E61-21 (RC1).** Reserved.**E61-22 (RC1).** The flare shall comply with the requirements of 40 CFR Part 64 (Compliance Assurance Monitoring [CAM]) and the requirements established in the CAM plan (Attachment 26). The monitoring submitted by the permittee satisfies the requirements in §64.3.

TAPCR 1200-03-09-.03(8), 40 CFR Part 64

Note to Section E61: Source numbering was updated as shown below to remove obsolete facility ID numbers and reference the current facility ID, as shown below.

Emission Source	Current Source Number	Previous Source Number
Acetic Anhydride Production and Acetic Acid Concentration	37-0028-112	37-1029-16
Natural Gas-Fired Steam Generating Units	37-0028-113	37- 1029-17
G-8 Nitration Process	37-0028-114	37-1029-20

37-1029-17, 37-0028-113	Source Description:	Natural gas fired only Steam Generating Units
Six low-NO _x micro boilers rated at 11.54 MMBtu/hr each and combined		40 CFR 60, Subpart Dc
heat and power (CHP) cogeneration turbine rated at 87 MMBtu/hr in line with		40 CFR 60, Subpart KKKK
a heat recovery steam generator (HRSG) with a 46 MMBtu/hr duct burner and		40 CFR 63, Subpart DDDDD
15 MMBtu/hr superheater.		40 CFR 63, Subpart YYYY

E62. Conditions E62-1 through E62-14 apply to source ~~37-1029-17, 37-0028-113~~**E62-1 (SM1).** The total heat input for all units shall not exceed 217.24 million British thermal units per hour (MMBtu/hr) on a monthly average basis.

This operating limitation is established pursuant to TAPCR 1200-03-06-.01(7), the information contained in the agreement letter dated August 14, 2013, the application dated April 17, 2017, and Condition E62-1 of construction permit 975946.

Compliance method: The permittee shall maintain a log of the fuel used and the total hours of operation of this source (~~37-1029-17, 37-0028-113~~) on a monthly basis. This information shall be used to determine the maximum heat input of the source on an hourly average basis (based on a conversion factor of 1,020 Btu/ft³ for natural gas). This log must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. The monthly log shall be kept in the following format, or a format which readily provides the same required information. This log must be retained for a period of not less than five years. Maintenance of this log fulfills the requirements of 40 CFR §60.48c(g)(2) and §60.48c(i).

Month	Natural Gas Usage (ft ³)	Hours Operated	Heat Input (MMBtu/hr)

- E62-2.** The total amount of steam used by sources ~~37-1029-16~~, 37-0028-112, and ~~37-1029-20~~, 37-0028-114 shall not exceed the total amount of steam generated by this source (~~37-1029-17~~, 37-0028-113) on an annual basis.

This operating limitation is established pursuant to TAPCR 1200-03-06-.01(7), the information contained in the agreement letter dated August 14, 2013 from the permittee, and Condition E62-2 of construction permit 975946. The permittee has requested this limitation in order to avoid PSD review.

Compliance method: The permittee shall determine the amount of steam (in pounds) generated by source (~~37-1029-17~~, 37-0028-113) on a 12-month annual basis. This amount shall be compared to the amount of steam used by sources ~~37-1029-16~~, 37-0028-112, and ~~37-1029-20~~, 37-0028-114. A 12-month log updated monthly of the steam used by these sources shall be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. The monthly log shall be kept in the following format, or a similar format which readily provides the same information. This log shall be retained for a period of not less than five years.

Month	Amount of Steam Used (pounds)		Total Steam (pounds)		Annual Difference 12-months Generated – 12-months Used (must be >0)
	37-1029-16 37-0028-112	37-1029-20 37-0028-114	Used	Generated by 37-1029-17 37-0028-113	

- E62-3.** Natural gas only shall be used as fuel for this source. TAPCR 1200-03-09-.01(1)(d) and the application dated August 15, 2013, Condition E62-3 of construction permit 975946.

Compliance method: The permittee shall certify in the annual compliance certification that only natural gas was used as fuel for this source.

- E62-4 (SM1).** Particulate matter (PM) emitted from this source shall not exceed 2.2 pounds per hour, not to exceed 7.09 tons during any period of 12 consecutive months.

This emission limitation is established pursuant to TAPCR 1200-03-06-.01(7), the information contained in the agreement letter dated August 14, 2013 from the permittee, and Condition E62-4 of construction permit 975946.

Compliance Method: Compliance with this emission limit shall be assured by compliance with Conditions E62-1 and E62-3, and using the PM emission factor from AP-42, Chapter 1, Section 1.4, Table 1.4-2 for natural gas (7.6 pounds PM per 10⁶ standard cubic feet).

- E62-5.** Sulfur dioxide (SO₂) emitted from this source shall not exceed 13.7 pounds per hour, not to exceed 2.4 tons during any period of 12 consecutive months.

This emission limitation is established pursuant to TAPCR 1200-03-14-.01(3), the information contained in the agreement letter dated August 14, 2013 from the permittee, and Condition E62-5 of construction permit 975946.

Compliance Method: Compliance with this emission limit shall be assured by compliance with **Conditions E62-1 and E62-3** and using the SO₂ emission factor from AP-42, Chapter I, Section 1.4, Table 1.4-2 for natural gas (0.6 pounds SO₂ per 10⁶ standard cubic feet).

- E62-6 (SM1).** Nitrogen oxides (NO_x) emitted from this source shall not exceed 25.88 tons during any period of 12 consecutive months. TAPCR 1200-03-06-.03(2), Condition E62-6 of construction permit 975946.

Compliance Method: Compliance with this emission limit shall be assured by compliance with **Conditions E62-1 and E62-3** and using the NO_x emission factors established by one of the two alternative compliance scenarios identified in **Condition E62-7** of this permit.

E62-7. For the CHP unit only the NO_x emissions shall not exceed 25 ppm at 15 percent O₂ or 150 ng/J of useful output (1.2 lb/MWh).

TAPCR 1200-03-09-.03(8), Table 1 to 40 CFR 60 Subpart KKKK (Standards of Performance for Stationary Combustion Turbines)

Compliance Method: Compliance with this limit shall be monitored by one of the following alternative compliance methods as follows:

- (a) A NO_x CEMs shall be installed and operated in accordance with 40 CFR §60.4340(b) or
- (b) Stack testing shall be performed in accordance with 40 CFR §60.4340(a).

E62-8 (SM1). The permittee has specified that the micro boilers, cogeneration turbine, and superheater are equipped with low-NO_x burners. These boilers shall not operate unless the low-NO_x burners are fully operational. Documentation from the manufacturer for these boilers which specifies that these features are present and which provides NO_x emission factors shall be maintained onsite and shall be made available to the Technical Secretary or a Division representative.

TAPCR 1200-03-06-.03(2), Condition E62-8 of construction permit 975946.

E62-9 (SM1). Carbon monoxide (CO) emitted from this source shall not exceed 62.28 tons during any period of 12 consecutive months. TAPCR 1200-03-06-.03(2), Condition E62-9 of construction permit 975946.

Compliance Method: Compliance with this emission limit shall be assured by compliance with Conditions E62-1 and E62-3, and using the CO emission factors from vendor supplied documents for the flue gas which contains 43.6 ppmv CO at 15 percent oxygen by volume.

E62-10 (SM1). Volatile organic compounds (VOC) emitted from this source shall not exceed 5.13 tons during any period of 12 consecutive months. TAPCR 1200-03-06-.03(2), Condition E62-10 of construction permit 975946.

Compliance Method: Compliance with this emission limit shall be assured by compliance with Conditions E62-1 and E62-3, and using the VOC emission factor from AP-42, Chapter 1, Section 1.4, Table 1.4-2 for natural gas (5.5 pounds VOC per 10⁶ standard cubic feet).

E62-11. Visible emissions from this source shall not exhibit greater than 20 percent (20%) opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent (27%) opacity. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A.

40 CFR §60.43c (c) and 40 CFR §60.45c (a)(8)

Compliance Method: Compliance with this standard shall be determined by the procedures of the Division's Opacity Matrix dated June 18, 1996 and amended on September 11, 2013 (enclosed as Attachment 1). If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E62-12. The micro steam generating units are subject to 40 CFR Part 60, Subpart Dc and 40 CFR Part 63, Subpart DDDDD (see Attachments 17 and 19). TAPCR 1200-03-09-.03(8)

E62-13. The cogeneration steam generating units are subject to 40 CFR Part 60, Subpart KKKK, 40 CFR Part 63 Subpart YYYY, and 40 CFR 63, Subpart DDDDD (see Attachments 18, 20, and 21). TAPCR 1200-03-09-.03(8)

E62-14 (SM1). Reserved. Per the letter from the permittee dated February 22, 2018, corresponding Area A steam generating units (82-0018-54) have been permanently shut down.

37-1029-20, 37-0028-114	Source Description:	G-8 Nitration Process
Organics processing, support, and nitration equipment. One scrubber used for pollution control.		

E63. Condition E63-1 through E63-9 apply to source 37-1029-20 , 37-0028-114

E63-1. The total amount of steam used by this source (~~37-1029-20~~, 37-0028-114) and source ~~37-1029-16~~, 37-0028-112 shall not exceed the total amount of steam generated by source ~~37-1029-17~~, 37-0028-113.

This operating limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated August 14, 2013, from the permittee. The permittee has requested this limitation in order to avoid PSD review.

Compliance method: The permittee shall determine the amount of steam (in pounds) generated by source (~~37-1029-17~~, 37-0028-113) on a 12-month annual basis. This amount shall be compared to the amount of steam used by sources ~~37-1029-16~~, 37-0028-112 and ~~37-1029-20~~, 37-0028-114. A 12-month log updated monthly of the steam used by these sources shall be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. The monthly log shall be kept in the following format, or a similar format which readily provides the same information. This log shall be retained for a period of not less than five years.

Month	Amount of Steam Used (pounds)		Total Steam (pounds)		Annual Difference 12-months Generated – 12-months Used (must be >0)
	37-1029-16 , 37-0028-112	37-1029-20 , 37-0028-114	Used	Generated by 37-1029-17 , 37-0028-113	

E63-2. Particulate matter (PM) emitted from each exhaust stack shall not exceed 0.02 grain per dry standard cubic foot (0.31 pound per hour total).

This emission limitation is established pursuant to Rule 1200-03-07-.04(1) of the Tennessee Air Pollution Control Regulations and the information contained in the permit application dated August 15, 2013, from the permittee.

Compliance Method: Compliance with this emission limit is based on compliance with **Conditions E63-7, E63-8**, and record required by **Condition E63-1** of this permit.

E63-3. Nitrogen oxides (NOx) emitted from this source shall not exceed 10.0 tons during any period of 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated August 14, 2013, from the permittee. The permittee has requested this limit in order to avoid PSD review.

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Condition E63-4** and through monitoring the operational-parameters established during the performance test described in **Condition E63-5**. Based on the results of the performance test, the permittee shall either establish an operational restriction (i.e. total batch limit) or develop an emission factor to calculate overall total NOx emissions for the source during any period of 12 consecutive months.

E63-4 (SM1). The scrubber must operate when the equipment controlled by the scrubbers is in operation. In the event a malfunction/failure of the scrubber occurs, the operation of the process serviced by the scrubber shall be regulated by Rule 1200-03-20 of the Tennessee Air Pollution Control Regulations.

E63-5. Within 180 days of startup of this source, the permittee shall perform an emissions performance test demonstrating the overall NOx control efficiency of each scrubber. At least 30 days prior to the actual date of the testing, the permittee shall furnish the Technical Secretary with a testing protocol. To be considered as being acceptable, the protocol must describe exactly how the overall emissions control efficiency of each pollution control device will be demonstrated, specify all test methodologies to be

employed, discuss the operational level of the source during the testing period, and specify the operational parameters that will be monitored continuously to demonstrate that the measured overall NOx control efficiencies are continuously maintained during operation of the source. Within 60 days of completion of each performance test, the permittee shall furnish the Technical Secretary with a written report of the test results. The report(s) shall include sufficient data to establish operating parameters to be used to demonstrate compliance.

If the emissions performance test on similar sources at this facility has already been performed, and approved by the Compliance Validation program, a performance test is not required for this source. The performance test data must include all required operational, parametric, and emissions information detailed in this condition.

TAPCR 1200-03-09-.03(8)

E63-6. At least 30 days prior to conducting the performance test, the Technical Secretary shall be given notice of the test in order to afford him the opportunity to have an observer present. TAPCR 1200-03-09-.03(8)

E63-7. Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. All maintenance activities (including maintenance that is in process) shall be entered in the log no later than seven days following the start of the maintenance activity. These records must be retained for a period of not less than five years. TAPCR 1200-03-10-.02(2)(a)

E63-8. Visible emissions from this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions from these sources shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures of the Division's Opacity Matrix dated June 18, 1996 and amended on September 11, 2013 (enclosed as Attachment 1).

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E63-9. Carbon Monoxide (CO) emitted from this source shall not exceed 13.8 tons during any period of 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated August 14, 2013, from the permittee. The permittee has requested this limit in order to avoid PSD review.

Compliance Method: Compliance with this condition is based on engineering calculations. Within 180 days of startup of this source, the permittee shall perform an emissions performance evaluation to establish operating parameters or batch limitations, or develop emission factors to be used to assure compliance with requested emission limits.

37-1029-24, 37-0028-115	Source Description:	Weak Acetic Acid Recovery Process -
Two (2) evaporators, a stripping column, and a concentrator used to remove ammonium nitrate and other impurities from weak acetic acid		40 CFR 60, Subpart VVa 40 CFR 60, Subpart NNN

E64. Condition E64-1 through E64-3 apply to source ~~37-1029-24, 37-0028-115~~

E64-1. Volatile Organic Compounds (VOC) emitted from this source shall not exceed 9.8 tons per year. This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated September 14, 2010, from the permittee. The permittee has requested this limit in order to avoid PSD review.

Compliance Method: Compliance with this emission limitation shall be assured by using the VOC emission factors developed during the performance tests required by Condition E64-2, and the calculation methods utilized in the construction permit application dated September 14, 2010.

- E64-2.** Per 40 CFR 60, Subpart VVa- Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After November 7, 2006, the permittee shall establish a Leak Detection and Repair Program to minimize fugitive equipment leaks.

40 CFR 60, Subpart VVa and TAPCR 1200-03-09-.03(8)

Compliance Method: Upon startup of this source, the permittee shall implement the alternative monitoring procedure- *Sensory Leak Inspection and Repair for Equipment in Acetic Acid and/or Acetic Anhydride Service*, as submitted to EPA on June 2, 2010, and approved by EPA on June 23, 2010 (see Attachments 12 and 13).

- E64-3.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures of the Division's Opacity Matrix dated June 18, 1996 and amended September 12, 2005 (enclosed as Attachment 1).

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

37-1029-25 , 37-0028-116	Source Description:	<u>Tanks 16A and 16B for the Weak Acetic Acid Recovery Process</u>
Wet Scrubber as Control		40 CFR 60, Subpart VVa 40 CFR 60, Subpart Kb

E65. Condition E65-1 through E65-6 apply to source ~~37-1029-25~~, 37-0028-116

- E65-1.** Volatile Organic Compounds (VOCs) emitted from this source shall not exceed 0.33 ton during any period of 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-07-.07(2) of the Tennessee Air Pollution Control.

Compliance Method: Compliance with this emission limitation shall be assured by the calculation methods utilized in the construction permit application dated August 14, 2013.

- E65-2. Removed-** No longer applicable since the startup notification was submitted August 9, 2016.

- E65-3.** Per 40 CFR 60, Subpart VVa - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, the permittee shall establish a Leak Detection and Repair Program to minimize fugitive equipment leaks.
40 CFR 60, Subpart VVa

Compliance Method: Upon startup of this source, the permittee shall implement the alternative monitoring procedure- *Sensory Leak Inspection and Repair for Equipment in Acetic Acid and/or Acetic Anhydride Service*, as submitted to EPA on June 2, 2010, and approved by EPA on June 23, 2010 (see Attachments 12 and 13).

- E65-4.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and 1200-03-05-.01(1)

Compliance Method: Compliance with this standard shall be determined by the procedures of the Division's Opacity Matrix dated June 18, 1996 and amended September 11, 2013 (enclosed as Attachment 1).

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

- E65-5.** Routine maintenance, as required to maintain specified emission limits, shall be performed on all control devices for this source. Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. All maintenance activities (including maintenance that is in-process) shall be entered in the log no later than seven days following the start of the maintenance.

TAPCR 1200-03-07-.07(2) and 1200-03-10-.02(2)(a)

- E65-6.** This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, federal regulations published under 40 CFR 63 for sources of hazardous air pollutants and 40 CFR 60, New Source Performance Standards.

Compliance Method: Compliance requirements with these standards are outlined in Attachment 22.

TAPCR 1200-03-09-.03(8)

37-0028-117	Source Description: Diesel Fuel-Fired Emergency Generators and Pumps 40 CFR 60, Subparts IIII and JJJJ as indicated, 40 CFR 63, Subpart ZZZZ
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E66-1 through E66-9 (RC1). Reserved.

- E66-10.** Visible emissions from this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and 1200-03-05-.01(1)

E66-11 through E66-15 (RC1). Reserved.

- E66-16 (RC1).** The permittee shall keep a record of operating hours of the engine for each calendar year and document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation (see example below). All data must be entered in the log no later than 30 days from the end of the month for which the data is required. The permittee shall retain this record at the source location for a period of not less than five years and keep this record available for inspection by the Technical Secretary or an authorized representative. TAPCR 1200-03-10-.02(2)(a), 40 CFR §63.6655(f)

YEARLY LOG: Source 37-0028-117

YEAR: _____

Date	Classification & Hours of Operation			Hours Per Calendar Year	
	Operation#	Classification of Operation (Maintenance & Readiness Testing, Power Failure, etc.)	Hours of Operation	Emergency Operation	Maintenance and Readiness Testing
Calendar Year Totals					

E66-17 through E66-28 (RC1). Reserved.

E66-29 (RC1). New Source Performance Standards (40 CFR Part 60)

This emission source is subject to the NSPS standards identified in **Table E66-29**:

Table E66-29: New Source Performance Standards (40 CFR Part 60)		
NSPS Subpart	Rule	Applies to:
A	General Provisions	37-0028-117
III	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	37-0028-117
JJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	37-0028-117

Compliance Method: A listing of specific applicability determinations for 40 CFR Part 60 in effect as of the issuance date of this permit is found in Attachment 28 of this permit. Compliance with this condition shall be assured by compliance with the specific requirements listed in Attachment 28. Changes that result in a change of applicability shall follow the applicable procedures in TAPCR 1200-03-09 and shall include an update to Attachment 28. The permittee shall comply with the applicable portions of the NSPS General Provisions as specified in 40 CFR 60 Subpart A and/or the referencing Subparts.

TAPCR 1200-03-09-.03(8)

E66-30 (RC1). National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63)

This emission source is subject to the MACT standards identified in **Table E66-30**:

Table E66-30: MACT Standards (40 CFR Part 63)		
MACT Subpart	Rule	Applies to:
A	General Provisions	37-0028-117
ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	37-0028-117

Compliance Method: A listing of specific applicability determinations for 40 CFR Part 63 in effect as of the issuance date of this permit is found in Attachment 28 of this permit. Compliance with this condition shall be assured by compliance with the specific requirements listed in Attachment 28. Changes that result in a change of applicability shall follow the applicable procedures in TAPCR 1200-03-09 and shall include an update to Attachment 28. The permittee shall comply with the applicable portions of the MACT General Provisions as specified in 40 CFR 63 Subpart A and/or the referencing Subparts.

TAPCR 1200-03-09-.03(8)

E66-31 (RC1). The following emission rates are established for fee purposes.

Pollutant	Fee Emissions (tons/year)	Basis
PM	1.76	40 CFR 60 Subpart IIII for NSPS engines, TAPCR 1200-03-06 (0.6 lb/MMBtu) for non-NSPS engines.
SO ₂	0.01	Calculated from heat input using rated horsepower and 30% thermal efficiency using 15 ppm diesel sulfur content.
CO	4.93	40 CFR 60 Subpart IIII for NSPS engines, AP-42 Chapter 3.3 for non-NSPS engines.
VOC	0.84	AP-42 Chapter 3.3 for non-NSPS engines.
NO _x	9.52	AP-42 Chapter 3.3 for non-NSPS engines.
NMHC + NO _x	3.95	40 CFR 60 Subpart IIII for NSPS engines

Compliance Method: Comply with maintenance and fuel sulfur content requirements in the applicable NSPS and MACT standards.

37-0028-118	Source Description:	Gasoline Storage and Dispensing Maximum Monthly Throughput < 10k gal/month
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E67.	Condition E67-1 through E67-6 apply to source 37-0028-118
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E67-1. The total stated maximum throughput of gasoline for this source is 119,988 gallons per calendar year. The total stated maximum monthly throughput of gasoline for this source is less than 10,000 gallons per month. As defined in 40 CFR §63.11132, monthly throughput means the total volume of gasoline that is loaded into, or dispensed from, all gasoline storage tanks at each gasoline dispensing facility (GDF) during a month. Average monthly throughput is calculated by summing the volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the previous 364 days, and then dividing that sum by 12. The permittee shall maintain a log of the monthly gasoline throughput using the following log format or an alternative format which readily provides the same required information. The monthly throughput must be entered into the log no later than thirty (30) days from the last day of each month. Pursuant to 40 CFR §63.11116(b), the permittee shall have records available within 24 hours of a request by the Technical Secretary or his representative, to document monthly throughput. Records required under 40 CFR §63.11111(e) shall be kept for a period of five years.

	Volume of gasoline loaded into, or dispensed from, all gasoline storage tanks during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks during the previous 364 days (gallons/365 days)	Average Monthly Throughput of Gasoline (gallons/month)
January		
February		
March		
Etc.		
December		
Calendar Year 20____	Throughput of Gasoline (gallons per calendar year)	
Total for January 1 to December 31		

E67-2. Pursuant to 40 CFR §63.11111(b), this gasoline dispensing facility (GDF), which has a monthly throughput of less than 10,000 gallons of gasoline, shall comply with the requirements in 40 CFR §63.11116. Pursuant to 40 CFR §63.11111(c), if this GDF has a monthly throughput of 10,000 gallons of gasoline or more, then the permittee shall comply with the requirements of 40 CFR §63.11117. Pursuant to 40 CFR §63.11111(d), if this GDF has a monthly throughput of 100,000 gallons of gasoline or more, then the permittee shall comply with the requirements of 40 CFR §63.11118.

E67-3. Pursuant to 40 CFR §63.11115, the permittee shall, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Technical Secretary which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

E67-4. Pursuant to 40 CFR §63.11116(a), the permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- Minimize gasoline spills;
- Clean up spills as expeditiously as practicable;
- Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use (Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with this requirement);

- (d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

E67-5. Pursuant to TAPCR 1200-03-18-.24(1)(b)2, this facility, located in Sullivan County, which dispenses less than 10,000 gallons of gasoline per month, is subject only to the provisions of TAPCR 1200-03-18-.24(3)(a)1 and TAPCR 1200-03-18-.24(5)(b)2.

E67-6. Pursuant to TAPCR 1200-03-18-.24(3)(a)1, all gasoline storage vessels at this facility shall be loaded by submerged fill. (“Submerged fill” means the method of filling a delivery vessel or storage vessel where product enters within 5.9 inches of the bottom of the delivery or storage vessel. Bottom filling of delivery and storage vessels is included in this definition).

E67-7. Pursuant to TAPCR 1200-03-18-.24(5)(b)2, the owner or operator of the facility shall maintain records showing the quantity of gasoline dispensed each month at the facility.

END OF REOPEN FOR CAUSE #1 TO PERMIT NUMBER: 568188

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE FOR
VISIBLE EMISSION EVALUATION METHODS 2 AND 9
DATED SEPTEMBER 11, 2013**

**Decision Tree PM for Opacity for
Sources Subject to Rule 1200-03-05-.01
Utilizing TVEE Method 2**

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standard in Rule 1200-03-05-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PMT required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing Tennessee Visible Emission Evaluation Method 2. The observer must be properly certified according to the criteria specified in EPA Method 9 to conduct TVEE Method 2 evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

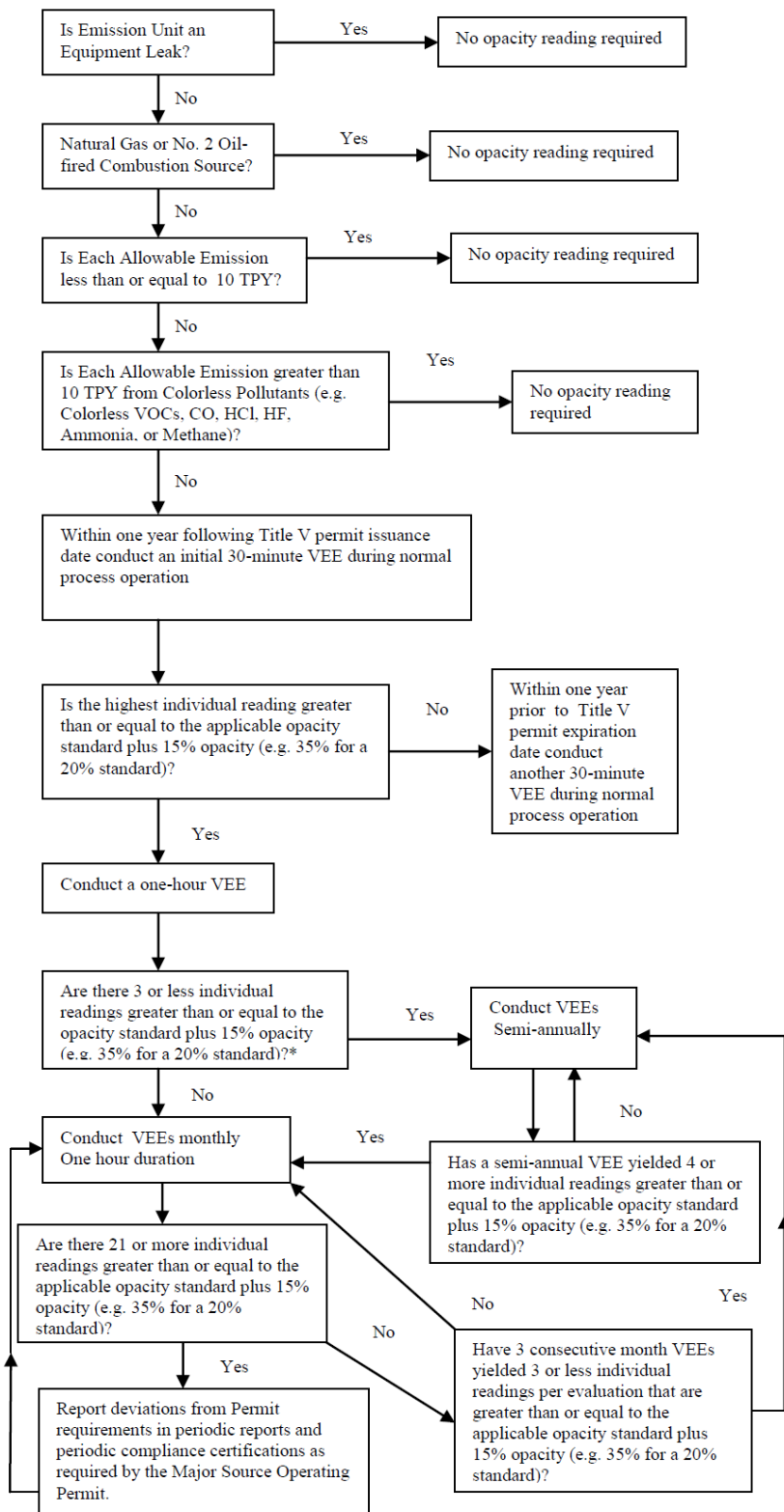
A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error
TVEE Method 2: The TAPCD declares non-compliance when 21 observations are read at the standard plus 15% opacity (e.g. 35% for a 20% standard).

*The rationale for this is the fact that Rule 1200-03-05-.01 allows for an exemption of 5 minutes (20 readings) per hour and up to 20 minutes (80 readings) per day. With 4 or more excessive individual readings per hour the possibility of a daily exceedance exists.

Note: A company could mutually agree to have all of its sources regulated by EPA Method 9. Caution: Agreement to use Method 9 could potentially place some sources in non-compliance with visible emission standards. Please be sure before you agree.

Dated June 18, 1996
Amended September 11, 2013



**Decision Tree PM for Opacity for
Sources Utilizing EPA Method 9*****Notes:**

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants

Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error

EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:

The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

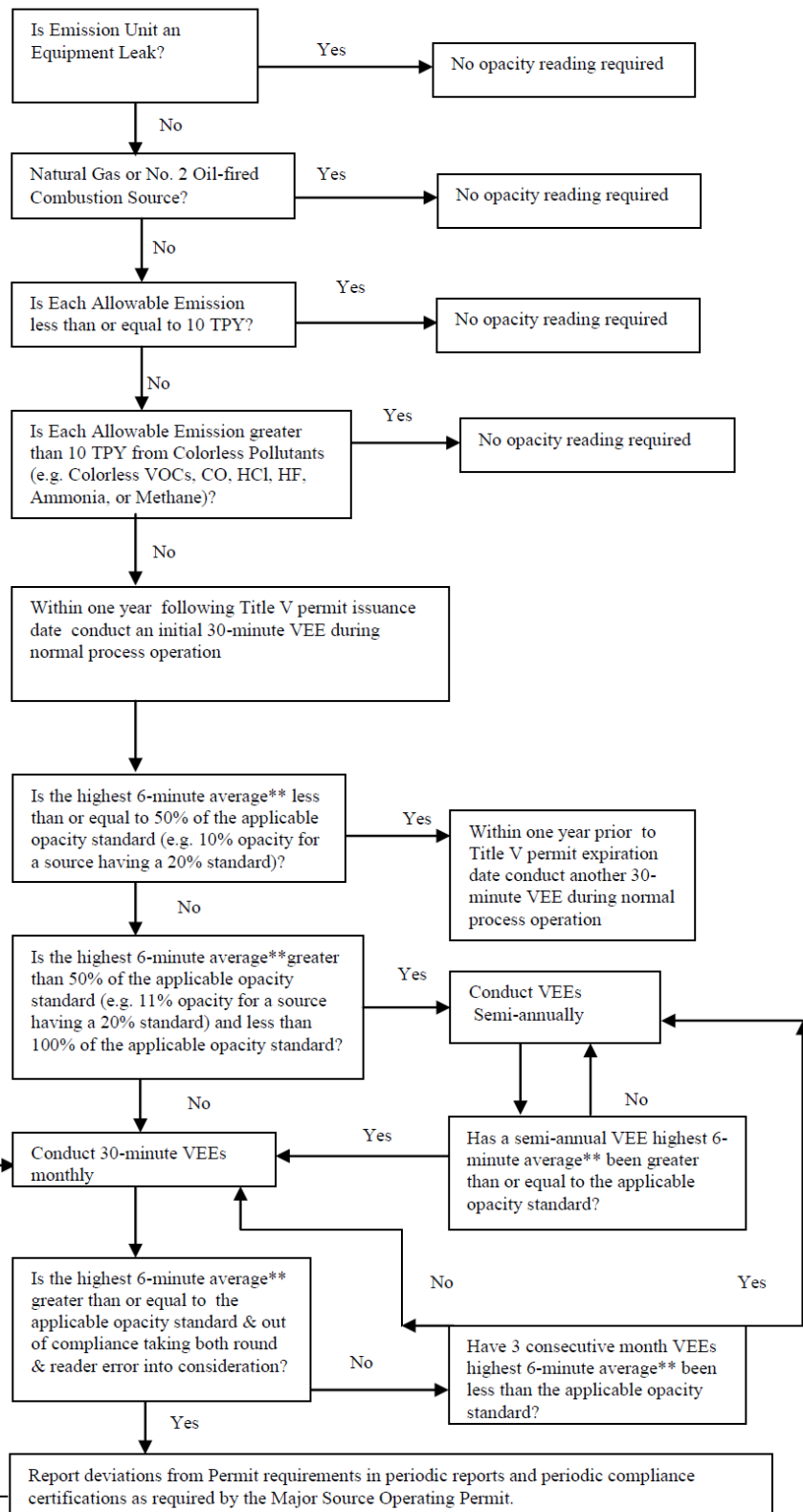
EPA Method 9, NSPS or NESHAPS stipulate opacity standards:

EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2

AP-42 FIFTH EDITION TABLE 1.1-1

COAL COMBUSTION EMISSION FACTORS

Table 1.1-1. POSTCOMBUSTION SO₂ CONTROLS FOR COAL COMBUSTION SOURCES

Control Technology	Process	Typical Control Efficiencies	Remarks
Wet scrubber	Lime/limestone	80 - 95+%	Applicable to high sulfur fuels, wet sludge product
	Sodium carbonate	80 - 98%	5-430 million Btu/hr typical application range, high reagent costs
	Magnesium oxide/hydroxide	80 - 95+%	Can be regenerated
	Dual alkali	90 - 96%	Uses lime to regenerate sodium-based scrubbing liquor
Spray drying	Calcium hydroxide slurry, vaporizes in spray vessel	70 - 90%	Applicable to low and medium sulfur fuels, produces dry product
Furnace injection	Dry calcium carbonate/hydrate injection in upper furnace cavity	25 - 50%	Commercialized in Europe, several U. S. demonstration projects are completed
Duct injection	Dry sorbent injection into duct, sometimes combined with water spray	25 - 50+%	Several research and development, and demonstration projects underway, not yet commercially available in the United States.

ATTACHMENT 3

**VOC EMISSIONS/MATERIAL BALANCE ANALYSIS
FOR FILTERING, WASHING, AND WEIGHING OF RDX
(37-0028-17, 28, 77, 78, 101, AND 102)**

**Filter Wash Process Emissions
E-Buildings**

Building	Source Reference Number	lb VOC / hr	tons VOC / year
E-2	37-1028-35	N/A	2.4
E-3	37-0028-17	N/A	11.4
E-4	37-0028-28	N/A	10.4
E-5	37-0028-77	N/A	2.4
E-6	37-0028-78	N/A	11.4
E-7	37-1028-36	N/A	2.4
E-8	37-1028-37	3.0	10.5
E-9	37-1028-38	N/A	2.4
E-10	37-1028-39	5.9	10.5
		Total:	63.8

Note: Building E-1 has been removed from the table since it has been demolished.

Buildings E-3 and E-6

HDC calculations used August 1996 Source Testing for the scrubber and Tanks 4.0 for the storage tanks.

Days of Operation per year	350
Scrubber emission rate at building capacity, lb/hr	2.63
Scrubber Emissions, tons/year	11.0
Tank Emissions, tons/year	0.35
Total Emissions per Building, tons/year	11.4

2013 Evaluation of current operations:

Equations from the Pharmaceutical MACT (40 CFR 63 Subpart GGG) were used.

Emissions were based on the previously determined maximum number of batches/day per per building.

Emissions were based on operations of 365 days/year, 24 hours/day.

An scrubber efficiency of 80% was used in the calculations for conservatism.

For the scrubber calculations, the displacement equation (#11) was used for transferring the batches and adding wash water. The purge equation (#12) was used to account for the continuous draft pulled on the wash tanks by the scrubber fan.

For the vacuum system calculations, the displacement equation (#11) was used to account for emissions from the receivers.

Etanks 4.0.9d was used to check the emissions from the storage tanks.

Emissions, tons/year	
Scrubber	5.55
Vacuum System	3.33
Storage Tanks	0.58
Total	9.5 < 11.4 tpy limit for E-3 and E-6, so the previously calculated limit is still valid

Building E-4

HDC calculations used May 1996 Source Testing for the scrubber and Tanks 4.0 for the storage tanks.

Days of Operation per year	350
Scrubber emission rate at building capacity, lb/hr	2.4
Scrubber Emissions, tons/year	10.1
Tank Emissions, tons/year	0.35
Total Emissions per Building, tons/year	10.4 > 9.5 calculated for E-3 and E-6 based on current operations, so the limit of 10.4 tpy for E-4 is still valid

Building E-8

HDC calculations were based on the Final Engineering Report HDC-28-76, Evaluation of Prototype Building E-1 which was for a continuous operation.

Days of Operation per year	350
Acetic Acid Rate from Scrubber, lb/hr	2.4
Scrubber Emissions, tons/year	10.1
Tank Emissions, tons/year	0.4
Total Emissions per Building, tons/year	10.5

Building E-8 is not currently in operation. If it was reactivated, it would likely be as a batch process like Buildings E-3 and E-6. Since the 2013 evaluation for E-3 and E-6 resulted in 9.5 tons/year, the limit of 10.5 tons/year is still valid for Building E-8.

Building E-10

HDC calculations were based on a preliminary material balance for E-10.

Days of Operation per year	350
Emissions from belt filters to scrubber, lb/hr	48
Scrubber Efficiency, %	96
Emissions from scrubber, lb/hr	1.92
Scrubber Emissions, tons/year	8.1
Tank Emissions, tons/year	0.4
Total Emissions per Building, tons/year	8.5

HDC had requested a limit of 10.5 tpy so Building E-10 would match Building E-8. Building E-10 is not currently in operation. If it was reactivated, it would be similar to Buildings E-3 and E-6, so the limit of 10.5 tons/year is still valid for Building E-10.

Buildings E-2, E-5, and E-9

HDC calculations were done using Tanks 4.0 based on the throughput of slurry coming to the buildings. The slurry was counted as all acetic acid. 5' diameter x 7' tank with 95°F for the operating temperature

Throughput, lb/hr of slurry	32,000
Annual throughput, gal/yr	33,841,727
Emissions from Tanks 4.0 tons/year	2.4

The buildings are currently not in operation. If they are re-activated, the emissions for the planned operations would be evaluated against the allowed 2.4 tons/year, so no changes are requested to the limits for Buildings E-2, E-5, and E-9 at this time.

Building E-7

HDC calculations for Building E-7 were the same as the ones for Buildings E-2, E-5, and E-9. Building E-7 is currently used to filter explosives from process wastewater before it is sent to the on-site industrial wastewater treatment facility. Evaluation of emissions for the current process resulted in a value well less than 2.4 tons/year as previously calculated, so the existing limit is acceptable.

ATTACHMENT 4

**CALCULATION OF VOC AND NITRIC ACID EMISSIONS
FROM RDX PRODUCTION BY NITRATION
(37-0028-12, 13, 14, 15, 18, 19, 20, 21, & 110)**

ATTACHMENT 5

**CALCULATION OF PARTICULATE EMISSIONS
FROM RECRYSTALLIZATION AND COATING OF RDX (37-0028-26)**

Emission Calculations for Flexible Manufacturing Facility

Particulate Matter

Source # 37-0028-26 and 37-0028-27 have a previous limit of
5.39 # / hour

= 23.6 tons / year

HSAAP Requests to Maintain this PM Allowable

NOx

Source # 37-0028-26 and 37-0028-27 have a previous limit of
= 15.0 tons / year

HSAAP Requests to Maintain this NOx Allowable

VOC

Previous VOC Allowable was:

6.22 tons / year for 37-0028-26

4.75 tons / year for 37-0028-27

10.5 tons / year for 37-1028-39*

21.47 tons / year

HSAAP Requests to Maintain this VOC Allowable

* Building E-10 is also included in Chapter 8. It is currently not used as a Filter Wash Building and is considered part of the Flexible Manufacturing Facility.

ATTACHMENT 6

**CALCULATION OF VOC EMISSIONS FROM RECRYSTALLIZATION
AND COATING OF RDX (37-0028-22, 23, 24, 25, 75, 76, 79, 80, 81, 82, 83, 84,
85, 86, 87, 88, 89, 103, 108, 109, & 111)**

Emission Calculations for **G-Building Recrystallization Processes**
G-Building Lacquer Coating Processes
G-Building Vacuum Coating Processes

		From previous Title V Permit Renewal Application		Adjustments for 2013 Title V Permit Renewal Application	
Source	Source #	pounds/hour	tons/year	pounds/hour	tons/year
Recrystallization					
G-1	37-0028-79	3.4	14.9	3.4	14.9
G-2	37-0028-22	N/A	4.75	N/A	4.75
G-3-1	37-0028-80	7	29	7	19.98
G-3-2	37-0028-81	N/A	2.4	N/A	2.4
G-4-1	37-0028-83	N/A	2.35	N/A	2.35
G-4-2	37-0028-84	N/A	2.35	N/A	2.35
G-5-1	37-0028-75	N/A		N/A	4.51
G-6-1	37-0028-86	N/A		N/A	4.51
G-6-2	37-0028-87	N/A	5	N/A	5
G-7-1	37-0028-23	18	9.9	18	9.9
G-8-1	37-0028-24	0.5	2.19	0.5	2.19
G-8-2	37-1029-05	12.9	56.5	12.9	56.5
G-8-3	37-1029-06	0.5	2.2	0.5	2.2
G-9	37-0028-25	N/A	4.75	N/A	4.75
		Total	136.29	Total	136.29

Lacquer Coating					
G-3-3	37-0028-82	1.3	5.7	1.3	1.29
G-4-3	37-0028-85	1.25	5.4	1.25	5.4
G-5-3	37-1028-90	N/A	N/A	N/A	4.41
G-6-3	37-0028-88	1.1	4.8	1.1	4.8
G-7-2	37-1029-14	2.1	8.8	2.1	8.8
Total			24.7	Total	24.7

Vacuum Stills					
G-5-2	37-0028-76	0.8	3.36	0.8	3.36
G-6-4	37-0028-89	N/A	2.05	N/A	2.05
Total			5.41	Total	5.41

For the 2013 renewal application, an evaluation of the existing processes was conducted. Past calculations by HDC were based on a combination of stack testing results and engineering estimates. Current operations were reviewed to determine the worst-case per batch emissions for the

recrystallization and coating processes and a maximum production rate. Pharmaceutical MACT (40 CFR 63 Subpart GGG) equations and engineering estimates were used to calculate emissions. The total VOCs for recrystallization, lacquer coating, and the vacuum stills are still valid for current operations. However, some of the processes that were historically conducted at Source G-3-1 are now done at Sources G-5-1 and G-6-1 and processes from Source G-3-3 are now done at Source G-5-3, so some of the VOC emissions have been shifted in the above table.

Building G-8 may be used for recrystallization and coating operations (G-8-1, G-8-2, G-8-3) or for ancillary nitration as described in Chapter 10.

ATTACHMENT 7

**CALCULATION OF VOC EMISSIONS FROM BUILDING 150
LACQUER PREPARATION (37-0028-92 & 105)**

B-150 Lacquer Preparation and Tank Farm 149

Emission Source Number	Older Reference #	Primary Vessels
37-0028-92	B-150-1	CA-01, CB-01
37-0028-94	B-150-3	CE-01, CF-01, CL-01
37-1028-86	T-149	See APC 6 attachment
37-1028-98	B-150-4	CD-01, CD-02, CD-03, CD-04

HDC used the Tanks 4.0 program to calculate emissions from the process vessels.

2013 Evaluation of Emissions:**37-0028-92:**

Reviewed the products currently made in the vessels and selected the one with the highest emissions.

Based the evaluation on a reasonable maximum production rate.

Used Pharmaceutical MACT (40 CFR 63 Subpart GGG) equations to calculate emissions.

Process Steps	Emissions (lbs/batch)	Emission Point
Charge Solvent	1.02	B
Charge Water	0.08	B
Charge Polymer	17.67	A
Heat Mixture	0.32	B
Transfer Mixture to Lacquer Wagon	1.88	Lacquer Wagon
Total	20.97	

Maximum batches per day per vessel	4	} for 37-0028-92
Maximum daily lb/hr emission rate per vessel*	3.50	
Maximum batches per year	1460	
Maximum annual emissions, tpy	15.3	

*includes emissions from lacquer wagons

37-0028-94:

Reviewed the products currently made in the vessels and selected the one with the highest emissions.

Based the evaluation on a reasonable maximum production rate.

Used Pharmaceutical MACT (40 CFR 63 Subpart GGG) equations to calculate emissions.

Process Steps	Emissions (lbs/batch)	Emission Point
Charge Solvent	0.40	B
Transfer Part of Solvent to Solvent/Lacquer Wagon	0.12	Solvent / Lacquer Wagon
Charge Plasticizer	0.07	B
Charge Polymer	0.02	B
Heat Mixture	0.27	B
Transfer Mixture to Lacquer Wagon	0.69	Lacquer Wagon
Total	1.57	

Maximum batches per day per vessel
Maximum daily lb/hr emission rate per vessel*

3

0.20

Maximum batches per year
Maximum annual emissions, tpy

1643

1.29

for 37-0028-94

*includes emissions from lacquer wagons

37-1028-98

Reviewed the products currently made in the vessels and selected the one with the highest emissions.

Based the evaluation on 5-8 times the production rate for the last few years.

Used Pharmaceutical MACT calculations.

Process Steps	Emissions (lbs/batch)	Emission Point
Charge Solvent	0.19	B
Charge Polymer	4.49	A
Charge Plasticizer	0.03	B
Heat Mixture	0.79	B
Charge Oil	0.06	B

Transfer Mixture to Lacquer Wagon	0.4	Lacquer Wagon
Total	5.96	

Maximum batches per day per vessel	2	} for 37-1028-98
Maximum daily lb/hr emission rate per vessel*	0.50	
Maximum batches per year	1460	
Maximum annual emissions, tpy	4.35	

*includes emissions from lacquer wagons

37-1028-86

The previous basis for the tank calculations was reviewed and no changes were needed.
Emissions from tanks were calculated to be 6256 lbs/yr (3.13 tpy)

Totals for Building 150 and Tank Farm 149:

37-0028-92	15.3
37-0028-94	1.29
37-1028-86	3.13
37-1028-98	4.35
Total	24.07

< 36.3 tpy, no change requested to limits for these sources

ATTACHMENT 8

**CALCULATION OF CARBON MONOXIDE EMISSIONS FROM
PLASMA ARC CUTTING MACHINE (37-0028-107)**

Removed from Operation

ATTACHMENT 9

**CALCULATION OF PARTICULATE EMISSIONS FROM
BUILDING 244B LIME SILO (37-0028-98)**

Calculations for Inputs and Emissions				
Building 224B				
Lime Storage and Slurrying Operation				
Reference #	Unit			
37-0028-98	Baghouse for silo			
Current Limits	100 Hours/Yr	2.5 lbs/hr		
	Maximum Allowable	$((2.5) \times (100))/2000$	0.125	Tons/Yr PM
Verification:	(1) Maximum Historical Demand for lime is approximately 1.35 M lb/yr			
	(2) Truck unloading rate = two hours for 50,000 lb load, or 25,000 lb/hr			
	(3) Vendor specification for <4 μ particles = 0.01% escaping particles			
		Particulate loading,	Emissions,	
Contaminant	Efficiency	lb/yr	lb/yr	TPY
PM	99.99%	1,350,000	135	0.07

ATTACHMENT 10

**AP-42 FIFTH EDITION TABLE 1.3-1
FUEL OIL COMBUSTION EMISSION FACTORS**

5/10

Table 1.3-1. CRITERIA POLLUTANT EMISSION FACTORS FOR FUEL OIL COMBUSTION^a

Firing Configuration (SCC) ^a	SO ₂ ^b		SO ₃ ^c		NO _x ^d		CO ^e		Filterable PM ^f	
	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING
Boilers > 100 Million Btu/hr										
No. 6 oil fired, normal firing (1-01-004-01), (1-02-004-01), (1-03-004-01)	157S	A	5.7S	C	47	A	5	A	9.19(S)+3.22	A
No. 6 oil fired, normal firing, low NO _x burner (1-01-004-01), (1-02-004-01)	157S	A	5.7S	C	40	B	5	A	9.19(S)+3.22	A
No. 6 oil fired, tangential firing, (1-01-004-04)	157S	A	5.7S	C	32	A	5	A	9.19(S)+3.22	A
No. 6 oil fired, tangential firing, low NO _x burner (1-01-004-04)	157S	A	5.7S	C	26	E	5	A	9.19(S)+3.22	A
No. 5 oil fired, normal firing (1-01-004-05), (1-02-004-04)	157S	A	5.7S	C	47	B	5	A	10	B
No. 5 oil fired, tangential firing (1-01-004-06)	157S	A	5.7S	C	32	B	5	A	10	B
No. 4 oil fired, normal firing (1-01-005-04), (1-02-005-04)	150S	A	5.7S	C	47	B	5	A	7	B
No. 4 oil fired, tangential firing (1-01-005-05)	150S	A	5.7S	C	32	B	5	A	7	B
No. 2 oil fired (1-01-005-01), (1-02-005-01), (1-03-005-01)	142S ^h	A	5.7S	C	24	D	5	A	2	A
No. 2 oil fired, LNB/FGR (1-01-005-01), (1-02-005-01), (1-03-005-01)	142S ^h	A	5.7S	A	10	D	5	A	2	A

External Combustion Sources

Table 1.3-1. (cont.)

Firing Configuration (SCC) ^a	SO ₂ ^b		SO ₃ ^c		NO _x ^d		CO ^e		Filterable PM ^f	
	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING
Boilers < 100 Million Btu/hr										
No. 6 oil fired (1-02-004-02/03), (1-03-004-02/03)	157S	A	2S	A	55	A	5	A	9.19(S)+3.22 ⁱ	B
No. 5 oil fired (1-03-004-04)	157S	A	2S	A	55	A	5	A	10 ⁱ	A
No. 4 oil fired (1-03-005-04)	150S	A	2S	A	20	A	5	A	7	B
Distillate oil fired (1-02-005-02/03), (1-03-005-02/03)	142S	A	2S	A	20	A	5	A	2	A
Residential furnace (A2104004/A2104011)	142S	A	2S	A	18	A	5	A	0.4 ^g	B

1.3-12

EMISSION FACTORS

- a To convert from lb/103 gal to kg/103 L, multiply by 0.120. SCC = Source Classification Code.
- b References 1-2,6-9,14,56-60. S indicates that the weight % of sulfur in the oil should be multiplied by the value given. For example, if the fuel is 1% sulfur, then S = 1.
- c References 1-2,6-8,16,57-60. S indicates that the weight % of sulfur in the oil should be multiplied by the value given. For example, if the fuel is 1% sulfur, then S = 1.
- d References 6-7,15,19,22,56-62. Expressed as NO₂. Test results indicate that at least 95% by weight of NO_x is NO for all boiler types except residential furnaces, where about 75% is NO. For utility vertical fired boilers use 105 lb/103 gal at full load and normal (>15%) excess air. Nitrogen oxides emissions from residual oil combustion in industrial and commercial boilers are related to fuel nitrogen content, estimated by the following empirical relationship: lb NO₂/103 gal = 20.54 + 104.39(N), where N is the weight % of nitrogen in the oil. For example, if the fuel is 1% nitrogen, then N = 1.
- e References 6-8,14,17-19,56-61. CO emissions may increase by factors of 10 to 100 if the unit is improperly operated or not well maintained.
- f References 6-8,10,13-15,56-60,62-63. Filterable PM is that particulate collected on or prior to the filter of an EPA Method 5 (or equivalent) sampling train. Particulate emission factors for residual oil combustion are, on average, a function of fuel oil sulfur content where S is the weight % of sulfur in oil. For example, if fuel oil is 1% sulfur, then S = 1.
- g Based on data from new burner designs. Pre-1970's burner designs may emit filterable PM as high as 3.0 lb/103 gal.
- h The SO₂ emission factor for both no. 2 oil fired and for no. 2 oil fired with LNB/FGR, is 142S, not 157S. Errata dated April 28, 2000. Section corrected May 2010.
- i The PM factors for No.6 and No. 5 fuel were reversed. Errata dated April 28, 2000. Section corrected May 2010.

ATTACHMENT 11

**NEW SOURCE PERFORMANCE STANDARDS (40 CFR PART 60)
SPECIFIC APPLICABILITY DETERMINATIONS FOR ACETIC
ACID CONCENTRATION AND ACETIC ANHYDRIDE PRODUCTION
(37-0028-112)**

Identification	Category	Rule Citation from 40 CFR 60.
Subpart A – General Provisions		
Entire Source	Notification, monitoring, recordkeeping, and reporting.	7, 13, 19
Vent H	Performance tests.	8
Vents B, C, D, E, H	Opacity standards.	11
Vent H	Flare requirements.	18(b) through 18(f)
Subpart Kb – Storage Vessels		
	Storage Vessels storing a VOL having a maximum true vapor pressure less than 75.7 kPa and must meet standards.	112b(a)
	Storage Vessels storing a VOL having a maximum true vapor pressure equal to or greater than 75.7 kPa and must meet standards.	112b(b)
	Storage Vessels that are not required to meet standards.	110b
	Monitoring, recordkeeping, and reporting.	115b, 116b
Subpart VVa – Equipment Leaks		
Equipment "in VOC Service"	Work practice standards for pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, etc.	482-1a through 482-11a, 483-1a through 483-2a
Equipment "in acetic acid and/or acetic anhydride service"	Alternative monitoring for equipment in acetic acid and/or acetic anhydride service (letter from Ms. Carol Kemker, EPA Region 4, to Mr. Barry Stephens, TDEC, dated June 23, 2010).	N/A
VVa subject points as applicable	Monitoring, recordkeeping, and reporting.	486a, 487a
Subpart NNN – Distillation		
Anhydride Refining Still Systems*	TRE less than or equal to 1.0 (Reduce TOC by 98% or to 20 ppmv).	662(a)
Anhydride Refining Still Systems*	TRE less than or equal to 1.0 (Combust in a flare).	662(b)
	TRE greater than 1.0 but less than or equal to 8.0.	662(c)
Acetic Anhydride Sludge Recovery System	TRE greater than 8.0.	660(c)(4)
	Batch Operation Exemption.	660(c)(3)
Azeotropic Column Systems, Solvent Still System, Acetic Acid Sludge Recovery System	Low Flow Exemption.	660(c)(6)
	Design Capacity Exemption.	660(c)(5)
NNN subject points as applicable	Monitoring, recordkeeping, and reporting.	663, 665
Anhydride Refining Still Systems	Alternative monitoring approved per letter from Ms. Carol Kemker, EPA Region 4, to Barry Stephens, TDAPC, December 7, 2012: waiver of requirement for process heater performance test, waiver of requirement for firebox temperature monitoring, and use of continuous valve position monitoring for process vent gases.	13(i)
Subpart RRR – Reactors		
Acid #1 and Acid #2 Scrubber Vents, Furnace Condensate Drain Tank Vent**	TRE less than or equal to 1.0 (Reduce TOC by 98% or to 20 ppmv).	702(a)
Acid #1 and Acid #2 Scrubber Vents, Furnace Condensate Drain Tank Vent**	TRE less than or equal to 1.0 (Combust in a flare).	702(b)
	TRE greater than 1.0 but less than or equal to 8.0.	702(c)
	TRE greater than 8.0.	700(c)(2)
	Batch Operation Exemption.	700(c)(1)
	Low Flow Exemption.	700(c)(4)
	Design Capacity Exemption.	700(c)(3)
	Low Concentration Exemption.	700(c)(8)
	Routed to distillation unit subject to subpart NNN except for a pressure relief valve.	700(c)(5)
RRR subject points as applicable	Monitoring, recordkeeping, and reporting.	703, 705

* The source may comply using either a boiler (§60.662(a)) or a flare (§60.662(b)). By issuance of construction permit #963968P, the source has fulfilled the notification requirement found in §60.665(a) to use an alternate provision of §60.662.

** The source may comply using either a boiler (§60.702(a)) or a flare (§60.702(b)). By issuance of construction permit #963968P, the source has fulfilled the notification requirement found in §60.705(a) to use an alternate provision of §60.702.

ATTACHMENT 12

NSPS VVa ALTERNATIVE MONITORING REQUEST

BAE SYSTEMS

ORDNANCE SYSTEMS INC.
4509 West Stone Drive
Kingsport, Tennessee 37660-9982
Telephone (423) 578-8010
Fax (423) 578-8054

In Reply Reference 2302RO

June 2, 2010

Keith Goff
Air, Pesticides and Toxics Management Division, Region 4
Environmental Protection Agency
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Dear Mr. Goff:

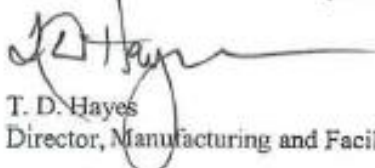
Please find enclosed an application for approval of alternative monitoring procedures submitted by BAE Systems Ordnance Systems, Inc. (OSI), the operating contractor for Holston Army Ammunition Plant (HSAAP), pursuant to the provisions of 40 CFR 60.13(i).

Approval of this application would establish alternative monitoring procedures to requirements found in 40 CFR 60 Subpart VVa that apply to equipment in acetic acid and/or acetic anhydride service at HSAAP in Kingsport, Tennessee. This request is similar to one approved by EPA Region 4 March 30, 2005 for Eastman Chemical Company in Kingsport, Tennessee.

If there are any questions concerning this application, please contact Amy Crawford at (423)578-6417 or amy.crawford@baesystems.com.

Respectfully,

BAE SYSTEMS Ordnance Systems Inc.



T. D. Hayes
Director, Manufacturing and Facilities Support

MW Reviewed by HSAAP Environmental Staff

BAE Systems Ordnance Systems, Inc.
Application for Alternative Monitoring Procedures
For
Certain New Source Performance Standards
Leak Detection and Repair Program
For Equipment in Acetic Acid and/or Acetic Anhydride Service

Background

The Holston Army Ammunition Plant (HSAAP) was constructed in 1942 by the United States Army for the manufacture of Research Department Explosives (RDX) which was crucial for a victory in World War II. Tennessee Eastman was chosen as the operating contractor for their expertise in converting weak acetic acid to glacial acetic acid and acetic anhydride, both of which are essential to the manufacture of RDX. For this reason, the acetic acid and acetic anhydride processes were sited on a 112-acre piece of property (identified as Area A) immediately adjacent to the Tennessee Eastman facility in Kingsport, Tennessee (Sullivan County) to ensure this process remained proprietary to the company. The remainder of the 6000-acre high explosives manufacturing facility was constructed in Hawkins County, Tennessee (identified as Area B), approximately 7 miles from Area A. The two areas are connected by rail and pipeline through an interplant corridor. In 1999, BAE Systems Ordnance Systems, Inc. (OSI) became the operating contractor for this government-owned contractor-operated (GOCO) facility.

OSI and the Army determined that extensive modernization would be required for continued reliable operation of the Area A facility. OSI examined refurbishing Area A through a significant investment to mitigate infrastructure deficiencies, including upgrading and repairing railroad bridges, modernizing azeo still capacity, replacing the acetic anhydride refining still, updating the water distribution and storage tank capacities, and refurbishing six ketene furnaces. Additionally, with the interplant pipe/rail corridor, the safety, environmental, and security risks are notable. The corridor crosses the Holston River three times and passes through a densely populated residential neighborhood.

The HSAAP facility was originally designed to operate in support of major military conflicts where large volumes of high explosives were used as was the case during World War II and Vietnam. Today's military no longer requires these large volumes of product, but OSI and the Army must ensure that adequate capabilities remain in place. Today's ammunition also must be more versatile while continuously striving to be safer and safer. OSI prides itself on providing the US Armed Services with a product that meets or exceeds our customer's expectations.

With these product demands in mind, the Army and OSI recognized the Area A facility with an infrastructure more than sixty years old is dramatically oversized for future needs. OSI evaluated relocating the operations from Area A to Area B through designing and building a state-of-the-art facility. This option has the following benefits:

- Integrate operations with existing process control systems
- Improve efficiency with current technology

BAE Systems Ordnance Systems, Inc.
Holston Army Ammunition Plant
NSPS VVa Alternative Monitoring Procedure Request
June 2, 2010

- Concentrate security requirements to Area B only
- Reduce energy needs and energy costs by approximately 28%
- Reduce chemical usage
- Reduce environmental footprint
- Allow utilization of existing Area B infrastructure by using steam from the existing coal-fired steam plant and by using reliable power and water at Area B
- Eliminate interplant corridor safety, environmental, and security risks

OSI and the Army chose the option to relocate operations from Area A to Area B. The new Area B operations will include acetic anhydride and concentrated acetic acid production. A separate but related modernization project involves the installation of new equipment for the recovery of weak acetic acid. This operation is currently done in an existing building at Area B that is also aging. It has been determined the new equipment to be installed at Area B will be subject to New Source Performance Standards (NSPS) Subpart VVa, "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006".

NSPS Subpart VVa requires a leak detection and repair (LDAR) program for pumps, valves, and connectors in volatile organic chemical (VOC) service per 40 CFR Sections 60.482-2a, 60.482-4a, 60.482-7a, 60.482-8a, and 60.482-11a along with the applicable recordkeeping and reporting requirements of Sections 60.486a and 60.487a. These provisions require leak detection for pumps in light liquid service and valves in gas/vapor or light liquid service to be done using an instrument known as Method 21 (see Section 60.485a) to detect VOC. Section 60.482-11a for connectors in gas/vapor and light liquid service also requires Method 21 for leak detection but is currently under a stay per 60.480a(f)(2)(iii). Records of all individual equipment components are required and leaking percentages are required to be calculated and reported, so the required monitoring frequency can be determined. Method 21 is also required to verify pressure relief devices in gas/vapor service are not leaking after a pressure release; to verify a pump, valve, or connector in heavy liquid service is leaking after evidence was found by sensory methods; to verify a pressure relief device in light liquid or heavy liquid service is leaking after evidence was found by sensory methods; and to verify the successful leak repair of leaking equipment. Subpart VVa also requires weekly visual inspections of pumps and subsequent repair of any pump seals found dripping.

OSI proposes to implement a program using sensory (sight, sound, smell) inspections for equipment in acetic acid and/or acetic anhydride service similar to the alternative procedures approved by EPA Region 4 for Eastman Chemical Company on March 30, 2005. The approval of that request was based on the physical properties of acetic acid and acetic anhydride and Eastman's record of identifying leaks without the aid of a Method 21 analyzer.

Therefore, OSI requests the Administrator approve this application for approval of an alternative monitoring approach pursuant to the provisions of 40 CFR Section 60.13(i).

BAE Systems Ordnance Systems, Inc.
Holston Army Ammunition Plant
NSPS VVa Alternative Monitoring Procedure Request
June 2, 2010

Proposed Alternative Monitoring Procedure

OSI proposes as an alternative to the work practices required by 40 CFR Sections 60.482-2a, 60.482-4a, 60.482-7a, 60.482-8a, and 60.482-11a, that all regulated equipment subject to NSPS Subpart VVa in "acetic acid and/or acetic anhydride service" at HSAAP comply with a leak detection and repair program that identifies leaks and verifies successful repairs using sensory (sight, sound, smell) methods. For equipment to be classified in "acetic acid and/or acetic anhydride service", acetic acid and/or acetic anhydride will be at least 50 weight percent of the VOCs in the mixture contained by the equipment. The proposed alternative monitoring procedure is included as Attachment 1. OSI requests approval of this procedure as an alternative to the procedures required by 40 CFR Sections 60.482-2a, 60.482-4a, 60.482-7a, 60.482-8a, and 60.482-11a and the related recordkeeping and reporting requirements of Sections 60.486a and 60.487a.

Justification

Region 4 has approved a similar request by Eastman Chemical Company on March 30, 2005 for equipment in acetic acid and/or acetic anhydride service. Also, Region 4 has approved 3 similar requests for equipment in acetic acid service, 2 from Eastman Chemical Company and 1 from DuPont Engineering Polymers. Monitoring results provided by Eastman showed the sensory method approach would provide an equivalent or higher level of emission control than Method 21. The physical properties of acetic acid and acetic anhydride allow easy sensory detection of leaks. These properties include low odor thresholds (acetic acid: 0.48 ppm, acetic anhydride: 0.117 ppm), high boiling points (acetic acid: 118°C, acetic anhydride: 139°C), and high corrosivity. The low odor thresholds allow personnel to identify and locate leaks by smell while the high boiling points mean many of the leaks show up as drip leaks that can be located by sight. With the high corrosivity of both chemicals, liquid drips may cause staining or rusting of metal components which provides an additional visual sign for personnel to use to identify and locate leaks.

Attachment 1**Sensory Leak Inspection and Repair
for
Equipment in Acetic Acid and/or Acetic Anhydride Service****1. Definitions**

- a. *In Acetic Acid and/or Acetic Anhydride Service* means the piece of equipment contains or contacts a mixture where acetic acid and/or acetic anhydride are at least 50 weight percent of the volatile organic compounds (VOCs) in the mixture.
- b. *In Gas/Vapor Service* means the piece of equipment contains or contacts a process fluid that is in the gaseous state at operating conditions.
- c. *In Light Liquid Service* means the piece of equipment contains or contacts a liquid where the vapor pressure of one or more of the organic components is greater than 0.3 kPa (0.044 psia) at 20°C, the total concentration of the pure organic components having a vapor pressure greater than 0.3 kPa (0.044 psia) at 20°C is equal to or greater than 20 percent by weight, and the fluid is a liquid at operating conditions.
- d. *In Heavy Liquid Service* means the piece of equipment is not in gas/vapor or light liquid service.
- e. *In Vacuum Service* means the equipment is operating at an internal pressure which is at least 5 kPa (0.7 psia) below ambient pressure.
- f. *In VOC Service* means the piece of equipment contains or contacts a process fluid that is at least 10 percent volatile organic compounds (VOC) by weight.

2. Schedule for Monitoring

- a. Pumps shall be inspected weekly.
 - b. Valves shall be inspected monthly for 2 calendar months following initial startup. If the leak rate is less than 2%, the valves shall then be inspected once per calendar quarter.
 - c. Connectors shall be inspected on the same frequency as valves.
 - d. Pressure relief devices in gas/vapor service shall be inspected within the first month following initial startup and within 5 calendar days after a pressure release. A pressure relief device that is equipped with an upstream rupture disk is exempt from this inspection.
3. A leak inspection of all equipment in VOC service that is not "in heavy liquid service" or is not "in vacuum service" shall be performed according to the schedule in paragraph 2. For this inspection, detection methods incorporating sight (e.g. looking for drips), sound (e.g. listening for hissing sounds indicative of a leak), or smell (e.g. detecting strong odors traceable to piping leaks) shall be used as appropriate. "Equipment" includes piping, pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, and connectors. Equipment that is covered by insulation or obstructed from sight when standing on existing floors or walkways is exempt from this inspection. Equipment that is in VOC service less than 300 hours/year is exempt from this inspection.
4. When a leak is detected, an initial attempt at repair shall be made no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be

completed within 15 calendar days after detection of each leak except as provided in paragraph 6.

5. For any pressure relief device equipped with an upstream rupture disk, a new rupture disk must be installed within 5 calendar days after each pressure release except as provided in paragraph 6.
6. Delay of Repair
 - a. Delay of repair of leaking equipment will be allowed if the repair is technically infeasible without a process unit shutdown or if repair personnel would be exposed to an immediate danger if attempting a repair without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.
 - b. Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and does not remain in VOC service.
 - c. Delay of repair for valves, connectors, and agitators is also allowed if the owner or operator determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair.
 - d. Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit shutdown will not be allowed unless the third process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
 - e. Delay of repair of pumps for up to 6 months after leak detection will be allowed if the pump is replaced with (1) a dual mechanical seal system, (2) a pump with no externally actuated shaft penetrating the pump housing, or (3) a new system the permittee has determined will provide better performance.
7. Recordkeeping Requirements
 - a. Records must be maintained that identify piping systems or process areas subject to this plan.
 - b. Records of all inspections must be kept documenting the inspection was conducted and the date of the inspection. If no leaks are detected during the inspection, the record must indicate this result.
 - c. When a leak is detected during the inspection, the following information shall be recorded:
 - i. Component identifier or description of location.
 - ii. Inspector name, initials, or identification number.
 - iii. Date the leak was detected.
 - iv. Dates of each attempt to repair the leak.
 - v. Repair methods applied in each attempt to repair the leak.
 - vi. Date of successful repair of the leak. "Successful repair" means the leak is no longer detected using the inspection procedure outlined in paragraph 3.
 - vii. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

- viii. Signature of the owner or operator (or designate) whose decision it was that repair could not occur without a process shutdown.
 - ix. Expected date of successful repair of the leak if it is not repaired within 15 days.
 - x. Dates of process unit shutdowns that occur while the equipment is unrepaired.
 - d. Records of each release from a pressure relief device in gas/vapor service.
8. Reporting Requirements
- a. The following information will be included in the Title V Semiannual Report for the source:
 - i. Process unit identification.
 - ii. Dates of inspections.
 - iii. Number of leaks found during inspections.
 - iv. Number of leaks that did not meet the repair requirements (first attempt at repair within 5 calendar days and successful repair within 15 calendar days of finding the leak).
 - v. Information regarding any delays of repair.

ATTACHMENT 13

**EPA REGION 4 RESPONSE TO
NSPS VV_a ALTERNATIVE MONITORING REQUEST**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 23 2010

Mr. Barry R. Stephens, P.E.
Director
Division of Air Pollution Control
Tennessee Department of Environment & Conservation
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Dear Mr. Stephens:

The purpose of this letter is to provide you with a determination regarding the enclosed alternative monitoring procedure that BEA Systems Ordnance Systems, Inc. (OSI) submitted to the Environmental Protection Agency (EPA) Region 4 on June 2, 2010. OSI is the operating contractor for the Holston Army Ammunition Plant (HSAAP). OSI's proposal relates to new equipment to be installed at HSAAP's Area B (located in Hawkins County, Tennessee) that will be subject to New Source Performance Standards (NSPS), Subpart VVa - "Standards of Performance for Equipment Leaks of Volatile Organic Compounds (VOC) in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) for Which Construction, Reconstruction, or Modification Commenced after November 7, 2006." OSI proposes to use sensory means (i.e., visual, audible, or olfactory) as an alternative to EPA Method 21 for identifying leaks from equipment that is in acetic acid and/or acetic anhydride service. Based upon our review, we have determined the OSI alternative monitoring procedure is acceptable. Monitoring data from similar facilities indicate that leaks from equipment in acetic acid and/or acetic anhydride service can be more easily identified through sensory methods than by using EPA Method 21.

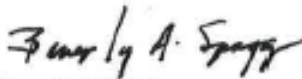
The types of equipment covered by the leak detection and repair standards in Subpart VVa are pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, and connectors. Under this regulation, owners/operators are required to periodically monitor equipment in VOC service. When leaks are detected, a first attempt at repair must be made within five days, and repairs must be completed within 15 days unless the provisions in Section 60.482-9a allow a delay in repairs. The two primary methods of detecting leaks under Subpart VVa are either using an instrumental analyzer that satisfies performance requirements in EPA Method 21 or using sensory methods that identify leaks through visual, audible, or olfactory means. In its alternative monitoring procedure, OSI proposes to use sensory methods to identify leaks for regulated equipment in acetic acid and/or acetic anhydride service where Subpart VVa requires the use of EPA Method 21. As indicated in the proposal, equipment that contains or contacts a process fluid where acetic acid and/or acetic anhydride comprises at least 50 percent by weight of the VOCs contained in the mixture would be classified as being in acetic acid and/or acetic anhydride service.

OSI's alternative monitoring procedure is based on a similar proposal from the Eastman Chemical Company (ECC) facility in Kingsport, Tennessee which was approved by Region 4 on March 30, 2005. The ECC alternative monitoring procedure was based on the use of sensory methods as an alternative to EPA Method 21 for equipment in acetic acid and/or acetic anhydride service, since monitoring results demonstrated that equipment leaks can be detected much more readily using sensory methods. The March 30, 2005, approval letter indicates that 124 leaks from equipment in acetic acid and/or acetic anhydride service in ECC's acetic anhydride process unit were detected by using sensory methods between October 1999 and August 2004, and no leaks were detected by using EPA Method 21. Region 4 has also approved three similar alternative monitoring procedures for equipment in acetic acid service.

As discussed in the March 30, 2005, approval of ECC's alternative monitoring procedure for equipment in acetic acid and/or acetic anhydride service, leaks are detected more easily with sensory techniques than with EPA Method 21 due to the physical properties of acetic acid and acetic anhydride. These physical properties include a high boiling point, high corrosivity, and low odor threshold. The boiling point of acetic acid is 118 °C, and the boiling point of acetic anhydride is 139 °C. Due to the high boiling points, leaks that do occur are usually present in the form of liquid drips that can be detected visually. Because acetic acid and acetic anhydride are corrosive, liquid drips tend to cause staining or rusting of metal components which also allows the leaks to be detected visually. The low odor threshold of acetic acid and acetic anhydride also makes it relatively easy for operators to identify and locate leaks using olfactory methods. Based upon these factors, we have determined that the alternative monitoring procedure submitted by OSI is acceptable.

If you have any questions concerning the determination provided in this letter, please contact Keith Goff of the EPA Region 4 staff at (404) 562-9137.

Sincerely,


Carol L. Kemker
Acting Director
Air, Pesticides and Toxics
Management Division

Enclosure

cc: T.D. Hayes
BAE Systems Ordnance Systems, Inc.

Amy Crawford
BAE Systems Ordnance Systems, Inc.

ATTACHMENT 14

**NSPS NNN AND RRR ALTERNATIVE MONITORING REQUEST
ACETIC ACID CONCENTRATION AND ACETIC
ANHYDRIDE PRODUCTION (37-0028-112)**

BAE SYSTEMS

ORDNANCE SYSTEMS INC.
4509 West Stone Drive
Kingsport, Tennessee 37660-9982
Telephone (423) 578-8010
Fax (423) 578-8054

In Reply Reference 2682RO

February 1, 2012

Ms. Beverly Banister
Air, Pesticides and Toxics Management Division, Region 4
Environmental Protection Agency
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Reference: New Source Performance Standards
Request for Performance Test Waiver and Alternate Monitoring
Title V Permit 558406, Emission Source Reference Number 37-1029-16
Holston Army Ammunition Plant

Dear Ms. Banister:

BAE Systems Ordnance Systems, Inc. (OSI), the operating contractor for Holston Army Ammunition Plant (HSAAP), will be constructing a new acetic anhydride manufacturing facility which is subject to New Source Performance Standards (NSPS) Subpart NNN (Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations) and Subpart RRR (Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes). This request is submitted for consideration under 40 CFR 60.8(b)(4) for waiving performance test requirements and under 40 CFR 60.13(i) for approving alternate monitoring procedures.

Acetic acid and a catalyst will be fed to two furnaces, each with a design heat input capacity of 2.38 million Btu/hr, which meet the definition of process heater (40 CFR 60.661 and 60.701). There will be a total of four furnaces; however, only two will operate at one time. After the furnaces, the chemicals will be further processed in a reactor to form acetic anhydride. The crude acetic anhydride will be refined in a distillation column. The reactor and distillation systems vent to a common header. Both Subpart NNN and RRR allow a source to reduce total organic compounds (TOC) in process vents by 98 weight percent by using a boiler or process heater (40 CFR 60.662(a) and 60.702(a), respectively). To use a boiler or process heater, both regulations require the vent stream to be introduced into the flame zone. The process vent gas streams from the reactor and distillation systems are mixed with the natural gas prior to the natural gas being fed to the burners in the furnaces (i.e., the flame zone), where the combined gases are combusted to provide heat to the acetic acid and catalyst. A flare complying with the requirements of 40 CFR 60.18 will be used as an alternate control device when the furnaces are unable to burn the process vent gases such as during startups or shutdowns.

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OSI HSAAP Title V Renewal Application
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ISO 9001:2008



BAE SYSTEMS

Paragraph 60.664(c) of Subpart NNN waives the requirement for an initial performance test if a boiler or process heater has a design heat input capacity of 44 MW (150 million Btu/hr) or greater. However, the corresponding paragraph in Subpart RRR (60.704(b)(5)(ii)) also allows the initial performance test to be waived for a boiler or process heater of any size if the vent stream is introduced into the unit with the primary fuel. As documented in the preamble to Subpart RRR (Federal Register Volume 5, Number 167, Pages 45957-45958, August 31, 1993), the EPA agreed the efficiency achieved in boilers and process heaters where the process vent streams are introduced as primary fuel would meet and exceed the 98 percent emission reduction required by the standard. Since the process vent streams from the acetic anhydride manufacturing facility will be fed to the furnaces with the natural gas (the primary fuel), OSI requests permission to comply with Subpart RRR for both the Subpart RRR and Subpart NNN sources venting to the furnaces.

Paragraph 60.663(c)(2) of Subpart NNN requires a temperature monitoring device in the firebox equipped with a continuous recorder for boilers or process heaters of less than 44 MW (150 million Btu/hr) heat input design capacity. However, the corresponding paragraph in Subpart RRR (60.703(c)(2)) exempts any vent stream introduced with the primary fuel into a boiler or process heater, of any size, from the temperature monitoring requirement. As with the performance testing requirement, the EPA decided temperature monitoring would not be required when the process vent stream is fed to a boiler or process heater as primary fuel (Federal Register Volume 5, Number 167, Pages 45957-45958, August 31, 1993). OSI requests permission to follow Subpart RRR for both the Subpart RRR and Subpart NNN sources venting to the furnaces, so no temperature monitoring would be required.

Paragraph 60.663(c)(1) of Subpart NNN requires a flow indicator that provides a record of vent stream flow to the control device at least once every hour from each distillation unit at a point closest to the inlet of each control device and before being joined with any other vent stream. Paragraph 60.703(c)(1) of Subpart RRR requires a flow indicator located at the entrance to any bypass line that could divert the vent stream from being routed to the control device, resulting in emissions to the atmosphere. The bypass line flow indicator is required to provide a record of vent stream flow at least once every 15 minutes for each affected facility. Subpart NNN defines each distillation unit as an affected facility while Subpart RRR allows more flexibility in the designation of an affected facility. It can be a single reactor system up to two or more reactor processes venting to a common recovery system (60.700(b)). As documented in the preamble to Subpart RRR (Federal Register Volume 5, Number 167, Pages 45955-45956, August 31, 1993), the EPA discussed its decision to move the flow monitoring to the bypass line entrance since the intent of this requirement is to determine when uncontrolled emissions are released to the atmosphere. Subpart RRR also allows the use of a valve in the bypass line equipped with a car-seal or a lock-and-key type configuration. Inspections and recordkeeping for this option are required. OSI requests permission to follow Subpart RRR for both the Subpart RRR and NNN sources and also requests an alternate monitoring plan. As shown in the attached sketch, there are three paths the process vent gases could take to reach the atmosphere. During normal operations, the process vent gases will be directed to the furnaces or the flare for control prior to release to the atmosphere. The path through the scrubber will only be used during startup when evacuating air from the system and before any process feeds are introduced to the furnaces or distillation column. Operators will have to answer queries from the control system to verify the system had been cleaned with water before the process vent gas valve to the scrubber can open. Also, there will be interlocks programmed into the control system that will not allow the process

BAE SYSTEMS

vent gas valve to open to the scrubber if the process feed valves to the furnaces or distillation column are open. There will be position indicators on all the valves on the attached sketch that will show if each valve is open or closed. The valve positions will be continuously monitored (at least once every 15 minutes) and recorded by the control system. OSI considers the continuous valve position monitoring provided by the control system to be more reliable than the manual recordkeeping associated with a car-seal or lock-and-key type configuration. OSI believes this alternative monitoring meets the requirement of ensuring the process vent gases do not bypass the control devices before reaching the atmosphere, satisfying the intent of 60.663(c)(1) and 60.703(c)(1).

The attached process sketch will be submitted with the initial report and will be maintained on file as required per 60.705(s).

If there are any questions concerning this application, please contact Amy Crawford at (423) 578-6417 or amy.crawford@baesystems.com.

Respectfully,

BAE SYSTEMS Ordnance Systems Inc.



T. D. Hayes
Director, Manufacturing and Facilities Support

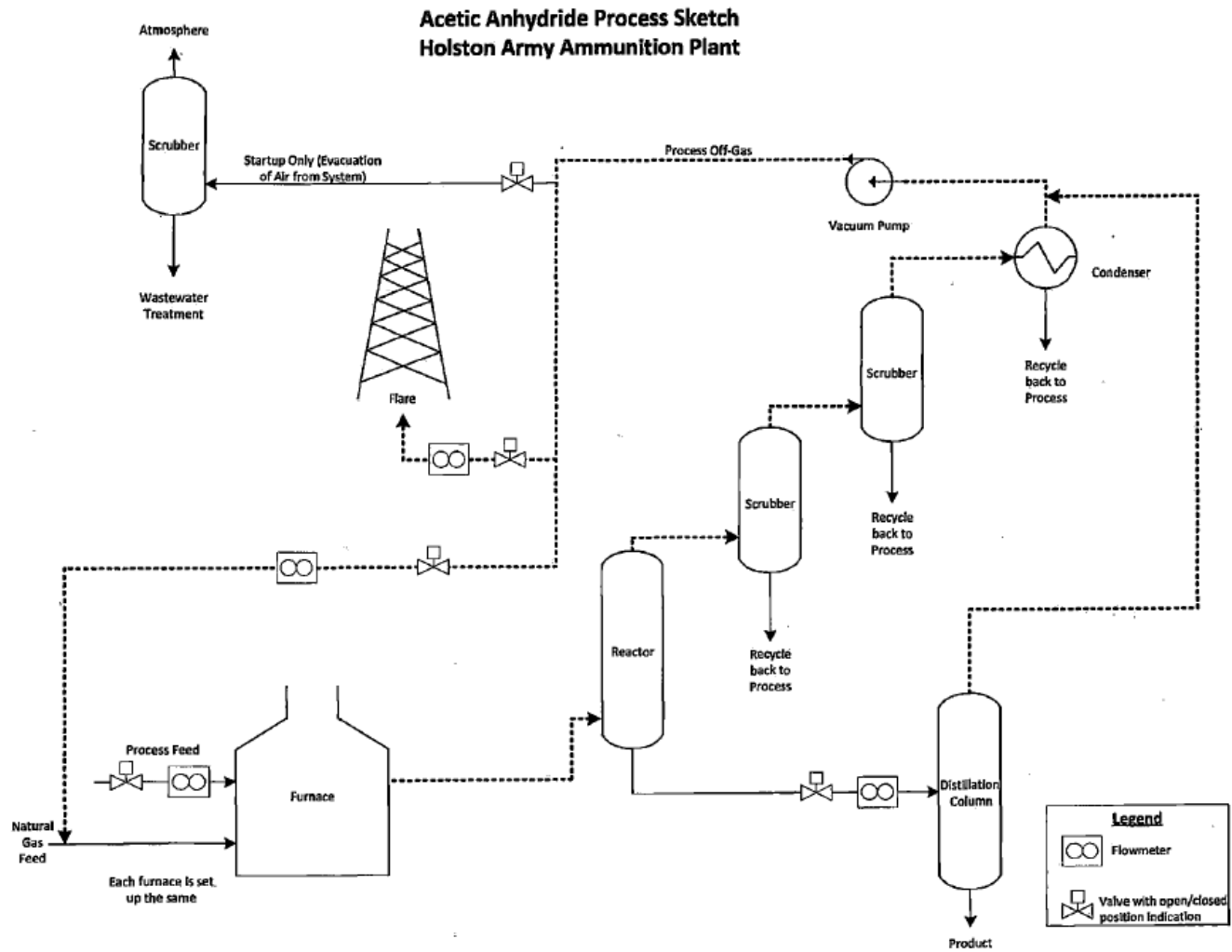
DHM Reviewed by HSAAP Environmental Staff

cc Environmental Affairs/Crawford
HSAAP/Vestal
Environmental Affairs Files 1305/2012

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OSI HSAAP Title V Renewal Application
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ATTACHMENT 15

**EPA RESPONSE TO NSPS NNN AND RRR ALTERNATIVE
MONITORING REQUEST
ACETIC ACID CONCENTRATION AND ACETIC
ANHYDRIDE PRODUCTION (37-0028-112)**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 07 2012

Mr. Barry R. Stephens, P.E.
Director
Division of Air Pollution Control
Tennessee Department of Environment & Conservation
9th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1531

Dear Mr. Stephens:

This letter is in response to a request for an initial performance test waiver and alternative monitoring procedures from BAE Systems Ordnance Systems, Inc. (OSI), the operating contractor for Holston Army Ammunition Plant in Kingsport, Tennessee. The request relates to a new acetic anhydride manufacturing facility which is subject to New Source Performance Standards (NSPS), Subpart NNN - "Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations" and NSPS Subpart RRR - "Standards of Performance for VOC Emissions from SOCMI Reactor Processes." OSI requests permission to use the monitoring procedures provided in NSPS Subpart RRR to demonstrate compliance for vent streams that are subject to Subpart NNN. The vent streams from the reactor and distillation column at the facility are routed to furnaces with the primary fuel (natural gas) and are combusted. The furnaces used for controlling VOC emissions have a heat input capacity of 2.38 million British thermal units per hour (Btu/hr). Based upon our review, the performance test waiver and alternative monitoring procedures requested by OSI are acceptable. Details regarding the basis of our determination are provided in the remainder of this letter.

Subpart NNN at 40 CFR Section 60.662(a) allows an owner/operator of an affected facility to comply with the standard by reducing the total emissions of total organic compounds (TOC) in the vent stream by 98 weight-percent, or to a TOC (less methane and ethane) concentration of 20 parts per million, on a dry basis corrected to three percent oxygen. If a boiler or process heater is used to comply with these limits, the vent gas stream must be introduced into the flame zone of the boiler or process heater. The terms "boiler" and "process heater" are defined under 40 CFR Section 60.661 of Subpart NNN. Subpart RRR at 40 CFR Section 60.702(a) includes the same emission standards. However, Subpart RRR allows more flexibility regarding performance testing and monitoring.

In the acetic anhydride manufacturing facility, acetic acid and a catalyst will be heated in two furnaces which meet the definition of process heaters under Subparts NNN and RRR. The chemicals will then be processed in a reactor to form acetic anhydride. The crude acetic anhydride will then be refined in a distillation column. The process vent gas streams from the reactor and distillation operations are mixed with natural gas prior to being fed to the burners in the furnaces (i.e., the flame zone), where the combined gases are combusted to provide heat to the acetic acid and catalyst. A flare complying with the requirements of 40 CFR Section 60.18 will be used as an alternate control device when the furnaces are unable to burn the process vent gases, such as during startups or shutdowns. The request for an initial performance test waiver and the particular sections of Subpart NNN for which OSI is requesting alternative monitoring are described below, along with the corresponding Subpart RRR requirements which OSI proposes to use.

Subpart NNN at 40 CFR Section 60.664(c) waives the initial performance test requirement when a boiler or process heater with a design heat input capacity of 150 million Btu/hr or greater is used to comply with 40 CFR Section 60.662(a). The corresponding section under Subpart RRR, 40 CFR Section 60.704(b)(5), waives the requirement for an initial performance test under the same conditions provided under Subpart NNN and also waives the requirement for an initial performance test when a vent stream is introduced into a boiler or process heater with the primary fuel. OSI has requested that the waiver of the initial performance test provided in Subpart RRR be allowed for Subpart NNN affected facilities whose vent streams are introduced with the primary fuel into the process heaters.

Subpart NNN at 40 CFR Section 60.663(c)(2) requires a temperature monitoring device in the firebox equipped with a continuous recorder if the vent stream is combusted in a boiler or process heater with a design heat input capacity of less than 150 million Btu/hr. The corresponding section under Subpart RRR in 40 CFR Section 60.703(c)(2) does not require a temperature monitoring device if the vent stream is introduced with the primary fuel into a boiler or process heater. OSI has requested that no temperature monitoring device be required for their Subpart NNN affected facilities whose vent streams are introduced with the primary fuel, since none is required under Subpart RRR.

For affected facilities that comply with 40 CFR Section 60.662(a) by using a boiler or process heater, Subpart NNN at 40 CFR Section 60.663(c)(1) requires the installation of a flow indicator that provides a record of vent stream flow to the boiler or process heater at least once every hour. The corresponding section under Subpart RRR, 40 CFR Section 60.703(c)(1), requires a flow indicator only on any bypass line that may divert the vent stream from the boiler or process heater. The bypass line flow indicator is required to provide a record of vent stream flow at least once every 15 minutes for each affected facility. This section of Subpart RRR also indicates that no flow indicator is required if the bypass line is secured in the closed position with a car-seal or lock-and-key type configuration. OSI has proposed to use the requirement of 40 CFR Section 60.703(c)(1) in Subpart RRR as alternative monitoring for 40 CFR Section 60.663(c)(1) of Subpart NNN.

During normal operations, process vent gases will be directed to the furnaces or the flare for control prior to release to the atmosphere. However, when evacuating air from the system during startup and before any feed is introduced to the furnaces or distillation column, vent gases will be directed to a scrubber. To ensure the process vent gases are not directed to the scrubber during normal operations, OSI proposes to use continuous valve position monitoring using a control system, rather than using a car-seal or lock-and-key type configuration with manual recordkeeping as allowed by Subpart RRR. The control system will not allow the process vent gas valve to the scrubber to open if the process feed

valves to the furnaces or distillation column are open. Position indicators on valves will show if each valve is open or closed and valve positions will be continuously monitored (at least once every 15 minutes) and recorded by the control system. The OSI proposal is to ensure process vent gases do not bypass the control devices before reaching the atmosphere, satisfying the intent of 40 CFR Sections 60.663(c)(1) and 60.703(c)(1).

The rationale for determining that performance testing and temperature monitoring for boilers and process heaters combusting vent streams with primary fuel were not warranted under NSPS Subpart RRR is presented in the Federal Register preamble for the standard (58 FR 45957; August 31, 1993). Based on the performance of boilers and process heaters, the preamble indicates that it is believed that they would already be achieving the performance levels required by the standard, and no performance testing and temperature monitoring are necessary to ensure compliance. The preamble to Subpart RRR also discusses the flow monitoring requirements for vent streams used as primary fuel in boilers and process heaters and indicates that the use of flow indicators was being altered (from that required under Subpart NNN) to indicate those times when the vent stream is being diverted to the atmosphere. The flow monitoring requirements under Subpart RRR were considered to be more appropriate than those under Subpart NNN for meeting the intent of flow monitoring requirements.

Pursuant to 40 CFR Section 60.8(b)(4), we are approving OSI's request for a waiver of the requirement for an initial performance test for vent streams introduced into the process heaters with the primary fuel. Pursuant to 40 CFR Section 60.13(i), we are approving the provisions of NSPS Subpart RRR at 40 CFR Section 60.703(c)(1) and (c)(2) as alternative monitoring for the provisions of NSPS Subpart NNN at 40 CFR Section 60.663(c)(1) and (c)(2). OSI must comply with the Subpart RRR record keeping and reporting requirements at 40 CFR Section 60.705(d)(1), (d)(2), (I)(2), and (I)(7). We are also approving the OSI proposal to use continuous valve position monitoring to ensure the process vent gases do not bypass the control devices.

If you have any questions concerning the determination provided in this letter, please contact Keith Goff of the EPA Region 4 staff at (404) 562-9137.

Sincerely,

Beverly H. Banister

Director

Air, Pesticides and Toxics

Management Division

cc: T.D. Hayes
BAE Systems Ordnance Systems

Amy Crawford
BAE Systems Ordnance Systems, Inc.

ATTACHMENT 16

**INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND
PROCESS HEATERS NESHAP (40 CFR 63 SUBPART DDDDD)
SPECIFIC APPLICABILITY DETERMINATIONS FOR KETENE
FURNACES (37-0028-112)**

Identification	Category	Rule Citation from 40 CFR 63
Emission Limitations and Work Practice Standards		
Ketene Furnaces: R-410, R-420, R-430, R-440	Conduct tune-up every 5 years for process heaters in the units designed to burn gas I fuels subcategory with a heat input capacity of less than or equal to 5 million Btu per hour.	7500(e)
Testing, Fuel Analysis, and Initial Compliance Requirements		
Ketene Furnaces: R-410, R-420, R-430, R-440	Demonstrate initial compliance with applicable work practice standards within 5 years of startup of the process heater. Complete tune-ups every 5 years.	7510(g), 7495(a), 7540(a)(12)
Ketene Furnaces: R-410, R-420, R-430, R-440	Conduct 5-year performance tune-up according to §63.7540(a)(12). First tune-up must be conducted no later than 61 months after the initial startup. Subsequent tune-ups must be conducted no later than 61 months after the previous tune-up.	7515(d)
Ketene Furnaces: R-410, R-420, R-430, R-440	Fuel specification analyses are not required for natural gas.*	7521(f)(1)
Ketene Furnaces: R-410, R-420, R-430, R-440	Fuel specification analyses are not required for gaseous fuels that are subject to part 60.*	7521(f)(2)
Continuous Compliance Requirements		
Ketene Furnaces: R-410, R-420, R-430, R-440	Conduct tune-up of process heater every 5 years as specified in paragraphs §7540(a)(10)(i) through (vi) for units with a heat input capacity of less than or equal to 5 million Btu per hour and the unit is in the units designed to burn gas I.	7540(a)(10)(i) through (vi), 7540(a)(12)
Ketene Furnaces: R-410, R-420, R-430, R-440	If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.	7540(a)(13)
Ketene Furnaces: R-410, R-420, R-430, R-440	Report each instance the work practice standards were not met.	7540(b)
Notification, Reports, and Records		
Ketene Furnaces: R-410, R-420, R-430, R-440	Submit initial startup notification within 15 days of startup.	7545(a), 63.9(b)
Ketene Furnaces: R-410, R-420, R-430, R-440	Submit 5-year compliance report with required information using CEDRI or as otherwise specified.	7550(b), 7550(c), 7550(c)(1), 7550(c)(5)(i) through (iv) and (xiv), 7550(h)(3)
Ketene Furnaces: R-410, R-420, R-430, R-440	Maintain copies of each notification and report submitted to comply with this subpart and any supporting information.	7555(a)
Ketene Furnaces: R-410, R-420, R-430, R-440	Maintain startup and shutdown records.	7555(i)
Ketene Furnaces: R-410, R-420, R-430, R-440	Maintain records of the type and amount of fuel using during each startup and shutdown.	7555(j)

* The ketene furnaces are designed to burn natural gas or a mixture of natural gas and the process off-gas which is subject to 40 CFR 60 Subparts NNN and RRR.

These requirements are applicable after the compliance date stipulated by the rule but can be used to demonstrate compliance with case-by-case Boiler MACT requirements (112 (j)) if required and implemented by the State.

ATTACHMENT 17

**INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND
PROCESS HEATERS NESHAP (40 CFR 63 SUBPART DDDDD)
SPECIFIC APPLICABILITY DETERMINATIONS FOR MIURA BOILERS
(37-0028-113)**

Identification	Category	Rule Citation from 40 CFR 63
Emission Limitations and Work Practice Standards		
Miura Boilers	Conduct annual tune-up for boilers in the units designed to burn gas fuels subcategory with a heat input capacity of 10 million Btu per hour or greater.	7500(a)(1)
Testing, Fuel Analysis, and Initial Compliance Requirements		
Miura Boilers	Demonstrate initial compliance with applicable work practice standards within 1 year of startup of boilers. Complete tune-ups every year.	7510(g), 7495(a), 7540(a)(12)
Miura Boilers	Conduct annual performance tune-up according to §63.7540(a)(10). First tune-up must be conducted no later than 13 months after the initial startup. Subsequent tune-ups must be conducted no later than 13 months after the previous tune-up.	7515(d)
Miura Boilers	Fuel specification analyses are not required for natural gas.	7521(i)(1)
Continuous Compliance Requirements		
Miura Boilers	Conduct annual tune-up of boiler as specified in paragraphs §63.7540(a)(10)(i) through (vi) for units with a heat input capacity of 10 million Btu per hour or greater.	7540(a)(10)
Miura Boilers	If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.	7540(a)(13)
Miura Boilers	Report each instance the work practice standards were not met.	7540(b)
Notification, Reports, and Records		
Miura Boilers	Submit initial startup notification within 15 days of startup.	7545(a), 63.9(b)
Miura Boilers	Submit annual compliance report with required information using CEDRI or as otherwise specified.	7550(b), 7550(c), 7550(c)(1), 7550(c)(5)(i) through (iv) and (xiv), 7550(h)(3)
Miura Boilers	Maintain copies of each notification and report submitted to comply with this subpart and any supporting information.	7555(a)
Miura Boilers	Maintain startup and shutdown records.	7555(i)
	Maintain records of the type and amount of fuel using during each startup and shutdown.	7555(j)

ATTACHMENT 18

INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS NESHAP (40 CFR 63 SUBPART DDDDD) SPECIFIC APPLICABILITY DETERMINATIONS FOR CHP (37-0028-113)

Identification	Category	Rule Citation from 40 CFR 63
Emission Limitations and Work Practice Standards		
CHP	Conduct annual tune-up for boilers in the units designed to burn gas 1 fuels subcategory with a heat input capacity of 10 million Btu per hour or greater.	7500(a)(1)
Testing, Fuel Analysis, and Initial Compliance Requirements		
CHP	Demonstrate initial compliance with applicable work practice standards within 1 year of startup of boilers. Complete tune-ups every year.	7510(g), 7495(a), 7540(a)(12)
CHP	Conduct annual performance tune-up according to §63.7540(a)(10). First tune-up must be conducted no later than 13 months after the initial startup. Subsequent tune-ups must be conducted no later than 13 months after the previous tune-up.	7515(d)
CHP	Fuel specification analyses are not required for natural gas.	7521(f)(1)
Continuous Compliance Requirements		
CHP	Conduct annual tune-up of boiler as specified in paragraphs §63.7540(a)(10)(i) through (vi) for units with a heat input capacity of 10 million Btu per hour or greater.	7540(a)(10)
CHP	If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.	7540(a)(13)
CHP	Report each instance the work practice standards were not met.	7540(b)
Notification, Reports, and Records		
CHP	Submit initial startup notification within 15 days of startup.	7545(a), 63.9(b)
CHP	Submit annual compliance report with required information using CEDRI or as otherwise specified.	7550(b), 7550(c), 7550(c)(1), 7550(c)(5)(i) through (iv) and (xiv), 7550(h)(3)
CHP	Maintain copies of each notification and report submitted to comply with this subpart and any supporting information.	7555(a)
CHP	Maintain startup and shutdown records.	7555(i)
	Maintain records of the type and amount of fuel using during each startup and shutdown	7555(j)

ATTACHMENT 19

**40 CFR 60 SUBPART Dc SPECIFIC APPLICABILITY DETERMINATIONS
FOR MIURA BOILERS (37-0028-113)**

40 CFR Part 60 Subpart Dc

Identification	Category	Rule Citation from 40 CFR Part 60
Applicability and delegation of authority.		
Miura Boilers	Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).	60.40c(a)
Testing, Fuel Analysis, and Initial Compliance Requirements		
Miura Boilers	No requirements based on natural gas fuel only	60.42c, 60.43c, 60.44c, 60.45c, 60.46c, and 60.47c
Reporting and recordkeeping requirements.		
Miura Boilers	The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include: (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.	60.48c(a)
Miura Boilers	As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO ₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.	60.48c(g)(2)
Miura Boilers	The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.	60.48c(j)

ATTACHMENT 20

**40 CFR 60 SUBPART KKKK SPECIFIC APPLICABILITY
DETERMINATIONS FOR CHP (37-0028-113)**

40 CFR Part 60 Subpart KKKK for Combined Heat and Power (CHP) combustion turbine and heat recovery steam generator (HRSG)

Requirement	Rule Citation from 40 CFR Part 60
Does this subpart apply to my stationary combustion turbine?	
If you are the owner or operator of a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005, your turbine is subject to this subpart. Only heat input to the combustion turbine should be included when determining whether or not this subpart is applicable to your turbine. Any additional heat input to associated heat recovery steam generators (HRSG) or duct burners should not be included when determining your peak heat input. However, this subpart does apply to emissions from any associated HRSG and duct burners.	60.4305(a)
Stationary combustion turbines regulated under this subpart are exempt from the requirements of subpart GG of this part. Heat recovery steam generators and duct burners regulated under this subpart are exempted from the requirements of subparts Da, Db, and Dc of this part.	60.4305(b)
What pollutants are regulated by this subpart?	
The pollutants regulated by this subpart are nitrogen oxide (NOX) and sulfur dioxide (SO ₂).	60.4315
What emission limits must I meet for nitrogen oxides (NOX)?	
You must meet the emission limits for NOX specified in Table 1 to this subpart.	60.4320(a)
What emission limits must I meet for sulfur dioxide (SO₂)?	
If your turbine is located in a continental area, you must comply with either paragraph (a)(1), (a)(2), or (a)(3) of this section.	60.4333(a)
You must not burn in the subject stationary combustion turbine any fuel which contains total potential sulfur emissions in excess of 26 ng SO ₂ /J (0.060 lb SO ₂ /MMBtu) heat input. If your turbine simultaneously fires multiple fuels, each fuel must meet this requirement, or	60.4333(a)(2)
What are my general requirements for complying with this subpart?	
You must operate and maintain your stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.	60.4333(a)
How do I demonstrate continuous compliance for NOX if I do not use water or steam injection?	
If you are not using water or steam injection to control NOX emissions, you must perform annual performance tests in accordance with §60.4400 to demonstrate continuous compliance. If the NOX emission result from the performance test is less than or equal to 75 percent of the NOX emission limit for the turbine, you may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NOX emission limit for the turbine, you must resume annual performance tests.	60.4340(a)
If the 60.4340(a) option is selected the following section 60.4400 may apply.	
As an alternative, you may install, calibrate, maintain and operate one of the following continuous monitoring systems: (1) Continuous emission monitoring as described in §§60.4335(b) and 60.4345, or (2) Continuous parameter monitoring as follows: . . .	60.4340(b)
If 60.4340(b) options are selected the following sections may apply: 60.4345, 60.4350, 60.4355, 60.4380, 60.4405, and 60.4410.	
How can I be exempted from monitoring the total sulfur content of the fuel?	
You may elect not to monitor the total sulfur content of the fuel combusted in the turbine, if the fuel is demonstrated not to exceed potential sulfur emissions of 26 ng SO ₂ /J (0.060 lb SO ₂ /MMBtu) heat input for units located in continental . . . You must use one of the following sources of information to make the required demonstration:	60.4365
The fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum . . . total sulfur content for natural gas use in continental areas is 20 grains of sulfur . . . has potential sulfur emissions of less than less than 26 ng SO ₂ /J (0.060 lb SO ₂ /MMBtu) heat input for continental areas . . . or	60.4365(a)
Representative fuel sampling data which show that the sulfur content of the fuel does not exceed 26 ng SO ₂ /J (0.060 lb SO ₂ /MMBtu) heat input for continental areas . . . At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required.	60.4365(b)
How often must I determine the sulfur content of the fuel?	
The frequency of determining the sulfur content of the fuel must be as follows:	60.4370
Gaseous fuel. If you elect not to demonstrate sulfur content using options in §60.4365, and the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel must be determined and recorded once per unit operating day.	60.4370(b)
What reports must I submit?	
For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this subpart, you must submit reports of excess emissions and monitor downtime, in accordance with §60.7(c). Excess emissions must be reported for all periods of unit operation, including start-up, shutdown, and malfunction.	60.4375(a)
For each affected unit that performs annual performance tests in accordance with §60.4340(a), you must submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test.	60.4375(b)
When must I submit my reports?	
All reports required under §60.7(c) must be postmarked by the 30th day following the end of each 6-month period	60.4395

ATTACHMENT 21

40 CFR 63 SUBPART YYYY

SPECIFIC APPLICABILITY DETERMINATIONS FOR CHP (37-0028-113)

Identification	Category	Rule Citation from 40 CFR 63
Emission Limitations and Work Practice Standards		
CHP	Stay of standards for gas-fired subcategories. If you start up a new or reconstructed stationary combustion turbine that is a lean premix gas-fired stationary combustion turbine or diffusion flame gas-fired stationary combustion turbine as defined by this subpart, you must comply with the Initial Notification requirements set forth in §63.6145 but need not comply with any other requirement of this subpart until EPA takes final action to require compliance and publishes a document in the Federal Register.	6095(d)
Notification, Reports, and Records		
CHP	As specified in §63.9(b), if you start up your new or reconstructed stationary combustion turbine on or after March 5, 2004, you must submit an Initial Notification not later than 120 calendar days after you become subject to this subpart.	6145(c)
CHP	If you are required to submit an Initial Notification but are otherwise not affected by the emission limitation requirements of this subpart, in accordance with §63.6090(b), your notification must include the information in §63.9(b)(2)(i) through (v) and a statement that your new or reconstructed stationary combustion turbine has no additional emission limitation requirements and must explain the basis of the exclusion (for example, that it operates exclusively as an emergency stationary combustion turbine).	6145(d)
What definitions apply to this subpart?		
CHP	Lean premix gas-fired stationary combustion turbine means: (1)(i) Each stationary combustion turbine which is equipped only to fire gas using lean premix technology, (ii) Each stationary combustion turbine which is equipped both to fire gas using lean premix technology and to fire oil, during any period when it is firing gas, and (iii) Each stationary combustion turbine which is equipped both to fire gas using lean premix technology and to fire oil, and is located at a major source where all new, reconstructed, and existing stationary combustion turbines fire oil no more than an aggregate total of 1000 hours during the calendar year.	6175

ATTACHMENT 22

**40 CFR 60 SPECIFIC APPLICABILITY DETERMINATIONS FOR
WEAK ACETIC ACID RECOVERY AND TANKS 16A AND 16B
(37-0028-115 AND 116)**

Identification	Category	Rule Citation from 40 CFR 60.
Subpart A – General Provisions		
Entire Source	Notification, monitoring, recordkeeping, and reporting.	7, 13, 19
Vents A and B	Performance tests.	8
	Opacity standards.	11
	Flare requirements.	18(b) through 18(f)
Subpart Kb – Storage Vessels		
	Storage Vessels storing a VOL having a maximum true vapor pressure less than 76.7 kPa and must meet standards.	112b(a)
Tanks T-16A and T-16B (Vent C)	Storage Vessels storing a VOL having a maximum true vapor pressure equal to or greater than 76.7 kPa and must meet standards.	112b(b)
	Storage Vessels that are not required to meet standards.	110b
Tanks T-16A and T-16B (Vent C)	Monitoring, recordkeeping, and reporting.	115b, 116b
Subpart VVa – Equipment Leaks		
Equipment "in VOC Service"	Work practice standards for pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, etc.	482-1a through 482-11a, 483-1a through 483-2a
Equipment "in acetic acid and/or acetic anhydride service"	Alternative monitoring for equipment in acetic acid and/or acetic anhydride service (letter from Carol Kemker, EPA Region 4, to Mr. Barry Stephens, TDEC, dated June 23, 2010).	N/A
VVa subject points as applicable	Monitoring, recordkeeping, and reporting.	486a, 487a
Subpart NNN – Distillation		
	TRE less than or equal to 1.0 (Reduce TOC by 98% or to 20 ppmv).	662(a)
	TRE less than or equal to 1.0 (Combust in a flare).	662(b)
	TRE greater than 1.0 but less than or equal to 8.0.	662(c)
Vent A	TRE greater than 8.0.	660(c)(4)
	Batch Operation Exemption.	660(c)(3)
Vent B	Low Flow Exemption.	660(c)(6)
	Design Capacity Exemption.	660(c)(5)
NNN subject points as applicable	Monitoring, recordkeeping, and reporting.	663, 665
Subpart RRR – Reactors		
	TRE less than or equal to 1.0 (Reduce TOC by 98% or to 20 ppmv).	702(a)
	TRE less than or equal to 1.0 (Combust in a flare).	702(b)
	TRE greater than 1.0 but less than or equal to 8.0.	702(c)
	TRE greater than 8.0.	700(c)(2)
	Batch Operation Exemption.	700(c)(1)
	Low Flow Exemption.	700(c)(4)
	Design Capacity Exemption.	700(c)(3)
	Low Concentration Exemption.	700(c)(8)
	Routed to distillation unit subject to subpart NNN except for a pressure relief valve.	700(c)(5)
	Monitoring, recordkeeping, and reporting.	703, 705

ATTACHMENT 23

**40 CFR 63 SUBPART FFFF
SPECIFIC APPLICABILITY DETERMINATIONS
ALL MCPUs CONTAINED IN 37-0028**

BAE SYSTEMS**Attachment 1**

Miscellaneous Organic NESHAP (MON) Requirements
40 CFR 63 Subpart FFFF
Specific Applicability Determinations
All MCPUs contained under Sources 37-0028, 37-1028, and 37-1029

Identification*	Category	Rule Citation from 40 CFR 63
Continuous Process Vents		
	Group 1 Continuous Process Vent and applicable monitoring	2455
	Continuous Process vent combined with Group 1 batch vent before control or recovery device	2455(b)(1)
	Existing Group 2 Process Vents with TRE >5	2455
	New Group 2 Process Vents with TRE >8	2455
	Existing Group 2 Continuous Process Vents with 1.9 < TRE ≤ 5.	2455(c)(1)
	New Group 2 Continuous Process Vents with 5 < TRE ≤ 8	2455(c)(1)
	Gaseous streams routed to a Fuel Gas System are not process vents and have no applicable requirements under 40 CFR 63 Subpart FFFF.	2550
Process Vents Emitting Hydrogen Halide or Halogen HAPs		
	Process with collective sum of hydrogen halide and hydrogen HAPs < 1,000 lb/year	2465(b), 1257(d)(2)(i)
	Process with collective sum of hydrogen halide and hydrogen HAPs ≥ 1,000 lb/year	2465(c), 994
	New process vents that emit HAP metals	2465(d)
Batch Process Vents		
	Group 1 process vents and applicable monitoring	2460
MCPUs as defined and updated in the Semiannual Compliance Reports	Group 2 process vents.	2460, 2525(e)
MCPUs as defined and updated in the Semiannual Compliance Reports	Process with non-reactive HAP usage < 10,000 lb/year	2460(b)(7)
	Halogenated Group 1 batch process vents for which a combustion device is used to control organic HAP emissions	2460
Vessels (Storage, Surge Control Vessels, and Bottoms Receivers)		
	Group 1 vessels storing a liquid for which the maximum true vapor pressure of organic HAPs ≥ 76.6 kPa (11.1 psi)	2470, 2450(r), 982
MCPUs as defined and updated in the Semiannual Compliance Reports	Group 1 vessels storing a liquid for which the maximum true vapor pressure of organic HAPs < 76.6 kPa (11.1 psi)	2470, 2450(r), Subpart WW
MCPUs as defined and updated in the Semiannual Compliance Reports	Group 2 vessels (Storage, Surge Control, and Bottoms Receivers)	2470, 2450(r)
	Halogenated Group 1 vessels for which a combustion device is used to control organic HAP emissions.	2470
Transfer Operations		
	Group 1 transfer racks and applicable monitoring and testing	2475
	Halogenated Group 1 transfer racks for which a combustion device is used to control organic HAP emissions	2475
Equipment Leaks		
Equipment in MON service	Equipment in OHAP service complying with 40 CFR 63 Subpart H.	2480(a)
	Equipment in OHAP service complying with 40 CFR 63 Subpart U.U.	2480(a)
	Equipment in OHAP service complying with 40 CFR 65 Subpart F.	2480(a)
Process Wastewater		
MCPUs as defined and updated in the Semiannual Compliance Reports	Group 1 wastewater stream	2485(c), (n), 132-148
MCPUs as defined and updated in the Semiannual Compliance Reports	Group 2 wastewater stream	2485
	Standards for waste management units managing Group 1 wastewater stream or residuals removed from Group 1 streams	2485(d)
	Liquid streams in open systems	2485(l), 149
Emissions averaging		
	Comply with the emissions averaging plan for selected emission points	2500, 150
Recordkeeping and Reporting		
MON subject points as applicable	Recordkeeping and reporting applicable MON emission points	2520, 2525

* MCPUs and their requirements as defined in the Notification of Compliance Status and as updated in the Semiannual Compliance Reports. Notification of new MCPUs will be included in the Semiannual Compliance Report for the period in which the new MCPU first operated.

ATTACHMENT 24

RESERVED

ATTACHMENT 25

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

37-0028-26 AND 27

**Compliance Assurance Monitoring (CAM) Plan
Title V Permit 558406, PES 37-0028-26 & 37-0028-27
Building G-10/G-10A NOx Scrubber**

Indicators	Caustic Recirculation Rate Caustic Recirculation Temperature
Measurement Approach	The caustic recirculation rate is measured with an Endress + Hauser Proline Promag 50 (electromagnetic flow measurement device). The caustic recirculation temperature is measured with an Endress + Hauser Pt100 Class B Resistance Temperature Detector (RTD).
Indicator Range	An excursion is defined as an hourly average of: <ul style="list-style-type: none"> • Caustic Recirculation Rate < 27 gpm • Caustic Recirculation Temperature > 105°F During a nitration. Excursions prompt an investigation, corrective action per Standard Operating Procedures, and a reporting requirement.
Performance Criteria	
Data Representativeness	The two devices are installed in the caustic recirculation line. <ul style="list-style-type: none"> • The minimum accuracy of the flow meter is $\pm 0.5\%$. • The minimum accuracy of the temperature measurement is $\pm 0.54^\circ\text{F}$.
Verification of Operational Status	The two instruments are in place and functioning.
Quality Assurance and Control Practices	The caustic recirculation flow meter will be calibrated once per calendar year. The caustic recirculation temperature will be calibrated once per calendar year.
Monitoring Frequency	Data from the two indicators will be recorded at least once every 15 minutes during a nitration.
Data Collection Procedures	Data from the two indicators will be collected by the process PLC (programmable logic controller).
Averaging Period	The data will be averaged for each nitration.

MONITORING APPROACH JUSTIFICATION

I. Background

The pollutant specific emissions unit (PSEU) consists of batch process equipment used in the nitration of various raw materials. The NOx generated during nitration is routed to a caustic scrubber.

The scrubber consists of a jet venturi fume scrubber and a packed bed tower mounted on top of a reservoir tank. The caustic solution in the reservoir is pumped through a cooler to the jet venturi and to a spray nozzle at the top of the packed bed. Part of the caustic solution is periodically dropped to a holding tank for subsequent disposal and fresh caustic is added back to the scrubber's reservoir. This removal and charging of caustic can be done while the process equipment is operating.

II. Rationale for Selection of Performance Indicators

The key operating parameters that impact the scrubber efficiency are the caustic recirculation flow rate to the packed tower and the caustic recirculation temperature. The scrubber was designed for a specific flow rate of caustic solution to remove the expected NO_x emissions coming to it from the process. This flow is needed to ensure proper distribution through the packed bed and to provide adequate contact between the caustic solution and process vapors, allowing NO to be converted to NO₂ and the NO₂ to be absorbed into the solution. The NO₂ will react with the caustic to form sodium nitrite and sodium nitrate. The cooler removes heat from the caustic solution which is added from the reaction with the NO_x vapors, the heat of mixing when fresh caustic is added, and from energy imparted to the solution by the circulation pump. Per the vendor, the caustic temperature is the most important parameter impacting scrubber efficiency.

III. Rationale for Selection of Indicator Ranges

A stack test of the Building G-10 NO_x scrubber was performed on May 22-23, 2013 while producing a batch of nitrotriazolone (NTO). Calculations by process experts have shown NTO to be the worst case for NO_x emissions among the products currently made at Building G-10. The caustic solution recirculation rate to the packed tower and the caustic recirculation temperature were recorded throughout the stack test. A review of the data and vendor recommendations were used to select the indicator limits.

ATTACHMENT 26

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

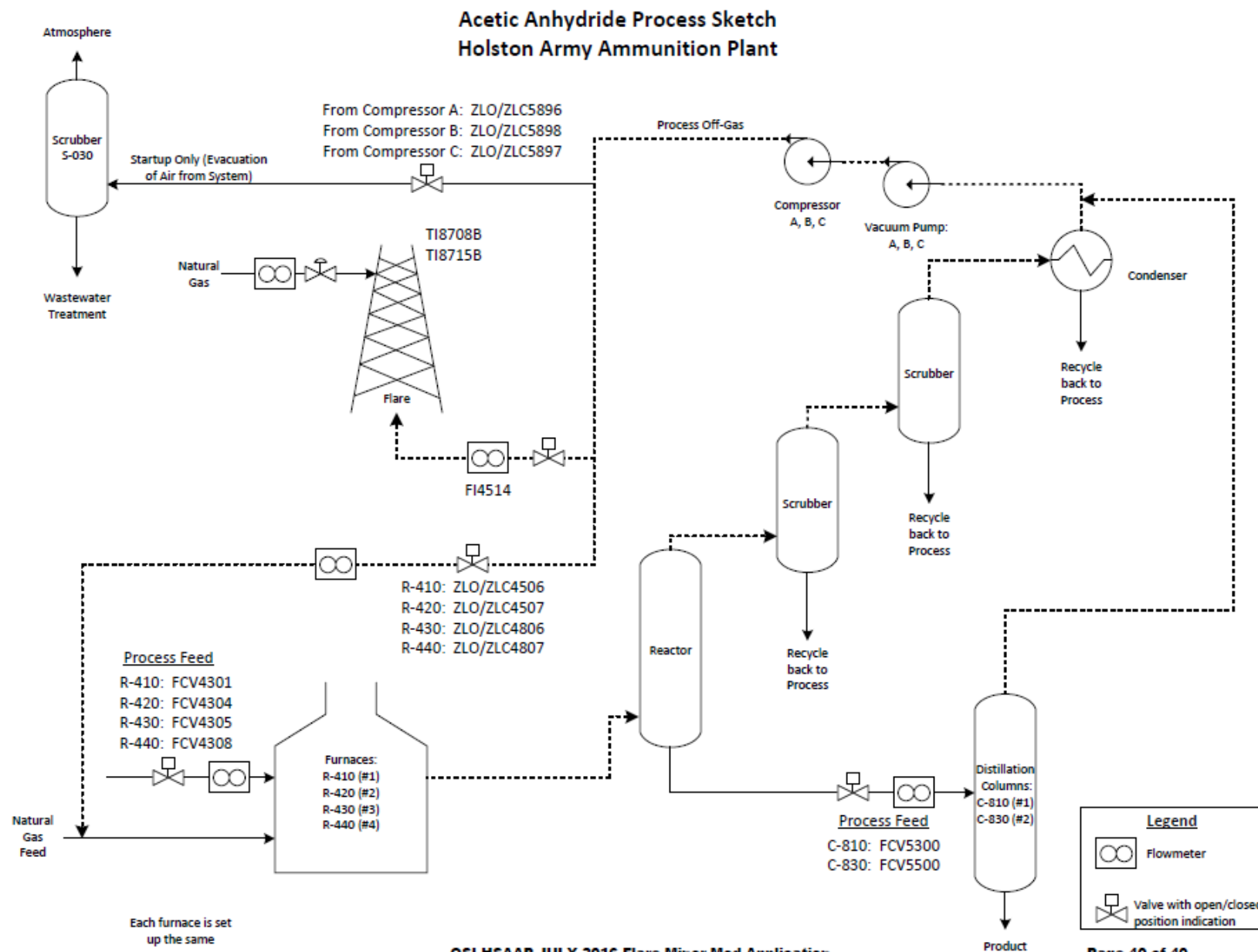
37-0028-112

Compliance Assurance Monitoring General Requirements:

Identification	Requirement	Rule Citation
Operation of Approved Monitoring		
	Commencement of monitoring upon permit issuance	§64.7(a)
	Commencement of monitoring by date specified in the permit pursuant to §64.6(d).	§64.7(a)
37-0028-112 (B-352 flare)	Proper maintenance	§64.7(b)
	Continued operation	§64.7(c)
	Response to excursions or exceedances	§64.7(d)
	Documentation of need for improved monitoring	§64.7(e)
Data Availability		
37-0028-112 (B-352 flare)	Minimum Data Availability	§64.6(c)(4)
Comply with TAPCR 1200-03-10-.04(2)(a)2 (95% data availability).		
Quality Improvement Plan (QIP)		
37-0028-112 (B-352 flare)	Requirement to submit QIP	§64.8(a)
	QIP elements	§64.8(b)
	Deadline for QIP development	§64.8(c)
	Reasonable changes to QIP	§64.8(d)
	QIP implementation	§64.8(e)
Comply with the provisions of §64.8 upon written notice from the Technical Secretary.		
Reporting and Recordkeeping Requirements		
37-0028-112 (B-352 flare)	Reporting requirements	§64.9(a)
	Recordkeeping requirements	§64.9(b)

**Compliance Assurance Monitoring (CAM) Plan – 40 CFR 64
37-0028-112 (B-352 flare)**

Indicators (§64.4(a)(1) and (2))	Process off-gas valve positions, interlock valve position, and flare pilot temperature
Indicator Range	See the attached sketch that shows the correct valve indicator positions when the furnaces are producing off-gas and/or the distillation system is operating. All valves are equipped with open and closed limit switches. An excursion is defined as any flare pilot temperature of less than 500°C, as indicated by at least 1 thermocouple, when the furnaces are producing off-gas and/or the distillation system is operating.
Performance Criteria: Data Representativeness	The limit switches are located on each valve and are adjusted to indicate if the valve is open or closed. The temperature indicators are located at the flare pilot burners. The minimum accuracy of the temperature measurement is $\pm 10^{\circ}\text{C}$.
Performance Criteria: Verification of Operational Status	The instruments are in place and functioning.
Performance Criteria: QA/QC Practices	Each valve is equipped with two limit switches, one that indicates the valve is open (not closed) and one that indicates the valve is closed (not open). A discrepancy in the position indicated by a given valve's limit switches will be investigated. An interlock, tested annually, ensures the off-gas path bypassing the furnaces or flare is closed when the furnace(s) and/or distillation system(s) is in operation. The flare pilot temperature indicators will be calibrated once per calendar year.
Performance Criteria: Monitoring Frequency	Valve positions are continuously monitored and recorded (at least once every 15 minutes) by the process computer. Data from the temperature indicators are continuously monitored and recorded (at least once every 15 minutes) when at least one furnace is operating and/or at least one distillation column system is operating.
Performance Criteria: Data Collection Procedures	Data from the limit switches and temperature indicators will be collected by the process PLC (programmable logic controller). This data will then be transferred to a network drive for archiving.
Data Review	Data is reviewed to verify the process off-gas was routed to the flare and/or furnaces, to verify the flare pilot temperature indicated the presence of flame, and to verify the data collection was continuous while a furnace and/or distillation system was in operation. Note: furnace in operation = acetic acid is fed to the furnace distillation system in operation = acetic anhydride fed to distillation column



ATTACHMENT 27

**SPECIFIC APPLICABILITY DETERMINATIONS
FOR 40 CFR 60 (NSPS) AND 40 CFR 63 (MACT) TO 37-0028-112**

General Provisions Applicability for 40 CFR 60 Subparts VVa, NNN, and RRR (TAPCR 1200-03-09-.03(8))			
Rule Citation	Subject	Applies to subpart	Explanation
§60.1	General applicability of the General Provisions	Yes	
§60.2	Definitions	Yes	
§60.3	Units and abbreviations	Yes	
§60.4	Address	Yes	
§60.5	Determination of construction or modification	Yes	
§60.6	Review of plans	Yes	
§60.9	Availability of information	Yes	
§60.10	State Authority	Yes	
§60.11	Compliance with standards and maintenance requirements	Yes	
§60.12	Circumvention	Yes	
§60.13	Monitoring requirements	Yes	See below for specific compliance alternatives
§60.14	Modification	Yes	
§60.15	Reconstruction	Yes	
§60.16	Priority list	Yes	
§60.17	Incorporations by reference	Yes	
§60.18	General control device requirements	Yes	
§60.19	General notification and reporting requirements	Yes	

General Provisions Applicability for 40 CFR 60 Subpart VVa (TAPCR 1200-03-09-.03(8))			
Rule Citation	Subject	Applies to subpart	Explanation
§60.8	Performance tests	No	§60.8(d) does not apply to Subpart VVa except that an owner or operator must notify the Administrator of the schedule for the initial performance tests at least 30 days before the initial performance tests.

General Provisions Applicability for 40 CFR 60 Subparts NNN and RRR (TAPCR 1200-03-09-.03(8))			
Rule Citation	Subject	Applies to subpart	Explanation
§60.7	Notification and Recordkeeping	No	Does not apply to Subparts NNN or RRR.

40 CFR 60 Subpart VVa Specific Applicability Provisions for 37-0028-112 (TAPCR 1200-03-09-.03(8))	
Rule Citation	Compliance Requirement
§60.482-1a	Equipment not in acetic acid and/or acetic anhydride service: Demonstrate compliance with the requirements of §§60.482-1a through 60.482-10a or §60.480a(e) for all equipment within 180 days of initial startup.
§60.13(i)	Equipment in acetic acid and/or acetic anhydride service: comply with the alternative monitoring plan for this source as approved by EPA on June 13, 2010 (Attachments 12 and 13 of Title V Operating Permit 568188).

40 CFR 60 Subparts NNN and RRR: Specific Applicability Provisions for 37-0028-112 (TAPCR 1200-03-09-.03(8))	
Rule Citation	Compliance Requirement
§§60.660(c)(4), 60.660(c)(6)*	Exemptions from Subpart NNN are as follows: (a) Each affected facility that has TRE index value greater than 8.0 is exempt from all provisions of Subpart NNN except for §§60.62; 60.664 (d), (e), and (f); and 60.665 (h) and (l). (b) Each affected facility operated with a vent stream flow rate less than 0.008 scm/min is exempt from all provisions of Subpart NNN except for the test method and procedure and the recordkeeping and reporting requirements in §60.664(g) and §§60.665(i), (l)(5), and (o).
§60.662, §60.702*	(a) Reduce emissions of TOC (less methane and ethane) by 98% by or to a TOC (less methane and ethane) concentration of 20 ppmv, on a dry basis corrected to 3% oxygen, whichever is less stringent. If a boiler or process heater is used to comply with this paragraph, then the vent stream shall be introduced into the flame zone of the boiler or process heater; or (b) Combust the emissions in a flare that meets the requirements of §60.18.
§§60.18(c)(1) and 60.18(f)(1)	The flare shall be designed for and operated with no visible emissions as determined by Reference Method 22 except for periods not to exceed a total of five minutes during any two consecutive hours. Method 22 of Appendix A to 40 CFR Part 60** shall be used to determine the compliance of flares with the visible emission provisions.
§§60.18(c)(2) and 60.18(f)(2)	The flare must be operated with a flame present at all times. The presence of a flare pilot flame when the source is in operation shall be monitored using a thermocouple or other equivalent device.
§60.18(d)	Owners or operators of flares shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs.
§60.18(e)	Flares shall be operated at all times when emissions may be vented to them.
§60.13(i)	Comply with the alternative monitoring plan for this source as approved by EPA on December 7, 2012 (Attachments 14 and 15 of this permit) when process gas vent streams are routed to the ketene furnaces.
<p>* The azeotropic column systems (ID #H-113), solvent still system (ID #H-214), and acetic acid sludge recovery system (ID #H-275) met the low flow exemption (tests conducted December 10-11, 2014). These vents and the new flash column condenser must be retested in accordance with §60.8(a) following start-up of the modified source.</p> <p>The acetic anhydride refining stills and acetic anhydride reactor systems are controlled by the flare or by combusting the gas with the natural gas in the furnaces. The source may comply using either a boiler (§60.702(a)) or a flare (§60.702(b)). The construction permit application for permit 977993 and the original issuance of construction permit #963968P address the notification requirement found in §60.705(a) for using an alternate provision of §60.702.</p> <p>** A visible emissions performance test was conducted for the flare on September 15, 2016.</p>	

General Provisions Applicability for 40 CFR 63 Subpart DDDDD (TAPCR 1200-03-09-.03(8))		
Rule Citation	Subject	Applies to Subpart
§63.1	Applicability	Yes.
§63.2	Definitions	Yes. Additional terms defined in §63.7575
§63.3	Units and Abbreviations	Yes.
§63.4	Prohibited Activities and Circumvention	Yes.
§63.5	Preconstruction Review and Notification Requirements	Yes.
§63.6(a), (b)(1)-(b)(5), (b)(7), (c)	Compliance with Standards and Maintenance Requirements	Yes.
§63.6(e)(1)(i)	General duty to minimize emissions.	No. See §63.7500(a)(3) for the general duty requirement.
§63.6(e)(1)(ii)	Requirement to correct malfunctions as soon as practicable.	No.
§63.6(e)(3)	Startup, shutdown, and malfunction plan requirements.	No.
§63.6(f)(1)	Startup, shutdown, and malfunction exemptions for compliance with non-opacity emission standards.	No.
§63.6(f)(2) and (3)	Compliance with non-opacity emission standards.	Yes.
§63.6(g)	Use of alternative standards	Yes, except §63.7555(d)(13) specifies the procedure for application and approval of an alternative timeframe with the PM controls requirement in the startup work practice.
§63.6(h)(1)	Startup, shutdown, and malfunction exemptions to opacity standards.	No. See §63.7500(a).
§63.6(h)(2) to (h)(9)	Determining compliance with opacity emission standards	No. Subpart DDDDD specifies opacity as an operating limit not an emission standard.
§63.6(i)	Extension of compliance	Yes. Note: Facilities may also request extensions of compliance for the installation of combined heat and power, waste heat recovery, or gas pipeline or fuel feeding infrastructure as a means of complying with this subpart.
§63.6(j)	Presidential exemption.	Yes.
§63.7(a), (b), (c), and (d)	Performance Testing Requirements	Yes.
§63.7(e)(1)	Conditions for conducting performance tests	No. Subpart DDDDD specifies conditions for conducting performance tests at §63.7520(a) to (c).
§63.7(e)(2)-(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.
§63.8(a) and (b)	Applicability and Conduct of Monitoring	Yes.
§63.8(c)(1)	Operation and maintenance of CMS	Yes.
§63.8(c)(1)(i)	General duty to minimize emissions and CMS operation	No. See §63.7500(a)(3).
§63.8(c)(1)(ii)	Operation and maintenance of CMS	Yes.
§63.8(c)(1)(iii)	Startup, shutdown, and malfunction plans for CMS	No.
§63.8(c)(2) to (c)(9)	Operation and maintenance of CMS	Yes.

General Provisions Applicability for 40 CFR 63 Subpart DDDDD (TAPCR 1200-03-09-.03(8))		
Rule Citation	Subject	Applies to Subpart
§63.8(d)(1) and (2)	Monitoring Requirements, Quality Control Program	Yes.
§63.8(d)(3)	Written procedures for CMS	Yes, except for the last sentence, which refers to a startup, shutdown, and malfunction plan. Startup, shutdown, and malfunction plans are not required.
§63.8(e)	Performance evaluation of a CMS	Yes.
§63.8(f)	Use of an alternative monitoring method.	Yes.
§63.8(g)	Reduction of monitoring data	Yes.
§63.9	Notification Requirements	Yes.
§63.10(a), (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	Yes.
§63.10(b)(2)(ii)	Recordkeeping of malfunctions	No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.
§63.10(b)(2)(iii)	Maintenance records	Yes.
§63.10(b)(2)(iv) and (v)	Actions taken to minimize emissions during startup, shutdown, or malfunction	No.
§63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§63.10(b)(3)	Recordkeeping requirements for applicability determinations	No.
§63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(10) and (11)	Recording nature and cause of malfunctions, and corrective actions	No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.
§63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(15)	Use of startup, shutdown, and malfunction plan	No.
§63.10(d)(1) and (2)	General reporting requirements	Yes.
§63.10(d)(3)	Reporting opacity or visible emission observation results	No.
§63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No. See §63.7550(c)(5)(xiii) for malfunction reporting requirements.
§63.10(e)	Additional reporting requirements for sources with CMS	Yes.
§63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§63.11	Control Device Requirements	No.
§63.12	State Authority and Delegation	Yes

General Provisions Applicability for 40 CFR 63 Subpart DDDDD (TAPCR 1200-03-09-.03(8))		
Rule Citation	Subject	Applies to Subpart
§63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes
§63.1(a)(5),(a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9).	Reserved	No
Source: §63.7565 and Table 10 to Subpart DDDDD		

40 CFR 63 Subpart DDDDD: Specific Applicability Provisions for 37-0028-112 (TAPCR 1200-03-09-.03(8))		
Identification	Category	Rule Citation
Emission Limitations and Work Practice Standards		
Ketene Furnaces: R-410, R-420, R-430, R-440	Conduct tune-ups every five years for process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity of ≤ 5 MMBtu/hr.	§63.7500(e)
Testing, Fuel Analysis, and Initial Compliance Requirements		
Ketene Furnaces: R-410, R-420, R-430, R-440	Demonstrate initial compliance with applicable work practice standards within five years of startup of the process heater. Conduct tune-ups every five years.	§63.7510(g), §63.7495(a), §63.7540(a)(12)
	Conduct five-year performance tune-ups according to §63.7540(a)(12). The first tune-up must be conducted no later than 61 months after the initial startup. Subsequent tune-ups must be conducted no later than 61 months after the previous tune-up.	§63.7515(d)
	Fuel specification analyses are not required for natural gas.*	§63.7521(f)(1)
	Fuel specification analyses are not required for gaseous fuels that are subject to Part 60.*	§63.7521(f)(2)
Continuous Compliance Requirements		
Ketene Furnaces: R-410, R-420, R-430, R-440	Conduct five-year performance tune-ups according to §63.7540(a)(10)(i) through (vi) for units with a heat input capacity of ≤ 5 MMBtu/hr and the unit is in the units designed to burn gas 1 subcategory.	§§63.7540(a)(10) and (12)
	If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.	§63.7540(a)(13)
	Report each instance the work practice standards are not met.	§63.7540(b)
Notifications, Reports, and Records		
Ketene Furnaces: R-410, R-420, R-430, R-440	Submit initial startup notification within 15 days of startup.	§63.7545(a), §63.9(b)
	Submit five-year compliance report with required information using CEDRI or as otherwise specified.	§§63.7550(b), (c)(1), (c)(5)(i) through (iv) and (xiv), §63.7550(h)(3)
	Maintain copies of each notification and report submitted to comply with this subpart and any supporting information.	§63.7555(a)
	Maintain startup and shutdown records.	§63.7555(d)(9)
	Maintain records of the type and amount of fuel used during each startup and shutdown.	§63.7555(d)(10)

* The ketene furnaces are designed to burn natural gas or a mixture of natural gas and the process off-gas, which is subject to 40 CFR 60 Subparts NNN and RRR.

ATTACHMENT 28

SPECIFIC APPLICABILITY DETERMINATIONS FOR 40 CFR 60 (NSPS) AND 40 CFR 63 (MACT) TO 37-0028-117

40 CFR Part 60 Subpart III – Specific Applicability Determinations for 370028-117 Unit ID #1040, 576, 574, 1017, and 1080	
Requirement	Rule Citation(s)
The provisions of this subpart are applicable to owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines.	§60.4200(a)(2)
The provisions of §60.4208 (deadline for importing or installing stationary CI ICE produced in previous model years) are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005.	§60.4200(a)(4)
Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE.	§60.4205(b)
Owners and operators of emergency stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests in-use must meet the NTE standards as indicated in §60.4212.	§60.4205(e)
Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine.	§60.4206
Beginning October 1, 2010, owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR §80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased.	§60.4207(b)
If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.	§60.4209(a)
If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under §60.4211(g): (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; (2) Change only those emission-related settings that are permitted by the manufacturer; and (3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.	§60.4211(a)
If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in § 60.4205(b), you must comply by purchasing an engine certified to the emission standards in §60.4205(b) for the same model year and engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g).	§60.4211(c)
Operate emergency stationary ICE according to the requirements in §§60.4211(f)(1) through (3). In order for the engine to be considered an emergency stationary ICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If you do not operate the engine according to the requirements in §§60.4211 (f)(1) through (3), the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines.	§60.4211(f)
If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance in accordance with §60.4211(g).	§60.4211(g)
If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in Table 5 to Subpart IIII, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.	§60.4214(b)
Table 8 to Subpart IIII shows which parts of the General Provisions (40 CFR 60 Subpart A) apply.	§60.4218
Definitions: all terms not defined herein shall have the meaning given them in the CAA and in 40 CFR 60 Subpart A.	§60.4219

40 CFR Part 60 Subpart JJJJ – Specific Applicability Determinations for 37-0028-117 Generac propane generator, Model #0055231, Serial # 5805229, 17 kW	
Requirement	Rule Citation
<p>The provisions of Subpart JJJJ are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §§60.4230(a)(1) through (6). For the purposes of Subpart JJJJ, the date that construction commences is the date the engine is ordered by the owner or operator.</p> <ul style="list-style-type: none"> • <i>Manufacturers</i> of stationary SI ICE with a maximum engine power <i>less than or equal to</i> 19 kW (25 hp) that are manufactured on or after July 1, 2008 (§60.4230(a)(1)). • <i>Owners and operators</i> of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured... on or after January 1, 2009, for emergency engines with a maximum engine power <i>greater than</i> 19 kW (§60.4230(a)(4)(iv)). <p>The listed engine is an affected facility subject to Subpart JJJJ pursuant to §60.4230(a)(1) based on the manufacture date of the engine. Since the maximum engine power is less than 19 kW, Subpart JJJJ establishes no requirements for the owner/operator of the engine.</p>	§60.4230(a)

40 CFR Part 60 Subpart ZZZZ – Specific Applicability Determinations for 37-0028-117 Unit ID #1040, 576, 574, 1017, 1080 Generac propane generator, Model #0055231, Serial # 5805229, 17 kW	
Requirement	Rule Citation
A stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002. A stationary RICE with a site rating of equal to or less than 500 brake hp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.	§63.6590(a)(2)
<p>An affected source that meets any of the following criteria must meet the requirements of this part by meeting the requirements of 40 CFR 60 Subpart IIII for compression ignition engines or 40 CFR 60 Subpart JJJJ for spark ignition engines. No further requirements apply for such engines under this part.</p> <ul style="list-style-type: none"> • A new or reconstructed emergency stationary RICE with a site rating of less than or equal to 500 brake hp located at a major source of HAP emissions; • A new or reconstructed compression ignition stationary RICE with a site rating of less than or equal to 500 brake hp located at a major source of HAP emissions. 	§63.6590(c)

40 CFR Part 60 Subpart ZZZZ – Specific Applicability Determinations for 37-0028-117 Unit #574	
Requirement	Rule Citation
A stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.	§63.6590(a)(2)
<p>An affected source which meets either of the criteria in §§63.6590(b)(1)(i) through (ii) does not have to meet the requirements of Subpart ZZZZ and of Subpart A of this part except for the initial notification requirements of §63.6645(f).</p> <ul style="list-style-type: none"> • The stationary RICE is a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii). 	§63.6590(b)(1)(i), §63.6645(f)
If you own or operate any of the following stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, you do not need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d of Subpart ZZZZ or the operating limitations in Tables 1b and 2b of Subpart ZZZZ... an emergency stationary RICE.	§63.6600(c)

40 CFR Part 60 Subpart ZZZZ – Specific Applicability Determinations for 37-0028-117 Unit ID #573, 1058, 911, and 913	
Requirement	Rule Citation
For stationary RICE with a site rating of less than or equal to 500 brake hp located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.	§63.6590(a)(1)
<p>If you own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake hp located at a major source of HAP emissions, comply with the applicable emission limitations and other requirements in Table 2c of Subpart ZZZZ. For each emergency stationary CI RICE¹:</p> <ul style="list-style-type: none"> • Change oil and filter every 500 hours of operation or annually, whichever comes first². • Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; • Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary³. • Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply³. <p>¹If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of this subpart, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.</p> <p>²Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2c of this subpart.</p> <p>³Sources can petition the Administrator pursuant to the requirements of §63.6(g) for alternative work practices.</p>	§63.6602, Table 2c to Subpart ZZZZ, §§63.6625(h) and (i)
Comply with the applicable emission limitations, operating limitations, and other requirements in Subpart ZZZZ at all times. At all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	§63.6605
<p>If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:</p> <ul style="list-style-type: none"> • An existing emergency stationary RICE with a site rating of less than or equal to 500 hp located at a major source of HAP emissions; 	§63.6625(e), §63.6640(a), Table 6 to Subpart ZZZZ
If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake hp located at a major source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.	§63.6625(f)
Each affected source that has a Title V operating permit must report all deviations as defined in this subpart in the Title V semiannual report.	§63.6640(b), §63.6650(f)

40 CFR Part 60 Subpart ZZZZ – Specific Applicability Determinations for 37-0028-117 Unit ID #573, 1058, 911, and 913	
Requirement	Rule Citation
<p>Operate emergency stationary RICE according to the requirements in §§63.6640(f)(1) through (4). If you do not operate the engine according to the requirements in §§63.6640(f)(1) through (4), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.</p> <ul style="list-style-type: none"> • There is no time limit on the use of emergency stationary RICE in emergency situations. • You may operate your emergency stationary RICE for any combination of the purposes specified in §§63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. • Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. 	§63.6640(f)
Keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.	§63.6655(e)
Existing emergency stationary RICE with a site rating of less than or equal to 500 brake hp located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.	§63.6655(f)
Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). You must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.	§63.6660
Table 8 to Subpart ZZZZ shows which parts of the General Provisions (40 CFR 63 Subpart A) apply. If you own or operate an existing emergency stationary RICE, you do not need to comply with any of the requirements of the General Provisions. If you own or operate a new emergency stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, you do not need to comply with the requirements in the General Provisions except for the initial notification requirements.	§63.6665
Terms used in Subpart ZZZZ are defined in the Clean Air Act, in 40 CFR §63.2, and in §63.6675.	§63.6675

ATTACHMENT 29

TITLE V FEE SELECTION FORM APC 36 (CN-1583)



DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

APC 36

TITLE V FEE SELECTION

Type or print and submit to the email address above.

FACILITY INFORMATION

1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]	
2. Site name (if different from legal name)	
3. Site address (St./Rd./Hwy.)	County name
City	Zip code
4. Emission source reference number	5. Title V permit number

FEE SELECTION

This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.

6. Payment Schedule (choose one):

Calendar Year Basis (January 1 – December 31) ☐

Fiscal Year Basis (July 1 – June 30) ☐

7. Payment Basis (choose one):

Actual Emissions Basis ☐ Allowable Emissions Basis ☐ Combination of Actual and Allowable Emissions Basis ☐

8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.

Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit.
			If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

8. (Continued)

[illegible]

CONTACT INFORMATION (BILLING)	
NAME	
ADDRESS	
CITY	
STATE	
ZIP	
PHONE	
FAX	
EMAIL	

9. Billing contact			Phone number with area code
Mailing address (St./Rd./Hwy.)			Fax number with area code
City	State	Zip code	Email address

SIGNATURE BY RESPONSIBLE OFFICIAL

Based upon information and belief formed after reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in the submittal is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

10. Signature		Date
Signer's name (type or print)	Title	Phone number with area code

TITLE V PERMIT RENEWAL STATEMENT

Facility Name:	Holston Army Ammunition Plant (HSAAP Area B)
City:	Kingsport
County:	Hawkins

Date Application Received:	December 23, 2013
Date Application Deemed Complete:	October 24, 2014

Emission Source Reference No.:	37-0028
Permit No.:	568188

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to Holston Army Ammunition Plant and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD - Prevention of Significant Deterioration
NESHAP - National Emission Standards for Hazardous Air Pollutants
NSPS - New Source Performance Standards
MACT - Maximum Achievable Control Technology
NSR - New Source Review

I. Identification Information

A. Source Description:

Listing and description of emission sources:

- (1) Fuel Burning Installation: (6) Coal Fired Boilers and (3) natural gas fired boilers (37-00028-01-09): for steam generation
- (2) Open Burning of Explosive Contaminated Waste (37-0028-10).

- (3) Refuse Incineration Units A & B (37-0028-11): noncontaminated refuse incineration
- (4) RDX Nitration Process (37-0028-12): chemical production of RDX explosive
- (5) RDX Nitration Process (37-0028-13): chemical production of RDX explosive
- (6) HMX Nitration Process (37-0028-14): chemical production of HMX explosive
- (7) RDX and HMX Nitration Process (37-0028-15): chemical production of RDX and HMX explosive
- (8) Filtering and Washing of Crude RDX (37-0028-16): purification of RDX
- (9) Filtering and Washing of Crude RDX and HMX (37-0028-17): purification of RDX and HMX
- (10) RDX Nitration Process (37-0028-18): chemical production of RDX explosive
- (11) RDX Nitration Process (37-0028-19): chemical production of RDX explosive
- (12) RDX Nitration Process (37-0028-20): chemical production of RDX explosive
- (13) RDX Nitration Process (37-0028-21): chemical production of RDX explosive
- (14) Recrystallization of RDX (37-0028-22): purification of RDX
- (15) Recrystallization of RDX or HMX (37-0028-23): purification of RDX or HMX
- (16) Recrystallization of RDX (37-0028-24): purification of RDX
- (17) Recrystallization of RDX (37-0028-25): purification of RDX
- (18) Recrystallization and Coating of RDX (37-0028-26, -27 and portion of 37-1029-39): purification of RDX
- (19) Filtering and Washing of HMX or RDX (37-0028-28): purification of RDX or HMX
- (20) Manufacturing of 61% Nitric Acid by Ammonia Oxidation Process (37-0028-43): chemical production nitric acid from ammonia, air and water
- (21) Nitric Acid Concentration by Magnesium Nitrate Process (37-0028-44, -45, -46, -47, -48, -63, -64, -65): concentration of 61% nitric acid to 99% nitric acid with magnesium nitrate catalyst.
- (22) Lime Storage and Handling (37-0028-49).
- (23) Open Burning of Explosive Waste (37-0028-53).
- (24) Manufacturing of 61% Nitric Acid by Ammonia Oxidation Process (37-0028-56): chemical production nitric acid from ammonia, air and water.
- (25) Manufacturing of 61% Nitric Acid by Ammonia Oxidation Process (37-0028-57): chemical production nitric acid from ammonia, air and water
- (26) Manufacturing of 61% Nitric Acid by Ammonia Oxidation Process (37-0028-58): chemical production nitric acid from ammonia, air and water
- (27) Ammonium Nitrate/Nitric Acid Solution Process (37-0028-67): reaction of ammonia and nitric acid
- (28) Recrystallization of HMX (37-0028-75): purification of HMX
- (29) Coating of HMX (37-0028-76): purification in solvent and lacquer coating of HMX for plastic explosives
- (30) Filtration and Washing of HMX (37-0028-78): purification of HMX
- (31) Recrystallization and Coating of RDX (37-0028-79): purification and coating of RDX for plastic explosives
- (32) Recrystallization of RDX (37-0028-80): purification of RDX
- (33) Coating of RDX (37-0028-81): purification and lacquer/ vistanex coating of RDX for plastic explosives
- (34) Coating of RDX (37-0028-82): purification and lacquer/vistanex coating of RDX for plastic explosives
- (35) Recrystallization of RDX (37-0028-83): purification of RDX
- (36) Recrystallization of RDX (37-0028-84): purification of RDX
- (37) Coating of RDX (37-0028-85): purification in solvent and lacquer/ vistanex coating of RDX for plastic explosives
- (38) Recrystallization of HMX (37-0028-86): purification of HMX
- (39) Recrystallization of HMX (37-0028-87): purification of HMX
- (40) Coating of RDX or HMX (37-0028-88): purification and coating of RDX or HMX
- (41) Coating of RDX or HMX (37-0028-89): purification in solvent and lacquer/ plasticizer coating of HMX for plastic explosives
- (42) Lacquer Preparation (37-0028-92): mixing of solvent and binder for lacquer coating of RDX and HMX explosives
- (43) Fly Ash Storage Bin (37-0028-97): boiler flyash storage and loadout to trucks
- (44) Lime Silo @ Building 224 (37-0028-98): lime unloading to wastewater treatment
- (45) Sodium Nitrate Recovery Process (~~37-1028-29~~, 37-0028-100): concentration and drying of sodium nitrate solution
- (46) Filtering and Washing of Crude RDX (~~37-1028-37~~, 37-0028-101): purification of RDX
- (47) Filtering and Washing of Crude RDX (~~37-1028-39~~, 37-0028-102): purification of RDX
- (48) Coating of RDX or HMX (~~37-1028-90~~, 37-0028-103): purification in solvent and lacquer coating of RDX to produce PBX plastic explosive
- (49) Coal Handling System (~~37-1028-96~~, 37-0028-104): for coal feed to Area B boilers; coal crushing, screening and conveying

- (50) Lacquer Preparation (~~37-1028-98~~, 37-0028-105): mixing of solvent and binder for lacquer coating of RDX or HMX explosives
- (51) Sodium Nitrate Sludge Drying Process (~~37-1028-99~~, 37-0028-106): double drum dryer
- (52) Plasma Arc Cutting Machine (~~37-1029-03~~, 37-0028-107): for cutting of steel plate/shapes
- (53) Recrystallization of RDX (~~37-1029-05~~, 37-0028-108): purification and coating of RDX
- (54) Coating of RDX (~~37-1029-06~~, 37-0028-109): production of PBX plastic explosive
- (55) HMX and RDX Nitration Process (~~37-1029-09~~, 37-0028-110): HMX and RDX production by chemical nitration
- (56) Coating of RDX or HMX (~~37-1029-14~~, 37-0028-111): purification in solvents and coating of RDX and HMX to produce PBX plastic explosive
- (57) Filtration and Washing of Crude RDX/HMX (37-0028-77): purification of RDX or HMX
- (58) Acetic Anhydride Production and Acetic Acid Concentration (~~37-1029-16~~, 37-0028-112)
- (59) Natural gas fired only Steam Generating Units (~~37-1029-17~~, 37-0028-113).
- (60) G-8 Nitration Process (~~37-1029-20~~, 37-0028-114).
- (61) Weak Acetic Acid Recovery Process (~~37-1029-24~~, 37-0028-115)
- (62) Tanks 16A and 16B for the Weak Acetic Acid Recovery Process (~~37-1029-25~~, 37-0028-116)

Permitting Activities Since Original Permit Issuance (Previous Permit 547262)

- 1 Significant modification to sources 37-0028-01-10, to replaces ESP control with fabric filters with sorbent injection systems for boiler MACT.
- 2. Significant modification to sources 37-0028-45, -46, -47, -48, -63, -64, and -65, to limit the sources to 249 TPY of NO_x for all these sources combined to avoid BART requirements.
- 3. Minor modification to sources 37-0028-26, -27 and ~~37-1028-39~~, 37-0028-102, to change NO_x emissions from 5 TPY to 15 TPY.
- 4. Remove sources 61 and 66.
- 5. Revised Conditions B5, C1, C2, and E2(b).

Permitting Activities Since Previous Permit Issuance 558406

- (1) The following Emission Source Referenced Numbers have been changed to the new Emission Source Referenced Numbers as follow:

<u>Previous Emission Source Referenced no.</u>	<u>New Emission Source Referenced no.</u>
37-1028-29	37-0028-100
37-1028-37	37-0028-101
37-1028-39	37-0028-102
37-1028-90	37-0028-103
37-1028-96	37-0028-104
37-1028-98	37-0028-105
37-1028-99	37-0028-106
37-1029-03	37-0028-107
37-1029-05	37-0028-108
37-1029-06	37-0028-109
37-1029-09	37-0028-110
37-1029-14	37-0028-111
37-1029-16	37-0028-112
37-1029-17	37-0028-113
37-1029-20	37-0028-114
37-1029-24	37-0028-115
37-1029-25	37-0028-116

- (2) New source ~~37-1029-16~~, 37-0028-112: January 14, 2014, construction permit no 967608P issued for Acetic Anhydride Production and Acetic Acid Concentration
- (3) New source (~~37-1029-17~~, 37-0028-113): . January 14, 2014, construction permit no 967609F issued for Natural gas fired only Steam Generating Units

- (4) New source ~~37-1029-20~~, 37-0028-114: January 14, 2014, construction permit no 967610P issued for G-8 Nitration Process.
- (5) New source ~~37-1029-24~~, 37-0028-115: December 10, 2010, construction permit no 963970P issued for Weak Acetic Acid Recovery Process
- (6) New source ~~37-1029-25~~, 37-0028-116: January 14, 2014, construction permit no 967612P issued for Tanks 16A and 16B for the Weak Acetic Acid Recovery Process
- (7) New source 37-0028-117, Eight Generates sets, Four Air Compressors, and Two pums
- (8) New Source 37-0028-118, Gasoline Storage and Dispensing
- (9) Remove sources 37-0028-11,-43, -56, -57, -58 and ~~37-108-99~~, 37-0028-106
- (10) Revised Conditions A12, B5, and E2(b)

B. Facility Classification

1. Attainment or Non-Attainment Area Location

Area is designated as an attainment area for all criteria pollutants.

2. Company is located in a Class II area.

C. Regulatory Status

1. PSD/NSR

This facility is an existing major source under PSD.

2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	y	y	
PM ₁₀	y	y	
SO ₂	y	y	
VOC	y	y	
NO _x	y	y	
CO	y	y	
Individual HAP	y	y	
Total HAPs	y	y	

3. MACT and NSPS Standards

37-0028-01-04 **(4) Coal Fired Boilers is subject to** 40 CFR 63, Subpart DDDDD

Source ~~37-1029-16~~, 37-0028-112, **Acetic Anhydride Production and Acetic Acid Concentration Is subject to**
40 CFR 60, Subpart VVa, 40 CFR 60, Subpart NNN, 40 CFR 60, Subpart RRR, and 40 CFR 63, Subpart DDDD

Source 37-1029-17, 37-0028-113 : Natural gas fired only Steam Generating Units is subject to 40 CFR 60, Subpart Dc,
40 CFR 60, Subpart KKKK, 40 CFR 63, Subpart DDDDD, and 40 CFR 63, Subpart YYYY

~~Source 37-1029-24, 37-0028-115:~~ **Weak Acetic Acid Recovery Process is subject to** 40 CFR 60, Subpart VVa, 40 CFR 60, Subpart NNN.

~~Source 37-1029-25, 37-0028-116:~~ **Tanks 16A and 16B for the Weak Acetic Acid Recovery Process is subject to** 40 CFR 60, Subpart VVa, 40 CFR 60, Subpart Kb.

4. Program Applicability

Are the following programs applicable to the facility?

PSD: yes

NESHAP: yes

NSPS: yes

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements? Yes

Industrial boilers, 40 CFR §63 Subpart DDDDD or the Boiler MACT: Compliance date extended to 1-31-2017..

III. Other Requirements

A. Emissions Trading

The facility is not involved in an emission-trading program.

B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

This facility is subject to 40 CFR 68 as of June 21, 1999.

THE FOLLOWING AGENCIES WERE NOTIFIED OF THE TITLE V DRAFT PERMIT FOR THIS COMPANY:

1. EPA, Region IV
2. The NC Dept. of Environment and Natural Resources
3. Virginia Department of Environmental Quality
4. Kentucky Division for Air Quality

V. ADDENDUM TO TITLE V PERMIT STATEMENT: SUMMARY OF COMMENTS

Facility Name:	Holston Army Ammunition Plant	(HSAAP Area B)
City:	Kingsport	
County:	Hawkins	

Date Application Received:	December 23, 2013
Date Application Deemed Complete:	October 24, 2014
Date of Public Notice:	May 18, 2016
Date of Public Hearing:	August 18, 2016

Emission Source Reference No.:	37-0028
Permit No.:	568188

Comments:

Comments were received during the initial 30-day public notice period and the public hearing conducted on August 18, 2016, including the 10-day period following the hearing. Because of the number of comments received, the summary of comments (with responses) is drafted as a separate document external to this statement of basis.

VI. Revisions to Draft Permit Incorporated for Proposed Permit Forwarded to EPA Post- Public Hearing

Condition E1: updated dates for present and next annual accounting periods under the fee table.

Condition A8. Updated and revised fee payment.

Conditions B5 and E2(a): updated Federal Register date and page numbers for Rule cite.

Add new conditions for Open Burning of Explosive Contaminated Materials for source 37-0028-10 as follows:

Condition E5-9(new) The open burning of materials, handling and disposal of ash and other waste generated from this burning process must be conducted in accordance with all applicable Tennessee Division of Solid Waste Management regulations.

TAPCR 1200-03-09-.03(8)

Condition E5-10 (new). The permittee shall not open burn demolition debris, or any other materials, that contain PCBs (e.g., pumps, motors, painted piping, painted masonry or wood, caulking, waste oil, etc.) without the permission of the United States Environmental Protection Agency (EPA). The permittee shall not burn material defined as lead hazardous waste under 40 CFR 261.24 Table 1 for D008. The permittee shall not open burn PCB wastes that are regulated for disposal under Subpart D of 40 CFR 761. If items are determined to be an explosive hazard that is regulated for disposal under Subpart D of 40 CFR 761, then the United States Environmental Protection Agency should be contacted¹.

¹ The statement of basis was updated 10/29/2018 to add the complete language for Condition E5-10.

Letter from Jon D. Johnston, Chief, Materials and Waste Management Branch, Resource Conservation and Restoration Division, EPA Region 4, dated March 25, 2016 enclosed as Attachment 24. TAPCR 1200-03-09-.03(8)

Condition E5-11 (new) The facility shall review available information related to alternatives to open burning of explosives and explosive-contaminated and or potentially explosive contaminated combustibles annually, and submit a statement signed by the Responsible Official certifying whether or not there are safe alternatives to open burning these materials. In the event a safe alternative is discovered, the statement shall include a plan and schedule to implement the new method of disposal explosive contaminated materials and explosive waste.

The statement shall be submitted by March 1st of each year beginning March 1, 2019. Hard copies or electronic copies (PDF) of the statement shall be submitted to both the Environmental Field Office and Nashville Central Office at the following addresses:

Adobe Portable Document Format (PDF) Copy to:

Hard Copy to:

Technical Secretary
Division of Air Pollution Control
Johnson City Environmental Field Office
2305 Silverdale Road
Johnson City, TN 37601-2162

APC.JCEFO@tn.gov

Technical Secretary
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

Air.Pollution.Control@tn.gov

TAPCR 1200-03-04-.04(1)(k), TAPCR 1200-03-10-.02(1)(a)

Add new conditions for Open Burning of Explosive Waste for Source 37-0028-53 as follows:

Condition E26-9 (new) The open burning of materials, handling and disposal of ash and other waste generated from this burning process must be conducted in accordance with all applicable Tennessee Division of Solid Waste Management regulations.

TAPCR 1200-03-09-.03(8)

~~**Condition E26-10 (new).** The permittee shall not open burn demolition debris, or any other materials, that contain PCBs (e.g., pumps, motors, painted piping, painted masonry or wood, caulking, waste oil, etc.) without the permission of the United States Environmental Protection Agency (EPA).~~

~~Letter from Jon D. Johnston, Chief, Materials and Waste Management Branch, Resource Conservation and Restoration Division, EPA Region 4, dated March 25, 2016 enclosed as Attachment 24. TAPCR 1200-03-09-.03(8)²~~

Condition E26-11(new). The facility shall review available information related to alternatives to open burning of explosives and explosive-contaminated and or potentially explosive contaminated combustibles annually, and submit a statement signed by the Responsible Official certifying whether or not there are safe alternatives to open burning these materials. In the event a

² The statement of basis was updated 10/29/2018 to remove the language shown for Condition E5-10. Because emission source 37-0028-53 does not burn construction/demolition debris, this language was not required for the Title V permit.

safe alternative is discovered, the statement shall include a plan and schedule to implement the new method of disposal explosive contaminated materials and explosive waste.

The statement shall be submitted by March 1st of each year beginning March 1, 2019. Hard copies or electronic copies (PDF) of the statement shall be submitted to both the Environmental Field Office and Nashville Central Office at the following addresses:

Adobe Portable Document Format (PDF) Copy to:

Hard Copy to:

Technical Secretary
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2305 Silverdale Road
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William R. Snodgrass Tennessee Tower
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Nashville, TN 37243

Air.Pollution.Control@tn.gov

TAPCR 1200-03-04-.04(1)(k), TAPCR 1200-03-10-.02(1)(a)

Changes to Title V Operating Permit 568188 since Renewal Issuance

Permit Modification	Issue Date	Condition or Section	Modification																					
Significant Modification #1 (SM1)	May 28, 2019	General Information	Significant modification #1 adds Vent H (15.0 MMBtu/hr superheater) to 37-0028-113 (natural gas-fired steam generating units) and seeks to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject (federally enforceable emissions cap assumed to avoid classification as a Title I modification). Specifically, BAE requests an increase in the monthly average heat input limit for 37-0028-113 from 180 MMBtu/hr to 217.24 MMBtu/hr. The change in emissions for each pollutant is shown below (see Attachment 1 to the statement of basis for detailed calculations).																					
			<table><tr><th>Pollutant</th><th>Net Emissions Increase (Permit 967909F)</th><th>Net Emissions Increase Following Removal of Heat Input Limit</th></tr><tr><td>PM</td><td>2.5</td><td>9.31</td></tr><tr><td>SO₂</td><td>0</td><td>4.96</td></tr><tr><td>CO</td><td>6.74</td><td>72.03</td></tr><tr><td>VOC</td><td>2.13</td><td>25.56</td></tr><tr><td>NO_x</td><td>8.02</td><td>28.54</td></tr><tr><td>CO_{2e}</td><td>72,251.29</td><td>91,959</td></tr></table>	Pollutant	Net Emissions Increase (Permit 967909F)	Net Emissions Increase Following Removal of Heat Input Limit	PM	2.5	9.31	SO ₂	0	4.96	CO	6.74	72.03	VOC	2.13	25.56	NO _x	8.02	28.54	CO _{2e}	72,251.29	91,959
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			NO _x	8.02	28.54																			
		CO _{2e}	72,251.29	91,959																				
		The table above demonstrates that the net emissions increase will be below the PSD significance thresholds for all pollutants except CO _{2e} . The net emissions increase for CO _{2e} exceeds the PSD significance threshold of 75,000 tons/year, but pursuant to <i>Utility Air Regulatory Group v. EPA</i> (U. S. Supreme Court, June 23, 2014) and 40 CFR§51.166, an increase in greenhouse gas emissions is significant only if there is a significant emissions increase for another regulated NSR pollutant.																						
		All sections	Updated rule citations from “TAPCR” (Tennessee Air Pollution Control Regulations) to “Tenn. Comp. R. & Regs.” (Tennessee Comprehensive Rules & Regulations).																					
		B11	Revised Condition B11 to be consistent with revised 1200-03-30-.06(2), (3), and (4)																					
		Section D	Added new general conditions D11 (NESHAP), D12 (NSPS), D13 (gasoline dispensing),and D14 (internal combustion engines).																					
		E1	Updated fee emissions.																					
		E2-1	Updated SAR requirements, removed Section E55 (no longer in operation).																					
		E3-4	Updated table of source for which an initial VEE is not required per the opacity matrix– added emission sources 37-0028-114 and 37-0028-117. Updated source description for 37-0028-113.																					
Section E62	Updated the source description for 37-0028-113 from four Miura boilers to six.																							
E62-1	Increased allowable monthly average heat input from 180 MMBtu/hr to 217.24 MMBtu/hr. Removed the statement that the permittee has requested the limit to avoid PSD.																							
E62-4	Increased allowable PM emissions from 5.85 tons/year to 7.09 tons/year.																							
E62-6	Increased allowable NO _x emissions from 21.92 tons/year to 25.88 tons/year.																							
E62-8	Added cogeneration turbine and superheater to the list of sources equipped with low-NO _x burners. Removed “flue gas recirculation” from the source description based on BAE comments (inclusion of FGR in the application was an error).																							
E62-9	Increased allowable CO emissions from 38.54 tons/year to 62.28 tons/year.																							
E62-10	Increased allowable VOC emissions from 4.23 tons/year to 5.13 tons/year.																							
	May 28, 2019	E62-14	Condition E62-14 was marked as reserved (Area A units have been shut down).																					

Changes to Title V Operating Permit 568188 since Renewal Issuance

Permit Modification	Issue Date	Condition or Section	Modification
Significant Modification #1 (SM1)		E63-4	Corrected the language of this condition to match the source description (there is only one scrubber used for this emission source).
		Public Participation	The public notice for this modification was published in the <i>Kingsport Times-News</i> ³ on April 15, 2019. During the public comment period, the Division received a citizen inquiry regarding the nature of the proposed changes and the specific emission increases associated with the changes. Division staff responded to the citizen on April 18, 2019 with a description of the proposed changes and associated emissions increases. The citizen did not comment on the substance of the draft/proposed permit, and there were no other comments received during the public comment period.
Minor Modification #1 (MM1)	Denied August 5, 2019	General Information	<p>Minor Modification #1 allows the installation of a new flare tip with a mixing nozzle and gas feed. Supplemental natural gas and improved mixing are expected to eliminate visible emissions from the flare through improved combustion. CO, VOC, and NO_x emissions will increase as a result of increased natural gas feed, but the modification does not change the monitoring methods or other regulatory requirements for the flare. Emissions increases are below the PSD significance thresholds for all pollutants.</p> <p>The Division determined that the requested change cannot be processed as a minor permit modification because Conditions E61-8 and E61-9 of Title V Operating Permit 568188 limit VOC emissions from the ketene furnaces, flares, and scrubbers (37-0028-112), and are identified as PSD avoidance limits. TAPCR 1200-03-09-.02(11)(f)5.(ii)(I)IV does not allow the use of minor permit modification procedures for modifications that seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Construction permit 977452 was issued November 4, 2019 to process the requested changes. Since these changes were included in the Title V renewal application but not incorporated into Title V permit 568188 during the renewal process, the Division will reopen the permit to incorporate these changes following issuance of a construction permit.</p>
Reopen for Cause #1 (RC1)	February 1, 2021	General Information	The Division of Air Pollution Control is reopening this permit pursuant to TAPCR 1200-03-09-.02(11)(f)6 to incorporate the requirements of construction permits 977452 and 977993 into 37-0028-112 and to revise the applicable requirements for emergency engines (40 CFR 60 Subparts IIII and JJJJ and 40 CFR 63 Subpart ZZZZ). The Division notified BAE of the intent to reopen this permit on December 6, 2019 and requested that BAE provide information on the location of emergency engines at this facility and at Holston Army Ammunition Plant's Area B operations.
		All sections	Updated rule citations from "Tenn. Comp. R. & Regs." (Tennessee Comprehensive Rules & Regulations) to "TAPCR" (Tennessee Air Pollution Control Regulations) based on revised guidance. Updated numbering convention as applicable (e. g., changed "ten (10) percent" to "10%").
		A12, A20, E2(d)	Updated standard language for permit renewal and accidental release plan requirements. Moved annual 112(r) certification from E2 to A20.
		B6, E2	Updated information for submittal of ACC to EPA.
		D7	Revised D7(a)2 to remove oil form the list of suitable dust control measures (oil has been removed from 1200-03-08-.01(b)).
		E1, Attachment 29	Updated fee emissions and annual accounting period dates, added fee selection form.
		E2(a)	Updated reporting requirements to remove language related to permit transition, add E26-4 and E61-22, and remove E5-1 (redundant with E5-4) and E26-1 and E26-2 (redundant with E26-4).
		E2(a)	Updated certification requirements to remove language related to permit transition.
		E3-1	Updated Responsible Official information.

³ This is the second public notice for Significant Modification #1. The first notice was published in November 2018, but the permit was withdrawn to address comments from U. S. EPA and to co-process a construction permit for the requested change.

Changes to Title V Operating Permit 568188 since Renewal Issuance

Permit Modification	Issue Date	Condition or Section	Modification
Reopen for Cause #1 (RC1)	February 1, 2021	E4-4	Revised as shown below: Boilers and process heaters located at a major source of hazardous air pollutants <u>are subject</u> to 40 CFR Part 63, Subpart DDDDD, NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR MAJOR SOURCES: INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS , including any and/or all applicable emission limitations, notifications, compliance options, records, reports, etc. as summarized, but not limited to the following in this condition.
		E5-8, E26-8	Added e-mail address for submittal of requests to change the open burning locations.
		E5-13	Added rule citation (open burning of asbestos prohibited). Updated the compliance method to add specific requirements.
		E19-1 and E19-2	Removed the conditions for 37-0028-24. The letter dated November 16, 2020 states that the physical building is still present but the recrystallization equipment and sources have been removed. Source 37-0028-114 is now operated at this building.
		E35-1 and E35-2	Removed the conditions for source 37-0028-80. The letter dated November 16, 2020 states that the building has been replaced and the new process is identified as source 37-0028-125 and covered by Permit #974192.
		E36-1	Removed the conditions for source 37-0028-81. The letter dated November 16, 2020 states that the building has been replaced and the new process is identified as source 37-0028-125 and covered by Permit #974192.
		E37-1 and E37-2	Removed the conditions for source 37-0028-82. The letter dated November 16, 2020 states that the building has been replaced and the new process is identified as source 37-0028-125 and covered by Permit #974192.
		E52-4 and E52-5	Added compliance method (annual certification) for use and maintenance of wet suppression.
		E61-1, E61-9	BAE requested removal of the reference to the August 14, 2013 agreement letter and the identification of the steam usage limit (Condition E61-1) and the VOC emission limit for Vents A, G, and I (Condition E61-9) as PSD avoidance conditions. The application states that identification of these condition as PSD avoidance is not accurate because emissions from this source and other aggregated sources are below PSD significance thresholds at the sources' potential to emit. The Division reviewed the application and determined that the existing conditions should be identified as PSD avoidance conditions. VOC emissions from Vents A and G are based on the use of wet scrubbers, and the existing VOC limit is necessary to ensure that emissions from this source do not exceed the PSD significance threshold. The steam usage limit is not needed to avoid PSD significance for this emission source, but the limit was included as part of a larger project and may be necessary to remain below PSD significance for the project as a whole. The reference to the August 2013 agreement letter was removed from Condition E61-9 (the previous emission limit was updated using the information in the current application) but was retained in Condition E61-1.
		E61-2	Added compliance method.
		E61-6	Increased allowable NOx emissions from 2.2 tons/year to 3.63 tons/year.
		E61-7	Increased allowable CO emissions from 33.1 tons/year to 40.9 tons/year (12-month rolling total). Updated compliance method to include Boiler MACT requirements (periodic tune-ups to reduce CO emissions).
		E61-8	Increased allowable VOC emissions (ketene furnaces and flare) from 6.2 tons/year to 6.5 tons/year. The previous application indicated allowable VOC emissions of 6.5 tons/year. Issuance of this permit corrects an error in the previous permit. Removed the language designating this limit as PSD avoidance (VOC emissions from the furnaces and flare are limited by NSPS NNN and RRR).

Changes to Title V Operating Permit 568188 since Renewal Issuance

Permit Modification	Issue Date	Condition or Section	Modification																																		
Reopen for Cause #1 (RC1)	February 1, 2021	E61-9	<p>Increased allowable VOC emissions (scrubbers and storage tank) from 2.7 tons/year to 4.0 tons/year as indicated below.</p> <table><thead><tr><th>Vent ID</th><th>Description</th><th>VOC Emissions From Permit 977452 (tons/year)</th><th>Updated VOC Emissions (tons/year)</th></tr></thead><tbody><tr><td>A</td><td>Acetic Acid Concentration & Storage Tanks, Scrubber S-033</td><td>2.04</td><td>3.23</td></tr><tr><td>F</td><td>B-7P Tank Farm, Scrubber S-036</td><td>0.05</td><td>0.11</td></tr><tr><td>G</td><td>Acetic Acid Sludge Recovery & Storage Tanks, Scrubber S-030</td><td>0.15</td><td>0.15</td></tr><tr><td>I</td><td>Azeo Feed Tank T-151</td><td>0.42</td><td>0.48</td></tr><tr><td colspan="2">Totals</td><td>2.66</td><td>3.97</td></tr></tbody></table> <table><thead><tr><th>Vent ID</th><th>Description of Changes</th></tr></thead><tbody><tr><td>A</td><td>Increased potential throughput by 20%, updated calculations to allow both azeotropic distillation columns to operate at the same time.</td></tr><tr><td>F</td><td>Increased usage of tanks T-152 (reject tank), T-350, and T-355.</td></tr><tr><td>G</td><td>No changes.</td></tr><tr><td>I</td><td>Increased throughput by 20%</td></tr></tbody></table> <p>Removed the language, “The permittee shall operate the emission source, associated air pollution control devices, and monitoring equipment as required to assure compliance with the specified emission limits.” See condition E61-19 for equivalent language. Updated underlying applicable requirement to TAPCR 1200-03-07-.07(2) and the current application. Retained the identifier of this condition as PSD avoidance based on review of uncontrolled and controlled emissions.</p>	Vent ID	Description	VOC Emissions From Permit 977452 (tons/year)	Updated VOC Emissions (tons/year)	A	Acetic Acid Concentration & Storage Tanks, Scrubber S-033	2.04	3.23	F	B-7P Tank Farm, Scrubber S-036	0.05	0.11	G	Acetic Acid Sludge Recovery & Storage Tanks, Scrubber S-030	0.15	0.15	I	Azeo Feed Tank T-151	0.42	0.48	Totals		2.66	3.97	Vent ID	Description of Changes	A	Increased potential throughput by 20%, updated calculations to allow both azeotropic distillation columns to operate at the same time.	F	Increased usage of tanks T-152 (reject tank), T-350, and T-355.	G	No changes.	I	Increased throughput by 20%
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		E61-10, E61-12, E61-13, E61-14, E61-16, E61-21	These requirements were combined into new Condition E61-16 (NSPS requirements). Added NSPS exemption language for low flow exemption and TRE index value > 8.0. Added a requirement to retest exempt equipment following startup of the modified emission source.																																		
		E61-15	The wording of this condition was updated, but there were no changes to existing requirements.																																		
E61-17	Updated MACT DDDDD requirements to add General Provisions applicability and to reference specific applicability determinations (Attachment 2). There were no changes to existing MACT requirements.																																				
E61-19	Added requirements for maintenance and repair of the emission source and associated control devices.																																				
E61-20	This condition was marked as reserved (not applicable for Title V permits).																																				
E61-22, Attachment 26	Added CAM requirement (40 CFR 64 for the flare).																																				
E66-1 through E66-9, E66-11 through E66-15, E66-17 through E66-28	These conditions were marked as reserved because they are redundant with NSPS/MACT emission limits and work practices.																																				
E66-29, E66-30, Attachment 28	Moved NSPS and MACT requirements for engines to Attachment 28.																																				
E66-31	Added fee emissions for source 117.																																				
Public Participation	The public notice for this permit was placed in the legal section of the <i>Kingsport Times-News</i> on December 15, 2020. The comments received during the public comment period are addressed in Attachment 4 of the statement of basis.																																				

Attachment 1: PSD Accounting
BAE Systems Ordnance Systems, Inc., Holston Army Ammunition Plant (37-0028)
Construction Permit 975946 and
Significant Modification #1 to Title V Operating Permit 568188

Significant Modification #1 to Title V Operating Permit was submitted to EPA for review on October 30, 2018. On December 4, 2018, EPA submitted the following comment.

This permitting action proposes to remove Prevention of Significant Deterioration (PSD) Avoidance limits for source 37-0028-113, "Natural Gas Fired only Steam Generating Units." The permit proposes to increase the average monthly heat input from 180 million British thermal units per hour (MMBtu/hr) to 217.24 MMBtu/hr, and the associated emission limits found in Condition E62. The applicant initially proposed the PSD avoidance limits in their August 14, 2013 application for particulate matter (PM), sulfur dioxide, nitrogen oxide (NO_x) and volatile organic matter (VOC). This significant modification proposes to increase the emissions of PM (Condition E62-4), NO_x (Condition E62-6), and VOC (Condition E62-10). The significant modification also proposes to increase the carbon monoxide limit; however, this limit was not included in the initial August 14, 2013 application. The permitting authority provided a table in the Statement of Basis that shows the emissions increase from the modification below the PSD significant thresholds for all pollutants, with the except of carbon dioxide equivalents.

If an applicant seeks to remove a PSD avoidance limit then they must go through the PSD process, even if the change itself would qualify as a minor modification. The final rule and Federal Register notice on the relaxation provision was published on August 7, 1980. The preamble discussion on the relaxation provision appears at 45 FR 52689, and the discussion reads as follows:

*Finally, as a result of today's policy, a **potential problem exists concerning the future relaxation of a preconstruction permit that previously caused a proposed stationary source to enjoy minor rather than major status.** For example, a source might evade NSR through agreement to unrealistically stringent operating limitations in its permit, and later obtain a relaxation of the condition. The Agency believes that the problem can be dealt with by 40 CFR 52.21(r)(4) [which has the same language as 40 C.F.R. § 51.166(r)(2)], entitled 'Source Obligation.' That paragraph provides that **any owner or operator of a source, who would receive a relaxation of a permit condition that had enabled avoidance of NSR, would then become subject to the original permit, as if they were new sources.** In other words, if operational limitations are to be considered as an aspect of a source's design, it is reasonable that the permit accurately incorporate that design. If such operation is changed, the permit, and concomitant obligations, should be correspondingly changed.*

For your reference 1200-03-09-.01(5)(b)(2)(ix), (which corresponds to 40 CFR 52.21(r)4 Source obligation):

At such time that a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any "legally enforceable limitation" which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of Subparagraph 1200-03-09-.01(5)(b) shall apply to the source or modification as though construction had not yet commenced on the source or modification.

In addition, the Agency has commented on minor changes to permit conditions, "If any modification, including a modification that was not "major," would nullify applicability of the relaxation provision, then misuse of the clause would occur." (See, <https://www.epa.gov/sites/production/files/2015-07/documents/ppg2001.pdf>)

Therefore, although the emissions from the new modification do not exceed the PSD thresholds the applicant is subject to the requirements of Subparagraph 1200-03-09-.01(5)(b). The applicant must perform a complete PSD analysis that includes the changes from the initial 2013 application as well as the addition of this superheater, "as if they were new sources." The Statement of Basis has included a summary table on page 9; however, a complete analysis that reevaluates the emissions calculations and is in full compliance with the regulations is required. (The total net emissions listed on page 6 of the 2013 application list the PM_{2.5} emissions as 8.07 tons per year. The table included in the Statement of Basis for this significant modification lists the net increase following the removal of the heat input limit as 3.74 tons per year of PM. The PSD threshold for PM_{2.5} is 10 tons per year.)

For the reasons explained above, we believe the applicant should go through PSD review accounting for 2013 changes and this new action.

Response to EPA Comment

Construction permits 963212 and 963969 were issued to BAE in 2010 for construction of two 90 MMBtu/hr steam generating boilers (emission source 37-1029-17, later renumbered to 37-0028-113). The allowable heat input for the entire source was limited to 90 MMBtu/hr. These boilers were not installed, and BAE installed four small boilers (later increased to six) and a combined heat and power unit (natural gas-fired combustion turbine with heat recovery steam generator and duct burner) in lieu of the larger boilers. In the application dated August 15, 2013, BAE proposed changes to several emission sources (Table 1):

Table 1: Changes in Emissions (August 15, 2013 Application)⁴		
ESRN	Description	Requested Change
37-1029-16 (37-0028-112)	Acetic Anhydride Production and Acetic Acid Concentration	Replace Area A furnaces with equivalent emissions units at Area B.
37-1029-17 (37-0028-113)	Natural Gas-Fired Steam Generating Units	Increase the allowable heat input from 90 MMBtu/hr to 180 MMBtu/hr.
37-1029-18	Pilot Plant	This emission point was designated as an insignificant emissions unit.
37-1029-20 (37-0028-114)	IMX Nitration Process	Source permitted 2010, added CO emissions
37-1029-22	IMX Nitric Acid Recovery	2010 permitted source was redesigned to a nitric acid concentrator/sulfuric acid concentrator
37-1029-24 (37-0028-115)	Weak Acetic Acid Recovery	Replace an existing feed tank with two new tanks

To assure that these emissions increases remained below the PSD applicability thresholds, BAE agreed to cease operation of the Area A boilers and acetic anhydride furnaces within 180 days of startup of the equivalent Area B operations. The August 15, 2013 application indicated that emissions would change as shown below.

PSD Determination - Calculations Summary Table

This table summarizes the increases for each source to determine if the increases are significant and combines the increases to determine if the net emissions increase is significant. To be considered major under NSR/PSD both have to be significant.

Source	PM	PM-10	PM-2.5	SO₂	NO_x	VOC	CO	CO₂e	Significant for any pollutant (Yes/No)
PSD Thresholds	25	15	10	40	40	40	100	75,000	
37-1029-16	2.2	2.2	2.2	4.4	0	5.8	0	0	No
37-1029-17	5.85	5.85	5.85	2.4	9.62	4.23	24.20	72,251.29	No
37-1029-18 IEU	---	---	---	---	4	4.5	---	---	No
37-1029-20 G-8	---	---	---	---	10	---	13.8	---	No
37-1029-22 NAC/SAC	0.02	0.02	0.02	0.002	2.82	---	10.29	645.58	No
37-1029-24 WAARP	---	---	---	---	---	10.13	---	---	No
Total Net Emissions Increases:	8.07	8.07	8.07	6.802	26.44	24.66	48.29	72,896.87	No

The Division of Air Pollution Control updated the 2013 emission calculations to determine whether BAE's requested change (removal of heat input limit for 37-1029-17/37-0028-113) would result in a significant net emissions increase. BAE calculated baseline CO and NO_x emissions for the Area A boilers and furnaces as shown in Table 2.

⁴ Table 1 excludes changes not associated with an emissions increase (e. g., alternative monitoring requests). A comprehensive list of changes is included in the August 15, 2013 application.

Table 2: Baseline Emissions for Area A						
Emission Source	Baseline Emissions (tons/year)					
	PM	SO₂	CO	VOC	NO_x	CO_{2e}
Area A Boilers			14.34		12.3	21245.31
Area A Furnaces and off gas			146.46		3.96	6271.09
For NO _x and CO _{2e} , baseline emissions were based on the 12-month period ending in August 2005.						
For CO, baseline emissions were based on the 12-month period ending in September 2005.						
Baseline emissions were not calculated for PM, SO ₂ , or VOC						

The Area B steam generating units (boilers and CHP) were limited to 180 MMBtu/hr. Six small boilers were permitted, but the heat input limit prevented operation of more than four units at any time. Emissions from this fuel burning installation were calculated as follows (Tables 3a and 3b).

Table 3a: Criteria Pollutant Emissions from 37-1029-17 (37-0028-113) – 2013 Calculations						
Emission Source	Heat Input (MMBtu/hr)	Criteria Pollutant Emissions in tons/year				
		PM	SO₂	CO	VOC	NO_x
Miura Boiler A	11.54	0.38	0.03	1.82	0.27	0.73
Miura Boiler B	11.54	0.38	0.03	1.82	0.27	0.73
Miura Boiler C	11.54	0.38	0.03	1.82	0.27	0.73
Miura Boiler E	11.54	0.38	0.03	1.82	0.27	0.73
CHP Cogeneration Turbine	87	2.84	0.22	31.26	2.05	19
HRSG Duct Burner	46	1.50	0.12	**	1.09	**
Totals	179.16	5.85	0.46	38.54	4.23	21.92
** CO and NO _x emissions from the cogeneration turbine and duct burner are based on vendor emissions data. Emissions reported for the turbine include emissions from the HRSG duct burner.						

Table 3b: GHG Emissions from 37-1029-17 (37-0028-113) – 2013 Calculations				
Emission Source	Heat Input (MMBtu/hr)	CO_{2e} Emissions in tons/year		
		CO₂	N₂O	CH₄
Miura Boiler A	11.54	5,946	2.3	35.3
Miura Boiler B	11.54	5,946	2.3	35.3
Miura Boiler C	11.54	5,946	2.3	35.3
Miura Boiler E	11.54	5,946	2.3	35.3
CHP Cogeneration Turbine	87	44,831	17.3	266.4
HRSG Duct Burner	46	23,704	9.1	140.8
Totals	179.16	92,320	36	549
Total CO₂ equivalent (tons/year): 92,904				

PSD applicability calculations are shown in Table 4a. BAE's 2013 calculations assumed a net change of 0 tons/year CO from the replacement of the Area A furnaces with the Area B furnaces (Table 4b).

Table 4a: PSD Accounting – 2013 Calculations									
Old ESRN	New ESRN	2013 Change in Emissions (tons/year)							
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	VOC	NO _x	CO _{2e}
Area A Boilers	N/A					(14.34)		(12.30)	(21,245)
Area A Furnaces	N/A					(146.46)		(3.96)	(6,271)
37-1029-16	37-0028-112	2.2	2.2	2.2	4.4	33	5.8	2.1	6,179
37-1029-17	37-0028-113	5.85	5.85	5.85	2.40	38.54	4.23	21.92	92,904
37-1029-18	Insignificant						4.5	4	
37-1029-20	37-0028-114					13.8		10	
37-1029-22	37-0028-119	0.02	0.02	0.02	0.002	10.29		2.82	646
37-1029-24	37-0028-115						10.13		
Totals		8.07	8.07	8.07	6.80	(65.17)	24.66	24.58	72,213
PSD Significance Threshold		25	15	10	40	100	40	40	75,000
Significant Emissions Increase?		No	No	No	No	No	No	No	No

Table 4b: PSD Accounting – 2013 Calculations with Zero-Out of Furnace CO Emissions									
Old ESRN	New ESRN	2013 Change in Emissions (tons/year)							
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	VOC	NO _x	CO _{2e}
Area A Boilers	N/A					(14.34)		(12.30)	(21,245)
Area A Furnaces	N/A					0.00		(3.96)	(6,271)
37-1029-16	37-0028-112	2.2	2.2	2.2	4.4	0	5.8	2.1	6,179
37-1029-17	37-0028-113	5.85	5.85	5.85	2.40	38.54	4.23	21.92	92,904
37-1029-18	Insignificant						4.5	4	
37-1029-20	37-0028-114					13.8		10	
37-1029-22	37-0028-119	0.02	0.02	0.02	0.002	10.29		2.82	646
37-1029-24	37-0028-115						10.13		
Totals		8.07	8.07	8.07	6.80	48.29	24.66	24.58	72,213
PSD Significance Threshold		25	15	10	40	100	40	40	75,000
Significant Emissions Increase?		No	No	No	No	No	No	No	No

Significant Modification #1 requests removal of the 180 MMBtu/hr heat input limit for 37-0028-113 to allow the operation of all six small boilers and a HRSG superheater (added 2017). Emissions from the proposed change are shown below (Tables 5a and 5b).

Table 5a: Criteria Pollutant Emissions from 37-1029-17 (37-0028-113) – 2018 Calculations						
	Heat Input (MMBtu/hr)	Criteria Pollutant Emissions in tons/year				
		PM	SO₂	CO	VOC	NO_x
Miura Boiler A	11.54	0.38	0.03	1.82	0.27	0.73
Miura Boiler B	11.54	0.38	0.03	1.82	0.27	0.73
Miura Boiler C	11.54	0.38	0.03	1.82	0.27	0.73
Miura Boiler E	11.54	0.38	0.03	1.82	0.27	0.73
Miura Boiler F	11.54	0.38	0.03	1.82	0.27	0.73
Miura Boiler G	11.54	0.38	0.03	1.82	0.27	0.73
CHP Cogeneration Turbine	87	2.84	0.22	31.26	2.05	19
HRSG Duct Burner	46	1.50	0.12	**	1.09	**
HRSG Superheater	15	0.49	0.04	20.10	0.35	2.5
Totals	217.24	7.09	0.56	62.28	5.13	25.88
** CO and NO _x emissions from the cogeneration turbine and duct burner are based on vendor emissions data. Emissions reported for the turbine include emissions from the HRSG duct burner.						

Table 5b: GHG Emissions from 37-1029-17 (37-0028-113) – 2018 Calculations				
	Heat Input (MMBtu/hr)	CO₂e Emissions in tons/year		
		CO₂	N₂O	CH₄
Miura Boiler A	11.54	5,946	2.3	35.3
Miura Boiler B	11.54	5,946	2.3	35.3
Miura Boiler C	11.54	5,946	2.3	35.3
Miura Boiler E	11.54	5,946	2.3	35.3
Miura Boiler F	11.54	5,946	2.3	35.3
Miura Boiler G	11.54	5,946	2.3	35.3
CHP Cogeneration Turbine	87	44,831	17.3	266.4
HRSG Duct Burner	46	23,704	9.1	140.8
HRSG Superheater	15	7,729	3.0	45.9
Totals	217.24	111,942	43	665
Total CO₂ equivalent (tons/year): 112,651				

Updated PSD applicability calculations, which include the removal of the heat input limit from source 113, are shown in Tables 6a and 6b. These tables show that the net emissions increase for CO₂e exceeds the PSD significance threshold of 75,000 tons/year. However, pursuant to *Utility Air Regulatory Group v. EPA* (U. S. Supreme Court, June 23, 2014) and 40 CFR §51.166, an increase in greenhouse gas emissions is significant only if there is a significant emissions increase for another regulated NSR pollutant. Therefore, a PSD permit would not be required for the requested change.

Table 6a: PSD Accounting – 2018 Calculations

Old ESRN	New ESRN	2018 Proposed Change in Emissions (tons/year)							
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	VOC	NO _x	CO _{2e}
Area A Boilers	N/A					(14.34)		(12.30)	(21,245)
Area A Furnaces	N/A					(146.46)		(3.96)	(6,271)
37-1029-16	37-0028-112	2.2	2.2	2.2	4.4	33	5.8	2.1	6,179
37-1029-17	37-0028-113	7.09	7.09	7.09	0.56	62.28	5.13	25.88	112,651
37-1029-18	Insignificant						4.5	4	
37-1029-20	37-0028-114					13.8		10	
37-1029-22	37-0028-119	0.02	0.02	0.02	0.002	10.29		2.82	646
37-1029-24	37-0028-115						10.13		
Totals		9.31	9.31	9.31	4.96	(41.43)	25.56	28.54	91,959
PSD Significance Threshold		25	15	10	40	100	40	40	75,000
Significant Emissions Increase?		No	No	No	No	No	No	No	Yes**

** The net emissions increase for CO_{2e} exceeds the PSD significance threshold of 75,000 tons/year, but pursuant to *Utility Air Regulatory Group v. EPA* (U. S. Supreme Court, June 23, 2014) and 40 CFR§51.166, an increase in greenhouse gas emissions is significant only if there is a significant emissions increase for another regulated NSR pollutant.

Table 6b: PSD Accounting – 2018 Calculations with Zero-Out of Furnace CO Emissions

Old ESRN	New ESRN	2018 Proposed Change in Emissions (tons/year)							
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	VOC	NO _x	CO _{2e}
Area A Boilers						(14.34)		(12.30)	(21,245)
Area A Furnaces						0.00		(3.96)	(6,271)
37-1029-16	37-0028-112	2.20	2.20	2.20	4.40	0.00	5.80	2.10	6,179
37-1029-17	37-0028-113	7.09	7.09	7.09	0.56	62.28	5.13	25.88	112,651
37-1029-18	Insignificant						4.50	4.00	
37-1029-20	37-0028-114					13.80		10.00	
37-1029-22	37-0028-119	0.02	0.02	0.02	0.00	10.29		2.82	646
37-1029-24	37-0028-115						10.13		
Totals		9.31	9.31	9.31	4.96	72.03	25.56	28.54	91,959
PSD Significance Threshold		25	15	10	40	100	40	40	75,000
Significant Emissions Increase?		No	No	No	No	No	No	No	Yes**

** The net emissions increase for CO_{2e} exceeds the PSD significance threshold of 75,000 tons/year, but pursuant to *Utility Air Regulatory Group v. EPA* (U. S. Supreme Court, June 23, 2014) and 40 CFR§51.166, an increase in greenhouse gas emissions is significant only if there is a significant emissions increase for another regulated NSR pollutant.

Attachment #2: Review of PSD Accounting
BAE Systems Ordnance Systems, Inc., Holston Army Ammunition Plant (37-0028)
Construction Permit 977993 and Reopen for Cause #1 to Title V Operating Permit 568188

For this permit, the 2018 PSD applicability calculations (construction permit 977452 and Significant Modification #1 to Title V permit 977993) were updated to show the emissions increases associated with the proposed changes to the process equipment. CO and VOC increases were below PSD significance thresholds. NO_x emissions decreased by 0.07 tons following correction of a calculation error, and CO₂e emissions did not change.

Table 4: PSD Accounting – 2020 Calculations									
Old ESRN	New ESRN	2018 Proposed Change in Emissions (tons/year)							
		PM	PM₁₀	PM_{2.5}	SO₂	CO	VOC	NO_x	CO₂e
Area A Boilers	N/A					(14.34)		(12.30)	(21,245)
Area A Furnaces	N/A					(146.46)		(3.96)	(6,271)
37-1029-16	37-0028-112	2.2	2.2	2.2	4.4	40.9	10.5	3.56	8,144
37-1029-17	37-0028-113	7.09	7.09	7.09	0.56	62.28	5.13	25.88	112,651
37-1029-18	Insignificant						4.5	4	
37-1029-20	37-0028-114					13.8		10	
37-1029-22	37-0028-119	0.02	0.02	0.02	0.002	10.29		2.82	646
37-1029-24	37-0028-115						10.13		
Totals		9.31	9.31	9.31	4.96	(33.53)	30.23	30.00	121,441
PSD Significance Threshold		25	15	10	40	100	40	40	75,000
Significant Emissions Increase?		No	No	No	No	No	No	No	Yes**
** The net emissions increase for CO ₂ e exceeds the PSD significance threshold of 75,000 tons/year, but pursuant to <i>Utility Air Regulatory Group v. EPA</i> (U. S. Supreme Court, June 23, 2014) and 40 CFR§51.166, an increase in greenhouse gas emissions is significant only if there is a significant emissions increase for another regulated NSR pollutant.									

Attachment #3: Response to Comments
BAE Systems Ordnance Systems, Inc., Holston Army Ammunition Plant (37-0028)
Reopen for Cause #1 to Title V Operating Permit 568188

I. Public Comments

Comment #1 – Open Burning of PFAS

Multiple commenters submitted comments opposing the open burning of PFAS (Per- and Polyfluoroalkyl Substances) at Holston Army Ammunition Plant, as summarized below.

I am writing out of concern regarding the burning of toxic chemicals at Holston Army Ammunition Plant. I ask you to consider the extremely harmful ramification of burning many of these listed below. As I am sure you know, PFOAs are "forever chemicals", and are known to cause birth defects and cancers. The citizens of the town of Hoosick Falls in NY state are battling the consequences of PFOAs in their water supply from a factory that manufactures Teflon products from PFOA chemicals. Elsewhere General Electric for many years used PCBs from their plants to cover dusty roads and outdoor cinema parking areas. Most people had now idea that PCBs were so dangerous. These are now contaminated sites. And GE has spent a fortune to dredge PCBs from the Hudson River. No doubt yourself and other staff at the DEC, share concern for the military men and women (and of course local citizens) whose health could and would be compromised by burning any of the below listed military waste. I sincerely hope that you will research any toxic waste constituents considered for burning as munition waste.

The Tennessee Department of Environment and Conservation, Division of Air Pollution Control is reopening two existing major source operating permits issued to BAE Systems Ordnance Systems Inc. (BAE) at Holston Army Ammunition Plant, subject to provisions of the Tennessee Air Pollution Control Regulations. A major source operating permit is required by both the Federal Clean Air Act and the Tennessee Air Pollution Control Regulations. EPA will perform a 45-day review concurrently with the state public comment period. Both agencies are accepting public comment on draft conditions and permit modifications.

The proposed permit modifications include a condition that expressly prohibits open burning of asbestos, which we support, but the condition fails to address other highly toxic waste constituents in this same waste treatment stream, particularly PFAS. Exposure to PFAS has been shown to affect growth and development, reproduction, thyroid function, the immune system, injure the liver and increase risk for certain cancers.

The current permit conditions allow Holston Army Ammunition Plant to annually open burn as much as 1,250,000 pounds of munitions wastes that may contain as much as 15% PFAS by weight. PFAS are not destroyed in an open fire and are therefore widely dispersed to the air and the surrounding environment where they accumulate in people, as well as fish, wildlife and food crops. At higher temperatures, poisonous hydrogen fluoride gas may be generated. Hydrogen fluoride is a listed hazardous air pollutant subject to regulation by U.S. EPA and authorized states under the Clean Air Act, as are other air emissions from open burning at Holston.

At other Department of Defense sites like the Blue Grass Army Depot in Kentucky, the military is expressly prohibited from open burning PFAS and dozens of other toxic wastes. Both Blue Grass and Holston are located in EPA Region 4. And we are adamant that Tennessee residents, workers and environment are afforded the same level of protection as their Kentucky neighbors.

Therefore, we request that the permit condition prohibiting open burning of asbestos (or other appropriate condition) be EXPANDED to include the following which are gleaned from the Blue Grass permit. Specifically, the Permittee shall not treat, by either open burning or open detonation, munitions or wastes that contain any of the items or substances listed below:

- *Hazardous waste from offsite sources*
- *Ammunition that is 0.50 caliber or smaller*
- *Municipal waste*
- *Dunnage*
- *Containerized gases*
- *Oil*
- *Pesticides*
- *Herbicides*
- *Ammonium perchlorates*

- *Dioxins or furans*
- *Titanium tetrachloride*
- *Polychlorinated biphenyls (PCBs)*
- *Flechettes*
- *Rounds containing submunitions*
- *White phosphorus*
- *Red phosphorous*
- *Colored smoke*
- *Hexachloroethane (HC) smoke*
- *Napalm*
- *Riot control agents*
- *Biological agents*
- *Choking agents*
- *Nerve agents*
- *Blood agents*
- *Blister agents*
- *Incapacitating agents*
- *Chemical warfare materiel*
- *Components of liquid filled rounds or chemical warfare materiel*
- *Nuclear components or devices*
- *Naturally occurring radioactive materials*
- *Depleted uranium (DU)*
- *Any liquids or items containing free liquids*
- *Asbestos*
- *Munitions wastes that are a potential source of Per- and polyfluoroalkyl substances (PFAS), including Teflon, Viton, and Viton-A. This also includes both short and long chain PFAS*
- *Waste Military Munitions with a different chemical composition from those already being treated at Holston*

Source document: *Hazardous Waste Facility Permit, Open Burning and Open/Buried Detonation (OB/OD) Section, Blue Grass Army Depot, KY8-213-820-105 AI: 2805 Activity: APE20040007, November 2018.*

Online at <https://cswab.org/wp-content/uploads/2018/12/Bluegrass-Army-Depot-OBOD-Final-Permit-Nov-2018.pdf>

IMPORTANT NOTE: *These public comments are not to be construed as supporting ANY open burning at Holston – the public notice specifies that regulators are only accepting comment on proposed conditions and permit modifications and our comments are submitted in this specific context. Thank your careful consideration of our comments and recommendations.*

Response: The specific conditions related to open burning, which might be applicable to PFAS, are not open for public comment⁵. However, because PFAS is emerging as a substance of concern due to the health effects associated with these substances (see <https://www.epa.gov/pfas/basic-information-pfas#health> for a summary), a general response to the commenters' concerns is appropriate.

The Division's authority to regulate PFAS-related emissions is limited, because PFAS compounds are not criteria pollutants or hazardous air pollutants and are not listed pollutants under Section 111 of the Clean Air Act. Our ability to address PFAS is also limited by the lack of available information on the amount of PFAS used by the facility. One commenter submitted a table showing the PFAS content of various explosives, but we still do not know actual PFAS use. However, EPA has added PFAS to the list of substances that must be reported in the TRI for 2020, and the TRI will better identify the specific compounds emitted at the facility.

In the longer term, Holston Army Ammunition Plant is working to phase out the open burning of explosives and explosive-contaminated materials using new treatment technologies for contaminated materials. The permittee is also assessing the viability of alternative technologies for explosive wastes. Alternative treatment technologies would be subject to additional requirements, such as the hazardous waste combustor MACT (40 CFR 63 Subpart EEE) or the standards of performance for

⁵ TAPCR 1200-03-09-.02(11)(f)6.(ii) states, "Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable."

commercial and industrial solid waste incinerators (40 CFR 60 Subpart CCCC), which would establish standards for products of combustion of PFAS, such as hydrogen fluoride.

Comment #2 – Open Burning of PVC

One commenter requested amendment of the permit to prohibit the open burning of materials that contain polyvinyl chloride (PVC), as follows:

In addition to signing the petition to prohibit open burning of items containing PFAS, etc, we would like to bring another issue to your attention. In the past, we saw a TDEC report that indicated that HSAAP was open burning conduits and perhaps other items which contain Polyvinyl Chloride (PVC). At a meeting with BAE, HSAAP and other attendees, we advised Colonel Ortiz and Joseph Kennedy of the contents of the report (or inspection). They both assured us that PVC was not being open burned at HSAAP and any information the contrary was inaccurate. However, when we asked them if they would agree to voluntarily amend their permits to expressly prohibit such activity, they refused.

We now ask that you include a specific prohibition in the permits to prohibit the open burning of any items contains PVC. As you well know, burning PVC release Vinyl Chloride Monomer, a compound that is extremely dangerous to humans.

Response: Vinyl chloride and some of its products of combustion (chlorine and hydrogen chloride) are hazardous air pollutants subject to regulation under Section 112 of the Clean Air Act, and the Division does have the authority to regulate emissions of these pollutants. As we noted above, amending the permit to prohibit the open burning of vinyl chloride would not be in accordance with the Title V regulations for reopening of a permit, because the requested change is not open for public comment.

The report to which the commenter refers is presumably the December 2018 site visit report. That report noted that PVC containing materials, such as conduit, might be burned in rare cases but that open burning of PVC was uncommon. Since that time, the facility has improved its waste segregation, and it is PVC-containing materials are no longer sent to the burn pile.

II. Comments submitted by U. S. EPA

1. *Conditions E61-16 and E61-17 refer to Attachment 27. Attachment 27 Table for General Provisions Applicability for 40 CFR 63 Subpart DDDDD includes an entry for the applicability of §63.10(d)(5). The table states that this regulation does not apply and refers to §63.7550(c)(11). This later citation does not exist in the code of federal regulations and a different citation should be added to the permit.*

Response: Attachment 27 of the permit was updated to correct the rule citation to §63.7550(c)(5)(xiii) (A compliance report must contain the following information depending on how the facility chooses to comply with the limits set in this rule... If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by you during a malfunction of a boiler, process heater, or associated air pollution control device or CMS to minimize emissions in accordance with §63.7500(a)(3), including actions taken to correct the malfunction).

2. *The permit lists the NO_x emission limit in Condition E61-6 as 3.63 tons during any period of 12 consecutive months. The statement of basis for this condition states, “Increased allowable NO_x emissions from 2.2 tons/year to 3.5 tons/year.” The permitting authority may wish to change the statement of basis to match the permitted limit of 3.63 tons/year.*

Response: The statement of basis was updated to note the correct increase in the emission limit for Condition E61-6.

3. *The statement of basis includes two entries for Condition E61-8 on page 11. The second entry’s emission limit matches the permit. The first entry can likely be deleted.*

Response: The duplicate entry for Condition E61-8 was removed from the statement of basis.

4. *The EPA also recommends removing Table 5 on page 16 in the statement of basis to avoid confusion.*

Response: Table 5 was removed from the statement of basis.