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BAY AREA AIR QUALITY MANAGEMENT DISTRICT

The Dow Chemical Company
901 Loveridge Road
Pittsburg, CA 94565
United States

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TITLE V

Wayne Kino
Director of Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V Reports

RE: TITLE V MONITORING REPORT FOR PERMIT #A0031

Enclosed is the Title V Monitoring Report for The Dow Chemical Company, Plant 31, located in Pittsburg, California for the period June 1, 2017 through November 30, 2017. Table VII of the Title V permit was modified for use as the Monitoring Report Template until such time as the Bay Area Air Quality Management District prescribes the use of a standard format.

A Reasonable Inquiry process was followed to review the monitoring requirements of the Title V permit. All required monitoring was performed and after review of the monitoring results all sources were found to be in compliance with the monitoring requirements of Table VII except for the following:

- S-389 B-502 Caustic Scrubber Instrument: On June 6, 2017, the block valve between the high pressure side of the differential pressure transmitter and the instrument tubing to S-336 B-502 caustic scrubber was not fully open, 40 CFR §63.8(c)(3).

- Pittsburg Site RMP: On September 6, 2017, it was determined the annual inspection of the protective pressure relief devices (pressure rupture disks) on the inlet and outlet of a pressure safety valve was not inspected by the due date as required by Major Facility Review Permit Standard Condition K for Plant #A0031.

- The combined ammonia emissions rate to the atmosphere from S-593, S-594, S-595, and S-596 exceeded 0.02 pounds on any day for 23 days (District Condition 4780 Part 3).

Based on information at the completion of the reasonable inquiry process, I certify that the above information is true, accurate, and complete to the best of my belief.

If you have any questions regarding this Monitoring Report, please call Marv Louie at 925-432-5525.

Sincerely,

Balaji Venkataraman

Balaji Venkataraman
Pittsburg Site Director
The Dow Chemical Company
Pittsburg, California 94565

Enclosure

VII. APPLICABLE EMISSION LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency column indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown using the following codes: annual (A), semi-annual (SA), quarterly (Q), monthly (M), weekly (W), daily (D), hourly (H), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
Facility

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-328.1, Tanks > 75 m3	N		Emission Control System with abatement with efficiency of ≥ 90% by weight until VOC concentration in tank ≤ 10,000 ppm as methane (Does not apply to tanks meeting limited exemption per 8-5-117, vapor pressure ≤ 0.5 psia)	BAAQMD 8-5-502	P-E	portable monitor	Yes	In Compliance
VOC	SIP 8-5-328, Tanks > 75m3	Y		Liquid balancing – resulting liquid has TVP < 0.5 psia or Emission Control System with abatement with efficiency of ≥ 90% by weight until VOC concentration in tank ≤ 10,000 ppm as methane	None BAAQMD 8-5-502	N P-A	N/A Source Test	Yes	In Compliance
VOC	BAAQMD 8-5-331	N		Tank Cleaning Agents meet 331.1, 331.2, and 331.3 or Emission Control System with abatement with efficiency of ≥ 90% by weight	None BAAQMD 8-5-502	N P-E	N/A portable monitor	Yes	In Compliance
VOC	BAAQMD 8-5-332	N		Tank sludge container standards; includes gap criteria	BAAQMD 8-5-332	N	None	Yes	In Compliance
VOC	BAAQMD 8-10-301	N		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	8-10-501	P-E	Records	Yes	In Compliance
VOC	SIP 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	None	P-E	Records	Yes	In Compliance
VOC	BAAQMD 8-10-302	N		Opening of Process Vessels: 302.1 TOC concentration ≤ 10,000 ppm as methane, 302.2 if greater than 10,000 ppm, then number of vessels less than 10% of total vessels during any consecutive 5 year period and emissions ≤ 15 pounds per day.	8-10-501	P-E	Records	Yes	In Compliance
	BAAQMD 11-2-401.3	N		For each asbestos renovation operation and for all dry removals, a written notification of intent to renovate shall be provided to the APCO at least ten (10) days prior to commencement of renovation.	BAAQMD 11-2-401.3	E	Notification	N/A	Intermittent Compliance
	40 CFR Part 68 (RMP)			Inspections and tests shall be performed on process equipment Overdue relief device inspection was identified.	40 CFR 68.73(d)	P	Inpsections	N/A	Intermittent Compliance

Table VII-B
Applicable Limits and Compliance Monitoring Requirements S-4, HCl Rail Tank Car Loading, Central Loading Rack TC-1 Abated by A-199, Manufacturing Services S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	For A-199, Condition 17985, Parts 6 & 7 For S-336, Condition 6859, Part 6,	For A-199: P-D For S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	For A-199, Condition 17985, Parts 6 & 7 For S-336, Condition 6859, Part 6,	For A-199: P-D For S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	For A-199, Condition 17985, Parts 6 & 7 For S-336, Condition 6859, Part 6,	For A-199: P-D For S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	For A-199, Condition 17985, Parts 6 & 7 For S-336, Condition 6859, Part 6,	For A-199: P-D For S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance

Table VII-B

Applicable Limits and Compliance Monitoring Requirements S-4, HCl Rail Tank Car Loading, Central Loading Rack TC-1 Abated by A-199, Manufacturing Services S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	For A-199, Condition 17985, Parts 6 & 7 For S-336, Condition 6859, Part 6,	For A-199: P-D For S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
FP	Logistics Activity	Y		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	For A-199, Condition 17985, Parts 6 & 7 For S-336, Condition 6859, Part 6,	For A-199: P-D For S-336: C	Caustic concentration Temperature monitor		
Caustic Concentration	Condition 17985, Part 6	Y		Caustic concentration ≥ 1%, wt	Condition 17985, Part 7	P-D	Caustic concentration	Yes	In Compliance

Note: S-4 subject to NESHAP Subpart NNNNN (details in MACT monitoring Table).

Table VII-C
Applicable Limits and Compliance Monitoring Requirements S-5, 720 Terminalized Products
1,3-Dichloropropene Loading abated by A-144, Vapor Balance System All other Non-Exempt Material Loading Abated by S-336 or S-389, Thermal Oxidizers
Other Exempt Material Loading - Unabated

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Exempt liquids	BAAQMD 8-6-110	Y		True vapor pressure < 0.5 psia	BAAQMD 8-6-501.1	P-E	Records	Yes	In Compliance
VOC	BAAQMD 8-6-302.1	Y		Loading into delivery vehicle: Vapor balanced, emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-302.2	Y		Loading into delivery vehicle or transportable container: Submerged fill pipe, bottom filling, or vapor loss control system, emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-304	Y		Loading into storage tank (2,008 to 39,630 gallons): Vapor balance or vapor loss control system, emissions < 0.17 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-305, 8-6-306, Condition 11276, Part 2	Y		Vapor tight, leak free, good working order	Condition #11276, Parts 5 & 6	P-E	Inspection	Yes	In Compliance

Note: S-5 is also subject to NESHAP Subpart EEEE during 1,3-Dichloropropene loading (details in MACT Monitoring Table).

Table VII-D
Applicable Limits and Compliance Monitoring Requirements S-6, 725 Terminalized Products
All Non-Exempt Material Loading Abated by S-336 or S-389, Thermal Oxidizers Dowanol PM Loading Abated by A-153, Vapor Balance System
All other Exempt Materials: Loading Unabated

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Exempt liquids	BAAQMD 8-6-110	Y		True vapor pressure < 0.5 psia	BAAQMD 8-6-501.1	P-E	Records	Yes	In Compliance
VOC	BAAQMD 8-6-302.1	Y		Loading into delivery vehicle: Vapor balanced, emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-302.2	Y		Loading into delivery vehicle or transportable container: Submerged fill pipe, bottom filling, or vapor loss control system, emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-304	Y		Loading into storage tank (2,008 to 39,630 gallons): Vapor balance or vapor loss control system, emissions < 0.17 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-305, 8-6-306, Condition 11276, Part 2	Y		Vapor tight, leak free, good working order	Condition #11276, Parts 5 & 6	P-E	Inspection	Yes	In Compliance

Table VII-E
Applicable Limits and Compliance Monitoring Requirements S-7, 725 Block Truck Loading Each Abated by S-336 or S-389, Thermal Oxidizers

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Exempt liquids	BAAQMD 8-6-110	Y		True vapor pressure < 0.5 psia	BAAQMD 8-6-501.1	P-E	Records	Yes	In Compliance
VOC	BAAQMD 8-6-302.1	Y		Loading into delivery vehicle: Vapor balance or vapor loss control system with emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-302.2	Y		Loading into delivery vehicle or transportable container: Submerged fill pipe, bottom filling, or vapor loss control system with emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-304	Y		Loading into storage tank (2,008 to 39,630 gallons): Vapor balance or vapor loss control system with emissions < 0.17 pounds/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-305, 8-6-306, Condition 11276, Part 2	Y		Vapor tight, leak free, good working order	Condition #11276, Parts 5 & 6	P-E	Inspection	Yes	In Compliance

Table VII–F
Applicable Limits and Compliance Monitoring Requirements S-27, T-605A Terminalized Products
S-30, Material Flow Tank T-608B
Each Abated by S-336 or S-389, Thermal Oxidizers

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-306	N		Control device standards; includes 95% efficiency requirement	BAAQMD Conditions 2039, part 13, and 6859, part 6	C	temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-306	Y		Control device standards; includes 95% efficiency requirement	BAAQMD Conditions 2039, part 13, and 6859, part 6	C	Temperature monitoring	Yes	In Compliance
VOC	BAAQMD 8-5-328	N		Emission Control System with abatement with efficiency of ≥ 90% by weight until VOC concentration in tank ≤ 10,000 ppm as methane	BAAQMD 8-5-502	P-E	portable monitor	Yes	In Compliance
VOC	SIP 8-5-328.1.1	Y		Tank cleaning control by liquid balancing in which the resulting organic liquid has a TVP is less than 0.5 psia	BAAQMD 8-5-501	P/E	Records	Yes	In Compliance
VOC	SIP 8-5-328.1.2	Y		Concentration of < 10,000 ppm as methane after cleaning	BAAQMD 8-5-503	P/E	Portable hydrocarbon detector	Yes	In Compliance
VOC	BAAQMD 8-5-331	N		Tank Cleaning Agents meet 331.1, 331.2, and 331.3 or Emission Control System with abatement with efficiency of ≥ 90% by weight	None BAAQMD 8-5-502	N P-E	N/A portable monitor	Yes	In Compliance
VOC	Condition 11276, part 2	Y		Vapor tight with no detectible organic emissions	Condition 11276, part 5, part 6	P/E	portable monitor	Yes	In Compliance

Note: S-27 and S-30 are both subject to NSPS Subpart Kb (details in NSPS Kb Table).

Table VII–G
Applicable Limits and Compliance Monitoring Requirements [Tanks storing liquids with vapor pressure ≤ 0.5 psia]
S-28, T-605B Material Flow S-36, N-Serve Plant Storage S-45, T-1 N-Serve
S-56, T-31 N-Serve S-57, T-32 N-Serve S-61, T-780 N-Serve S-62, T-781 N-Serve S-63, T-782 N-Serve S-346, T-241
S-372, T-20 Block 560 Storage Tank, Abated by A-400 (S-400), Thermal Oxidizer R- 901
S-382, N-Serve Unit Storage T-783
S-383, Petroleum Hydrocarbon Distillate Tank S-407, T-728 N-Serve Formulation Tank
S-447, T-774

S-466, Plant 663 T-408A Intermediate Product Storage S-467, Plant 663 T-408B Intermediate Product Storage S-498, Sym Tet T-102 Storage Tank

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD Condition # 21059, Part 1	Y		Vapor pressure ≤ 0.5 psia	BAAQMD Condition # 21059, Part 2	P/E	Records	Yes	In Compliance

Note: S-28, S-36, S-45, S-56, S-57, S-61,S-62, S-63, S-346, S-372, S-382, S-383, S-407, S-447, S-466, S-467, and S-498 are subject to NESHAP Subpart EEEE (details in MACT Monitoring Table).

Table VII–H
Applicable Limits and Compliance Monitoring Requirements S-29, T-608 Terminalized Products, S-31, T-609 Terminalized Products, S-33, T-727 Terminalized Products, S-35, T-773 Terminalized Products, S-151, T-614 Terminalized Products, S-153, T-604 Each Abated by S-336 or S-389, Thermal Oxidizers

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-306	N		Control device standards; includes 95% efficiency requirement	BAAQMD Conditions 2039, part 13, and 6859, part 6	C	Temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-306	Y		Control device standards; includes 95% efficiency requirement	BAAQMD Conditions 2039, part 13, and 6859, part 6	C	Temperature Monitoring	Yes	In Compliance
VOC	BAAQMD 8-5-328	N		Emission Control System with abatement with efficiency of ≥ 90% by weight until VOC concentration in tank ≤ 10,000 ppm as methane	BAAQMD 8-5-502	P-E	portable monitor	Yes	In Compliance
VOC	SIP 8-5-328.1.1	Y		Tank cleaning control by liquid balancing in which the resulting organic liquid has a TVP is less than 0.5 psia	BAAQMD 8-5-501	P/E	Records	Yes	In Compliance
VOC	SIP 8-5-328.1.2	Y		Concentration of < 10,000 ppm as methane after cleaning	BAAQMD 8-5-503	P/E	Portable hydrocarbon detector	Yes	In Compliance
VOC	BAAQMD 8-5-331	N		Tank Cleaning Agents meet 331.1, 331.2, and 331.3 or Emission Control System with abatement with efficiency of ≥ 90% by weight.	None BAAQMD 8-5-502	N P-E	N/A portable monitor	Yes	In Compliance
VOC	BAAQMD Condition# 11276, part 2	Y		Vapor tight with no detectible organic emissions	Condition 11276, part 5, part 6	P/E	portable monitor	Yes	In Compliance

Table VII-I
Applicable Limits and Compliance Monitoring Requirements S-40, Water Treatment HCl Storage T-24
Abated by A-175, Utilities T-24 Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		

Table VII-J
Applicable Limits and Compliance Monitoring Requirements S-44, N-Serve Plant
Abated by S-389, Sym-Tet Thermal Oxidizer R-501 or Abated by A-88, B-106 Sym-Tet Scrubber or
Abated by A-89, X-3 Emergency Venturi at N-Serve/Sym-Tet

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	For S-389: Condition 2039,	S-389: C A-88/89: N	Temperature monitor N/A	Yes	In Compliance
Opacity	SIP 6301	Y		Ringelmann No. 1 for < 3 min/hr	For S-389: Condition 2039, Part 13 For A-88/ A-89: None	S-389: C A-88/89: N	Temperature monitor N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	Same as Above	Same as Above	Same as Above	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	Same as Above	Same as Above	Same as Above	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	Same as Above	Same as Above	Same as Above		
FP	SIP 6-311	Y		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	Same as Above	Same as Above	Same as Above		
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	For S-389: Condition 2039, Part 13 For A-88/ A-89: None	S-389: C A-88/89: N	Temperature monitor N/A	Yes	In Compliance
POC	SIP 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	None	P-E	Records	Yes	In Compliance
POC	BAAQMD 8-10-302	N		Opening of Process Vessels: 302.1 TOC concentration ≤ 10,000 ppm as methane, 302.2 if greater than 10,000 ppm, then number of vessels less than 10% of total vessels during any consecutive 5 year period and emissions ≤ 15 pounds per day.	8-10-501	P-E	Records	Yes	In Compliance

Note: T-70 and T-74 at S-44 are subject to NESHAP Subpart EEEE (details in MACT Monitoring Table)

Table VII– K
Applicable Limits and Compliance Monitoring Requirements [Pressure Tank < 75m3]
S-48, T19A N-Serve S-49, T19B N-Serve
Abated by A-154, Vent Recovery System H-320A & T-320

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	SIP 8-5-307	Y		< 100 ppm for non- pressure relief devices (expressed as methane) above background	Not specified	None	Method 21 Inspection	Yes	In Compliance
VOC	Condition 5148, Part 1	Y		Minimum of 85% control efficiency for VOC or emissions less than 15 lb/day	Condition 5148, Part 3	C	Pressure drop and temperature at A-154	Yes	In Compliance

Table VII–L
Applicable Limits and Compliance Monitoring Requirements [Pressure Tank < 75m3 with submerged fill]
S-55, T-30 N-Serve
S-408, T-723 Terminalized Products

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-307	N		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm for non- pressure relief devices (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance

Table VII-M
Applicable Limits and Compliance Monitoring Requirements S-135, HCl Storage Tank T-606A S-136, HCl Storage Tank T606B S-137, HCl Storage Tank T606C S-138, HCl Storage Tank T606D S-139, HCl Storage Tank T-606E Abated by A-18, Hydrochloric Acid Storage Tanks Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance

Note: S-135 through S-139 are subject to NESHAP Subpart NNNNN (details in MACT Monitoring Table).

Table VII-N
Applicable Limits and Compliance Monitoring Requirements S-172, Maintenance Exhaust Area M-5

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-19-302	Y		VOC content ≤ 2.8 pounds/gallon, excluding water	BAAQMD 8-19-501.1, 8-19-501.2	P-W	Records	Yes	In Compliance
VOC	BAAQMD 8-19-320.2	Y		Cleanup solvent VOC content < 0.42 pounds/gallon or collect and recycle or properly dispose of off site or use a spray gun washer compliant with BAAQMD 8-16	BAAQMD 8-19-501.1	P-M	Records	Yes	In Compliance

Table VII-O
Applicable Limits and Compliance Monitoring Requirements S-174, Gasoline Dispensing Facility

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD Regulation 8-7-301.6	Y		All Phase I Equipment (except components with allowable leak rates) shall be leak free (≤ 3 drops/minute) and vapor tight	BAAQMD Regulation 8-7-301.13 and 8-7-503.2	P/A	Static Pressure Performance Test, ST-30	Yes	In Compliance
VOC	BAAQMD Regulation 8-7-301.10	Y		98% or highest CARB vapor recovery rate	None	N	N/A	Yes	In Compliance
VOC	Condition #20666, part 1, part 2	Y		Drop tube/drain valve leak rate not to exceed 0.17 CFH at 2" H2O; minimum 360° rotation with maximum 108 pound-inch torque Rotable Adaptor Torque Test (CARB TP201.1B)	BAAQMD 8-7-503.2; BAAQMD Condition #20666 Part 2	P- once every 36 months	Drop tube/drain valve leak test (CARB TP 201.1C or 201.1D) and torque test (CARB TP)	Yes	In Compliance
VOC	Condition 24289, Part 1	N		20,000 gallons/12 months	BAAQMD 8-7-503.1	P-M	Records	Yes	In Compliance

Table VII-P
Applicable Limits and Compliance Monitoring Requirements S-176, Chloralkali Cooling Tower H-1A, Abated by A-30, Chloralkali Mist Eliminator
S-177, Chloralkali Cooling Tower H-1B, Abated by A-31, Chloralkali Mist Eliminator
S-178, Chloralkali Cooling Tower H-2A, Abated by A-32, Chloralkali Mist Eliminator
S-179 Chloralkali Cooling Tower H-2B, Abated by A-33, Chloralkali Mist Eliminator

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance

Table VII-Q
Applicable Limits and Compliance Monitoring Requirements S-286, Railcar Purging Facility at Car-Barn
Abated by A-55, Maintenance – Packed Bed Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	Condition #20826, Parts 1, 2	P-E	Visual Check	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	Condition #20826, Parts 1, 2	P-E	Visual Check	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
Visible Emissions	Condition #20826 Part 1	Y		If visible emissions are detected, then corrective action shall be taken.	Condition #20826, Parts 1, 2	P-E	Visual Check	Yes	In Compliance

Table VII-R
Applicable Limits and Compliance Monitoring Requirements S-302, Dowicil Train 1

S-303, Dowicil Train 2

Abated by A-192, Vent Recovery System (refrigeration)

Followed by S-389, Sym-Tet Thermal Oxidizer or S-336, Manufacturing Services Thermal Oxidizer, at least 89% of the Dowicil Plant operating time

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Methylene Chloride	Condition 14438, Part 6	Y		1233 lb/day of methylene chloride sent to halogen acid furnace S-389	Condition 14438, Part 7	D	District Approved Calculation Method	Yes	In Compliance

Note: S-302 and S-303 will be subject to NESHAP Subpart FFFF upon Title V issuance, and were previously subject to

Table VII-S
Applicable Limits and Compliance Monitoring Requirements S-323, Dryer, D-605A
S-324, Dryer, D-609

S-535, Portable Dryer, D-605B

Each abated by S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-1-110.3	Y		VOC abated ≥ 85% by weight and ≥ 90% of organic carbon oxidized to CO2	Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance

Table VII-T
Applicable Limits and Compliance Monitoring Requirements S-336, Manufacturing Services Thermal Oxidizer
Abated by A-86, B14A & B Karbate Acid Absorber > A-21, B-15 Manufacturing Services Scrubber > A-54, B-15 Demister > A-72, B-16 Caustic Scrubber in series

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
NOx	Condition 6859, Part 3	Y		NOx ≤ 8.6 lbs/day as NO2	Condition 6859, Part 8	P- once every five years	Source Test	Yes	In Compliance
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 6859, Part 6	C	Temperature monitor	Yes	In Compliance
VOC	Condition 6859, Part 4	Y		Organic destruction efficiency ≥ 99.99% by weight	Condition 6859, Part 6	C	Temperature monitor	Yes	In Compliance
VOC	Condition 6859, Part 6	Y		Temperature ≥ 1807 degrees F	Condition 6859, Part 6	C	Temperature monitor	Yes	In Compliance
SO2	BAAQMD 9-1-301	Y		ground level concentrations 0.5 ppm for 3 min; 0.25 ppm for 60 min; 0.05 ppm for 24 hrs	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-304	Y		Sulfur content ≤ 0.5% by weight or do not emit SO2 > 300 ppm, dry	None	N	N/A	Yes	In Compliance
Liquid waste	Condition 6859, Part 1	Y		Feed rate ≤ 650 lbs/hour	Condition 6859, Part 5	P-H	Records	Yes	In Compliance
pH	Condition 6859, Part 9	Y		pH ≥ 7.6 of A-72 whenever liquid feed or process vents are being abated	Condition 6859, Part 9	P-H	pH monitor	Yes	In Compliance

Note: S-336 is subject to 40 CFR Part 63 Subpart EEE (details in MACT Monitoring Table) and is subject to 40 CFR Part 64 Compliance Assurance Monitoring requirements (details in CAM Monitoring Table).

Table VII-U
Applicable Limits and Compliance Monitoring Requirements S-389, Sym-Tet Thermal Oxidizer
Abated by A-74, B-502 Caustic Scrubber and A-94, B-501 Acid Absorber at all times Abated by A-75, X-505 Particulate Scrubber when burning chlorinated liquids

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP FP	SIP 6-310 BAAQMD 6-1-311	Y N		0.15 grain/dscf 4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None None	N N	N/A N/A	Yes	In Compliance
FP	SIP 6-311	Y		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
NOx	Condition 2039, Part 10	Y		NOx ≤ 6194 lbs/year	Condition 2039, Part 9	P – semiannual	source test & calculations	Yes	In Compliance
CO	Condition 2039, Part 4	Y		250 ppm at 3% O2	Condition 2039, Part 10	P – semiannual	Source test	Yes	In Compliance
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	Condition 2039, Part 5	Y		Organic destruction efficiency ≥ 99.99% by weight	Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
SO2	BAAQMD 9-1-301	Y		ground level concentrations 0.5 ppm for 3 min; 0.25 ppm for 60 min; 0.05 ppm for 24 hrs	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-304	Y		Sulfur content ≤ 0.5% by weight or do not emit SO2 > 300 ppm, dry	None	N	N/A	Yes	In Compliance
Temperature	Condition 2039, Part 1	Y		Temperature ≥ 1830 degrees F	Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
Residence time	Condition 2039, Part 2	Y		Residence time ≥ 0.9 seconds	None	N	N/A	Yes	In Compliance
Liquid waste	Condition 2039, Parts 7 & 8	Y		Annual average liquid feed ≤ 45.1 gallons/hour Maximum daily liquid feed < 70 gallons/hour	Condition 2039, Part 13	C	Liquid mass flowmeter/ calculations	Yes	In Compliance

Table VII-U
Applicable Limits and Compliance Monitoring Requirements S-389, Sym-Tet Thermal Oxidizer
Abated by A-74, B-502 Caustic Scrubber and A-94, B-501 Acid Absorber at all times Abated by A-75, X-505 Particulate Scrubber when burning chlorinated liquids

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
pH	Condition 2039, Part 16	Y		pH ≥ 7.35 at A-74, whenever liquid feed or process vents are being abated	Condition 2039, Part 16	P-H	pH monitor	Yes	In Compliance
	40 CFR 63.8(c)	Y		CMS to be installed, operational, and the data verified as specified in the relevant standard	40 CFR 63.8(c)	P	Inspection	N/A	Intermittent Compliance

Notes: S-389 is subject to Subpart EEE (details in MACT Monitoring Table) and is subject to 40 CFR Part 64 Compliance Assurance Monitoring requirements (details in CAM Monitoring Table).

Table VII-V
Applicable Limits and Compliance Monitoring Requirements A-400 (S-400), Thermal Oxidizer R-901 Abated by A-401, Acid Adsorber B-901, Followed by A-79, Packed Bed Scrubber B-902

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
FP	SIP 6-311	Y		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 2213, Part 9	C	Temperature Monitor	Yes	In Compliance
VOC	Condition 2213, Part 8	Y		Organic destruction efficiency ≥ 64% by weight	Condition 2213, Part 9	C	Temperature Monitor	Yes	In Compliance
SO2	BAAQMD 9-1-301	Y		ground level concentrations 0.5 ppm for 3 min; 0.25 ppm for 60 min; 0.05 ppm for 24 hrs	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-302	Y		SO2 ≤ 300 ppm, dry	None	N	N/A	Yes	In Compliance
Temp	Condition 2213, Part 9	Y		Temperature ≥ 1472 degrees F	Condition 2213, Part 9	C	Temperature Monitor	Yes	In Compliance

Notes: A-400 (S-400) is subject to 40 CFR Part 64 Compliance Assurance Monitoring

requirements (details in CAM Monitoring Table).

Table VII-W
Applicable Limits and Compliance Monitoring Requirements S-402, HCl Storage Tank
Abated by A-401, Acid Adsorber B-901 and A-79, Packed Bed Scrubber B-902

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
HCl	Condition 5147, Part 2	Y		200,000 gallons/12-months	Condition 5147, Part 3	P/E	Records	Yes	In Compliance

Table VII-X
Applicable Limits and Compliance Monitoring Requirements S-428, Sym-Tet Processing, H-300
S-448, H-200 Sym-Tet
Both Abated by A-154, Vent Recovery System H-320A & B, T-320

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-1-110.3	Y		VOC abated ≥ 85% by weight; if achieved through incineration, ≥ 90% of organic carbon must be oxidized to CO2	Condition 5148, Part 3	C	Pressure Drop and Temperature monitor	Yes	In Compliance
VOC	Condition 5148, Part 1	Y		VOC abated ≥ 85% by weight or emit < 15 lbs/day as carbon	Condition 5148, Part 3	C	Pressure Drop and Temperature monitor	Yes	In Compliance
Temp	Condition 5148, Part 2	Y		Temperature exiting Heat Exchanger ≤ 140 degF	Condition 5148, Part 3	C	Temperature monitor	Yes	In Compliance

Table VII–Y
Applicable Limits and Compliance Monitoring Requirements S-431, Carbon Tetrachloride Pressure Vessel, D-260A
S-432, Carbon Tetrachloride Pressure Vessel, D-260B
Each Abated by S-336, Manufacturing Services Thermal Oxidizer or Operated as Pressure Vessels

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-306	N		Control device standards; includes 95% efficiency requirement	BAAQMD Condition 6859, part 6	C	Temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-306	Y		Control device standards; includes 95% efficiency requirement	BAAQMD Condition 6859, part 6	C	Temperature monitoring	Yes	In Compliance
VOC	BAAQMD 8-5-307	N		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm for non- pressure relief devices (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD 8-5-328.1	N		Abatement by approved control device until concentration of organics is < 10,000 ppm as methane	BAAQMD 8-5-503	P/E	Portable hydrocarbon detector	Yes	In Compliance
VOC	SIP 8-5-328.1.1	Y		Tank degassing control by liquid balancing in which the resulting organic liquid has a TVP is less than 0.5 psia	BAAQMD 8-5-501	P/E	Records	Yes	In Compliance
VOC	SIP 8-5-328.1.2	Y		Abatement by Approved Control System until concentration of organics is < 10,000 ppm as methane	BAAQMD 8-5-503	P/E	Portable hydrocarbon detector	Yes	In Compliance

Table VII-Z
Applicable Limits and Compliance Monitoring Requirements S-434, Manufacturing Services Facility
Abated by A-87, HCl Absorber/Heat Exchanger H-109 and A-85, Absorber – Packed Bed in series, Followed by A-199, Manufacturing Services Scrubber B-12, or Abated by S-336, Manufacturing Services Thermal Oxidizer, or Abated by A-199, Manufacturing Services Scrubber B-12

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	For A-199 and A-87/A-85/A-199: Condition 17985, Part 7 Condition 6859, Part 6	A-199: P-D S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	For A-199 and A-87/A- 85/A-199: Condition 17985, Part 7 Condition 6859, Part 6	A-199: P-D S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	For A-199 and A-87/A- 85/A-199: Condition 17985, Part 7 Condition 6859, Part 6	A-199: P-D S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
FP	SIP 6-310			0.15 grain/dscf	For A-199 and A-87/A- 85/A-199	A-199: P-D	Caustic concentration	Yes	In Compliance

Table VII-Z

Applicable Limits and Compliance Monitoring Requirements S-434, Manufacturing Services Facility

Abated by A-87, HCl Absorber/Heat Exchanger H-109 and A-85, Absorber – Packed Bed in series, Followed by A-199, Manufacturing Services Scrubber B-12, or Abated by S-336, Manufacturing Services Thermal Oxidizer, or Abated by A-199, Manufacturing Services Scrubber B-12

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
FP	BAAQMD 6-1-311	N		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	For A-199 and A-87/A-85/A-199: Condition 17985, Part 7 Condition 6859, Part 6	A-199: P-D S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	For A-199 and A-87/A- 85/A-199: Condition 17985, Part 7 For S-336: Condition 6859, Part 6	A-199: P-D S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	For A-199 and A-87/A-85/A-199: Condition 17985, Part 7 Condition 6859, Part 6	A-199: P-D S-336: C	Caustic concentration Temperature monitor	Yes	In Compliance
POC	BAAQMD 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	8-10-501	P-E	Records	Yes	In Compliance
POC	SIP 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	None	P-E	Records	Yes	In Compliance
POC	BAAQMD 8-10-302	N		Opening of Process Vessels: 302.1 TOC concentration ≤ 10,000 ppm as methane, 302.2 if greater than 10,000 ppm, then number of vessels less than 10% of total vessels during any consecutive 5 year period and emissions ≤15 pounds per day.	8-10-501	P-E	Records	Yes	In Compliance
Caustic concentration	Condition 17985, Part 9	Y		A-199 Caustic concentration ≥ 1% wt.	Condition 17985, Part 7	A-199: P-D	Caustic concentration	Yes	In Compliance
HCl	Condition 17985, Part 6	Y		36% HCl production ≤108,300 tons/12 months	Condition 17985, Part 9	P-M	Records	Yes	In Compliance

Note: HCl emissions from S-434 and A-199 is subject to NESHAP Subpart NNNNN (details in MACT Monitoring Table). S-434 Carbon Distillation Process subject to NESHAP Subpart FFFF (details TBD in MACT Monitoring Table).

Table VII-AA
Applicable Limits and Compliance Monitoring Requirements S-444, U-183 Dowtherm Heater

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310.3	N		0.15 grain/dscf, corrected to dry standard conditions 6% O2	None	N	N/A	Yes	In Compliance
FP	SIP 6-310.3	Y		0.15 grain/dscf, corrected to dry standard conditions 6% O2	None	N	N/A	Yes	In Compliance
NOx	BAAQMD 9-7-301.1	N		30 ppmvd at 3% O2	Condition 11054, Part 5	P – Annual	Source Test	Yes	In Compliance
NOx	SIP 9-7-301.1	Y		30 ppmvd at 3% O2	Condition 11054, Part 5	P – Annual	Source Test	Yes	In Compliance
NOx	BAAQMD 9-7-307.5	N		9 ppmvd at 3% O2	Condition 11054, Part 5	P – Annual	Source Test	Yes	In Compliance
NOx	Condition 11054 Part 2b			9 ppmvd at 3% O2	Condition 11054, Part 5	P – Annual	Source Test	Yes	In Compliance
CO	BAAQMD 9-7-301.4	N		400 ppmvd at 3% O2	Condition 11054, Part 5	P – Annual	Source Test	Yes	In Compliance
CO	SIP 9-7-301.2	Y		400 ppmvd at 3% O2	Condition 11054, Part 5	P – Annual	Source Test	Yes	In Compliance
CO	Condition 11054, Part 3	Y		50 ppmvd at 3% O2	Condition 11054, Part 5	P – Annual	Source Test	Yes	In Compliance
SO2	BAAQMD 9-1-301	Y		ground level concentrations 0.5 ppm for 3 min; 0.25 ppm for 60 min; 0.05 ppm for 24 hrs	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-302	Y		SO2 ≤ 300 ppm, dry	None	N	N/A	Yes	In Compliance

Table VII-AB
Applicable Limits and Compliance Monitoring Requirements S-446, Sym-Tet Plant
Abated by S-389 when S-389 is operating, or Abated by A-88, B-106 Sym-Tet Scrubber or
Abated by A-89, X-3 Emergency Venturi at N-Serve/Sym-Tet
Reactor and Stripping Systems, or abated by A-168, B-609 Emergency Backup Caustic Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	For S-389: Condition 2039, Part 13 For A-88/ A-89: None	S-389: C A-88/89: N	Temperature monitor N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	For S-389: Condition 2039, Part 13 For A-88/ A-89: None	S-389: C A-88/89: N	Temperature monitor N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	Same as Above	Same as Above	Same as Above	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	Same as Above	Same as Above	Same as Above	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	Same as Above	Same as Above	Same as Above		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	Same as Above	Same as Above	Same as Above		
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	For S-389: Condition 2039, Part 13 For A-88/ A-89: None	S-389: C A-88/89: N	Temperature monitor N/A	Yes	In Compliance
POC	BAAQMD 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	8-10-501	P-E	Records	Yes	In Compliance
POC	SIP 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	None	P-E	Records	Yes	In Compliance
POC	BAAQMD 8-10-302	N		Opening of Process Vessels: 302.1 TOC concentration ≤ 10,000 ppm as methane, 302.2 if greater than 10,000 ppm, then number of vessels less than 10% of total vessels during any consecutive 5 year period and emissions ≤15 pounds per day.	8-10-501	P-E	Records	Yes	In Compliance

Table VII–AC
Applicable Limits and Compliance Monitoring Requirements [Pressure Tank < 75m3]
S-458, T-80 in Block 660

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-307	N		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP	Y		< 100 ppm for non- pressure relief devices (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance

Table VII-AD
Applicable Limits and Compliance Monitoring Requirements S-460, Dowtherm Heater U-83

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310.3	N		0.15 grain/dscf, corrected to dry standard conditions 6% O2	None	N	N/A	Yes	In Compliance
FP	SIP 6-310.3	Y		0.15 grain/dscf, corrected to dry standard conditions 6% O2	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
FP	SIP 6-311	Y		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
NOx	BAAQMD 9-7-301.1	Y		30 ppmvd at 3% O2	Condition 503, Part 7	P/A	Source Test	Yes	In Compliance
NOx	SIP 9-7-301.1	Y		30 ppmvd at 3% O2	Condition 503, Part 7	P/A	Source Test	Yes	In Compliance
NOx	BAAQMD 9-7-307.5	N		9 ppmvd at 3% O2	Condition 503, Part 7	P/A	Source Test	Yes	In Compliance
NOx	Condition #503, Part 3b	Y		9 ppmvd at 3% O2	Condition 503, Part 7	P/A	Source Test	Yes	In Compliance
CO	BAAQMD 9-7-307.5	N		400 ppmvd at 3% O2	Condition 503, Part 7	P/A	Source Test	Yes	In Compliance
CO	SIP 9-7-301.2	Y		400 ppmvd at 3% O2	Condition 503, Part 7	P/A	Source Test	Yes	In Compliance
SO2	BAAQMD 9-1-301	Y		ground level concentrations 0.5 ppm for 3 min; 0.25 ppm for 60 min; 0.05 ppm for 24 hrs	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-302	Y		SO2 ≤ 300 ppm, dry	None	N	N/A	Yes	In Compliance

Table VII-AE
Applicable Limits and Compliance Monitoring Requirements
S-461, Plant 663 R-401 Reactor, Abated by A-96, B-405 Acid Absorber & Tails Tower
S-462, Plant 663 R-402 Reactor, Abated by A-96, B-405 Acid Absorber & Tails Tower
S-463, Plant 663 F-403 Separator

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A	Yes	In Compliance

Notes: S-461, S-462, and S-463 are subject to Subpart MMM (details in MACT Monitoring Table).

Table VII-AF
Applicable Limits and Compliance Monitoring Requirements S-465, Product Dryer
Abated by A-95, F-413 Bag Filter and A-114, Vacuum System with Condenser

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	Condition 23250, Part 3	P/W	Pressure Drop Monitoring	Yes	In Compliance
Opacity	BAAQMD 6-301	Y		Ringelmann No. 1 for < 3 min/hr	Condition 23250, Part 3	P/W	Pressure Drop Monitoring	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	Condition 23250, Part 3	P/W	Pressure Drop Monitoring	Yes	In Compliance
FP	BAAQMD 6-310	Y		0.15 grain/dscf	Condition 23250, Part 3	P/W	Pressure Drop Monitoring	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	Condition 23250, Part 3	P/W	Pressure Drop Monitoring	Yes	In Compliance
FP	BAAQMD 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	Condition 23250, Part 3	P/W	Pressure Drop Monitoring		

Table VII-AG
Applicable Limits and Compliance Monitoring Requirements S-474, Plant 421 - Verdict Reactor R-210, Abated by A-98, B-202 Reactor Vent Scrubber, A-99, B-203 Scrubber, routed to S-694 Reaction/HCl Absorption SystemS-476, Plant 421 Trifluoro, Abated by A-97, B-201 Organic Scrubber, and A-100, B-230 Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	None	N	N/A	Yes	In Compliance

Notes: S-474 will be subject to 40 CFR Part 63, Subpart FFFF upon Title V issuance.

Table VII-AH
Applicable Limits and Compliance Monitoring Requirements S-482, Carbon Tetrachloride Rail Car Loading Each Abated by S-336 or S-389, Thermal Oxidizers

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Exempt liquids	BAAQMD 8-6-110	Y		True vapor pressure < 0.5 psia	BAAQMD 8-6-501.1	P-E	Records	Yes	In Compliance
VOC	BAAQMD 8-6-302.1	Y		Loading into delivery vehicle: Vapor balance or vapor loss control system with emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-302.2	Y		Loading into delivery vehicle or transportable container: Submerged fill pipe, bottom filling, or vapor loss control system with emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-304	Y		Loading into storage tank (2,008 to 39,630 gallons): Vapor balance or vapor loss control system with emissions < 0.17 pounds/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-305, 8-6-306, Condition 11276, Part 2	Y		Vapor tight, leak free, good working order	Condition #11276, Parts 5 & 6	P-E	Inspection	Yes	In Compliance

Table VII-A1
Applicable Limits and Compliance Monitoring Requirements S-483, Carbon Tetrachloride Rail Car Loading Each Abated by S-336 or S-389, Thermal Oxidizers

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Exempt liquids	BAAQMD 8-6-110	Y		True vapor pressure < 0.5 psia	BAAQMD 8-6-501.1	P-E	Records	Yes	In Compliance
VOC	BAAQMD 8-6-302.1	Y		Loading into delivery vehicle: Vapor balance or vapor loss control system with emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-302.2	Y		Loading into delivery vehicle or transportable container: Submerged fill pipe, bottom filling, or vapor loss control system with emissions < 0.35 lbs/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-304	Y		Loading into storage tank (2,008 to 39,630 gallons): Vapor balance or vapor loss control system with emissions < 0.17 pounds/1000 gallons loaded	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	BAAQMD 8-6-305, 8-6-306, Condition 11276, Part 2	Y		Vapor tight, leak free, good working order	Condition #11276, Parts 5 & 6	P-E	Inspection	Yes	In Compliance
VOC	Condition #24779, Part 5	Y		0.335 tons of POC per consecutive 12-month period	Condition #24779, Part 4	P-Q, Biannual	Portable hydrocarbon monitor	Yes	In Compliance

Table VII–AJ
Applicable Limits and Compliance Monitoring Requirements S-492, T-403 Environmental Services Pressure Tank >75m3

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-306	N		Control device standards; includes 95% efficiency requirement (when operated with emission control system)	BAAQMD Condition 6859, part 6	C	Temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-306	Y		Control device standards; includes 95% efficiency requirement (when operated with emission control system)	BAAQMD Condition 6859, part 6	C	Temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm for non- pressure relief devices (expressed as methane) above background (when operated as pressure tank)	Not Specified	None	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD 8-5-328.1	N		Abatement by approved control device until concentration of organics is < 10,000 ppm as methane	BAAQMD 8-5-503	P/E	Portable hydrocarbon detector	Yes	In Compliance
VOC	SIP 8-5-328.1	Y		Tank degassing control by liquid balancing in which the resulting organic liquid has a TVP is less than 0.5 psia	BAAQMD 8-5-501	P/E	Records	Yes	In Compliance
VOC	SIP 8-5-328.1.2	Y		Abatement by approved control system until concentration of organics is < 10,000 ppm as methane	BAAQMD 8-5-503	P/E	Portable hydrocarbon detector	Yes	In Compliance

Table VII–AK
Applicable Limits and Compliance Monitoring Requirements S-496, T-241 Storage Tank Specialty Chemicals Pressure Tank < 75 m3

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-307	N		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance

Table VII-AL
Applicable Limits and Compliance Monitoring Requirements S-504, Chlorinolysis Train 1
Abated by A-400 (S-400), Thermal Oxidizer R-901
Followed by A-401, Acid Adsorber B-901 and A-79, Packed Bed Scrubber B-902

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 2213, Part 9	C	Temperature Monitor	Yes	In Compliance
VOC	Condition 2213, Part 4	Y		VOC emissions ≤ 15.75 pounds/hour before abatement	Condition 2213 Parts 4, 12	P-E	Measurement VOC content and feedrate	Yes	In Compliance

Table VII-AM
Applicable Limits and Compliance Monitoring Requirements S-505, Chlorinolysis Train 2
Abated by A-400 (S-400), Thermal Oxidizer R-901Followed by A-401, Acid Adsorber B-901 and A-79, Packed Bed Scrubber B-902

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 2213, Part 9	C	Temperature Monitor	Yes	In Compliance
VOC	Condition 2213, Part 5	Y		VOC emissions ≤ 1.5 pounds/hour before abatement	Condition 2213, Part 9	C	Temperature Monitor	Yes	In Compliance

Table VII–AN
Applicable Limits and Compliance Monitoring Requirements S-519, Chlorinated Pyridine Storage Tank, T-502A [< 75m3] S-520, Chlorinated Pyridine Storage Tank, T-

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-306	N		Control device standards; includes 95% efficiency requirement (when operated with emission control system)	BAAQMD Condition 2039, part 13	C	Temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-306	Y		Control device standards; includes 95% efficiency requirement (when operated with emission control system)	BAAQMD Condition 2039, part 13	C	Temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background (when operated as a pressure tank)	Not Specified	None	N/A	Yes	In Compliance
VOC	BAAQMD Condition 1748, part 2	Y		No detectible organic emissions	None	N	N/A	Yes	In Compliance

Table VII-AO
Applicable Limits and Compliance Monitoring Requirements S-521, Water Treatment System – Steam Stripper Abated by S-336 or S-389, Thermal Oxidizers

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 6859, Part 6; Condition 2039, Part 13	C	Temperature monitor	Yes	In Compliance
VOC	Condition 1785, Part 1	Y		System shall be vapor tight with no detectable emissions from the components or connectors	See Components Table	See Components Table	See Components Table	Yes	In Compliance

Table VII-AP
Applicable Limits and Compliance Monitoring Requirements S-530, T-902 HCl Storage Tank

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		

Table VII--AQ
Applicable Limits and Compliance Monitoring Requirements S-576, HCl Storage Tank, T-122
Abated by A-87, HCl Absorber, and A85, B-102 Absorber in series, followed by A-199, Manufacturing Services Scrubber B-12

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	For A-87/A-85/A-199: Condition 17985, Part 7	P-D	Caustic concentration	Yes	In Compliance
Opacity	BAAQMD 6-301	Y		Ringelmann No. 1 for < 3 min/hr	For A-87/A-85/A-199: Condition 17985, Part 7	P-D	Caustic concentration	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	Same as Above	Same as Above	Same as Above	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	Same as Above	Same as Above	Same as Above	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	Same as Above	Same as Above	Same as Above		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	Same as Above	Same as Above	Same as Above		

Note: S-576 subject to NESHAP Subpart NNNNN (details in Table TBD).

Table VII–AR
Applicable Limits and Compliance Monitoring Requirements S-580, Specialty Chemicals Storage Tank, T-3A S-581, Specialty Chemicals Storage Tank, T-3B S-582, Specialty Chemicals Storage Tank, T-215 S-583, Specialty Chemicals Storage Tank, T-200 Each abated by A-140, Specialty Chemicals Pressure Storage Tanks Vapor Return System

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD Condition #3195, Part 3	Y		Vapor pressure ≤ 0.5 psia	BAAQMD Condition #3195, Part 4	P/E	Recordkeeping	Yes	In Compliance

Table VII-AS
Applicable Limits and Compliance Monitoring Requirements S-593, Plant 640 Section 1, Abated by A-146, NMP Scrubber and A-147, Water Scrubber S-594, Plant 640 Section 2, Abated by A-147, Water Scrubber S-595, Plant 640 Section 3, Abated by A-149, Water Scrubber S-596, Plant 640 Section 4, Abated by A- Water Scrubber and A-148, Water Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 4780, Part 18	P – once every 5 years	Source Test	Yes	In Compliance
VOC	Condition 4780, Part 1	Y		POC emissions from A-147 & A-149 combined ≤ 8 pounds/day	Condition 4780, Part 18	P – once every 5 years	Source Test	Yes	In Compliance
VOC	Condition 4780, Part 2	N		4-amino-3,5 dichloro-2,6 diflouro pyridine from A- 147 & A-149 ≤ 0.02 pounds/day	Condition 4780, Part 18	P-Once every 5 years	Source Test	Yes	In Compliance
VOC	Condition 4780, Part 11	Y		Railcar shipments ≤ 345 cars/year	Condition 4780, Part 16	P-E	Records	Yes	In Compliance
NH3	Condition 4780, Part 3	N		NH3 emissions from MEI Plant 640 do not exceed 0.02 pound per day and that the exhaust concentration does not exceed 200 ppm.	Condition 4780, Part 18	P-Once every 5 years	Source Test	Yes	Intermittent Compliance

Table VII-AT
Applicable Limits and Compliance Monitoring Requirements S-604, Tank Truck Loading Facility Plant 640
Abated by A-157, Vapor Return for Truck Loading Facility – Vapor Balance

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-6-110	Y		Load exempt materials only, true vapor pressure ≤ 0.5 psia	BAAQMD 8-6-503	P-E	Records	Yes	In Compliance
VOC	Condition 4780, Part 6	Y		No detectable emissions from tank truck loading < 100 ppm organic as methane measured 1cm from source	See Components Table	See Components Table	See Components Table	Yes	In Compliance

Table VII–AU
Applicable Limits and Compliance Monitoring Requirements S-607, Storage Tank, T-1904
Abated by A-147, B-3210 Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-307	N		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	BAAQMD 8-18-401	P/Q	Method 21 Inspection	Yes	In Compliance

Table VII-AV
Applicable Limits and Compliance Monitoring Requirements S-620, HCL Truck Loading Operation Abated by A-165, HCl Truck Loading Scrubber System

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	Condition #4945, Parts 2 & 3	P-E	Visual Check	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	Condition #4945, Parts 2 & 3	P-E	Visual Check	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		

Note: S-620 subject to NESHAP Subpart NNNNN (details in MACT Monitoring Table at the end of the section).

Table VII–AW
Applicable Limits and Compliance Monitoring Requirements
S-625, T-610 Perc Expansion Tank < 75 m3, Abated by A-400 (S-400), Thermal Oxidizer R-901

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance
VOC	Condition 21059, Part 1	Y		Vapor pressure ≤ 0.5 psia	Condition 21059, Part 2	P/E	Records	Yes	In Compliance

S-625 is subject to Subpart EEEE (details in MACT Monitoring Table).

Table VII-AX
Applicable Limits and Compliance Monitoring Requirements S-631, Portable Resin Dryer D-203C Abated by S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	Condition 5336, Part 2	Y		No detectable emissions from piping and equipment	See Component Table	See Component Table	See Component Table	Yes	In Compliance

Table VII-AY
Applicable Limits and Compliance Monitoring Requirements S-633, Water Treatment Carbon Bed Regeneration Abated by S-336 or S-389, Thermal Oxidizers

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-1-110.3	Y		VOC abated ≥ 85% by weight and ≥ 90% of organic carbon oxidized to CO2	Condition 6859, Part 6, Condition 2039, Part 13	C	Temperature monitors	Yes	In Compliance
VOC	Condition 5722, Part 1	Y		No detectable emissions	See Component Table	See Component Table	See Component Table	Yes	In Compliance

Table VII–AZ
Applicable Limits and Compliance Monitoring Requirements
S-641, Groundwater Treatment Plant Decant Tank, T-440 [<75 m3] Abated by S-336 or S-389, Thermal Oxidizers

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-306	N		Control device standards; includes 95% efficiency requirement (when operated with emission control system)	BAAQMD Conditions 2039, part 13, and 6859, part 6 6	C	Temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-306	Y		Control device standards; includes 95% efficiency requirement (when operated with emission control system)	BAAQMD Conditions 2039, part 13, and 6859, part	C	Temperature monitoring	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background (when operated as pressure tank)	Not Specified	None	Method 21 Inspection	Yes	In Compliance

Table VII–BA
Applicable Limits and Compliance Monitoring Requirements S-644, Hydrochloric Acid Storage Tank, T-34A
S-645, Hydrochloric Acid Storage Tank, T-34B
Both abated by A-179, X-39/B-39 Scrubber System or S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
HCl	BAAQMD Condition # 7775 Part 1	Y		Combined throughput of HCl ≤ 3,000,000 gallons/12 months	BAAQMD Condition # 7775 Part 5	P/M	Records	Yes	In Compliance

Table VII-BB
Applicable Limits and Compliance Monitoring Requirements S-646, 36% HCl Tank Truck Loading Operation
Abated by A-180, HCl Tank Truck Loading Vapor Return Line – Vapor Balance to A-179, X-39/B-39 Scrubber System or S-644,T-34A 36% HCl Storage Tank or S-Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
PM	Condition 7775, Part 3	Y		Throughput of 36% HCl ≤ 3,000,000 gallons/12 months	Condition 7775, Part 5	P-M	Records	Yes	In Compliance

Note: S-646 subject to NESHAP Subpart NNNNN (details in Table at the end of the section).

Table VII-BC
Applicable Limits and Compliance Monitoring Requirements S-647, Catalytic Hydrogen Chloride Plant
Followed by S-648, Hydrogen Chloride Absorber E-277 Vents Abated by A-181, B-278 Packed Bed Column, Followed by A-182, B-279 Packed Bed Column, Followed by S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	For S-336: Condition 6859, Part 6	For S-336: C	Temperature monitor	Yes	In Compliance

Note: S-647 subject to NESHAP Subpart NNNNN (details in Table at the end of the section).

Table VII-BD
Applicable Limits and Compliance Monitoring Requirements
S-648, Hydrogen Chloride Absorber, E-277 Abated by A-181, B-278 Packed Bed Column, Followed by A-182, B-279 Packed Bed Column, Followed by S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		

Note: S-648 subject to NESHAP Subpart NNNNN (details in Table at the end of this section).

Table VII–BE
Applicable Limits and Compliance Monitoring Requirements S-649, 36% Hydrogen Chloride Acid Storage Tank, V-277
Abated by A-181, B-278 Packed Bed Column, followed by A-182, B-279 Packed Bed Column, followed by S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		

Note: S-649 subject to NESHAP Subpart NNNNN (details in Table at the end of the section).

Table VII–BF

Applicable Limits and Compliance Monitoring Requirements S-650, 36% Hydrogen Chloride Acid Storage Tank, V-280A S-651, 36% Hydrogen Chloride Acid Storage Abated by A-181, B-278 Packed Bed Column, followed by A-182, B-279 Packed Bed Column, followed by A-184, ME 290A/B Carbon Beds or S-336, Manufacturing

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-311	N		$4.10\ P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		4.10 P 0.67 lb/hr particulate, where P is process weight rate in ton/hr	None	N	N/A		

Note: S-650, S-651, S-652 are subject to NESHAP Subpart NNNNN (details in Table at the end of this section).

Table VII-BG
Applicable Limits and Compliance Monitoring Requirements S-654, Abrasive Blasting Operation Abated by A-185, Eagle Containment Screens

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Confined: Ringelmann No. 1 for < 3 min/hr	Condition 8591, Part 5	P-W	Inspection	Yes	In Compliance
Opacity	SIP 6-301	Y		Confined: Ringelmann No. 1 for < 3 min/hr	Condition 8591, Part 5	P-W	Inspection	Yes	In Compliance
FP	BAAQMD 6-1-311	N		Confined: $4.10\ P^{0.67}$ lb/hr, where P is process weight rate in ton/hr	None	N	N/A		
FP	SIP 6-311	Y		Confined: $4.10\ P^{0.67}$ lb/hr, where P is process weight rate in ton/hr	None	N	N/A		
Opacity	BAAQMD 12-4-301	N		Unconfined: Ringelmann No. 1, unless comply with 12-4-303 though 12-4-309	None	N	N/A	Yes	In Compliance
Opacity	SIP 12-4-301	Y		Unconfined: Ringelmann No. 1	None	N	N/A	Yes	In Compliance
Opacity	BAAQMD 12-4-302	Y		Unconfined: Ringelmann No. 2, if comply with 12-4-303 though 12-4-309	None	N	N/A	Yes	In Compliance
PM	BAAQMD 12-4-303, 304	Y		Operating requirements for or pavement marking removal and preparation, and blasting other than in 12-4-303 or 12-4-305 through 309	Condition 8591, Part 3	P-E	Records	Yes	In Compliance
PM	BAAQMD 12-4-305.1	Y		Before blasting: abrasives for dry unconfined blasting, including re-used certified abrasives, ≤ 1% wt #70 US Standard sieve material	Condition 8591, Parts 3 & 4	P-E	Records	Yes	In Compliance
PM	BAAQMD 12-4-305.2	Y		After blasting: abrasives for dry unconfined blasting, excluding reused certified abrasives, ≤ 1.8% wt 5 micron or smaller material	Same as Above	Same as Above	Same as Above	Yes	In Compliance
PM	BAAQMD 12-4-306	Y		Abrasives for unconfined dry blasting must be certified annually	Condition 8591, Parts 3, 4	P-E	Records	Yes	In Compliance
PM	BAAQMD 12-4-308, 12-4-309	N		Type of blasting for which confined blasting is required and operational requirements for blasting of stucco or concrete	Condition 8591, Part 3	P-E	Records	Yes	In Compliance
PM	Condition 8591, Part 1	Y		Confined: grit type blast media throughput ≤ 270.4 tons/12 months	Condition 8591, Part 3	P-M	Records	Yes	In Compliance
PM	Condition 8591, Part 2	Y		Unconfined: grit type blast media throughput ≤ 33.8 tons/12 months	Same as Above	Same as Above	Same as Above	Yes	In Compliance
PM	Condition 8591, Part 4	Y		Unconfined blasting: Only certified abrasives may be used	Same as Above	Same as Above	Same as Above	Yes	In Compliance

Table VII–BH
Applicable Limits and Compliance Monitoring Requirements S-662, Storage Tank, T-243
S-663, Storage Tank, T-242 S-664, Storage Tank, T-244
Abated by A-192, Vent Recovery System, S-336, Manufacturing Services Thermal Oxidizer, S-389, Sym-Tet Thermal Oxidizer, or Pressure Valve Setting

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-307	N		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance
Methylene Chloride	Condition 14438, Part 6	Y		1233 lb/day of methylene chloride sent to halogen acid furnace S-389	Condition 14438, Part 7	D	District Approved Calculation Method	Yes	In Compliance

S-662, S-663, S-664 are subject to Subpart EEEE (details in MACT Monitoring Table).

Table VII–BI
Applicable Limits and Compliance Monitoring Requirements S-680, Pressure Tank, T-440

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-307	N		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD 8-5-328.1	N		Abatement by approved control device until concentration of organics is < 10,000 ppm as methane	BAAQMD 8-5-503	P/E	Portable hydrocarbon detector	Yes	In Compliance
VOC	SIP 8-5-328.1	Y		Tank degassing control by liquid balancing in which the resulting organic liquid has a TVP is less than 0.5 psia	BAAQMD 8-5-501	P/E	Records	Yes	In Compliance
VOC	SIP 8-5-328.1.2	Y		Abatement by approved control system until concentration of organics is < 10,000 ppm as methane	BAAQMD 8-5-503	P/E	Portable hydrocarbon detector	Yes	In Compliance
VOC	BAAQMD 8-6-304	Y		Equipped with vapor balance or vapor loss control system, emissions ≤ 0.17 lbs/1000 gallons	None	N	N/A	Yes	In Compliance
VOC	BAAQMD Condition # 14354 Part 1	Y		Carbon tetrachloride ≤ 5,669 gallons (74,720 lbs) during any consecutive twelve-month period	BAAQMD Condition # 14354 Part 3	P/E	Records	Yes	In Compliance
VOC	BAAQMD Condition # 14354 Part 2	Y		Unloading Events ≤ 5 during any calendar year During tank interior inspections and emergency repair ≤ 5 per day and ≤ 20 for the event. Unloading Events < 5 during any calendar year During tank interior inspections and emergency repair ≤ 5 per day and ≤ 20 for the event.	BAAQMD Condition # 14354 Part 3	P/E	Records	Yes	In Compliance

S-680 is subject to Subpart EEEE (details in Table at the end of the section).

Table VII-BJ
Applicable Limits and Compliance Monitoring Requirements S-681, Truck Transfer
Abated by A-191, Carbon Tetrachloride Tank Truck Loading Vapor Return Line – Vapor Balance

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-6-302.1	Y		Loading into delivery vehicle: Vapor balance or vapor loss control system with emissions < 0.35 pounds/1000 gallons loaded	Condition 14354, Part 5	P-E	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD 8-6-302.2	Y		Loading into delivery vehicle or transportable container: Submerged fill pipe, bottom filling, or vapor loss control system with emissions < 0.35 pounds/1000 gallons loaded	Condition 14354, Part 5	P-E	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD 8-6-304	Y		Loading into storage tank (2,008 to 39,630 gallons): Vapor balance or vapor loss control system with emissions < 0.17 pounds/1000 gallons loaded	Condition 14354, Part 5	P-E	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD 8-6-305, 8-6-306	Y		Vapor tight, leak free, good working order	Condition 14354, Part 5	P-E	Method 21 Inspection	Yes	In Compliance

Table VII-BK
Applicable Limits and Compliance Monitoring Requirements S-693, Distillation System
Abated by A-194, X-600 Venturi and A-195, B-615 Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-301	Y		Ringelmann No. 1 for < 3 min/hr	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	Condition 15932, Part 8	P-W	Caustic circulation rate	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	Condition 15932, Part 8	P-W	Caustic circulation rate	Yes	In Compliance
FP	BAAQMD 6-1-311	N		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	Condition 15932, Part 8	P-W	Caustic circulation rate		
FP	SIP 6-311	Y		4.10 $P^{0.67}$ lb/hr particulate, where P is process weight rate in ton/hr	Condition 15932, Part 8	P-W			
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 15932, Part 8	P-W		Yes	In Compliance
POC	BAAQMD 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	8-10-501	P-E		Yes	In Compliance
POC	SIP 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	None	P-E		Yes	In Compliance
POC	BAAQMD 8-10-302	N		Opening of Process Vessels: 302.1 TOC concentration ≤ 10,000 ppm as methane, 302.2 if greater than 10,000 ppm, then number of vessels less than 10% of total vessels during any consecutive 5 year period and emissions ≤ 15 pounds per day.	8-10-501	P-E		Yes	In Compliance
VOC	Condition 15932, Part 1	Y		Combined POC emissions from S-693 and S-694 < 56.9 lbs/12 months	Condition 15932, Part 8	P-W		Yes	In Compliance
Circulation rate	Condition 15932, Part 3			Alkali solution circulation rate ≥ 17 gal/minute	Condition 15932, Part 8	P-W		Yes	In Compliance

Note: S-693 will be subject to 40 CFR Part 63 Subpart FFFF upon Title V issuance.

Table VII-BL
Applicable Limits and Compliance Monitoring Requirements S-694, Reaction/HCl Absorption System Abated by A-195, B-615 Scrubber

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	BAAQMD 8-2-301	Y		Emissions ≤ 15 pounds/day and ≤ 300 ppm total carbon, dry	Condition 15932, Part 8	P–W	Caustic circulation rate	Yes	In Compliance
POC	BAAQMD 8-10-301	N		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	8-10-501	P-E	Records	Yes	In Compliance
POC	SIP 8-10-301	Y		Vessel depressurization recovered/combusted or contained/treated until organic partial pressure < 4.6 psig	None	P-E	Records	Yes	In Compliance
POC	BAAQMD 8-10-302	N		Opening of Process Vessels: 302.1 TOC concentration ≤ 10,000 ppm as methane, 302.2 if greater than 10,000 ppm, then number of vessels less than 10% of total vessels during any consecutive 5 year pounds per day.	8-10-501	P-E	Records	Yes	In Compliance
VOC	Condition 15932, Part 1	Y		Combined POC emissions from S-693 and S-694 < 56.9 lbs/12 months	Condition 15932, Part 8	P-W	Records	Yes	In Compliance
Circulation rate	Condition 15932, Part 7	Y		Alkali solution circulation rate at A-195 ≥ 50 gal/minute	Condition 15932, Part 8	P–W	Caustic circulation rate	Yes	In Compliance

Note: S-694 will be subject to 40 CFR Part 63 Subpart FFFF upon Title V issuance.

Table VII–BM
Applicable Limits and Compliance Monitoring Requirements S-695, Storage Tank, T-580, Pressure Tank [< 75 m3]

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD Condition # 15932 Part 9	Y		Combined POC emissions from S-695, S-696, S-697 ≤ 198.9 lbs/12 months	BAAQMD Condition # 15932, Part 13	P/W	Records Calculations	Yes	In Compliance
VOC	BAAQMD Condition # 15932 Part 10	Y		Vapor pressure ≤ 0.5 psia	BAAQMD Condition # 15932, Part 13	P/W	Records	Yes	In Compliance

Table VII–BN
Applicable Limits and Compliance Monitoring Requirements S-696, T-585, Pressure Tank [<75 m3]

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD Condition # 15932 Part 9	Y		Combined POC emissions from S-695, S-696, and S- 697 ≤ 198.9 lbs/12 months	BAAQMD Condition # 15932, Part 13	P/W	Records Calculations	Yes	In Compliance
VOC	BAAQMD Condition # 15932 Part 10	Y		Vapor pressure ≤ 0.5 psia	BAAQMD Condition # 15932, Part 13	P/W	Records	Yes	In Compliance

Table VII-BO
Applicable Limits and Compliance Monitoring Requirements S-697, ISO Container Loading Operation Abated by Vapor Balance System

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Exempt liquids	BAAQMD 8-6-110	Y		True vapor pressure < 0.5 psia	BAAQMD 8-6-501.1	P-E	Records	Yes	In Compliance
VOC	BAAQMD Condition 15932, Part 9	Y		Combined POC emissions from S-695, S- 696, and S-697 ≤ 198.9 lbs/12 months	BAAQMD Condition 15932, Part 13	P/W	Records Calculations	Yes	In Compliance

Table VII-BP
Applicable Limits and Compliance Monitoring Requirements S-699, Purge Tank/Drum Loading Operation

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Exempt liquids	BAAQMD 8-6-110	Y		True vapor pressure < 0.5 psia	BAAQMD 8-6-501.1	P-E	Records	Yes	In Compliance
VOC	Condition 15932, Part 14	Y		Distillation system purge stream throughput ≤ 30,000 gallons/12 months	Condition 15932, Part 15	P-W	Records	Yes	In Compliance

Table VII-BQ
Applicable Limits and Compliance Monitoring Requirements S-701, T-12 at Manufacturing Services Operated as a Pressure Tank or Vented to S-336, Manufacturing Services Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	BAAQMD 8-5-307	N		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 500 ppm for pressure relief devices (expressed as methane) above background	BAAQMD 8-5-403	P/SA	Method 21 Inspection	Yes	In Compliance
VOC	SIP 8-5-307	Y		< 100 ppm (expressed as methane) above background	Not Specified	None	Method 21 Inspection	Yes	In Compliance
VOC	BAAQMD 8-6-304	Y		Equipped with vapor balance or vapor loss control system, emissions ≤ 0.17 lbs/1000 gallons	When operated as a pressure tank: N When abated by S-336: Condition 6859, Part 6	N C	N/A Temperature monitor	Yes	In Compliance
VOC	Condition 16612	N		Total amount of organic materials stored at S-701 shall not exceed 100,000 gallons in any consecutive 12-month period	Condition 16612, Part 3	P/M	Records	Yes	In Compliance

Table VII-BR
Applicable Limits and Compliance Monitoring Requirements S-706, FPI Standby Generator (Diesel)

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-303	N		Ringelmann No. 2	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-303	Y		Ringelmann No. 2	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-301	N		Ground level concentration ≤ 0.5 ppm for 3 minutes, 0.25 ppm for 60 minutes, or 0.05 over 24 hours	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-304	N		Fuel sulfur content ≤ 0.5% by weight, unless the SO2 concentration in the resulting emissions ≤ 300 ppm, dry	Condition 18317, Part 1	P-E	Vendor certification	Yes	In Compliance
Reliablity Related Hours	BAAQMD 9-8-330,	N		Operation for reliability-related activities ≤ 50 hours/calendar year	BAAQMD 9-8-530,	C	Totalizing meter, records	Yes	In Compliance
Hours for maintenance and testing	Title 17, California Code of Regulations section 93115.6(b)(3)	N		Operation for reliability- related activities ≤ 50 hours/calendar year	93115.10(d)	P/E	Totalizing meter, records	Yes	In Compliance
Hours for Maintena nce and Testing	Condition 22850, Part 1	N		Operation for reliability- related activities ≤ 50 hours/calendar year	BAAQMD 9-8-530, Condition 22850, Part 3	C	Totalizing meter, records	Yes	In Compliance

Note: S-706 is subject to Subpart ZZZZ (details in MACT Monitoring Table).

Table VII-BS
Applicable Limits and Compliance Monitoring Requirements
, Diesel Engine Backup Generator P1A, S-708, Diesel Engine Backup Generator P1B S-711, Diesel Engine Backup Generator 223

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-303	N		Ringelmann No. 2	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-303	Y		Ringelmann No. 2	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-301	N		Ground level concentration ≤ 0.5 ppm for 3 minutes, 0.25 ppm for 60 minutes, or 0.05 over 24 hours	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-304	N		Fuel sulfur content ≤ 0.5% by weight, unless the SO2 concentration in the resulting emissions ≤ 300 ppm, dry	None		N/A	Yes	In Compliance
Reliability Related Hours	BAAQMD 9-8-330	N		Operation for reliability- related activities ≤ 50 hours/calendar year	BAAQMD 9-8-530,	C	Totalizing meter, records	Yes	In Compliance
Hours for maintenan ce and testing	Title 17, California Code of Regulations section 93115.6(a)(4)	N		Not operate more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 – "Standard for the Inspection, Testing, and Maintenance of Water- Based Fire Protection Systems," 2002 edition	93115.10(d)	P/E	Totalizing meter records	Yes	In Compliance
Hours for Maintena nce and Testing	Condition 25675, Part 1	N		Operation for reliability- related activities ≤ 50 hours/calendar year	BAAQMD 9-8-530, Condition 25675, Part 3	C	Totalizing meter, records	Yes	In Compliance
Hours for Maintena nce and Testing	Condition 22850, Part 1 (S-711 Only)	N		Operation for reliability- related activities ≤ 50 hours/calendar year	BAAQMD 9-8-530, Condition 22850, Part 3	C	Totalizing meter, records	Yes	In Compliance

Note: S-707, S-708, and S-711 is subject to Subpart ZZZZ (details MACT Monitoring Table).

Table VII-BT
Applicable Limits and Compliance Monitoring Requirements S-709, IC Engine Backup Generator (LPG) 471A

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Opacity	BAAQMD 6-1-303	N		Ringelmann No. 2	None	N	N/A	Yes	In Compliance
Opacity	SIP 6-303	Y		Ringelmann No. 2	None	N	N/A	Yes	In Compliance
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
FP	SIP 6-310	Y		0.15 grain/dscf	None	N	N/A	Yes	In Compliance
SO2	BAAQMD 9-1-301	N		Ground level concentration ≤ 0.5 ppm for 3 minutes, 0.25 ppm for 60 minutes, or 0.05 over 24 hours	None	N	N/A	Yes	In Compliance
Reliability Related Hours	BAAQMD 9-8-330,	N		Operation for reliability-related activities ≤ 50 hours/calendar year	BAAQMD 9-8-530,	C	Totalizing meter, records	Yes	In Compliance
Reliability Related hours	Condition 19724, Part 1	N		Operation for reliability- related activities ≤ 50 hours/calendar year	Condition 19724, Part 4		Totalizing meter, records	Yes	In Compliance

Note: S-709 is subject to Subpart ZZZZ (details MACT Monitoring Table).

Table VII-BU
Applicable Limits and Compliance Monitoring Requirements S-718, Nitrapyrin Plant

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	Condition 24763, Part 7	Y		0.891 tons per consecutive 12-month period	Condition 24763, Part 6	P-Quarterly for Pumps and Valves, Biannual for connectors	Portable Hydrocarbon Analyzer (Method 21)	Yes	In Compliance

Table VII-BV
Applicable Limits and Compliance Monitoring Requirements S-1011 Auxilliary Boiler abated by A-1011 SCR

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
NOx	NSPS 40 CFR 60.44b (a)(1)(ii)	Y		0.2 lb/MM BTU (30- day rolling average) except during startup, shutdown, or malfunction	Condition #19356, part 14c	C	CEM	Yes	In Compliance
NOx	BAAQMD 9-7-307.6	N		9 ppmvd at 3% O2	Condition #19356, part 14c	C	CEM	Yes	In Compliance
NOx	SIP 9-7-301.1	Y		30 ppmvd at 3% O2	Condition #19356, part 14c	C	CEM	Yes	In Compliance
NOx	Condition #19356, part 3	Y		$\leq$9 ppmv @ 3% O_2, dry, averaged over any rolling 3 hour period, excluding startup and shutdown	Condition #19356, part 14c	C	CEM	Yes	In Compliance
NOx	Condition #19356, part 3	Y		$\leq$9 ppmv @ 3% O_2, dry, averaged over any rolling 3 hour period, excluding startup and shutdown	Condition #19356, part 12	Every 8,000 firing hours or 3 years, whichever comes first	Source Test	Yes	In Compliance
NOx	Condition #19356, part 13a	Y		6 tons per consecutive twelve month period	Condition #19356, part 14c	C	CEM	Yes	In Compliance
CO	BAAQMD 9-7-307.6	N		400 ppmvd @3% O2	Condition #19356, part 14c	C	CEM	Yes	In Compliance
CO	SIP 9-7-301.2	Y		400 ppmvd @3% O2	Condition #19356, part 14c	C	CEM	Yes	In Compliance

Table VII-BV
Applicable Limits and Compliance Monitoring Requirements S-1011 Auxilliary Boiler abated by A-1011 SCR

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
CO	Condition #19356, part 4	Y		< 50 ppmv @ 3% O2, dry, averaged over any rolling 3 hour period, excluding startup and shutdown	Condition #19356, part 14c	C	CEM	Yes	In Compliance
	Condition #19356, part 4	Y		< 50 ppmv @ 3% O2, dry, averaged over any rolling 3 hour period, excluding startup and shutdown	Condition #19356, part 12	Every 8,000 firing hours or 3 years, whichever comes first	Source Test	Yes	In Compliance
	Condition #19356, part 13b	Y		20.3 tons per consecutive twelve month period	Condition #19356, part 12	C	CEM	Yes	In Compliance
Precursor Organic Compounds	Condition #19356, part 13c	Y		0.7 tons per consecutive twelve month period	Condition #19356, parts 14f, 15d, 15f	P/M	Calculation, Records	Yes	In Compliance
Sulfur Dioxide	BAAQMD 9-1-301	Y		GLCi of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N	None	Yes	In Compliance
	BAAQMD 9-1-302	Y		300 ppm (dry)		N	None	Yes	In Compliance
Sulfur Dioxide	Condition #19356, part 13e	Y		0.4 tons per consecutive twelve month period	Condition #19356, parts 15d, 15f	P/M	Record- keeping	Yes	In Compliance
Opacity	BAAQMD 6-301	Y		Ringelmann No. 1 for < 3 min/hr		N	None	Yes	In Compliance
FP	BAAQMD 6-310	Y		0.15 grain/dscf @ 6 % O_2		N	None	Yes	In Compliance
	Condition #19356, part 8	Y		Ringelmann No. 1 for < 3 min/hr		N	None	Yes	In Compliance

Table VII-BV
Applicable Limits and Compliance Monitoring Requirements S-1011 Auxilliary Boiler abated by A-1011 SCR

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
PM10	Condition #19356, part 6	Y		< 1.53 lb/hour	Condition #19356, part 12	P/A	Source Test	Yes	In Compliance
	Condition #19356, part 13d	Y		2.7 tons per consecutive twelve month period	Condition #19356, part 15d	P/M	Record- keeping	Yes	In Compliance
Ammonia	Condition #19356, part 12	Y		< 10 ppmv @ 3% O2, dry, averaged over any rolling 3 hour period	Condition #19356, part 12	Every 8,000 firing hours or 3 years, whichever comes first	Source Test	Yes	In Compliance

Table VII-BW
Applicable Limits and Compliance Monitoring Requirements Components

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	BAAQMD 8-18-301	N		Except if subject to Sections 302, 303, 304, 305, 306: equipment leaks ≤ 100 ppm, unless the leak has been discovered, minimized ≤ 24 hours and repaired ≤ 7 days	BAAQMD 8-18-401.1 8-18-401.5	P – ≤ 90 days after startup, if opened during a turnaround. P-w/i 24 hrs of repair, if leak >Section 300 limits.	Method 21 Inspection Method 21 Inspection t	Yes	In Compliance
POC	SIP 8-18-301	Y		Except if subject to Sections 302, 303, 304, 305, 306: equipment leaks ≤ 100 ppm, unless the leak has been discovered, minimized ≤ 24 hours and repaired ≤ 7 days	BAAQMD 8-18-401.1 8-18-401.5	P – ≤ 90 days after startup, if opened during P-w/i 24 hrs of repair, if leak >Section 300 limits.	Method 21 Inspection Method 21 Inspection t	Yes	In Compliance
POC	BAAQMD 8-18-302	N		Valve leaks ≤ 100 ppm, unless the leak has been discovered, minimized ≤ 24 hours and repaired ≤ 7 days. If discovered by the APCO, repaired within 24 hours, or the valve meets the applicable provisions of 8-18-306.	BAAQMD 8-18-401.1 8-18-401.2 8-18-401.5 8-18-404	P – ≤ 90 days after startup, if opened during a turnaround. Accessible If leak >Section 300 limits: P ≤ 24 hrs of repair. P-A, if requirements are met.	Method 21 Inspection Method 21 Method 21 Inspection	Yes	In Compliance

Table VII-BW

Applicable Limits and Compliance Monitoring Requirements Components

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	SIP 8-18-302	Y		Valve leaks ≤100 ppm, unless the leak has been discovered, minimized ≤24 hours and repaired ≤7 days. If discovered by the APCO, repiared within 24 hours.	BAAQMD 8-18-401.1 8-18-401.2 8-18-401.3 8-18-401.5 8-18-404	P – ≤ 90 days after startup, if opened during a turnaround. Accessible valves: P-Q Inaccessible valves: P-A If leak >Section 300 limits: P ≤ 24 hrs of repair. P-A, if requirements	Method 21 Inspection Method 21 Inspection Method 21 Inspection Method 21 Inspection Method 21		
POC	BAAQMD 8-18-303	N		Pump and Compressor leaks ≤ 500 ppm, unless the leak has been discovered, minimized ≤ 24 hours and repaired ≤ 7 days. If discovered by the APCO, repaired within 24 hours, or the pump or compressor meets the applicable provisions of 8-18-306..	BAAQMD 8-18-401.1 8-18-401.2 8-18-401.5 8-18-403	P – w/i 90 days of startup, if opened during a turnaround. Accessible Pumps and Compressors P-Q P-w/i 24 hours of repair, if leak > Section 300 limits Pumps and Compressors: P-D, except when facility not staffed	Method 21 Inspection Method 21 Inspection Method 21 Inspection Visual inspection Method 21 Inspection (upon discovery of liquid leak)	Yes	In Compliance

Table VII-BW
Applicable Limits and Compliance Monitoring Requirements Components

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	SIP 8-18-303	Y		Pump and Compressorleaks ≤ 500 ppm, unless the leak has been discovered, minimized w/i 24 hours and repaired w/i 7 days. If discovered by the APCO, repaired within 24 hours.	BAAQMD 8-18-401.1 8-18-401.5 8-18-403	P – w/i 90 days of startup, if opened during a turnaround. P-w/i 24 hours of repair, if leak >Section 300 limits. Pumps and Compressors: P-D, except when facility	Method 21 Inspection Method 21 Inspection Visual inspection Method 21 Inspection (upon leak discovery)	Yes	In Compliance
POC	BAAQMD 8-18-304	N		Connection leaks ≤ 100 ppm, unless the leak has been discovered, minimized ≤ 24 hours and repaired ≤ 7 days. Or if inspected per 401.6 and discovered by the APCO, repaired within 24 hours. Or the connection meets the applicable provisions of 8-18-306	BAAQMD 8-18-401.1	P – w/i 90 days after startup, if opened during a turnaround.	Method 21 Inspection	Yes	In Compliance
POC	SIP 8-18-304	Y		Connection leaks ≤ 100 ppm, unless the leak has been discovered, minimized ≤ 24 hours and repaired ≤ 7 days. Or if inspected per 401.6 and discovered by the APCO, repaired within 24 hours.	BAAQMD 8-18-401.1 8-18-401.5	P – w/i 90 days after startup, if opened during a turnaround. P-w/i 24 hrs of repair, if leak >Section 300 limits.	Method 21 Inspection Method 21 Inspection	Yes	In Compliance

Table VII-BW
Applicable Limits and Compliance Monitoring Requirements Components

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	BAAQMD 8-18-305	N		Pressure Relief Devices leak ≤ 500 ppm, unless the leak has been discovered, minimized ≤ 24 hours and repaired ≤ 15 days.	BAAQMD 8-18-401.1	P – w/i 90 days after startup, if opened during a turnaround.	Method 21 Inspection	Yes	In Compliance
					8-18-401.2	Accessible Pressure Relief Devices P-Q	Method 21 Inspection		
					8-18-401.3	Inaccessible Pressure Relief Devices P-A	Method 21 Inspection		
					8-18-401.5	P-w/i 24 hrs of repair, if leak >Section 300 limits.	Method 21 Inspection		
					8-18-401.7	Pressure Relief Device w/inaccessible horn shall have weephole inspeeted P-Q	Method 21 Inspection Method 21 Inspection		
					8-18-401.8	Pressure Relief Device that releases to atmosphere P-within 5 days of release			

Table VII-BW
Applicable Limits and Compliance Monitoring Requirements Components

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	SIP 8-18-305	Y		Pressure Relief Devices leak ≤ 500 ppm, unless the leak has been discovered, minimized ≤ 24 hours and repaired ≤ 15 days.	BAAQMD 8-18-401.1	P – w/i 90 days after startup, if opened during a turnaround.	Method 21 Inspection	Yes	In Compliance
					8-18-401.2	Accessible Pressure Relief Devices P-Q	Method 21 Inspection		
					8-18-401.3	Inaccessible Pressure Relief Devices P-A	Method 21 Inspection		
					8-18-401.5	P-w/i 24 hrs of repair, if leak >Section 300 limits.	Method 21 Inspection		
					8-18-401.7	Pressure Relief Device w/inaccessibl e horn shall have weephole inspected P-Q	Method 21 Inspection		
					8-18-401.8	Pressure Relief Device that releases to atmosphere P-within 5 days of release	Method 21 Inspection		
POC	BAAQMD 8-18-306.1	N		If cannot be repaired: Repair or replace within 5 yrs or at next scheduled turnaround, whichever is first	BAAQMD 8-18-502.4	P-E	Records	Yes	In Compliance
POC	SIP 8-18-306.1	Y		If cannot be repaired: Repair or replace within 5 yrs or at next scheduled turnaround, whichever is first	BAAQMD 8-18-502.4	P-E	Records	Yes	In Compliance
POC	BAAQMD 8-18-306.2	N		Pressure Relief Devices ≤ 1%, Pumps and Compressors ≤ 1%	BAAQMD 8-18-502.4	P-E	Records	Yes	In Compliance
POC	SIP 8-18-306.2	Y		Awaiting repair: Valves ≤ 0.5%, Pressure Relief Devices ≤ 1%, Pumps and Compressors ≤ 1%, unless comply with 306.3	BAAQMD 8-18-502.4	P-E	Records	Yes	In Compliance
POC	BAAQMD 8-18-306.3	N		A connection > 100 ppm and < 10,000 can be considered non- repairable equipment provided each non- repairable connection is considered as two valves toward the total number of non- repairable equipment allowed.	BAAQMD 8-18-502.4	P-E	Records	Yes	In Compliance

Table VII-BW
Applicable Limits and Compliance Monitoring Requirements Components

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	SIP 8-18-306.3	Y		If cannot be repaired: Measure mass emissions w/i 7 days; Valves awaiting repair ≤0.1 lb/day and 1%, PRDs ≤ 0.2 lb/day and 5% , Pumps and Compressors ≤ 0.2 lb/day and 5%. If mass emissions > 15 lbs/day TOC, must repair w/i 7 days	BAAQMD 8-18-502.4	P-E	Records	Yes	In Compliance
POC	BAAQMD 8-18-306.4	N		A valve with a major leak may not be considered non- repairable equipment pursuant to 8-18-306 for more than 45 days after leak discovery, unless mass emission rate has been measured in accordance with 8-18- 604 and emissions < 15 lb/day.	8-18-306.4	P-E	See 8-18-604	Yes	In Compliance
POC	BAAQMD 8-18-307	N		Liquid leaks must be discovered, minimized w/i 24 hours and repaired w/i 7 days.	BAAQMD 8-18-403	P-D, except when facility not staffed	Method 21 Inspection	Yes	In Compliance
POC POC	SIP 8-18- 8-25-302	Y Y		Liquid leaks must be discovered, minimized w/i 24 hours and the APCO	BAAQMD 8-18-403 8-25-401.2 SIP 8-25-401.1	P-D, except when facility P-within 7 days of repair	Method 21 Inspection Method 21 Inspection	Yes Yes	In Compliance In Compliance
POC	SIP 8-25-303	Y		Compressors: 500 ppm as methane measured ≤ 1 cm from PRV, unless minimized within 24 hours and repaired within 7 days of discovery by operator or repaired within 24 hours if discovered by the APCO	SIP 8-25-401.2 SIP 8-25-401.1	P-Q P-within 7 days of repair	Method 21 Inspection	Yes	In Compliance
POC	SIP 8-25-304.1, 8-25-306	Y		Non-repairable pumps and compressors and those found by the APCO to be leaking 2 times in a year: Repair or replace within 5 years or next scheduled turnaround, whichever is first	SIP 8-25-401.2 SIP 8-25-401.1 SIP 8-25-503.4	P-Q P-within 7	Method 21 Inspection and Records	Yes	In Compliance

Table VII-BW
Applicable Limits and Compliance Monitoring Requirements Components

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	SIP 8-25-304.2, 8-25-306	Y		Number of pumps and compressors awaiting repair ≤ 1%	SIP 8-25-401.2 SIP 8-25-401.1 SIP 8-25-503.4	P-Q P-within 7 days of repair	Method 21 Inspection and Records	Yes	In Compliance
POC	SIP 8-25-305, 8-25-306	Y		Pump or compressor repaired or replaced under §304.1 shall not leak > 500 ppm for 4 consecutive quarters	SIP 8-25-401.1	P-within 7 days of repair	Method 21 Inspection	Yes	In Compliance
POC	SIP 8-25-307	Y		Liquid leaks must be minimized within 24 hours of discovery by operator and repaired within 7 days	SIP 8-25-403 SIP 8-25-401.1	P-D P-within 7 days of repair	Visual Inspection Method 21 Inspection	Yes	In Compliance
POC	BAAQMD 8-28-402.1	N		Overpressure Events: Pressure Relief Device equipped with telltale indicator shall be inspected at least once per day unless the device has been equipped with a monitoring system pursuant to 8-28-503 and the facility has submitted a demonstration report pursuant to 8-28-406.	BAAQMD 8-28-402.1	P-D or monitoring system pursuant to 8-28-503	Visual Inspection or monitoring system pursuant to 8-28-503	Yes	In Compliance
POC	BAAQMD 8-28-402.2	N		PRV: Inspection within 5 working days of release event	BAAQMD 8-28-401	P-E	Method 21 Inspection and Report	Yes	In Compliance
POC	SIP 8-28-402	Y		PRV: Inspection within 5 working days of release event	BAAQMD 8-28-401	P-E	Method 21 Inspection and Report	Yes	In Compliance

Table VII-BX
Applicable Limits and Compliance Monitoring Requirements MACT - Equipment Leaks, Fugitive Components (Subpart H Monitoring)
S-5, 720 Terminalized Products (Applicable when Subpart EEEE requires fugitive monitoring at S-5)
S-29 T-608B Terminalized Products Storage Tank
S-44 N-Serve Plant (includes T-70 and T-74 all components containing greater than 5% carbon tetrachloride)
S-55 T-30 N-Serve N2-Padded Heat Transfer Fluid Pressure Tank S-151 T-614 Terminalized Products
S-372, T-20 Perchlorethylene Tank Fugitive Components
S-434 Manufacturing Services (Carbon Tetrachloride Distillation System and all components containing greater than 5% carbon tetrachloride)
S-446, Sym-Tet Plant
S-458 T-80 Perchloroethylene Expansion Pressure Tank S-482 Carbon Tetrachloride Loading Rack
S-483 Carbon Tetrachloride Loading Rack

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Organic HAP	40 CFR Part 63, §163(b)(2)(i)	Y		Pumps in light liquid service, Phase I: 10,000 ppm	§63.163(b)(1)	P-M	Method 21 inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §163(b)(2)(ii)	Y		Pumps in light liquid service, Phase II: 5,000 ppm	§63.163(b)(1)	P-M	Method 21 inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §163(b)(2)(iii)	Y		Other pumps, Phase III: 1,000 ppm	§63.163(b)(1)	P-M	Method 21 inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §163(b)(3)	Y		Pumps in light liquid service: Liquid leak	§63.163(b)(3)	P-W	Visual inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §163(d)(2)	Y		Pumps in light liquid service, Phase III: If > 10% of pumps or > 3 pumps in a process unit leak, a quality improvement plan must be implemented	§63.181(b)(1)	P-M	Calculation s	Yes	In Compliance
Organic HAP	40 CFR Part 63, §165(a)	Y		Pressure relief devices in gas/vapor service: 500 ppm above background	§63.165(b)(2)	P-E	Method 21 inspection	Yes	In Compliance
Organic	40 CFR Part 63,	Y		Valves in gas/vapor and	§63.168(c)	P-Q	Method 21	Yes	In Compliance

Table VII-BX
Applicable Limits and Compliance Monitoring Requirements MACT - Equipment Leaks, Fugitive Components (Subpart H Monitoring)
S-5, 720 Terminalized Products (Applicable when Subpart EEEE requires fugitive monitoring at S-5)
S-29 T-608B Terminalized Products Storage Tank
S-44 N-Serve Plant (includes T-70 and T-74 all components containing greater than 5% carbon tetrachloride)
S-55 T-30 N-Serve N2-Padded Heat Transfer Fluid Pressure Tank S-151 T-614 Terminalized Products
S-372, T-20 Perchlorethylene Tank Fugitive Components
S-434 Manufacturing Services (Carbon Tetrachloride Distillation System and all components containing greater than 5% carbon tetrachloride)
S-446, Sym-Tet Plant
S-458 T-80 Perchloroethylene Expansion Pressure Tank S-482 Carbon Tetrachloride Loading Rack
S-483 Carbon Tetrachloride Loading Rack

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
HAP	§168(b)(2)(i)			light liquid service, Phase I: 10,000 ppm			inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §168(b)(2)(ii)	Y		Valves in gas/vapor and light liquid service, Phase II: 500 ppm	§63.168(c)	P-Q	Method 21 inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §168(b)(2)(iii)	Y		Valves in gas/vapor and light liquid service, III: 500 ppm	§63.165(d)(1)	For ≥ 2% leakers: P-M or P-Q with a Quality Improvement Plan	Method 21 inspection	Yes	In Compliance
					§63.165(d)(2)	For < 2% leakers: P-Q	Method 21 inspection		
					§63.165(d)(3)	For < 1% leakers: P-once per 2 quarters	Method 21 inspection		
					§63.165(d)(4)	For < 0.5% leakers: P-once per 4 quarters	Method 21 inspection		
Organic HAP	40 CFR Part 63, §169(b)	Y		Agitators in heavy liquid service: 10,000 ppm			Method 21 inspection	Yes	In Compliance

Table VII-BX
Applicable Limits and Compliance Monitoring Requirements MACT - Equipment Leaks, Fugitive Components (Subpart H Monitoring)
S-5, 720 Terminalized Products (Applicable when Subpart EEEE requires fugitive monitoring at S-5)
S-29 T-608B Terminalized Products Storage Tank
S-44 N-Serve Plant (includes T-70 and T-74 all components containing greater than 5% carbon tetrachloride)
S-55 T-30 N-Serve N2-Padded Heat Transfer Fluid Pressure Tank S-151 T-614 Terminalized Products
S-372, T-20 Perchlorethylene Tank Fugitive Components
S-434 Manufacturing Services (Carbon Tetrachloride Distillation System and all components containing greater than 5% carbon tetrachloride)
S-446, Sym-Tet Plant
S-458 T-80 Perchloroethylene Expansion Pressure Tank S-482 Carbon Tetrachloride Loading Rack
S-483 Carbon Tetrachloride Loading Rack

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Organic HAP	40 CFR Part 63, §169(b)	Y		Valves, connectors, in heavy liquid service; instrumentation systems; pressure relief devices in liquid service: 500 ppm			Method 21 inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §173(a)(2)	Y		Agitator in gas/vapor and light liquid service: 10,000 ppm	§63.173(a)(1)	P-M	Method 21 inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §173(b)(2)	Y		Agitator in gas/vapor and light liquid service: liquid leak	§63.173(b)(1)	P-W	Visual inspection	Yes	In Compliance
Organic HAP	40 CFR Part 63, §174(a)(2)	Y		Connectors in gas/vapor and light liquid service: 500 ppm	§63.174(b)(3)(i) §63.174(b)(3)(ii) §63.174(b)(3)(iii)	For leakers ≥ 0.5%: P-A For leakers < 0.5%: P-once every 2 years For leakers < 0.5%: for 2 years: P-once every 4 years	Method 21 inspection Method 21 inspection Method 21 inspection	Yes	In Compliance

Table VII-BY
Applicable Limits and Compliance Monitoring Requirements 40 CFR Part 60 Subpart Kb Sources
NSPS for Volatile Organic Liquid Storage Vessels
S-27, T-605A Terminalized Products abated by S-336 or S-389 S-30, Material Flow Tank T-608B abated by S-336 or S-389

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	NSPS Subpart Kb 60.112b (a)(3)(i)	Y		When operated with emission control system - Closed vent system leak tightness standards, VOC concentrations shall not exceed 500 ppmv above background.	NSPS Subpart Kb 60.116b	P/A	Method 21 Inspection	Yes	In Compliance
VOC	NSPS Subpart Kb 60.112b (a)(3)(ii)	Y		When not operated as a pressure tank - Control device standards; includes 95% efficiency requirement	NSPS Subpart Kb 60.116b BAAQMD 8-18-401 BAAQMD Conditions 2039, part 13, and 6859, part 6	C	Temperature monitoring	Yes	In Compliance

Dow operates the following sources that are subject to Subpart NNNNN:

S-4, HCl Rail Tank Car Loading abated by A-199 Manufacturing Services Scrubber B-12 or S- 336 Manufacturing Services Thermal Oxidizer
S-135, HCl Storage Tank T606A abated by A-18 Hydrochloric Acid Storage Tanks Scrubber S-136, HCl Storage Tank T606B abated by A-18 Hydrochloric Acid Storage Tanks
S-434, Manufacturing Services Facility abated by A-199 Manufacturing Services Scrubber B-12 or S-336 Manufacturing Services Thermal Oxidzer
S-576, HCl Storage Tank, T-122 abated by A-199 Manufacturing Service Scrubber B-12 S-620, HCl Tank Loading Operation abated by A-165 HCl Truck Loading Scrubber
S-646, 36% HCl Tank Truck Loading abated byA-179 X-39/B-39 Scrubber System or S-336 Manufacturing Services Thermal Oxidizer
S-647, Catalytic Hydrogen Chloride Plant abated by S-336 Manufacturing Services Thermal Oxidizer
S-648, Hydrogen Chloride Absorber, E-277 abated by S-336 Manufacturing Services Thermal Oxidizer and abatement train (A-72 B-16 Caustic Scrubber)
S-649, 36% Hydrogen Chloride Acid Storage Tank, V-277 abated by S-336 Manufacturing Services Thermal Oxidizer
S-650, 36% Hydrogen Chloride Acid Storage Tank, V-280A abated by S-336 Manufacturing Services Thermal Oxidizer
S-651, 36% Hydrogen Chloride Acid Storage Tank, V-280B abated by S-336 Manufacturing Services Thermal Oxidizer and abatement train (A-72 B-16 Caustic Scrubber)
S-652, 36% Hydrogen Chloride Acid Storage Tank, V-280C abated by S-336 Manufacturing Services Thermal Oxidizer and abatement train (A-72 B-16 Caustic Scrubber)

Table VII-BZ
Applicable Limits and Compliance Monitoring Requirements Subpart NNNNN
NESHAP for Hydrogen Chloride Manufacturing

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
HCl	Subpart NNNNN 63.9000(a)	Y		Emission stream from an HCl storage tank at an existing source - reduce HCl emissions by ≥ 99% ; or achieve an outlet concentration of ≤ 120 ppmv. Emission stream from an HCl transfer operation at an existing source - Reduce HCl emissions by >99%	63.9020(c)	E-Initial	Design Evaluation for tanks and transfer operations subject to Subpart except for sources vents.	Yes	In Compliance

Table VII-BZ
Applicable Limits and Compliance Monitoring Requirements Subpart NNNNN
NESHAP for Hydrogen Chloride Manufacturing

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
HCl	Subpart NNNNN 63.9000(a)	Y		Emission stream from an HCl process vent at an existing source - reduce HCl emissions by ≥ 99%; or achieve an outlet concentration of ≤ 20 ppmv, and reduce Cl2 emissions by ≥ 99%; or achieve an outlet concentration of ≤ 100 ppmv.	63.9015(a), 63.9020(a)	P-every 5 years	Performance Test at A- 199 Manufacturi ng Services Scrubber B- 12 at S-434 (Note: Performance Test not required for S-336 abatement train since subject to Subpart EEE, RCRA and BIF permits, See 63.9000(c)(4))	Yes	In Compliance
HCl	Subpart NNNNN 63.9000(a)	Y		Emission stream from an HCl process vent at an existing source - reduce HCl emissions by ≥ 99%; or achieve an outlet concentration of ≤ 20 ppmv, and reduce Cl2 emissions by ≥ 99%; or achieve an outlet concentration of ≤ 100 ppmv.	63.9035(b)(1) and (2)	C	Flowmeter pH monitor	Yes	In Compliance
HCl	Subpart NNNNN 63.9000(a)	Y		Emission stream from an HCl storage tank at an existing source - reduce HCl emissions by ≥ 99% ; or achieve an outlet concentration of ≤ 120 ppmv.	63.9035(b)(1) and (2)	C	Flowmeter pH monitor	Yes	In Compliance
HCl	Subpart NNNNN 63.9000(a)	Y		Emission stream from an HCl transfer operation at an existing source - Reduce HCl emissions by ≥99% OR Achieve an outlet concentration of ≤120 ppmv	63.9035(b)(1) and (2)	C	Flowmeter pH monitor	Yes	In Compliance

Table VII-CA
Applicable Limits and Compliance Monitoring Requirements 40 CFR Part 63 Subpart MMM
NESHAP for Pesticide Active Ingredient Production
S-461, Plant 663 R-401 Reactor, Abated by A-96, B-405 Acid Absorber & Tails Tower – vapor recovery
S-462, Plant 663 R-402 Reactor, Abated by A-96, B-405 Acid Absorber & Tails Tower S-463, Plant 663 F-403 Separator

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC	63.1362(b)(3)(ii)	Y		HCl from process vents reduced by 94 percent or greater or to outlet concentrations less than or equal to 20 ppmv.	63.1365(a)(6) 63.1366(b)(ii) 63.1366(b)(xiii) 63.1366(h)(2)(i)	Initial C M A	Source Test Flowmeter Inspection of Bypass Seal or Closure Mechanism Audio Visual Ofactory (AVO)	Yes	In Compliance

Control Device Process monitoring: HCl water absorber liquid recycle flow on a continuous basis, annual flowmeter calibration, annual inspection of HCl closed vent system to A-96

Dow operates the following sources that are subject to Subpart EEEE: S-5, 720 Terminalized Products
S-28, T-605B Material Flow
S-30, T-608B Terminalized Products, 333,000 gallons S-36, N-Serve Plant Storage
S-44, N-Serve Plant, Note this applies to T-70 and T-74 at N-Serve Plant (No Source Numbers) S-45, T-1 N-Serve
S-56, T-31 N-Serve S-57, T-32 N-Serve S-61, T-780 N-Serve S-62, T-781 N-Serve S-63, T-782 N-Serve
S-151, T-614 Terminalized Products, 700,000 gallons S-346, T-241
S-372, T-20 Block 560 Storage Tank S-382, N-Serve Unit Storage T-783
S-383, Petroleum Hydrocarbon Distillate Tank S-407, T-728 N-Serve Formulation Tank
S-447, T-774
S-466, Plant 663 T-408A Intermediate Product Storage S-467, Plant 663 T-408B Intermediate Product Storage S-498, Sym Tet T-102 Storage Tank
S-625, T-610 Perc Expansion Tank
S-662, Storage Tank, T-243, Pressure Tank, 15,000 gallons S-663, Storage Tank, T-242, Pressure Tank, 15,000 gallons S-664, Storage Tank, T-244, Pressure Tank, 15,000 gallons S
Dow operates five storage tanks that require controls under Subpart EEEE: S-30, T-608B Terminalized Products, 333,000 gallons
S-151, T-614 Terminalized Products, 700,000 gallons
S-662, Storage Tank, T-243, Pressure Tank, 15,000 gallons S-663, Storage Tank, T-242, Pressure Tank, 15,000 gallons S-664, Storage Tank, T-244, Pressure Tank, 15,000 gallons

Table VII-CB
Applicable Limits and Compliance Monitoring Requirements Subpart EEEE
NESHAP for Organic Liquid Distribution

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	63.2346(a)	Y		Storage Tanks. Table 2 emission limits for tanks requiring control	Subpart EEEE 63.2366 63.2374	C	Temperature Monitor at S- 336 or S-389 (Performance Testing Not Required per 63.2396(e), 63.988(b)(2))	Yes	In Compliance
VOC	63.2346(b)	Y		Transfer Racks, (1) Table 2 emission limits (2)) Route emissions to fuel gas systems or back to a process (3) Vapor balance system	Subpart EEEE 63.2366 63.2374 Condition 11276 part 1 for Limits (1) and (2) Condition 11276 part 6 for Limit (3)	C for Limits (1) and (2) E for Limit (3)	Temperature Monitor at S- 336 or S-389 (Performance Testing Not Required per 63.2396(e), 63.988(b)(2)) Records	Yes	In Compliance

Table VII-CB
Applicable Limits and Compliance Monitoring Requirements Subpart EEEE
NESHAP for Organic Liquid Distribution

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
VOC	63.2346(c)	Y		Equipment Leaks for each pump, valve, and sampling connection in organic liquids service at least 300 hours/year, Leak Detection and Repair Program	Subpart EEEE Table 4 Work Practice Standards CFR part 63	P/Varies in Subpart H, Quarterly for Valves, F-Pumps	Method 21 Inspection	Yes	In Compliance
VOC	63.2346(e)	Y		Operating Limits, High Throughput Racks must meet limits in Table 3. For each storage tank and low throughput transfer rack comply with requirements for monitored parameters as specified in Subpart SS or alternatively comply with Table 3.	Subpart EEEE 63.2366 63.2374	C	Temperature Monitor at S- 336 or S-389 (Performance Testing Not Required per 63.2396(e). 63.988(b)(2))	Yes	In Compliance

Notes: 63.2374 requires monitoring and data collection in accordance with 40 CFR Part 63 Subpart SS. 63.983(b)(1)(i) requires closed vent systems to be inspected annually.

Table VII-CC
Applicable Limits and Compliance Monitoring Requirements Subpart EEE
NESHAP for Hazardous Waste Combustors
S-336, Manufacturing Services Thermal Oxidizer S-389, Sym-Tet Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Dioxins and Furans	Subpart EEE 63.1218(a)	Y		CO ≤ 100 ppm @ 7% O2	Subpart EEE 63.1207(a)(3) 63.1209(a) 63.1209(b) 63.1209(k)	Initial C C	Source Test CO CEM Oxidizer Temperature, Flowrate or Production Rate, Maximum Feed Rate	Yes	In Compliance

Table VII-CC
Applicable Limits and Compliance Monitoring Requirements Subpart EEE
NESHAP for Hazardous Waste Combustors
S-336, Manufacturing Services Thermal Oxidizer S-389, Sym-Tet Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Mercury, Hydrogen Chloride, Chlorine, Specified Metals, and Particulate Matter	Subpart EEE 63.1218(a)	Y		HCl and Cl2 combined ≤ 150 ppm @ 7% O2; or System Removal Efficiency at least 99.923% of Cl2 and chloride fed to the combustor.	Subpart EEE 63.1209(o) 63.1207(d)	Initial P - every 5-years C C C	Comprehensive Performance Test Chlorine and Chloride Feedrate Caustic Scrubber Flowrate Scruber pH	Yes	In Compliance
CO and hydrocarbons	Subpart EEE 63.1218(a)	Y		CO ≤ 100 ppm @ 7% O2 and hydrocarbons ≤ 10 ppm @ 7% O2	Subpart EEE 63.1209(a) 63.1207(d)	C for CO Initial for hydrocarbons	CEM Comprehensive Performance Test	Yes	In Compliance

Table VII-CC
Applicable Limits and Compliance Monitoring Requirements Subpart EEE
NESHAP for Hazardous Waste Combustors
S-336, Manufacturing Services Thermal Oxidizer S-389, Sym-Tet Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
POC/ HAP	Subpart EEE 63.1218(c)	Y		Destruction Removal Efficiency (DRE) 99.99%	Subpart EEE 63.1206(b)(7)	Initial	Comprehensive Performance Test with DRE Test	Yes	In Compliance
					63.1207(d)				
					CAM Condition 26192 Part 3, Part 8	P - every 5-years w/Subpart EEE Comprehensive Performance	DRE test using Subpart EEE methodology		
					63.1209(j)	C	Oxidizer Temperature, Flowrate or Production Rate, Maximum Feed Rate, Operation of Waste Firing System		

Notes: Halogen Acid Furnaces S-336 and S-389 monitor the following: Combustion temperature, feed rate, maximum chloride feed, scrubber pH,

Dow operates the following sources that are subject to Subpart FFFF:

S-44 N-Serve Plant
S-302 Dowacil Train 1 S-303 Dowacil Train 2
S-434 Manufacturing Services S-446 Sym-Tet Plant
S-474 Trifluro S-476 Trifluro
S-593, Plant 640, Section 1
S-594, Plant 640, Section 2
S-595, Plant 640, Section 3
S-596, Plant 640, Section 4 S-693 Distillation System S-695 Storage Tank, T-580
Storage Tanks that are also subject to Subpart EEEE may also be subject to Subpart FFFF.

Table VII-CD
Applicable Limits and Compliance Monitoring Requirements Subpart FFFF
NESHAP for Miscellaneous Organic Chemical Manufacturing

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
TBD	TBD	Y	TBD	TBD	TBD	TBD	TBD	Yes	In Compliance

Note: The monitoring requirements of 40 CFR Part 63 Subpart FFFF-Miscellaneous Chemical Manufacturing will be added into the Title V permit at a future date.

Table VII-CE
Applicable Limits and Compliance Monitoring Requirements Subpart ZZZZ
NESHAP for Stationary Reciprocating Internal Combustion Engines S-706, Diesel Engine for FPI Standby Generator
S-707, Diesel Engine Backup Generator P1A S-708, Diesel Engine Backup Generator P1B S-711, Diesel Engine Backup Generator 223

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
Hours of Operation	63.6640(f)	Y		No limit for emergency use 100 hours/year for maintenance and readiness checks	63.6655(f)	C	Non- resettable hour meter	Yes	In Compliance

Table VII-CF
Applicable Limits and Compliance Monitoring Requirements Subpart DDDDD
NESHAP for Boilers and Process Heaters S-444, U-183 Dowtherm Heater
S-460, U-83 Dowtherm Heater S-1011, Auxiliary Boiler

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
CO	Tune up to minimize CO, 63.7500, 63.7540	Y	63.7495(c) (9)		Limited Use Boiler, or Boiler or Process Heater with continuous oxygen trim system 63.7540	P-5 years	Tune-up	Yes	In Compliance
CO	Tune up to minimize CO, 63.7500, 63.7540	Y	63.7495(c) (9)		Boiler or Process Heater without continuous oxygen trim system 63.754	P-A for heat input ≥ 10 MMBtu/hr P-Biennially fir heat input < 10 MMBtu/hr and > 5 MMBtu/hr P-every 5 years for heat input ≤ 5 MMBtu/hr	Tune-up	Yes Yes	In Compliance In Compliance

Table VII-CG
Applicable Limits and Compliance Monitoring Requirements 40 CFR Part 64-Compliance Assurance Monitoring
S-151 T-614 Terminalized Products abated by S-336 or S-389
S-633 Water Treatment Carbon Beds Regeneration abated by S-336 or S-389 S-434, Carbon Tetrachloride Purification System, abated by S-336
S-446 Sym-Tet S-Plant abated by S-389
S-302 Dowicil Train 1, abated by S-336 or S-389 S-303 Dowicil Train 2 abated by S-336 or S-389
S-322 D-203 A/B Portable Dryers abated by S-336 or S-389 S-631 D-203 C Portable Resin Dryer abated by S-336 or S-389
S-504 Chlorinolysis Train 1 abated by A-400 (S-400) S-505 Chlorinolysis Train 2 abated by A-400 (S-400)
Abatement Devices: S-336 Halogenated Acid Furnace: Manufacturing Services Thermal Oxidizer, S-389 R-501 Halogenated Acid Furnace: Sym-Tet Thermal Oxidizer, 400) R-901 Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
S-336, VOC, HAPs	Condition 6859 part 4, CAM Condition #26192 part 3	Y		Minimum Organic Destruction Efficiency of 99.99% by weight	CAM Condition #26192 part 3	P – every five years in accordance with Subpart EEE	Source Test	Yes	In Compliance
S-336, VOC, HAPs	Condition 6859 part 4, part 6, CAM Condition #26192 part 3, part 4	Y		Minimum Temperature 1745 degrees F, Minimum Organic Destruction Efficiency of 99.99% by weight	Condition 6859 part 6, CAM Condition #26192 part 6	C	Temperature	Yes	In Compliance
S-389, HAPs	Condition 2039 part 5, CAM Condition #26192 part 8	Y		Minimum Organic Destruction Efficiency of 99.99% by weight	CAM Condition #26192 part 8	P – every five years in accordance with Subpart EEE	Source Test	Yes	In Compliance
S-389, HAPs	Condition 2039 part 1, part 5, CAM Condition #26192 part 8, part 9	Y		Minimum Temperature of 1830 degrees F, Minimum Organic Destruction Efficiency of 99.99% by weight	Condition 2039 part 13, CAM Condition #26192 part 11	C	Temperature	Yes	In Compliance

Table VII-CG

Applicable Limits and Compliance Monitoring Requirements 40 CFR Part 64-Compliance Assurance Monitoring

S-151 T-614 Terminalized Products abated by S-336 or S-389

S-633 Water Treatment Carbon Beds Regeneration abated by S-336 or S-389 S-434, Carbon Tetrachloride Purification System, abated by S-336

S-446 Sym-Tet S-Plant abated by S-389

S-302 Dowicil Train 1, abated by S-336 or S-389 S-303 Dowicil Train 2 abated by S-336 or S-389

S-322 D-203 A/B Portable Dryers abated by S-336 or S-389 S-631 D-203 C Portable Resin Dryer abated by S-336 or S-389

S-504 Chlorinolysis Train 1 abated by A-400 (S-400) S-505 Chlorinolysis Train 2 abated by A-400 (S-400)

Abatement Devices: S-336 Halogenated Acid Furnace: Manufacturing Services Thermal Oxidizer, S-389 R-501 Halogenated Acid Furnace: Sym-Tet Thermal Oxidizer, 400) R-901 Thermal Oxidizer

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Performed?	Monitoring Results
A-400 (S-400) HAPs	Conadition 2213 part 8, CAM Condition			Minimum Organic Destruction Efficiency of 64% by weight	CAM Condition #26192 part 13	P - every five years	Source Test	Yes	In Compliance
A-400 (S- 400) HAPs	Condition 2213 part 8, part 9, CAM Condition #26192 part 13, part 14	Y		Minimum Temperature 1472 degrees F Minimum Organic Destruction Efficiency of 64% by weight	Condition 2213 part 9, CAM Condition #26192 part 16	C	Temperature	Yes	In Compliance