



**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Blue Ridge Regional Office**  
www.deq.virginia.gov

Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

Robert J. Weld  
Regional Director

**Lynchburg Office**  
7705 Timberlake Road  
Lynchburg, Virginia 24502  
(434) 582-5120  
Fax (434) 582-5125

**Roanoke Office**  
3019 Peters Creek Road  
Roanoke, Virginia 24019  
(540) 562-6700  
Fax (540) 562-6725

**Federal Operating Permit**  
**Article 1**

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Arkema Inc.  
Facility Name: Arkema Inc.  
Facility Location: 601 Tightsqueeze Industrial Road  
Chatham, Virginia  
Registration Number: 30954  
Permit Number: BRRO-30954

September 11, 2014  
Effective Date

September 10, 2019  
Expiration Date

\_\_\_\_\_  
Regional Director

\_\_\_\_\_  
Signature Date

Table of Contents, 1 page  
Permit Conditions, 23 pages

Table of Contents

<b>FACILITY INFORMATION .....</b>	<b>1</b>
<b>EMISSION UNITS .....</b>	<b>2</b>
<b>PROCESS EQUIPMENT REQUIREMENTS – OLIGOMERS CHEMICAL MANUFACTURING PROCESS UNIT (CMPU) REQUIREMENTS .....</b>	<b>6</b>
<b>40 CFR 63 MACT VVVVVV – OLIGOMERS CHEMICAL MANUFACTURING PROCESS UNIT (CMPU) REQUIREMENTS .....</b>	<b>8</b>
<b>INSIGNIFICANT EMISSION UNITS .....</b>	<b>13</b>
<b>PERMIT SHIELD &amp; INAPPLICABLE REQUIREMENTS .....</b>	<b>13</b>
<b>GENERAL CONDITIONS .....</b>	<b>15</b>

## **Facility Information**

Permittee  
Arkema Inc.  
601 Tightsqueeze Industrial Road  
Chatham, VA 24531

Responsible Official  
Marilyn Hanover  
Plant Manager

Facility  
Arkema Inc.  
601 Tightsqueeze Industrial Road  
Chatham, VA 24531

Contact Person  
John E. Sullivan  
HES Manager  
434-441-0818

**County-Plant Identification Number:** 51-143-00138

**Facility Description:** NAICS 325211 - Arkema Inc. manufactures products commonly known as "oligomers" and "monomers". Monomers, acrylic acid/methacrylic acid based esters, are produced for sale and/or use in the Oligomers units as monomers or diluents. Oligomers are acrylate-based oligomer and oligomer/monomer blend products for various end-uses.

## Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Oligomers Chemical Manufacturing Process Unit (CMPU) subject to NESHAP Subpart VVVVVV</b>							
BL-2015	S-2540a and S2540b	One commercial blender/reactor system for blending and manufacturing oligomers and monomers	4,000 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Modified in April 30, 2001 permit from May 26, 1995 permit
BL-4550		Blender not fully installed at this time	1750 gallons			VOC	2011 permit exemption
R-0501	S-2540a and S2540b	One agitated tank reactor system for the manufacture of acrylate based oligomers and oligomer/monomer blends	12,500 lbs/hr	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted July 16, 1999
R-2001	S-2540a and S2540b	One commercial reactor system for the manufacture of acrylate based oligomers and oligomer/monomer blends	2,600 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit.
R-0301	S-2540a and S2540b	One semi-commercial reactor system for the manufacture of acrylate based oligomers and oligomer/monomer blends	360 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit.

R-4001	S-2540a and S2540b	One commercial reactor system for the manufacture of acrylate based oligomers and oligomer/monomer blends	5,000 gal	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	2011 permit exemption
V-0532	S-2540a and S2540	One acrylate feed storage tank	1,400 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted July 16, 1999
T-3038	S-2540a and S2540b	One raw material storage tank	10,293 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Permitted April 30, 2001
T-3002	S-2540a and S2540b	One toluene storage tank	11,300 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
T-3005	S-2540a and S2540b	One acrylate storage tank	9,400 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
T-3016	S-2540a and S2540b	One acrylic acid storage tank	11,300 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
T-3026	S-3026	One epoxy storage tank	9,400 gallons	N/A	N/A	N/A	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
T-2530	S-2540a and S2540b	One light waste storage tank	27,800 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
T-2532	S-2540a and S2540b	One heavy waste storage tank	6,500 gallons	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
T-2104 & T-2107	S-2540a and S2540b	Two product storage tanks	8,800 gallons (each)	Two thermal oxidizers controlling Oligomers CMPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit

T-3027	S-3027	One epoxy storage tank	15,400 gallons	None	N/A	N/A	July 16, 1999,
T-2030	S-2540a and S2540b	One process feed tank	330 gallons	Two thermal oxidizers controlling Oligomers CPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
V-2032	S-2540a and S2540b	One acrylate feed tank	2,200 gallons	Two thermal oxidizers controlling Oligomers CPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
V-2034	S-2540a and S2540b	One acrylate feed tank	750 gallons	Two thermal oxidizers controlling Oligomers CPU	S-2540a and S2540b	VOC	N/A
V-0320	S-2540a and S2540b	One acrylate feed tank	250 gallons	Two thermal oxidizers controlling Oligomers CPU	S-2540a and S2540b	VOC	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
V-4030	S-2540a and S2540b	Feed tank	300 gallons	Two thermal oxidizers controlling Oligomers CPU	S-2540a and S2540b	VOC	July 19, 2011 permit exemption
V-4032	S-2540a and S2540b	Feed tank	2,050 gallons	Two thermal oxidizers controlling Oligomers CPU	S-2540a and S2540b	VOC	July 19, 2011 permit exemption
V-4533	S-4533	Storage tank not fully installed at this time	3200 gallons	None	N/A	N/A	July 19, 2011 permit exemption
L-2104	S-2104	Product Loading Rack	Unknown	None	N/A	N/A	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
L-2530	S-2530	Light Waste Loading Rack	Unknown	None	N/A	N/A	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
L-2532	S-2532	Heavy Waste Loading Rack	Unknown	None	N/A	N/A	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
L-2107	S-2107	Product Loading Rack	Unknown	None	N/A	N/A	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit

P-/TU-Fug	NA	Fugitive Emissions from Truck Unloading and Processes	N/A	None	N/A	N/A	Originally permitted May 26, 1995. April 30, 2001 permit superseded 1995 permit
-----------	----	---	-----	------	-----	-----	---

\*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

\*\* Documentation of size and contents is required to show no additional Subpart Kb requirements are necessary. Subpart Kb applies to tanks larger than 75 cubic meters (20,000 gallons) and T-3027 is 15,400 gallons.

## Process Equipment Requirements – Oligomers Chemical Manufacturing Process Unit (CMPU) Requirements

- Process Equipment Requirements - Limitations** - Volatile organic compound (VOCs) emissions from the three (3) reactor systems (R-0301, R-0501, and R-2001), acrylic acid storage, toluene storage, acrylate storage, heavy waste storage, light waste storage, blender/reactor system (BL-2015), and feed tanks (V-0320, V-0532, V-2030, V-2032, and V-2034) shall be controlled by thermal oxidation. The thermal oxidizers (TO-2540a or TO-2540b) shall maintain a minimum temperature of 1,400°F when in use. The thermal oxidizer shall be provided with adequate access for inspection.  
(9 VAC 5-80-110, Condition 3 of 7/16/1999 Permit Document, and Condition 4 of 4/30/2001 Permit Document)
- Process Equipment Requirements - Limitations** - The thermal oxidizer (TO-2540a and TO-2540b) fuel is restricted to natural gas, propane, or liquefied petroleum gas.  
(9 VAC 5-80-110, Condition 5 of 7/16/1999 Permit Document, and Condition 8 of 4/30/2001 Permit Document)
- Process Equipment Requirements - Limitations** - Emissions from the operation of R-0501 reactor system during the urethane and epoxy based acrylate manufacturing shall not exceed the limits specified below:

Volatile Organic Compounds	0.2 lbs/hr	0.88 tons/yr
Toluene Diisocyanate (CAS # 584849)	0.0096 lbs/hr	0.003 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits and emission factors supplied by the permittee. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits.

(9 VAC 5-80-110 and Condition 7 of 7/16/1999 Permit Document)

- Process Equipment Requirements - Limitations** - Emissions from the operation of the acrylic based oligomer/monomer manufacturing and blending facility using three (3) reactor systems (R-0301, R-0501, and R-2001), acrylic acid storage, toluene storage, acrylate storage, heavy waste storage, light waste storage, blender/reactor system (BL-2015), and feed tanks (V-0320, V-2030, V-2032, and V-2034) shall not exceed the limits specified below:

Volatile Organic Compounds	20.0 lbs/hr	1.9 tons/yr
----------------------------	-------------	-------------

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits.

(9 VAC 5-80-110 and Condition 15 of 4/30/2001 Permit Document)

5. **Process Equipment Requirements - Limitations** - Visible emissions from the thermal oxidizer (TO-2540a and TO-2540b) shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.  
(9 VAC 5-80-110, Condition 8 of 7/16/1999 Permit Document, and Condition 17 of 4/30/2001 Permit Document)
6. **Process Equipment Requirements - Monitoring** - The thermal oxidizer (TO-2540a and TO-2540b) shall be equipped with a device to continuously measure and record the thermal oxidizer temperature. The monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the reactor system is operating.  
(9 VAC 5-80-110, Condition 4 of 7/16/1999 Permit Document, and Condition 5 of 4/30/2001 Permit Document)
7. **Process Equipment Requirements - Monitoring** - At least one time per calendar week an observation of the presence of visible emissions from each of the thermal oxidizer (TO-2540a and TO-2540b) stacks shall be made, provided they operated during that week. The presence of visible emissions shall require the permittee to:
  - a. take timely corrective action such that the thermal oxidizer, with visible emissions, resumes operation with no visible emissions, or,
  - b. conduct a visible emission evaluation (VEE) on the thermal oxidizer stack, with visible emissions, in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from each of the thermal oxidizers are 5 percent opacity or less. If any of the 15-second observations exceed 5 percent opacity, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the thermal oxidizer (TO-2540a and TO-2540b) resumes operation within the 5 percent opacity limit.

The permittee shall maintain a thermal oxidizer stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the thermal oxidizer has not been operated for any period during the week it shall be noted in the log book

(9 VAC 5-80-110 and Condition 5 of 4/30/2001 Permit Document)

8. **Process Equipment Requirements – Urethane and epoxy based acrylate production - Recordkeeping** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to the production of urethane and epoxy based acrylates, VOC and TDI emissions, calculated monthly as the sum of the previous consecutive 12 months' production. These records shall be available on site for inspection by the DEQ and shall be current for the most recent three (3) years.  
(9 VAC 5-80-110 and Condition 12 of 7/16/1999 Permit Document)
9. **Process Equipment Requirements - Acrylic based oligomer/monomer manufacturing and blending - Recordkeeping** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:
- a. The monthly and annual production of acrylate based oligomers/monomers and blended products sufficient to calculate VOC emissions and to demonstrate compliance with Condition No. 4. Yearly emissions shall be calculated monthly as the sum of each consecutive 12 month period.
  - b. Results of all observations as required in Condition 7 of this permit.
- These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.  
(9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 20 of 4/30/2001 Permit Document)
10. **Process Equipment Requirements - Testing** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. This includes constructing the facility such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and providing stack or duct that is free from cyclonic flow. Upon request from the Department, test ports shall be provided at the appropriate locations.  
(9 VAC 5-80-110, Condition 6 of 7/16/1999 permit, and Condition 22 of 4/30/2001 permit Document)

#### **40 CFR 63 MACT VVVVVV – Oligomers Chemical Manufacturing Process Unit (CMPU) Requirements**

11. **Management Practices** – Each process vessel shall be equipped with a cover or lid that must be closed at all times when it is in metal HAP service, except for manual operations that require access, such as material addition and removal, inspection, sampling and cleaning. This requirement does not apply to process vessels containing only metal HAP that are in a liquid solution or other form that will not result in particulate emissions of metal HAP (e.g., metal HAP that is in ingot, paste, slurry, or moist pellet form or other form). The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.  
(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11495)

12. **Inspection** -The permittee shall conduct inspections of process vessels and equipment for each CMPU in metal HAP service, as specified in Conditions 12.a through 12.e to demonstrate compliance with Condition 11 and to determine that the process vessels and equipment are sound and free of leaks. Alternatively, except when the subject CMPU contains metal HAP as particulate, inspections may be conducted while the subject process vessels and equipment are in VOC service, provided that leaks can be detected when in VOC service. The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.
- a. Inspections must be conducted at least quarterly.
  - b. For these inspections, detection methods incorporating sight, sound, or smell are acceptable. Indications of a leak identified using such methods constitute a leak unless you demonstrate that the indications of a leak are due to a condition other than loss of HAP. If indications of a leak are determined not to be HAP in one quarterly monitoring period, you must still perform the inspection and demonstration in the next quarterly monitoring period.
  - c. As an alternative to conducting inspections, as specified in Condition 12.b, you may use Method 21 of 40 CFR part 60, appendix A-7, with a leak definition of 500 ppmv to detect leaks. You may also use Method 21 with a leak definition of 500 ppmv to determine if indications of a leak identified during an inspection conducted in accordance with Condition 12.b are due to a condition other than loss of HAP. The procedures in this paragraph may not be used as an alternative to the inspection required by Condition 12.b for process vessels that contain metal HAP as particulate.
  - d. Inspections must be conducted while the subject CMPU is operating.
  - e. No inspection is required in a calendar quarter during which the subject CMPU does not operate for the entire calendar quarter and is not in metal HAP service. If the CMPU operates at all during a calendar quarter, an inspection is required.

(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11495)

13. **Repair** - The permittee shall repair any leak within 15 calendar days after detection of the leak, or document the reason for any delay of repair. For the purposes of §63.11495(a)(4), a leak will be considered “repaired” if a condition in Conditions 13.a, 13.b, or 13.c of this permit is met. The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.
- a. The visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated, or
  - b. No bubbles are observed at potential leak sites during a leak check using soap solution, or

c. The system will hold a test pressure.

(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11495)

14. **Records** - The permittee shall keep records of the dates and results of each inspection event, the dates of equipment repairs, and, if applicable, the reasons for any delay in repair. The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.  
(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11495)
15. **Operation and Maintenance** - At all times the permittee shall operate and maintain any affected CMPU, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the CMPU. The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.  
(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11495(d))
16. **Limit** - The permittee shall comply with the requirements in Conditions 16.a and 16.b for metal HAP emissions from each CMPU using 40 CFR 63 Subpart VVVVVV Table 1 metal HAP. If the collective uncontrolled metal HAP emissions from all metal HAP process vents from a CMPU are equal to or greater than 400 lb/yr, then you must also comply with the emission limits and other requirements in 40 CFR 63 Subpart VVVVVV Table 4 and in 40 CFR 63.11496 (f)(3), (4), or (5). The requirements of this condition do not apply to metal HAP process vents from CMPU containing only metal HAP that are in a liquid solution or other form that will not result in particulate emissions of metal HAP (e.g., metal HAP that is in ingot, paste, slurry, or moist pellet form or other form). The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.
- a. Determine the sum of metal HAP emissions from all metal HAP process vents within a CMPU subject 40 CFR 63 Subpart VVVVVV, except you are not required to determine the annual emissions if you control the metal HAP process vents within a CMPU in accordance with 40 CFR 63 Subpart VVVVVV Table 4 or if you determine your total metal HAP usage in the process unit is less than 400 lb/yr. To determine the mass emission rate you may use process knowledge, engineering assessment, or test data. You must keep records of the emissions calculations
- b. If your current estimate is that total uncontrolled metal HAP emissions from a CMPU subject to 40 CFR 63 Subpart VVVVVV are less than 400 lb/yr, then you must keep records of either the number of batches operated per month (batch vents) or the process operating hours (continuous vents). Also, you must reevaluate your total emissions before you make any process or operational change that affects emissions of metal HAP. If projected emissions increase to 400 lb/yr or more, then you must be in compliance with one of the options for metal HAP process vents in 40 CFR 63

Subpart VVVVVV Table 4 upon initiating operation under the new operating conditions. You must keep records of all recalculated emissions determinations

(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11496)

17. **General Provisions** – The permittee shall meet the requirements of the General Provisions in 40 CFR Part 63, Subpart A, as shown in Table 9 to 40 CFR 63 Subpart VVVVVV. The General Provisions in other parts do not apply except when a requirement in an overlapping standard, which is at least as stringent as 40 CFR 63 Subpart VVVVVV and with which the facility has opted to comply, requires compliance with general provisions in another part. The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.  
(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11501)

18. **Notification** - Notification of compliance status (NOCS). Your NOCS required by §63.9(h) shall include the following additional information as applicable:

This certification of compliance, signed by a responsible official:

“This facility complies with the management practices in §63.11495.”

The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.  
(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11501)

19. **Recordkeeping** - The permittee shall maintain files of all information required by 40 CFR 63 Subpart VVVVVV for at least 5 years following the date of each occurrence according to the requirements in §63.10(b)(1). If you are subject, you shall comply with the recordkeeping and reporting requirements of §63.10(b)(2)(iii) and (vi) through (xiv), and the applicable requirements specified in Conditions 19.i through 19.iv. The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit.

- i. Records of management practice inspections, repairs, and reasons for any delay of repair, as specified in Condition 14.
- ii. Records of metal HAP emission calculations as specified in Conditions 16.a and 16.b. If total uncontrolled metal HAP process vent emissions from a CMPU subject to this subpart are estimated to be less than 400 lb/yr, also keep records of either the number of batches per month or operating hours, as specified in 16.b.
- iii. Records of the date, time, and duration of each malfunction of operation of process equipment, control devices, recovery devices, or continuous monitoring systems used to comply with this subpart that causes a failure to meet a standard. The record shall include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions.

- iv. Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 16.b, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11501)

20. **Semiannual Compliance Reports** - The permittee shall submit semiannual compliance reports that contain the information specified in Conditions 20.a through 20.d, as applicable. Reports are required only for semiannual periods during which you experienced any of the events described in Conditions 20.a through 20.d. The requirements of this condition are limited to the CMPU equipment as identified in the Emission Units table found at the beginning of this permit. Submittals shall coincide with time identified in Condition 34.

- a. Deviations - Clearly identify any deviation from the requirements of 40 CFR 63 Subpart VVVVVV.
- b. Delay of leak repair - Provide the following information for each delay of leak repair beyond 15 days for any process vessel: information on the date the leak was identified, the reason for the delay in repair, and the date the leak was repaired.
- c. Process change - Report each process change that affects a compliance determination and submit a new certification of compliance with the applicable requirements in accordance with the procedures specified in Condition 18.
- d. Malfunctions - If a malfunction occurred during the reporting period, the report must include the number of instances of malfunctions that caused emissions in excess of a standard. For each malfunction that caused emissions in excess of a standard, the report must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions. The report must also include a description of actions you took during a malfunction of an affected source to minimize emissions in accordance with Condition 15, including actions taken to correct a malfunction.

(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11501(d))

21. **Affirmative defense for violation of emission standards during malfunction** - In response to an action to enforce the standards set forth in §§63.11495 through 63.11499, the permittee may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 CFR 63.2. Appropriate penalties may be assessed if you fail to meet your burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11501(e))

22. **Report** - If you seek to assert an affirmative defense, you must submit a written report to the Board, with all necessary supporting documentation, that you have met the requirements set forth in Condition 21. This affirmative defense report must be included in the first periodic compliance report, deviation report, or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance report, deviation report, or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance report, deviation report, or excess emission report due after the initial occurrence of the violation of the relevant standard.  
(9 VAC 5-80-110, 9 VAC 5-60-100, and 40CFR 63.11501(e)(2))

**Insignificant Emission Units**

23. **Insignificant Emission Units** - The following emission units that are part of the Oligomer Chemical Manufacturing Process Unit (CMPU) are identified in the application as insignificant emission units under 9 VAC 5-80-720:

<b>Emission Unit No.</b>	<b>Emission Unit Description</b>	<b>Citation</b>	<b>Pollutant(s) Emitted (9 VAC 5-80-720B)</b>	<b>Rated Capacity (9 VAC 5-80-720C)</b>
None Identified				

These emission units are presumed to be in compliance with all requirements of the Federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. This Title V permit is limited to the requirements mandated by 40 CFR MACT VVVVVV and is not applicable to Insignificant Emission Units identified outside of this Title V permit.

**Permit Shield & Inapplicable Requirements**

24. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to the permitted facility comprising the Oligomers CMPU equipment as identified in the Emission Units table found at the beginning of this permit:

<b>Citation</b>	<b>Title of Citation</b>	<b>Description of Applicability</b>
9 VAC 5-50-410	Exemption from NSPS Subpart Kb	The Oligomers CMPU is not subject to NSPS Subpart Kb because no storage vessel has its rated capacity or its contents' vapor pressure above the applicable thresholds.
9 VAC 5-50-410	Exemption from NSPS Subpart VV	The Oligomers CMPU is not subject to NSPS Subpart VV because it does not produce any of the regulated chemicals listed in 40 CFR 60.489.
9 VAC 5-60-100	Exemption from NESHAP Subpart SS	The Oligomers CMPU does not have any applicable control requirements in NESHAP Subpart VVVVVV that reference Subpart SS. As a result, Subpart SS is not applicable to the Oligomers CMPU.
9 VAC 5-60-100 and 40 CFR 63.11494(a)(2)(iii)	Exemption of Monomer CMPU from NESHAP Subpart VVVVVV	The other CMPU at the Chatham facility (Monomer) does not use a Table 1 HAP as a feedstock or generate a Table 1 HAP as a product or byproduct and is therefore not subject to NESHAP Subpart VVVVVV.
9 VAC 5-60-100 and 40 CFR 63.11494(c)(5)	Exemption of ancillary equipment to Oligomer CMPU from NESHAP Subpart VVVVVV	Ancillary equipment are not included as part of the Oligomers CMPU and therefore are not subject to NESHAP Subpart VVVVVV.
9 VAC 5-80-70.C and 40 CFR 70.3(c)(2)	Exemption of emission units at nonmajor sources from Title V permitting	None of the equipment at the Chatham facility, except the Oligomers CMPU, is subject to Title V permitting.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

## General Conditions

25. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.  
(9 VAC 5-80-110 N)
26. **General Conditions - Permit Expiration** - This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
27. **General Conditions - Permit Expiration** - The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
28. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application for an initial permit or renewal under Condition 27, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
29. **General Conditions - Permit Expiration** - No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
30. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
31. **General Conditions - Permit Expiration** - The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

32. **General Conditions -Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

33. **General Conditions -Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

34. **General Conditions -Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
  - i. Exceedance of emissions limitations or operational restrictions;
  - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
  - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

35. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

[R3\\_APD\\_Permits@epa.gov](mailto:R3_APD_Permits@epa.gov)

(9 VAC 5-80-110 K.5)

36. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Director, Blue Ridge Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement

explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 34 of this permit. (9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

37. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Blue Ridge Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Blue Ridge Regional Office. (9 VAC 5-20-180 C)
38. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit. (9 VAC 5-80-110 G.1)
39. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application. (9 VAC 5-80-110 G.2)
40. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (9 VAC 5-80-110 G.3)
41. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)
42. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

43. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.  
(9 VAC 5-80-110 G.6)
44. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.  
(9 VAC 5-80-110 K.1)
45. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350 in addition to an annual permit maintenance fee consistent with the requirements of 9 VAC 5-80-2310 through 9 VAC 5-80-2350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. The amount of the annual permit maintenance fee shall be the largest applicable base permit maintenance fee amount from Table 8-11A in 9 VAC 5-80-2340, adjusted annually by the change in the Consumer Price Index.  
(9 VAC 5-80-110 H, 9 VAC 5-80-340 C and 9 VAC 5-80-2340 B)
46. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
  - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;

- d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

47. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E)

48. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

49. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

50. **General Conditions - Reopening For Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F. The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

51. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.  
(9 VAC 5-80-150 E)

52. **General Conditions - Transfer of Permits** - No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.  
(9 VAC 5-80-160)

53. **General Conditions - Transfer of Permits** - In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-160)

54. **General Conditions - Transfer of Permits** - In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-160)

55. **General Conditions - Malfunction as an Affirmative Defense** - A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements stated in Condition 56 are met.  
(9 VAC 5-80-250)

56. **General Conditions - Malfunction as an Affirmative Defense** - The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
- a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
  - b. The permitted facility was at the time being properly operated.
  - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
  - d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
- (9 VAC 5-80-250)
57. **General Conditions - Malfunction as an Affirmative Defense** - In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.  
(9 VAC 5-80-250)
58. **General Conditions - Malfunction as an Affirmative Defense** - The provisions of Conditions 55–57 are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.  
(9 VAC 5-80-250)
59. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.  
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

60. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.  
(9 VAC 5-80-80 E)
61. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.  
(40 CFR Part 82, Subparts A-F)
62. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).  
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)
63. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.  
(40 CFR Part 68)
64. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.  
(9 VAC 5-80-110 I)
65. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
  - b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
  - c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)