State of New Hampshire
Department of Environmental Services
Air Resources Division

Temporary Permit

Permit No: TP-0265
Date Issued: July 22, 2020
Significant Amendment: June 15, 2021

This certified that:

Renewable Fuels by Peterson LLC
35 Business Park Road
North Haverhill, NH 03774

has been granted a Temporary Permit for:

Biodiesel Production Operations

at the following facility and location:

Renewable Fuels by Peterson LLC
35 Business Park Road
North Haverhill, NH 03774

Facility ID No: **3300990315**
Application No: **19-0083**, received May 2, 2019; Temporary Permit Application
20-0632, received November 12, 2020; Significant Permit Amendment

which includes devices that emit air pollutants into the ambient air as set forth in the permit application referenced above which was filed with the New Hampshire Department of Environmental Services, Air Resources Division (department) in accordance with RSA 125-C of the New Hampshire Laws. Request for permit renewal must be received by the department at least 90 days prior to expiration of this permit and must be accompanied by the appropriate permit application forms.

This permit is valid upon issuance and expires on **January 31, 2022**.

Craig Wright COPY

Director
Air Resources Division

Abbreviations and Acronyms

AAL	Ambient Air Limit
acf	actual cubic foot
ags	above ground surface
ASTM	American Society of Testing and Materials
Btu	British thermal units
CAS	Chemical Abstracts Service
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
Env-A	New Hampshire Code of Administrative Rules – Air Related Programs
ft	foot or feet
ft^3	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant as defined in Section 112 of the 1990 Clean Air Act Amendments
hr	hour
lb	pound
LDAR	Leak Detection and Repair
LPG	Liquefied Petroleum Gas
MM	million
MW	megawatt
NAAQS	National Ambient Air Quality Standard
NSPS	New Source Performance Standard
NOx	Oxides of Nitrogen
PM_{10}	Particulate Matter < 10 microns
ppm	parts per million
psi	pounds per square inch
RACT	Reasonable Available Control Technology
RSA	Revised Statutes Annotated
RTAP	Regulated Toxic Air Pollutant
RUCO	Recycled Used Cooking Oil
SDS	Safety Data Sheet
scf	standard cubic foot
SO_2	Sulfur dioxide
TOC	Total Organic Carbon
TSP	Total Suspended Particulate
tpy	tons per consecutive 12-month period
ULSD	Ultra-Low Sulfur Diesel
UCO	Used cooking oil
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound
WFE	Wiped Film Evaporator

I. Facility Description

Renewable Fuels by Peterson LLC (RFP) owns and operates a facility to produce biodiesel from used restaurant vegetable oil (UCO) at 35 Business Park Road in North Haverhill, New Hampshire. The Facility manufactures biodiesel through a batch transesterification process, which has the potential to emit methanol (CAS No. 67-56-1), a compound that is a Hazardous Air Pollutant (HAP), at quantities greater than the major source threshold. Methanol is also a Volatile Organic Compound (VOC) and a Regulated Toxic Air Pollutant (RTAP). The Facility is currently operating under Temporary Permit TP-0265 which established RFP as a synthetic minor source of HAP emissions.

This significant permit amendment (Application #20-0632) authorizes the installation and operation of a two pretreatment processes and a wiped film evaporator (WFE) which will further purify finished biodiesel and glycerin which is generated as a byproduct during the biodiesel manufacturing process. In addition, the maximum design capacity of the biodiesel manufacturing process is being increased from 6.4 to 7.8 million gallons per year and tank capacities are being removed from the permit.

II. Emission Unit Identification

This permit covers the devices and processes identified in Table 1.

Table 1 – Process Emission Unit Identification[1]

Emission Unit ID	Process Identification & Associated Equipment [2,3]	
EU15	Methanol Delivery	R1 – Methanol Unloading Rack
	Methanol Storage & Recovery	
	T3 – Methanol/Water Storage Tank T11 – Methanol Storage Tank T20 – Flash Condensate Tank T21 – Methanol Still Condensate Tank	T25 – Methanol Storage Tank T26 – Methanol Storage Tank T31 – Glycerin Still Condensate Tank
	Biodiesel Production	7,800,000 gallons per year finished biodiesel
	T2 – Reactor Tank T4 – Crude Biodiesel Storage Tank T6 – Recycled UCO (RUCO) Tank T111 – Acid Storage Tank T113 – Catalyst Storage Tank	T19 – Flash Evaporator T32 – Biodiesel Wash Tank T12 – Biodiesel Check Tank T112 – Caustic Storage Tank
	Glycerin Storage	
	T5 – Crude Water Wash Tank T30 – Glycerin Still T33 – Crude Glycerin Storage Tank T41 – Glycerin Separator Tank	T43 – Glycerin Storage Tank T114 – Crude Glycerin Tank T115 – Glycerin Water Wash Tank T116 – Clean Glycerin Storage Tank
	Wastewater Treatment & Storage	
	T8 – Crude Wastewater Tank T9 – Recycle Water Storage Tank	T40 – Food Waste Tank T49 – Food Waste Tank

[1] Emission unit EU15 constitutes a single process unit as defined in 40 CFR 60.481a.

[2] Emission units EU15 exhausts to the wet scrubber and the thermal oxidizer (PCE02) for the control of methanol emissions. The wet scrubber is a recovery device and is not identified as a pollution control device.

[3] T26 has not been installed to date.

Table 1 – Process Emission Unit Identification[1]	
Emission Unit ID	**Process Identification & Associated Equipment [2,3]**
	Methanol Recovery Unit
	Packed tower wet scrubber for the recovery of methanol from the process stream
	GC1 – Glycerolysis condenser 1 for recovery of methanol from the process stream
	Glycerolysis Process
	GR1 – Reactor 1 GS1 – Separator 1
	GR2 – Reactor 2 GS2 – Separator 2 (formerly T102)
	Biodiesel and Glycerin Purification Processes
	Pretreatment Processes (2) – DeMethanolizer (DeMeOH), Devolatization (DeVol)
	WFE

III. Pollution Control Equipment

Air pollution control equipment listed in Table 2 shall be operated at all times that the associated devices are in operation in order to meet permit conditions.

Table 2 – Pollution Control Equipment Identification			
Pollution Control Equipment ID	**Description**	**Purpose**	**Emission Units Controlled**
PCE02	Thermal oxidizer	Control VOCs and HAPs	EU15

IV. Stack Criteria

The following devices at the Facility shall have exhaust stacks that are vertical and unobstructed[4] and meet the criteria in Table 3.

Table 3 – Stack Criteria			
Stack Number	**Emission Unit/Pollution Control Equipment ID**	**Minimum Height (feet above ground surface)**	**Maximum Exit Diameter (feet)**
1	PCE02	35	2.667
Scrubber	Methanol Recovery Scrubber	35	0.5

V. Operating and Emission Limitations[5]

The owner or operator shall be subject to the operating and emission limitations identified in Table 4.

[4] There is no impediment to vertical flow and the exhaust stack extends at least 2 feet higher than any roofline within 10 feet of the exhaust stack exit, measured horizontally.

[5] The Facility does not have the potential to emit the pollutants VOCs, NOx, SO_2, CO, and PM_{10} at levels greater than the major source thresholds for these pollutants. Therefore, the Facility is a true minor source for VOCs, NOx, SO_2, CO, and PM_{10}.

Table 4 - Operating and Emission Limitations			
Item #	**Requirement**	**Applicable Emission Unit**	**Regulatory Basis**
1.	*Facility-Wide HAP Emission Limitation* Facility-wide emissions of Hazardous Air Pollutants (HAPs, as defined in Section 112 of the 1990 Clean Air Act Amendments) shall be limited to less than 10 tpy for any individual HAP and 25 tpy for all HAPs combined[6].	Facility Wide	Env-A 604.02(a)(1) & Consent Decree Docket No. 215-2020-CV-00084
2.	*24-hour and Annual Ambient Air Limit* The emissions of any Regulated Toxic Air Pollutant (RTAP) shall not cause an exceedance of its associated 24-hour or annual Ambient Air Limit (AAL) as set forth in Env-A 1450.01, *Table of All Regulated Toxic Air Pollutants*.	Facility wide	Env-A 1400 State only enforceable limit
3.	*Revisions of the List of RTAPs* In accordance with RSA 125-I:5 IV, if the department revises the list of RTAPs or their respective AALs or classifications as set forth in Table 1450-1 in Env-A 1450.01, and as a result of such revision any source is required to obtain or modify the permit under the provisions of RSA 125-I or RSA 125-C, the owner or operator shall have 90 days following publication of notice of such final revision in the New Hampshire Rulemaking Register to complete and file an application for such permit or permit modification.	Facility wide	Env-A 1404.02 State-only enforceable limit
4.	*Synthetic Organic Chemicals Manufacturing – NSPS Operating Requirements* Each piece of equipment is presumed to be in VOC service, unless it has been tested as required in Table 5, Item 8, to determine that the equipment is NOT in VOC service (i.e. < 10% VOC by weight).	EU15	40 CFR 60.481a and 60.485a(d) subpart VVa
5.	*Facility Process Unit (FPU) – Emission Limitations* a.) Reduce emissions of total organic compounds (TOC), less methane and ethane, by greater than or equal to 98%; or b.) Reduce emissions of TOC to a TOC (less methane and ethane) concentration ≤ 20 ppmv, on a dry basis, corrected to 3% oxygen.	EU15	Consent Decree Docket No. 215-2020-CV-00084 and 40 CFR60.662(a) Subpart NNN
6.	*Control Device – Operating Requirements* a.) The control device (PCE02) shall be operated at all times that emissions are vented to it; b.) Install and operate a temperature monitoring device which is capable of providing a continuous record in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs; and c.) The minimum operating temperature for the thermal oxidizer (PCE02) shall be 1562°F as determined during performance testing required in Table 5, Item 4; and	PCE02	§60.482-10(e) & (m) subpart VVa, 40 CFR 60.663(a)(1) subpart NNN & Consent Decree Docket No. 215-2020-CV-00084
	d.) Install and operate a flow indicator that provides a record of vent stream flow to the thermal oxidizer at least once every hour.		40 CFR 60.663(a)(2) subpart NNN

[6] The Facility has the potential to emit a HAP (methanol, CAS # 67-56-1) at levels greater than the major source threshold of 10 tpy for any individual HAP. The annual emission limit in Table 4, Item 1 is less than this threshold and establishes the Facility as a synthetic minor source of air pollution for HAPs.

Table 4 - Operating and Emission Limitations			
Item #	**Requirement**	**Applicable Emission Unit**	**Regulatory Basis**
7.	*Pumps in Light Liquid Service – NSPS Operating Requirements*[7] a.) A leak is defined as ≥2,000 ppm and is based on monitoring instrument readings as determined in Table 5, Item 17.a.);	EU15	40 CFR 60.482-2a(2)(b)(1)(ii) subpart VVa
	b.) When a leak is detected: 1.) It shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Table 4, Item 13; 2.) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to the following practices where practicable: i.) Tightening of packing gland nuts; ii.) Ensuring that the seal flush is operating at design pressure and temperature.		40 CFR 60.482-2a(c) subpart VVa
8.	*Pressure Relief Devices in Gas/Vapor Service – NSPS Operating Requirements* a.) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of <500 ppm above background except after each pressure release; b.) After each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of <500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in Table 4, Item 13.	EU15	40 CFR 60.482-4a subpart VVa
9.	*Sampling Connection Systems – NSPS Operating Requirements*[8] a.) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system[9]; b.) Each closed-purge, closed-loop or closed-vent system shall: 1.) Return the purged process fluid directly to the process line; or 2.) Collect and recycle the purged process fluid to a process.	EU15	40 CFR 60.482-5a subpart VVa
10.	*Open-ended Valves or Lines – NSPS Operating Requirements* a.) Each open-ended valve or line shall: 1.) Be equipped with a cap, blind flange, plug, or second valve, except as provided b.) and c.) below; 2.) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. b.) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of a.) above; c.) Open-ended valves or lines containing materials which would autocatalytically polymerize, or would present an explosion, serious overpressure, or other safety hazard if capped are exempt from the requirements of a.) and b.) above.	EU15	40 CFR 60.482-6a subpart VVa

[7] *In light liquid service* means "that a piece of equipment contains a liquid that meets (1), (2) or (3): (1) The vapor pressure of one or more of the organic compounds is > 0.3 kPa at 20°C; (2) the total concentration of organic compounds having a vapor pressure of > 0.3 kPa at 20°C is ≥ 20% by weight of the total process stream, and (3) the fluid is a liquid at operating conditions." [40 CFR 60.481a]

[8] Purged process fluid is returned to process; closed purge sampling system.

[9] Gases displaced during filling of the sample container are not required to be collected or captured.

Table 4 - Operating and Emission Limitations			
Item #	**Requirement**	**Applicable Emission Unit**	**Regulatory Basis**
11.	*Valves in Gas/Vapor Service and in Light Liquid Service –NSPS Operating Requirements* a.) A leak is defined as ≥ 500 ppm and is based on monitoring instrument readings as determined in Table 5, Item 17.a.);	EU15	40 CFR 60.482-7a subpart VVa
	b.) When a leak is detected: 1.) It shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Table 4, Item 13; 2.) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected;		40 CFR 60.482-7a(d) subpart VVa
	c.) First attempts at repair include, but are not limited to, the following practices where practicable: 1.) Tightening on bonnet bolts; 2.) Replacement of bonnet bolts; 3.) Tightening of packing gland nuts; and 4.) Injection of lubricant into lubricated packing;		40 CFR 60.482-7a(e) subpart VVa
12.	*Pumps, Valves and Connectors in Heavy Liquid Service and Pressure Relief Devices in Light Liquid or Heavy Liquid[10] – NSPS Operating Requirements* a.) A leak is defined as determined in Table 5, Item 17 by an instrument reading of ≥ 10,000 ppm.	EU15	40 CFR 60.482-8a subpart VVa
	b.) When a leak is detected: 1.) It shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Table 4, Item 13. 2.) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.		40 CFR 60.482-8a(c) subpart VVa
	c.) First attempts at repair include, but are not limited to the following practices where practicable: 1.) For pumps: i.) Tightening packing gland nuts; ii.) Ensuring that the seal flush is operating at design pressure and temperature; 2.) For valves: i.) Tightening of bonnet bolts; ii.) Replacement of bonnet bolts; iii.) Tightening of packing gland nuts; and iv.) Injection of lubricant into lubricated packing		40 CFR 60.482-8a(c)(2), 60.482-2a(c)(2) & 60.482-7a(e) subpart VVa
13.	*Delay of Repair – NSPS Operating Requirements* a.) Delay of repair of equipment for which leaks have been detected is allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur by the end of the next process unit shutdown; b.) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in VOC service;	EU15	40 CFR 60.482-9a subpart VVa

[10] *In heavy liquid service* means "that a piece of equipment is not in gas/vapor service or in light liquid service." [40 CFR 60.481a]

Table 4 - Operating and Emission Limitations			
Item #	**Requirement**	**Applicable Emission Unit**	**Regulatory Basis**
	c.) Delay of repair for valves and connectors is also allowed if: 1.) It has been determined that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair; and 2.) When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with Table 4, Item 5.a.); d.) Delay of repair for pumps is also allowed if: 1.) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and 2.) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected; e.) Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit shutdown will not be allowed unless the third process unit shutdown occurs sooner than 6 months after the first process unit shutdown.		
14.	*Closed-vent Systems – NSPS Operating Requirements*[11] a.) A leak is defined as an instrument reading > 500 ppm above background based on monitoring instrument readings as determined in Table 5, Item 17.a.), or by visual inspections, shall be repaired as soon as practicable, except as provided in b.) below; 1.) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected; 2.) Repair shall be completed no later than 15 calendar days after the leak is detected, except as provided in b.) below;	EU15	40 CFR 60.482-10a(g) subpart VVa
	b.) Delay of repair of a closed-vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown;		40 CFR 60.482-10a(h) subpart VVa
	c.) Whenever emissions are vented to a closed-vent system or control device, the closed-vent system and control device shall be operating.		40 CFR 660.482-10(a)(m) subpart VVa
15.	*Connectors in Gas/Vapor Service and in Light Liquid Service –NSPS Operating Requirements* a.) A leak is defined as an instrument reading of ≥500 ppm based on monitoring instrument readings as determined in Table 5, Item 17.a.); b.) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Table 4, Item 13;	EU15	40 CFR 60.482-11a subpart VVa

[11] RFP operates a closed-loop vent system which consists of ventilation from each tank and piece of equipment that emits VOC/HAP that is routed to the methanol recovery scrubber and PCE02. RFP monitors each component (i.e. connector, valve, etc.) as part of its LDAR program which is why the closed-loop vent system is not independently referenced in the LDAR plan.

Table 4 - Operating and Emission Limitations			
Item #	**Requirement**	**Applicable Emission Unit**	**Regulatory Basis**
	c.) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected;		
	d.) If any inaccessible, ceramic, or ceramic-lined connector is observed by visual, audible, olfactory, or other means to be leaking, the visual audible, olfactory, or other indications of a leak to the atmosphere shall be eliminated as soon as practical.		40 CFR 60.482-11a(f)(2) subpart VVa
16.	*Visible Emission Standards* The average opacity shall not exceed 20 percent for any continuous 6-minute period.[12]	EU15	Env-A 2103.02
17.	NSPS General Provisions a.) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on available information which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source; b.) For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in this part, nothing in this part shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.	EU15	40 CFR 60.11(d) & 40 CFR 60.11(g)

VI. Monitoring and Testing Requirements

The owner or operator is subject to the monitoring and testing requirements as contained in Table 5.

Table 5 - Monitoring and Testing Requirements				
Item #	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
1.	When conditions warrant, the department may require the owner or operator to conduct stack testing in accordance with USEPA or other department approved methods.	Upon request by the department	Facility wide	RSA 125-C:6, XI

[12] Compliance with visible emission limitations shall be determined, upon request by the department, using 40 CFR 60, Appendix A, Method 9, or other department approved method.

Table 5 - Monitoring and Testing Requirements				
Item #	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
2.	*Stack Test Pre-test Protocol* Testing shall be planned and carried out in accordance with the following schedule: a.) A pre-test protocol shall be submitted to the department at least 30 days prior to the commencement of testing and shall contain all the information required pursuant to Env A 802.04; and b.) The owner or operator and any contractor retained by the owner or operator to conduct the test shall meet with a department representative in person or by telephone at least 15 days prior to the test date to finalize the details of the testing pursuant to Env-A 802.05. c.) A test report shall be submitted to the department within 60 days after completion of testing.	As specified	EU15 & PCE02	Env-A 802 and 40 CFR 60.665(b) subpart NNN
3.	*Operating Conditions During a Stack Test* Compliance testing shall be conducted under one of the following operating conditions: a.) Between 90 and 100%, inclusive, of maximum production rate or rated capacity; b.) A production rate at which maximum emissions occur; or c.) At such operating conditions agreed upon during a pre-test meeting conducted pursuant to Table 5, Item 2.b).	For each compliance stack test	EU15	Env-A 802.10 and 40 CFR 60.664(a) subpart NNN
4.	*Control Device Testing* The following test methods, or department approved alternatives, shall be used, as applicable to determine compliance with Table 4, Item 5: a.) Collect combustion zone temperature readings as agreed upon in the pre-test protocol required in Table 5, Item 2; b.) Collect process information as agreed upon in the pre-test protocol required in Item Table 5, Item 2, above; c.) USEPA Methods 1-4 for exit flow rate, percentage of carbon dioxide, oxygen and moisture; d.) USEPA Method 18 for concentration of TOC; and e.) Testing shall be performed at the outlet and/or inlet of the thermal oxidizer in order to determine the destruction efficiency of the device.	Within 60 days of achieving the maximum production capacity of the WFE, but not later than 180 days from startup of the WFE; whichever occurs first and every 5 years within the same calendar quarter of the date of the anniversary of the most recent compliance test[13]	PCE02	Env-A 802, 40 CFR 60.664(b) and 60.665(b)(1)(i) and (ii) subpart NNN

[13] The most recent compliance test for PCE02 was performed on August 23, 2018.

Table 5 - Monitoring and Testing Requirements				
Item #	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
5.	*Thermal Oxidizer Combustion Temperature* a.) Monitor and record the temperature in the combustion chamber.	Monitor continuously when the associated process is operating	PCE02	40 CFR 60.663(a)(1) Subpart NNN, RSA 125-C:6, XI; Env-A 906 and Env-A 911.03(b)
	b.) If the average hourly temperature reading is less than the minimum specified in Table 4, Item 6.c, then inspect the unit and take corrective action to raise the temperature. c.) If the average hourly temperature cannot be brought back up within 48 hours of the excursion[14], then maintain records of the excursion pursuant to Table 6, Item 8.	As noted		
6.	*Thermal Oxidizer Vent Stream Flow* Monitor and record the vent stream flow at least once every hour.	Monitor continuously when the associated process is operating	PCE02	40 CFR 60.663(a)(2) Subpart NNN
7.	*Thermal Oxidizer Inspection* Conduct a visual external integrity inspection of the thermal oxidizer. a.) The inspection shall include an evaluation of whether all emissions are being vented through the dedicated stack exit. b.) The inspection shall be conducted by plant personnel familiar with the operation of the oxidizer and associated equipment.	If conditions indicate that the system may need maintenance, but at least annually	PCE02	RSA 125-C:6, XI
8.	*Equipment Identification – Not in VOC Service* The owner or operator shall leak test each piece of equipment unless the owner or operator demonstrates that a process unit is not in VOC service using the following methods and procedures: a.) Procedures that conform to the general methods in ASTM E260-73, 91 or 96, E168-67, 77 or 92, E169-63, 77 or 93 shall be used to determine the percent VOC content in the process fluid that is contained in or contacts a piece of equipment; b.) Organic compounds that are considered to have negligible photochemical reactivity may be excluded from the total quantity of organic compounds in determining the VOC content of the process fluid; c.) Engineering judgment may be used to estimate the VOC content, if a piece of equipment had not been shown previously to be in service.[15]	As necessary	EU15	40 CFR 60.485a(d) subpart VVa

[14] An excursion occurs when a monitored parameter specified by the permit to document the performance of the air pollution control equipment is above the maximum or below the minimum set point or is outside of the required operating range for that parameter.

[15] If the USEPA or the department disagrees with the judgment, Table 5, Item 8.a.) and b.) shall be used to resolve the disagreement.

Table 5 - Monitoring and Testing Requirements

<table>
<tr><th>Item #</th><th>Method of Compliance</th><th>Frequency</th><th>Applicable Unit</th><th>Regulatory Basis</th></tr>
<tr><td>9.</td><td><u>Equipment Identification – Light Liquid Service</u>
The owner or operator shall demonstrate that a piece of equipment is in light liquid service by showing that all the following conditions are met:
a.) The vapor pressure of one or more of the organic components is > 0.3 kPa at 20°C using standard reference texts or ASTM D2879-83,96 or 97 to determine vapor pressures;
b.) The total concentration of the pure organic components having a vapor pressure of > 0.3 kPa at 20°C is ≥ 20% by weight; and
c.) The fluid is a liquid at operating conditions.</td><td>As necessary</td><td>EU15</td><td>40 CFR 60.485a(e) subpart VVa</td></tr>
<tr><td>10.</td><td><u>Equipment Leaks – NSPS Monitoring Frequency Requirements</u>
a.) For batch process units that operate less than 365 days per year, the owner or operator shall monitor to detect leaks from pumps, valves, and open-ended valves or lines at the following frequency:
<table>
<tr><th rowspan="2">Operating time (% of hours during the year)</th><th colspan="3">Equivalent monitoring frequency time in use</th></tr>
<tr><th>Monthly</th><th>Quarterly</th><th>Semiannually</th></tr>
<tr><td>0 to < 25</td><td>Quarterly</td><td>Annually</td><td>Annually</td></tr>
<tr><td>25 to < 50</td><td>Quarterly</td><td>Semiannually</td><td>Annually</td></tr>
<tr><td>50 to < 75</td><td>Bimonthly</td><td>Three times</td><td>Semiannually</td></tr>
<tr><td>75 to < 100</td><td>Monthly</td><td>Quarterly</td><td>Semiannually</td></tr>
</table>
b.) Monitoring may be performed at any time during the specified monitoring period (e.g., month, quarter, year), provided the monitoring is conducted at a reasonable interval after completion of the last monitoring campaign and are defined as:
1.) When monitoring is conducted quarterly, monitoring events must be separated by at least 30 calendar days;
2.) When monitoring is conducted semiannually (i.e., once every 2 quarters), monitoring events must be separated by at least 60 calendar days;
3.) When monitoring is conducted 3 times per year, monitoring events must be separated by at least 90 calendar days; and
4.) When monitoring is conducted annually, monitoring events must be separated by at least 120 calendar days.</td><td>As specified</td><td>EU15</td><td>40 CFR 60.482-1a(f) & 60.482-2a subpart VVa</td></tr>
<tr><td>11.</td><td><u>Pumps in Light Liquid Service – NSPS Monitoring Requirements</u>
a.) Monitor each pump monthly, or as specified in Table 5, Item 10a.), to detect leaks according to Table 5, Item 17.a.);</td><td>Monthly</td><td rowspan="2">EU15</td><td>40 CFR 60.482-2a(a)(1) subpart VVa</td></tr>
<tr><td>b.) Each pump shall be checked by visual inspection for indications of liquids dripping from the pump seal.</td><td>Once each calendar week</td><td>40 CFR 60.482-2a(1)(2) subpart VVa</td></tr>
<tr><td>12.</td><td><u>Pressure Relief Devices in Gas/Vapor Service – NSPS Monitoring Requirements</u>
Except as provided in Table 4, Item 13, no later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions indicated by an instrument reading of < 500 ppm above background, as measured according to Table 5, Item 17.</td><td>No later than 5 calendar days after the pressure release</td><td>EU15</td><td>40 CFR 60.482-4a(b)(1) subpart VVa</td></tr>
</table>

Table 5 - Monitoring and Testing Requirements				
Item #	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
13.	*Valves in Gas/Vapor Service and Light Liquid Service – NSPS Monitoring Requirements* a.) Monitor each valve during the first month of every calendar quarter, or as specified in Table 5, Item 10a.), according to Table 5, Item 17a.) until a leak is detected. b.) If a leak is detected, the valve shall be monitored monthly until a leak is not detected for two successive months.	As specified	EU15	40 CFR 60.482-7a(c)(1) subpart VVa
	c.) Any valve that is designated as unsafe-to-monitor is exempt from the requirements of Table 4, Item 11.a.) and b.) above if the owner or operator: 1.) Determines that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with a.) and b.) above; 2.) Has a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable;			40 CFR 60.482-7a(g) subpart VVa
	d.) Any valve that is designated as difficult to monitor is exempt from the requirements of a.) above and Table 4, Item 11.a.), and b.) above if the owner or operator: 1.) Determines that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above the support surface or it is not accessible at any time in a safe manner; 2.) Designates less than 3% of the total number of valves as difficult to monitor; and 3.) Follows a written plan that requires monitoring of the valve at least once per calendar year.			40 CFR 60.482-7a(h) subpart VVa
14.	*Pumps, Valves and Connectors in Heavy Liquid Service; and Pressure Relief Devices in Light Liquid or Heavy Liquid Service – NSPS Monitoring Requirements* Pumps, valves and connectors in heavy liquid service, and pressure relief devices in light liquid or heavy liquid service shall be monitored within 5 calendar days by the method specified in Table 5, Item 17.a.) if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method. If such a potential leak is repaired as required in Table 4, Items 12.b.) and c.), it is not necessary to monitor the system for leaks by the methods specified in Table 5, Item 17.a.).	As specified	EU15	40 CFR 60.482-8a subpart VVa
15.	*Closed-vent Systems – NSPS Monitoring Requirements*[16] Each closed-vent system shall be inspected annually for visible, audible, or olfactory indications of leaks.	As specified	EU15	40 CFR 60.482-10a(f) subpart VVa

[16] The closed vent system is operated under a vacuum [60.482-10a(i)].

Table 5 - Monitoring and Testing Requirements				
Item #	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
16.	*Connectors in Gas/Vapor Service and in Light Liquid Service – NSPS Monitoring Requirements*[17] a.) Monitor all connectors, except as provided in e.) and f.), as specified below:	As specified in b.) and c.)	EU15	40 CFR 60.482-11a subpart VVa
	b.) All subsequent monitoring of connectors shall be at the following frequencies: 1.) If the percent leaking connectors in the process unit was ≥0.5% during the last required monitoring period;	Once per year (i.e., 12-month period)		40 CFR 60.482-11a(b)(3)(i) subpart VVa
	2.) If the percent leaking connectors was ≥0.25% but <0.5% during the last required monitoring period[18];	Once every 4 years	EU15	60.482-11a(b)(3)(ii) subpart VVa
	3.) If the percent leaking connectors was <0.25% during the last required monitoring period: i.) Monitor at least 50% of the connectors within 4 years of the start of the monitoring period. ii.) If the percent leaking connectors calculated from the monitoring conducted in 3.)i.) above is ≥ 0.35%, the owner or operator shall monitor as soon as practical, but within the next 6 months, all connectors that have not yet been monitored during the monitoring period. At the conclusion of monitoring, a new monitoring period shall be started pursuant to b.)1.), 2.) or 3.) above, based on the percent of leaking connectors within the total monitored connectors. iii.) If the percent leaking connectors calculated from the monitoring conducted in 3.)i.) above is < 0.35% of the monitored connectors, the owner or operator shall monitor all connectors that have not yet been monitored within 8 years of the start of the monitoring period. c.) If during monitoring conducted pursuant to b.)3.), a connector is found to be leaking, it shall be re-monitored once within 90 days after repair to confirm that it is not leaking. d.) Keep a record of the start and end date of each monitoring period.	As specified	EU15	60.482-11a(b)(3)(iii) subpart VVa
	e.) Any connector that is described as an unsafe-to-monitor connector is exempt from the requirements in Table 5, Item 17.a.) and b.) and Table 5, Item 17.a), if the owner or operator: 1.) Determines that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with the monitoring requirements in a.), b.) and c.) above and 2.) Has a written plan that requires monitoring of the connector as frequently as practicable during safe to monitor periods, but not more frequently than the periodic schedule;	As specified	EU15	60.482-11a(e) subpart VVa

[17] The initial round of monitoring has been conducted.

[18] Compliance with this condition may be met by monitoring at least 40% of the connectors in the first two years and the remainder of the connectors by the end of the 4-year period. The percent leaking connectors will be calculated for the total of all monitoring performed during the 4-year period.

Table 5 - Monitoring and Testing Requirements				
Item #	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
	f.) Any connector that is inaccessible or is ceramic or ceramic-lined (e.g., porcelain, glass, or glass-lined): 1.) Is exempt from the requirements of the monitoring requirements in Table 5, Items 16.a.) through c.). An inaccessible connector is one that is: i.) Buried; ii.) Insulated in a manner that prevents access to the connector by a monitoring probe; iii.) Obstructed by equipment or piping that prevents access to the connector by a monitoring probe; iv.) Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold which would allow access to connector up to 7.6 meters (25 feet) above ground; v.) Not able to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines, or would risk damage to equipment; 2.) If any inaccessible or ceramic or ceramic-lined connector is observed by visual, audible, olfactory, or other means to be leaking, the leak shall be repaired as soon as practicable.	As specified	EU15	40 CFR 60.482-11a(f) subpart VVa
	g.) For use in determining the monitoring frequency in Table 5, Item 16.b.), the percent leaking connectors shall be calculated as follows: $$\%C_L = \frac{C_L}{C_t} \times 100$$ Where: % C_L = percent leaking connectors as determined through periodic monitoring required in Table 5, Items 16.a.) and b.) C_L = number of connectors measured at ≥ 500 ppm by the method specified in Table 5, Item 17.a.) C_t = total number of monitored connectors in the process unit	As specified	EU15	40 CFR 60.482-11a(c) subpart VVa

Table 5 - Monitoring and Testing Requirements				
Item #	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
17.	*Equipment Leaks – NSPS Monitoring Requirements*[19] Monitoring shall comply with the following: a.) Monitoring shall comply with Method 21 of 40 CFR part 60, appendix A; b.) The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21 of 40 CFR part 60, appendix A-7; c.) Calibration gases shall be 1.) Zero air (less than 10 ppm of hydrocarbon in air); 2.) A mixture of methane or n-hexane and air at a concentration no more than 2,000 ppm greater than the leak definition concentration of the equipment monitored. i.) If the monitoring instrument's design allows for multiple calibration scales, then the lower scale shall be calibrated with a calibration gas that is no higher than 2,000 ppm above the concentration specified as a leak and the highest scale shall be calibrated with a calibration gas that is approximately equal to 10,000 ppm; ii.) If only one scale on an instrument will be used during monitoring, the owner or operator need not calibrate the scales that will not be used during that day's monitoring; 3.) A calibration drift assessment shall be performed, at a minimum, at the end of each monitoring day. Check the instrument using the same calibration gasses that were used to calibrate the instrument before use. Follow the procedures specified in Method 21 of appendix A-7, Section 10.1, except do not adjust the meter readout to correspond to the calibration gas value..	As specified	EU15	40 CFR 60.485a subpart VVa

VII. Recordkeeping Requirements

The owner or operator shall be subject to the recordkeeping requirements identified in Table 6.

Table 6 - Recordkeeping Requirements				
Item #	**Requirement**	**Duration/ Frequency**	**Applicable Unit**	**Regulatory Basis**
1.	*Record Retention and Availability* Keep the required records on file. These records shall be available for review by the department upon request.	Retain for a minimum of 5 years	Facility wide	Env-A 902
2.	*Process Operations – Recordkeeping Requirements* Maintain the following records for process operations: a.) Total quantity of raw materials used containing RTAPs and HAPs; b.) Total quantity of biodiesel produced; and c.) Hours of operation for the process.	Monthly	EU15	Env-A 903.03

[19] RFP does not adjust instrument readings for background.

Table 6 - Recordkeeping Requirements				
Item #	**Requirement**	**Duration/ Frequency**	**Applicable Unit**	**Regulatory Basis**
3.	*Pollution Control Equipment – Additional Recordkeeping Requirements* Maintain records of all air pollution control equipment activities required in Table 5, including: a.) Thermal oxidizer (PCE02) temperature; b.) Record all 3-hour periods of operation during which the average combustion temperature was more than 50 °F below the average combustion temperature during the most recent performance test at which compliance was determined. c.) Vent stream flow; d.) Records of all periods when the vent stream is diverted from the thermal oxidizer or has no flow; e.) PCE02 inspections; f.) Pollution control device maintenance performed; g.) Pollution control device by-pass incidents; and h.) Corrective actions.	As specified in Table 5	PCE02	Env-A 906, 40 CFR 60.663(a), 60.665(c)(1) and 60.665(d) subpart NNN
4.	*Equipment Leaks – NSPS Recordkeeping Requirements* a.) The owner or operator shall keep the following records for each monitoring event required in Table 5, Items 11, 12, 13, 14, 15 and 16: 1.) Monitoring instrument identification; 2.) Operator identification; 3.) Equipment identification; 4.) Date of monitoring; 5.) Instrument reading; 6.) The start date and end date of each monitoring period for connectors in gas/vapor and light liquid service.	Maintain on a continuous basis[20]	EU15	40 CFR 60.486a(3) & 60.482-11a(b)(3)(v) subpart VVa
	b.) For any leaks detected as specified in Table 4, Items 7, 8, 11, 12, 14 and 15, a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment;			40 CFR 60.486a(b)

[20] All records and information required shall be maintained in a manner that can be readily accessed at the plant site. This could include physically locating the records at the plant site or accessing the records from a central location by computer at the plant site.

Table 6 - Recordkeeping Requirements				
Item #	**Requirement**	**Duration/ Frequency**	**Applicable Unit**	**Regulatory Basis**
	c.) When each leak is detected as specified in specified in Table 4, Items 7, 8, 11, 12, 14 and 15, the following information shall be recorded in a log: 1.) The instrument and operator identification numbers and the equipment identification number, except when indications of liquids dripping from a pump are designated as a leak; 2.) The date the leak was detected and the dates of each attempt to repair the leak; 3.) Repair methods applied in each attempt to repair the leak; 4.) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A-7 after it is successfully repaired or determined to be nonrepairable; except when a pump is repaired by eliminating indications of liquids dripping; 5.) ''Repair delayed'' and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; i.) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown. ii.) The expected date of successful repair of the leak if a leak is not repaired within 15 days. iii.) Dates of process unit shutdowns that occur while the equipment is unrepaired. 6.) The date of successful repair of the leak.	Maintain up-to-date data	EU15	40 CFR 60.486a(c) subpart VVa
	d.) The owner or operator shall maintain records of the following information for closed-vent systems and control devices: 1.) Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams; 2.) The dates and descriptions of any changes in the design specifications; 3.) A description of the parameter or parameters monitored, to ensure that control device is operated and maintained in conformance with its design and an explanation of why that parameter (or parameters) was selected for the monitoring; 4.) Dates and durations when the closed-vent systems and control devices are not operated as designed as indicated by the monitored parameters. 5.) Dates and durations of start-ups and shutdowns of control device.	Maintain on a continuous basis and retain for the life of the equipment	EU15	40 CFR 60.486a(d) subpart VVa

Table 6 - Recordkeeping Requirements				
Item #	**Requirement**	**Duration/ Frequency**	**Applicable Unit**	**Regulatory Basis**
	e.) Maintain the following information for all equipment subject to leak detection monitoring pursuant to Table 5, Item 17: 1.) A list of identification numbers for equipment; 2.) A list of identification numbers for equipment that are designated for no detectable emissions; 3.) A list of equipment identification numbers for pressure relief devices; 4.) The dates of each compliance test as required in Table 5, Item 4; 5.) A list of identification numbers for equipment in vacuum service; 6.) A list of identification numbers for equipment in VOC service less than 300 hours per year; 7.) The date and results of the weekly visual inspection for indications of liquids dripping from pumps in light liquid service; 8.) Records for monitoring instrument calibrations conducted according to Method 21 of Appendix A-7 of this part and 60.485a(b) including: i.) Date of calibration and initials of operator performing the calibration; ii.) Calibration gas cylinder identification, certification date, and certified concentration; iii.) Instrument scale used; description of any corrective action taken if the meter readout could not be adjusted to correspond to the calibration gas value; iv.) Results of each calibration drift assessment.	Maintain up-to-date data	EU15	40 CFR 60.486a(e) subpart VVa and Env-A 802.11
	f.) The following information pertaining to valves that are unsafe or difficult to monitor, pumps that are unsafe to monitor and connectors that are unsafe to monitor shall be recorded in a log that is kept in a readily accessible location: 1.) A list of identification numbers of equipment designated as unsafe to monitor, an explanation stating why each is unsafe-to-monitor and the plan for monitoring this equipment. 2.) A list of identification numbers for connectors that are designated as difficult to monitor, an explanation of why the connectors are difficult to monitor, and the schedule for monitoring this equipment.	Maintain up-to-date data	EU15	40 CFR 60.486a(f) subpart VVa
	g.) Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location.			40 CFR 60.486a(j) subpart VVa

Table 6 - Recordkeeping Requirements				
Item #	**Requirement**	**Duration/ Frequency**	**Applicable Unit**	**Regulatory Basis**
5.	*Regulated Toxic Air Pollutants* Maintain records documenting compliance with Env-A 1400. Compliance was demonstrated at the time of permit issuance as described in the department's Application Review Summaries for application # 20-0632. The source must update the compliance demonstration using one of the methods provided in Env-A 1405 if: a.) There is a revision to the list of RTAPs lowering the AAL or De minimis level for any RTAP emitted from the Facility; b.) The amount of any RTAP emitted is greater than the amount that was evaluated in the Application Review Summary; c.) An RTAP that was not evaluated in the Application Review Summary will be emitted; or d.) Stack conditions (e.g., air flow rate) changes.	Update prior to process changes and within 90 days of each revision of Env-A 1400	Facility wide	Env-A 902.01 State-only requirement
6.	*Leak Detection and Repair (LDAR) Monitoring Plan* The owner or operator shall prepare and maintain an up to date plan which contains the following information: a.) Description of monitoring equipment; b.) Monitoring equipment calibration methods and criteria; c.) Monitoring procedures and schedule; and d.) Tracking of equipment leaks and repairs.	Maintain an up-to-date plan	EU15	Env-A 906.01 State-only requirement
7.	*Additional Recordkeeping Requirements: Facility-wide emission limitations* Maintain a 12-month running total of Facility-wide emissions, calculated pursuant to Env-A 705.03, of HAPs, for the purpose of demonstrating that the total emissions of these pollutants are below the major source thresholds for these pollutants of 10/25 tpy.	Monthly	Facility Wide	Env-A 906 and Env-A 604.02(a)(3)
8.	*Permit Deviation Recordkeeping* Maintain records of each permit deviation which result in excess emissions, or monitoring parameter excursions lasting 48 hours or more. The content of the records is specified in Condition IX.B.2.(e through n).	As specified	EU15 and PCE02	Env-A 911.03(b)

VIII. Reporting Requirements

A. Pursuant to Env-C 203.02(b), *Date of Issuance or Filing*, written documents shall be deemed to have been filed with or received by the department on the actual date of receipt by the department, as evidenced by a date stamp placed on the document by the department in the normal course of business.

B. All emissions data submitted to the department shall be available to the public. Claims of confidentiality for any other information required to be submitted to the department pursuant to this permit shall be made at the time of submission in accordance with Env-C 208.04, *Initial Claim of Confidentiality*.

C. The owner or operator shall be subject to the reporting requirements identified in Table 7.

Table 7 - Reporting Requirements

Item #	Requirement	Frequency	Applicable Unit	Regulatory Basis
1.	*General Reporting Requirements* a.) Each report shall be separately and clearly labeled with: 1.) The name, mailing address and physical address of the source covered by the report; 2.) The operating period covered by the report; 3.) The permit number and condition or item number that requires the report submittal; 4.) The type of report, using the name of the report as specified in the reporting condition in the permit, that is being submitted; and 5.) The date the report was prepared; b.) An owner or operator who submits a report that is a revision to a previously-submitted report shall clearly identify the previously-submitted report with the information specified in a.) above, and indicate which portions of the report have been revised; c.) The owner or operator may submit more than one report with a single cover, provided the owner or operator clearly identifies each report being submitted using the information required in a.) and b.) above, if applicable, for each report; and d.) The owner or operator shall submit reports as paper documents or by electronic means.	For each report submitted to the department	Facility wide	Env-A 907.01 State-only requirement
2.	*Annual Emissions Report* Submit an annual emissions report which shall include the following information: a.) Actual calendar year emissions from each emission unit of total VOCs, HAPs (reported by CAS number), and RTAPs (reported by CAS number); b.) The methods used in calculating such emissions in accordance with Env-A 705.03, *Determination of Actual Emissions for Use in Calculating Emission-Based Fee;* c.) The emission factors and the source of the emission factors; and d.) The information recorded in accordance with Table 6, Items 2.b.) and c.).	Annually (received by the department no later than April 15th of the following year)	EU15	Env-A 907.02
3.	*Equipment Leaks – NSPS Reporting Requirements –* The report shall identify the process unit identification. For each month during the semiannual reporting period include: a.) The number of valves for which leaks were detected as described in Table 4, Items 11.a.) and 12.a.), ; b.) The number of valves for which leaks were not repaired as required in Table 4, Items 11.b.) and 12.b.).); c.) The number of pumps for which leaks were detected as described in Table 4, Item 7.a.) and 12.a.); d.) The number of pumps for which leaks were not repaired as required in Table 4, Items 7.b.) and 12.b.); e.) The number of connectors for which leaks were detected as described in Table 4, Items 12.a.) and 15.a.);	Semiannually Postmarked by January 30th and July 30th of each calendar year	EU15	40 CFR 60.487a(c) subpart VVa

Table 7 - Reporting Requirements				
Item #	**Requirement**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
	f.) The number of connectors for which leaks were not repaired as required in Table 4, Items 12.b.) & 15.b.); g.) The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible; h.) Date of process unit shutdowns.			
4.	*Distillation Operations – NSPS Reporting Requirements –* The semiannual reporting period include: a.) Temperature exceedances recorded pursuant to Table 6, Item 3.b.) b.) All periods when the vent stream is diverted from the control device or has no flow rate.	Semiannually; the initial report is due within 6 months after the initial startup date of WFE	EU15	40 CFR 60.665(l) subpart NNN
5.	*Stack Performance Testing – Reporting Requirements* The owner or operator shall submit a report to the department documenting the results of the compliance stack test required in Table 5, Item 4 no more than 60 days after completion of the testing. The test report shall contain the following information: a.) All the information required for the pre-test protocol as described in Env-A 802.04 and Table 5, Item 2; b.) All test data; c.) All calibration data; d.) Process data agreed by the department and the owner or operator to be collected; e.) All test results; f.) A description of any discrepancies or problems that occurred during testing or sample analysis; g.) An explanation of how discrepancies or problems were treated and the effect on the final results; and h.) A list and description of all equations used in the test report, including sample calculations for each equation used. i.) A paper copy of the testing report shall be submitted to: NH DES Air Resources Division Source Testing Section 29 Hazen Drive PO Box 95 Concord, NH 03302-0095	No more than 60 days after completion of testing	EU15 & PCE02	Env-A 802 & Env-A 904.08
6.	*Air Pollution Control Equipment Monitoring Plan* If the owner or operator determines that the information and procedures documented in the air pollution control equipment monitoring plan submitted with Application #19-0083 need to be changed at any time to accurately represent the activities performed to maintain the control equipment, the owner or operator shall submit a revised monitoring plan to the department in writing.	Submit to the department within 30 days of any change to the plan	PCE02	Env-A 810.01(e) State only requirement
7.	*Permit Deviation Reporting Requirements* Report permit deviations that cause excess emissions, or monitoring parameter excursions lasting 48 hours or more in accordance with Condition IX.B.	As specified	EU15 & PCE02	Env-A 911.04(a) and (d)

Table 7 - Reporting Requirements				
Item #	**Requirement**	**Frequency**	**Applicable Unit**	**Regulatory Basis**
8.	*Leak Detection and Repair Monitoring Plan* The owner or operator shall submit a copy of the leak detection and repair monitoring plan as required in Table 6, Item 6.	Submit to the department within 30 days of any change to the plan	EU15	Env-A 910.01 State only requirement
9.	*Annual Emission Fee* Pay annual emission fee in accordance with Condition XII.	Annually (received by the department no later than May 15th of the following year)	EU15	Env-A 705
10.	*Startup Notification* Submit a notification to the department and USEPA stating the date of initial startup of the device. In addition, the notification shall include the specific provisions of §60.662 with which the owner or operator has elected to comply.	Actual date of initial startup of the WFE, received by the department within 15 days after such date.	EU15	Env-A 910.01, 40 CFR 60.7(a)(3) subpart A and 40 CFR 60.665(a) subpart NNN

IX. Permit Deviation Reporting Requirements

A. Env-A 101, Definitions:

1. A *permit deviation* is any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in either a Title V permit, state permit to operate, temporary permit or general state permit issued by the department.
2. An *excess emission* is an air emission rate that exceeds any applicable emission limitation.
3. An emission limitation means "emission limitation" as defined in section 302(k) of the Act, namely "a requirement established by the State or the Administrator which limits the quantity, rate, or concentration of emissions of air pollutants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice or operational standard promulgated under this Act." This term includes "emission standard".

B. Env-A 911.04, *Reporting Requirements*: In the event of a permit deviation that causes excess emissions, or for pollution control equipment monitoring parameter excursions lasting more than 48 hours in duration:

1. Notify the department of the permit deviation and excess emissions by telephone (603-271-1370), fax (603-271-7053) or e-mail (pdeviations@des.nh.gov), within 24 hours of discovery of the permit deviation, unless it is a Saturday, Sunday, or state legal holiday, in which event, the department shall be notified on the next day which is not a Saturday, Sunday, or state legal holiday.
2. Submit a written report of the deviation on paper or by electronic means to the department within 10 days of discovery of the permit deviation reported above. The report shall include all of the following information:
   a. Facility name;
   b. Facility address;

c. Name of the responsible official;

d. Facility telephone number;

e. A description of the permit deviation, including the applicable permit number and permit conditions(s);

f. The probable cause of the permit deviation;

g. The date and time of the discovery of the permit deviation;

h. The actual date(s) and time(s) of the permit deviation;

i. The duration of the permit deviation, including the date and time that the device, process or air pollution control equipment returned to operation in compliance with an enforceable emission limitation or operating condition;

j. The specific device, process or air pollution control equipment that contributed to the permit deviation;

k. Any corrective measures taken to address the permit deviations;

l. Preventative measures taken to prevent future permit deviations;

m. The type and amount of excess emissions that occurred as a result of the permit deviation; and

n. The calculation or estimation used to quantify the excess emissions.

X. Permit Amendments

A. Env-A 612.01, *Administrative Permit Amendments*:

1. An administrative permit amendment includes the following:

a. Corrects typographical errors;

b. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

c. Requires more frequent monitoring or reporting; or

d. Allows for a change in ownership or operational control of a source provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the department.

2. The owner or operator may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

B. Env-A 612.03, *Minor Permit Amendments: Temporary Permits and State Permits to Operate*:

1. The owner or operator shall submit to the department a request for a minor permit amendment for any proposed change to any of the conditions contained in this permit which does not qualify as either an administrative or significant amendment.

2. The request for a minor permit amendment shall be in the form of a letter to the department and shall include the following:

a. A description of the proposed change; and

b. A description of any new applicable requirements that will apply if the change occurs.

3. The owner or operator may implement the proposed change immediately upon filling a request for the minor permit amendment, but shall be subject to enforcement if the department later determines that the change violated any applicable state or federal requirement.

C. Env-A 612.04, *Significant Permit Amendments: Temporary Permits and State Permits to Operate*:

1. The owner or operator shall submit a written request for a permit amendment to the department prior to the implementation of any proposed change which meets one of the following:
    a. Any proposed change that results in the following:
        i. Any increase in allowable hourly or annual emissions of NOx, SO_2, VOCs, HAPs, or PM_{10}; or
        ii. Any increase in potential emission equal to or greater than 5 lb/hr of CO;
    b. Any proposed change to operating or emission limitations;
    c. Any proposed change in the type of pollution control equipment; or
    d. Any proposed change that results in an increase in previously allowed loading of existing pollution control equipment by greater than 50%.
2. A request for a significant permit amendment shall include the following:
    a. A complete application form, as described in Env-A 1703 through Env-A 1708, as applicable;
    b. A description of:
        i. The proposed change;
        ii. The emissions resulting from the change; and
        iii. Any new applicable requirements that will apply if the change occurs; and
    c. Where air pollution dispersion modeling is required for a device pursuant to Env-A 606.02, the information required pursuant to Env-A 606.04.
    d. An air pollution control equipment monitoring plan pursuant to Env-A 810.01.
3. The owner or operator shall not implement the proposed change until the department issues the amended permit.

XI. Inspection and Entry

Department personnel shall be granted access to the facility covered by this permit, in accordance with RSA 125–C:6, VII for the purposes of: inspecting the proposed or permitted site; investigating a complaint; and assuring compliance with any applicable requirement found in the New Hampshire Rules Governing the Control of Air Pollution and/or conditions of any permit issued pursuant to Chapter Env-A 600.

XII. Annual Emission Fee Requirements

A. Env-A 705.02, *Annual Emission Fee*: The owner or operator shall pay to the department each year an annual emission fee consisting of an emission-based fee calculated pursuant to Condition XII.C and a baseline emission fee stated in Condition XII.D. The owner or operator shall submit, to the department, payment of the annual emission fee so that the department receives it on or before May 15th for emissions during the previous calendar year. For example, the fees for calendar year 2020 shall be received on or before May 15, 2021.

B. Env-A 705.03, *Determination of Actual Emissions for use in Calculating of Emission-based Fee*: The owner or operator shall determine the total actual annual emissions from the emission units listed in Table 1 for each calendar year in accordance with the methods specified in Env-A705.03.

C. Env-A 705.04, *Calculation of Emission-based Fee*: The owner or operator shall calculate the annual emission-based fee for each calendar year in accordance with the procedures specified in Env-A 705.03 and the following equation:

$$FEE = E * DPT$$

Where:

FEE = The annual emission-based fee for each calendar year as specified in Env-A 705;

E = Total actual emissions as determined pursuant to Condition XII.B; and

DPT = The annual fee, in dollars per ton of emissions, which the department has calculated in accordance with Env-A 705.04.

D. Env-A 705.04, *Payment of Annual Baseline Emission Fee*: In addition to the annual emission-based fee, the owner or operator shall pay to the department each year an annual baseline emission fee pursuant to the following:

1. Env-A 705.07(a), $750.
2. Env-A 705.06(c), If the owner or operator is not required to pay an emission-based fee for any calendar year because the Facility had zero reportable emissions, the annual baseline fee shall be $500 in lieu of the fee stated in Condition XII.D.1.