Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			required testing and monitoring in the permit. Second sentence of (a): Statement of law that imposes no compliance obligations and is thus not amenable to certification. Second sentence of (b): Braskem presumes that compliance with the operating and work practice standards incorporated into the Title V permit constitutes compliance with this requirement. With the possible exception of the deviations identified below, emission units described in this permit were in compliance with all permit terms and conditions in this permit over the previous year, as determined by all required testing and monitoring in the permit. The condition (c) is an explanatory statement that imposes no compliance obligations and is thus not amenable to certification. PADEP made a determination of the physical configurations or design details in	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			applications for plan approvals/ installation permits and operating permits which are essential for compliance with the applicable requirements of the Title V permit. Therefore, no certification is required.	
[25 Pa. Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department 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. (b) Upon request, the p...	Facility has supplied all information requested by PADEP within a reasonable time. Facility has supplied copies of records requested by PADEP within a reasonable time.	☒Continuous ☐Intermittent
[25 Pa. Code § 127.541] (Significant Operating Permit Modifications)	Section B	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA...	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.704, 127.705 & 127.707] (Fee Payment)	Section B	(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). The applicable fees shall be made payable to 'The Commonwealth of Pennsylvania Clean Air Fund' with the ...	Permit fees were paid according the invoice provided by the Department. Applicable annual Title V permit fees were paid by September 1 for the previous calendar year. (c) Statements of law that impose no compliance obligations and are thus	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			not amenable to certification. (d) Statements of law that impose no compliance obligations and are thus not amenable to certification. (e) Statements of law that impose no compliance obligations and are thus not amenable to certification. (f) Statements of law that impose no compliance obligations and are thus not amenable to certification.	
[25 Pa. Code §§ 127.14(b) & 127.449] (Authorization for De Minimis Emission Increases)	Section B	(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written n...	Plant changes are reviewed within the facility's Management of Change procedure. There were no minor sources installed or deminimis increases of the mentioned minor sources during this compliance review period. (f) Statements of law that impose no compliance obligations and are thus not amenable to certification.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.11a & 127.215] (Reactivation of Sources)	Section B	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will...	There were no sources which were reactivated during this compliance review period.	☒Continuous ☐Intermittent
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, ...	The facility did not engage in any activity which may have been construed as circumvention of applicable permit or regulatory requirements. The facility did not use a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which would conceal or dilute an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated there under during this compliance review period.	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection (At the address given on the permit transmittal letter, or otherwise notified)	All required submissions were submitted to the appropriate address of either PADEP or EPA. All applications, forms, reports or compliance certifications submitted contained the required	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(b) Any report or notifica...	certification statement by the responsible official.	
[25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable req...	Monitoring, analysis, testing, and sampling procedures specified by this permit were performed as needed. There were no additional applicable requirements promulgated under the Clean Air Act after permit issuance. Monitoring, analysis, testing, and sampling procedures specified by this permit were conducted in accordance with the requirements of 25 Pa Code Chapter 139 or by the Clean Air Act, as needed.	☒Continuous ☐Intermittent
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following: (1) The date, place (as defined in the permit) and time of sampling or measurements. (2) The dates the analyses were performed. (...	Facility has maintained and made available, upon request of the Department, all records of required monitoring information. Facility has maintained and made available, upon request of the Department, all records required to comply with reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)] (Reporting Requirements)	Section B	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean A...	Facility has fulfilled all reporting requirements specified by this permit. Moreover, there were no additional applicable requirements promulgated under the Clean Air Act after permit issuance. Reporting requirements specified by this permit were performed, as needed, and contained the required certification statement by the responsible official. All applications, forms, reports or compliance certifications submitted contained the required certification statement by the responsible official. The first sentence of (d) imposes obligations on PADEP and is therefore not amenable to certification by Braskem. The second sentence is a statement of law.	☒Continuous ☐Intermittent
[25 Pa. Code § 127.513] (Compliance Certification)	Section B	(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, includin...	This certification report is intended to satisfy this requirement. All applications, forms, reports or compliance certifications submitted contained the required	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			certification statement by the responsible official.	
[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] (Risk Management)	Section B	(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Se...	Braskem America, Inc. has developed & implemented a Risk Management Plan (RMP). Braskem America, Inc. has prepared a written RMP meeting the requirements of 40 CFR Part 68. The original RMP was submitted to the EPA on or before June 21, 1999. The facility has submitted all necessary updates, corrections, and resubmittals as required. (b) This is a historical requirement and imposes no specific requirements during the current period. (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification. (d) In the cover letter for the facility's Annual Certification Report, the following statement was included: Facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68,	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			and 25 Pa. Code § 127.512(i). (e) Facility has maintained records supporting implementation of accidental release program for the past five (5) years. (f) This is a historical requirement and imposes no specific requirements during the current compliance review period. Facility has registered and submitted RMP.	
[25 Pa. Code §121.7] (Prohibition of air pollution.)	Section C - I. Restrictions - Emission Restriction(s)	No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. § 4003).	Braskem has designed and implemented policies and procedures for incident reporting that are consistent with permit requirements.	☒Continuous ☐Intermittent
[25 Pa. Code §123.1] (Prohibition of certain fugitive emissions)	Section C - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following: (a) construction or demolition of buildings or structures; (b) grading, paving and maintenance of roads and streets;	Braskem has designed and implemented policies and procedures for incident reporting that are consistent with permit requirements.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(c) use of roads and streets. Emissions f...		
[25 Pa. Code §123.2] (Fugitive particulate matter)	Section C - I. Restrictions - Emission Restriction(s)	A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code Section 123.1(a)(1)-(9) (relating to the prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's...	To control the emissions of fugitive particulate matter, the facility has work practices in place, in accordance with applicable regulatory requirements for PM and as specified by individual Permit terms and conditions below. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.	☒Continuous ☐Intermittent
[25 Pa. Code §123.31] (Limitations)	Section C - I. Restrictions - Emission Restriction(s)	A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.	To prevent the detection of malodors outside of the property, the facility has work practices in place, in accordance with applicable regulatory requirements and as specified by individual permit terms and conditions below. These practices include a process for review and	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			correction of deviations reported via routine "odor and visible emission inspections", the facility's total event reporting process, and the hydrocarbon Leak Detection and Repair program. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.	
[25 Pa. Code §123.41] (Limitations)	Section C - I. Restrictions - Emission Restriction(s)	A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour. (b) Equ...	Performed weekly observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department for review/approval on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking.	☒Continuous ☐Intermittent
[25 Pa. Code §123.42] (Exceptions)	Section C - I. Restrictions - Emission Restriction(s)	The opacity limitations as per 25 Pa. Code § 123.41 shall not apply to a visible emission in either of the following instances:	Statements of law that impose no compliance obligations and are thus not amenable to certification.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(a) When the presence of uncombined water is the only reason for failure to meet the limitations; (b) When the emission results from the operation of equipment used sole...		
[25 Pa. Code §129.14] (Open burning operations)	Section C - I. Restrictions - Emission Restriction(s)	No person may permit the open burning of material in the Southeast Air Basin, except where the open burning operations result from: (a) a fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer; (b) any fire set for the...	Braskem did not conduct any of the listed fire exercises that required specific Department approval.	☒Continuous ☐Intermittent
[25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section C - II. Testing Requirements	(a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to...	Statements of law that impose no compliance obligations and are thus not amenable to certification.	☒Continuous ☐Intermittent
[25 Pa. Code §123.43] (Measuring techniques)	Section C - III. Monitoring Requirements	Visible emissions may be measured using either of the following: (a) A device approved by the Department and maintained to provide accurate opacity measurements.	This is a historical requirement which imposes requirements during performance testing. When the facility measures visible emissions, such as during performance testing, a trained observer is used. Additionally, no quantitative measurements were	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(b) Observers, trained and qualified, to measure plume opacity with the naked eye or with the aid of any devices approved by the Dep...	required during this compliance review period, thus this requirement is not amenable to certification during this compliance review period.	
[25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section C - III. Monitoring Requirements	(a) The permittee shall monitor the facility, once per operating day, for the following: (1) Odors which may be objectionable (as per 25 Pa. Code §123.31). (2) Visible Emissions (as per 25 Pa. Code §§123.41 and 123.42). (3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2). (...	To prevent the detection of malodors outside of the property, the facility has work practices in place, in accordance with applicable regulatory requirements and as specified by individual permit terms and conditions below. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections", the facility's total event reporting process, and the hydrocarbon Leak Detection and Repair program. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices. In the event odors or emissions are detected outside the facility, facility has work practices to	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			report, investigate & mitigate the incident. A permanent log of the "odor and visible emission inspections" forms are kept onsite. (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification.	
[25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section C - V. Reporting Requirements	(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An ...	Facility has work practices and procedures in place in accordance with applicable regulatory requirements and as specified by individual terms and conditions of this Permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process. Applicable events as described in (b) and (c) were communicated to the Department in accordance notification guidelines.	☒Continuous ☐Intermittent
[25 Pa. Code §127.441]	Section C - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]	This certification report is intended to satisfy this requirement.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Operating permit terms and conditions.)		The permittee shall submit the following reports: (1) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. Thi...		
[25 Pa. Code §123.1] (Prohibition of certain fugitive emissions)	Section C - VI. Work Practice Standards	For any source specified in Condition #002 of this Section, the permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following: (a) Use, where possible, of water or chemicals for control of dust ...	To control the emissions of fugitive air contaminants, the facility has work practices in place, in accordance with applicable regulatory requirements for PM and as specified by individual terms and conditions of this permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.	☒Continuous ☐Intermittent
[25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section C - VI. Work Practice Standards	(a) The permittee shall begin to immediately implement measures, which may include for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant	Facility does not have any identified sources where there was a required action to implement measures to reduce emissions.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		emissions to within applicable limitations, if at any time the operation of the source(s) indentified in Section A, of th...		
[25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section C - VII. Additional Requirements	For the purpose of this Operating Permit: (1) the Polypropylene Plant No. 1 consists of: Source ID 101A - Three Storage Silos Source 102A - Polypropylene Mfg. Sources Source ID 103A - Fugitive Sources (2) the Polypropylene Plant No. 2 consists of: Source ID 101B - Three Storage Silos Source 102B -...	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	☒Continuous ☐Intermittent
[25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section C - VII. Additional Requirements	(a) This Operating Permit contains conditions pursuant to 25 Pa. Code Sections 129.96 - 129.100 (RACT II) that also satisfy the requirements of 25 Pa. Code Sections 129.91 - 129.95 (RACT I), developed previously. (b) All RACT monitoring and recordkeeping measures shall be fully implemented upon iss...	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	☒Continuous ☐Intermittent
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §123.13] (Processes)	Section D - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate mattter in the effluent gas exceeds 0.04 grains per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.	Based on emissions calculations using the design specifications in the permit application, the particulate matter emissions do not exceed 0.04 grains per dry standard cubic foot.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).] (a) The total Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No. 1 shall be less than 37.10 tons per year on a 12-month rolling sum. (b) Particulate Matter (PM/PM10) emissions f...	VOC emissions for the 101A silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 37.1 ton per 12 month rolling sum emission limit. Particulate matter emissions for the 101A silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 7.10 ton per 12 month rolling sum emission limit.	☒Continuous ☐Intermittent
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §129.99] (Alternative RACT proposal and petition for alternative compliance schedule.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority of this permit condition is also derived from 25 Pa. Code §127.511.] (a) The total volatile organic compounds (VOC) emissions from the silos under this source identification shall not exceed 12.10 tons on a 12-month rolling sum. (b) The total volatile organic compounds (VOC) ...	VOC emissions for the 101A silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 10 lb/hr, 240 lb/day, and 12.10 ton per 12 month rolling sum emission limit.	☒Continuous ☐Intermittent
101A - PLANT 1, THREE STORAGE SILOS	Section D - I. Restrictions - Throughput Restriction(s)	Polypropylene production from Plant 1 shall not exceed 595,680,000 pounds per 12-month rolling sum.	Production is tracked monthly; a 12-month rolling sum production rate is calculated and	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.441] (Operating permit terms and conditions.)			compared to the production limit.	
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is from 25 Pa. Code Section 129.100.] (a) The permitee shall monitor the loading (polypropylene production) and hours of operation of the silos on a monthly basis. (b) For calculating the overall emissions for Plant No. 1, at the conclusion of each m...	Production and silo hours are tracked monthly; a 12-month rolling sum production rate is calculated and compared to the production limit. Facility uses the DEP approved calculation methodology to confirm compliance with short term emission limits.	☒Continuous ☐Intermittent
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is from 25 Pa. Code Section 129.100.] The emissions from the silos shall be calculated using the methods specified in Braskem Marcus Hook Facility Expansion Project Emissions Summary, submitted by the permittee with Plan Approval No. 23-0012C, and app...	Emissions for the 101A silos are calculated monthly and as a 12 month rolling sum using approved emission calculation methodologies.	☒Continuous ☐Intermittent
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §129.100] (Compliance demonstration and	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 127.441.] The permittee shall keep records of:	Production and silo hours are tracked monthly; a 12-month rolling sum production rate is calculated and compared to the production limit. VOC emissions calculated using November 2011	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
recordkeeping requirements.)		(a) polypropylene production on a monthly basis and as a 12-month rolling sum; (b) silo operating hours on a monthly basis	Plant 2 storage silos stack test results.	
101A - PLANT 1, THREE STORAGE SILOS [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.560] (Applicability and designation of affected facilities.)	Section D - VII. Additional Requirements	The silos are not subject to the provisions of 40 CFR 60 Subpart DDD, as per the definition of 'commenced' in 40 CFR §60.2, and the applicability specified in 40 CFR §60.560(b)(1)(ii).	Statement of law not amenable to certification	☒Continuous ☐Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §123.13] (Processes)	Section D - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.	Based on emissions calculations using the design specifications in the permit application, the particulate matter emissions do not exceed 0.04 grains per dry standard cubic foot.	☒Continuous ☐Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).] (a) The combined Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No.2 shall not exceed 24.30 tons per year on a twelve (12) month rolling basis.	VOC emissions for the 101B silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 24.3 ton per 12 month rolling sum	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(b) The combined Particulate Matt...	emission limit. Particulate matter emissions for the 101B silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 7.10 ton per 12 month rolling sum emission limit.	
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §129.99] (Alternative RACT proposal and petition for alternative compliance schedule.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority of this permit condition is also derived from 25 Pa. Code §127.512.] VOC emissions from the silos under this source identification shall not exceed 1.06 pounds per hour and 4.64 tons per year as 12-month rolling sum. Note:Compliance with the hourly emission limit was demonst...	VOC emissions for the 101B silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 1.06 lb/hr and 4.64 ton per 12 month rolling sum emission limit.	☒Continuous ☐Intermittent
101B - PLANT 2, THREE STORAGE SILOS [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.560] (Applicability and designation of affected facilities.)	Section D - I. Restrictions - Emission Restriction(s)	The Total Organic Compound (TOC) from the silo's stack shall be less than 0.10 percent by weight. Note:Compliance with this TOC limit was demonstrated in a stack test in May, 2017. Review of the test procedures and results by the Department's Source Test Group is pending. Depending on the results o...	A representative test was conducted on 11/22/2011 of source 101B which demonstrates this requirement.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Throughput Restriction(s)	Polypropylene production from Plant 2 shall not exceed 595,680,000 pounds per 12-month rolling sum.	Production is tracked monthly, a 12-month rolling sum production rate is calculated and compared to the production limit.	☒Continuous ☐Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - II. Testing Requirements	[Additional authority for these conditions is derived from 40 CFR §60.564.] (a) As per 40 CFR §60.564(a)(1), whenever changes are made in production capacity, feedstock type or catalyst type, or whenever there is an addition of a control device, the permittee shall determine compliance with the 40 ...	Changes such as production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of product recovery equipment, are documented within the facility's Management of Change records. Performance test results are maintained in the facility environmental files.	☒Continuous ☐Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - II. Testing Requirements	(a) The permittee shall submit one paper copy plus one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (mail and email add...	The facility did not perform any testing during this reporting period.	☒Continuous ☐Intermittent
101B - PLANT 2, THREE STORAGE SILOS	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is from 25 Pa. Code Section 129.100.]	Production and silo hours are tracked monthly; a 12-month rolling sum production rate is	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.441] (Operating permit terms and conditions.)		The permitee shall monitor the loading (polypropylene production) and hours of operation of the silos on a monthly basis.	calculated and compared to the production limit.	
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is from 25 Pa. Code Section 129.100.] The emissions from the silos shall be calculated using the methods specified in Braskem Marcus Hook Facility Expansion Project Emissions Summary, submitted by the permittee with Plan Approval No. 23-0012C, and app...	Emissions for the 101B silos are calculated monthly and as a 12 month rolling sum using approved emission calculation methodologies.	☒Continuous ☐Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §129.100] (Compliance demonstration and recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 127.441.] The permittee shall keep records of: (a) polypropylene production on a monthly basis and as a 12-month rolling sum; (b) silo operating hours on a monthly basis	Production and silo hours are tracked monthly; a 12-month rolling sum production rate is calculated and compared to the production limit.	☒Continuous ☐Intermittent
101B - PLANT 2, THREE STORAGE SILOS [40 CFR Part 60 Standards of Performance for New Stationary	Section D - IV. Recordkeeping Requirements	(a) As per 40 CFR §60.565(a)(10), the permittee shall keep an up-to-date, readily-accessible record of each process operating variable that may result in an increase in the uncontrolled annual emissions or the TOC weight percent, should such operating variable be changed.	Facility has work practices and procedures in place in accordance with applicable regulatory requirements and as specified by individual terms and conditions of this Permit. Changes are	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)		(b) As per 40 CFR §60.565(...	documented within the facility's Management of Change records.	
101B - PLANT 2, THREE STORAGE SILOS [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - V. Reporting Requirements	As per 40 CFR §60.565(k), the permittee shall submit to the Department semiannual reports of any change in process operation that increases the uncontrolled annual emissions or the VOC weight percent of the individual stream, as recorded in 40 CFR §60.565(h).	Facility has work practices and procedures in place in accordance with applicable regulatory requirements and as specified by individual terms and conditions of this Permit. Changes are documented within the facility's Management of Change records. Applicable changes would be submitted in the noted semiannual report.	☒Continuous ☐Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).] (a) The total Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No. 1 shall be less than 37.10 tons per year on a 12-month rolling sum. (b) Particulate Matter (PM/PM10) emissions f...	Emissions for the 102A sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 37.1 ton VOC limit and 7.1 ton PM limit per 12 month rolling sum.	☒Continuous ☐Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [25 Pa. Code §129.99]	Section D - I. Restrictions - Emission Restriction(s)	The total volatile organic compounds (VOC) emissions from Plant No. 1 sources (fugitive sources, silo sources and manufacturing sources) shall be limited to 10 lb/hr and 240 lb/day, each calculated as a 12-month rolling average.	Emissions for the 102A sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling average is	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Alternative RACT proposal and petition for alternative compliance schedule.)			determined and compared against the 10 lb/hr and 240 lb//day VOC limit.	
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Throughput Restriction(s)	Polypropylene production for this plant shall not exceed 595,680,000.00 pounds per 12-month rolling sum.	Production is tracked monthly; a 12-month rolling sum production rate is calculated and compared to the production limit.	☒Continuous ☐Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-1] (Standards: Process emissions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h) and 25 Pa. Code §129.99.] (a) As per 40 CFR §§60.18(c), and 60.562-1(a)(1)(i)(C) , the continuous and intermittent emission streams from the process shall be vented and combusted in the flare that is: (1...	Facility has work practices and procedures in place in accordance with applicable regulatory and as specified by individual terms and conditions of this Permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process. Thermocouples on the flare to monitor for the presence of a pilot flame and flare flame detector were installed and are monitored. Process control systems in place	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			that both alarm and automatically re-ignite flare pilots as needed. Performed weekly observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare gas analyzer. All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency. Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity.	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare.	
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.564] (Test methods and procedures.)	Section D - II. Testing Requirements	[Additional authority for this permit condition is from 25 Pa. Code 127.441.] (a) In conducting the performance tests required in 40 CFR §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR Part 60 or other methods and procedures specified in 4...	There were no performance tests conducted during the compliance review period.	☒Continuous ☐Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is from 25 Pa. Code 129.100.] The permittee shall monitor the following: (a) the hours and days of operation of the plant on a monthly basis, and (b) data including mass flows, maintenance purge activities, or other engineering material balances neces...	Production and emission data are tracked monthly in accordance with department approved methodologies.	☒Continuous ☐Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 25 Pa. Code §129.100 and 40 CFR §§ 60.18 and 64.3.]	The thermocouples on the flare monitoring for the presence of a pilot flame and flare flame detector were installed, calibrated, maintained, and operated according to manufacturer's	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Sources §40 CFR 60.563] (Monitoring requirements.)		(a) As per 40 CFR §60.563(a)(2) and (3), the permittee shall calibrate, maintain, and operate according to manufacturer's specifications the monitoring ...	specifications and/or good engineering practices. Thermocouples on the flare to monitor for the presence of a pilot flame and flare flame detector were installed and are monitored. Flare is part of the operator surveillance program and is inspected and maintained as part of plant turnaround work practices. Braskem America, Inc. has chosen to comply with the car seal option. A monthly car seal inspection program is in place.	
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is from 25 Pa. Section 129.100.] The emissions from this source shall be calculated using the methods specified in Braskem Marcus Hook Facility Expansion Project Emissions Summary, submitted by the permittee with Plan Approval No. 23-0012C, and approv...	Production and emission data are tracked monthly and on a 12 month rolling sum in accordance with department approved methodologies.	☒Continuous ☐Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441]	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is from 25 Pa. Code Section 129.100.] The permittee shall record the following:	Production and emission data are tracked monthly and on a 12 month rolling sum in accordance with department approved methodologies.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Operating permit terms and conditions.)		(a) the design exhaust air flow rate (scfm) for the elutriator baghouses, (b) the hours of operation of the plant on a monthly basis, and (c) data including mass flows, m...		
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 25 Pa. Code §129.100.] (a) As per 40 CFR §60.565(a)(3), the permittee shall keep an up-to-date, readily-accessible record of the following information measured during each flare performance test, and shal...	The following records are available in the performance test (5/17/2017): All visible emission readings, heat content determinations, flow rate measurements, and exit velocity determinations; continuous records of the pilot flame and records of all periods of operations during which the pilot flame is absent. Control device was operating continuously during the performance test. Records associated with the facility car seal program and flare flame instrumentation are maintained and retained in accordance with applicable requirements. Changes such as production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of product	☒Continuous ☐Intermittent

Certification of Continuous or Intermittent Compliance
23-00012 - BRASKEM AMER INC/MARCUS HOOK

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			recovery equipment, are documented within the facility's Management of Change records. Performance test results are maintained in the facility environmental files	
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511] (b) As per 40 CFR §60.565(k), the permittee shall submit to the Department semiannual reports, due by March 1 and September 1 each year, of the following recorded information. (a) All periods recorded under...	Facility has submitted semiannual reports required under this condition.	☒Continuous ☐Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.560] (Applicability and designation of affected facilities.)	Section D - VII. Additional Requirements	Emergency vent streams, as defined in 40 CFR §60.561, are exempt from the requirements of 40 CFR 60.562-1(a)(2) as per 40 CFR §60.560(h).	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).] (a) The combined Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No.2 shall not exceed 24.30 tons per year on a twelve (12) month rolling basis. (b) The combined Particulate Matt...	VOC and PM emissions for the 102B sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 24.3 ton VOC and 7.1 ton PM per 12 month rolling sum emission limit.	☒Continuous ☐Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Throughput Restriction(s)	Polypropylene production for this plant shall not exceed 595,680,000.00 pounds per 12-month rolling sum.	Production is tracked monthly; a 12-month rolling sum production rate is calculated and compared to the production limit.	☒Continuous ☐Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-1] (Standards: Process emissions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h) and 25 Pa. Code §129.99.] (a) As per 40 CFR §§60.18(c), and 60.562-1(a)(1)(i)(C) , the continuous and intermittent emission streams from the process shall be vented and combusted in the flare that is: (1...	Facility has work practices and procedures in place in accordance with applicable regulatory and as specified by individual terms and conditions of this Permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			Thermocouples on the flare to monitor for the presence of a pilot flame and flare flame detector were installed and are monitored. Process control systems in place that both alarm and automatically re-ignite flare pilots as needed. Performed weekly observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare gas analyzer. All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency. Flare exit velocity is measured using a	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare.	
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.564] (Test methods and procedures.)	Section D - II. Testing Requirements	[Additional authority for this permit condition is from 25 Pa. Code 127.441.] (a) In conducting the performance tests required in 40 CFR §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR Part 60 or other methods and procedures specified in 4...	There were no performance tests conducted during the compliance review period.	☒Continuous ☐Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is from 25 Pa. Code Section129.100.] The permittee shall monitor the following: (a) the hours of operation of the plant on a monthly basis, and (b) data including mass flows, maintenance purge activities, or other engineering material balances necessa...	Production and emission data are tracked monthly in accordance with department approved methodologies.	☒Continuous ☐Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 25 Pa. Code §129.100 and 40 CFR §§ 60.18 and 64.3.]	The thermocouples on the flare monitoring for the presence of a pilot flame and flare flame detector	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.563] (Monitoring requirements.)		(a) As per 40 CFR §60.563(a)(2) and (3), the permittee shall calibrate, maintain, and operate according to manufacturer's specifications the monitoring ...	were installed, calibrated, maintained, and operated according to manufacturer's specifications and/or good engineering practices. Thermocouples on the flare to monitor for the presence of a pilot flame and flare flame detector were installed and are monitored. Flare is part of the operator surveillance program and is inspected and maintained as part of plant turnaround work practices. Braskem America, Inc. has chosen to comply with the car seal option. A monthly car seal inspection program is in place.	
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is from 25 Pa. Code Section 129.100.] The emissions from this source shall be calculated using the methods specified in Braskem Marcus Hook Facility Expansion Project Emissions Summary, submitted by the permittee with Plan Approval No. 23-0012C, and a...	Production and emission data are tracked monthly and on a 12 month rolling sum in accordance with department approved methodologies.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	The permittee shall record the following: (a) the design exhaust air flow rate (scfm) for the elutriator baghouses, (b) the hours of operation of the plant on a monthly basis, and (c) data including mass flows, maintenance purge activities, or other engineering material balances necessary for emiss...	Production and emission data are tracked monthly and on a 12 month rolling sum in accordance with department approved methodologies.	☒Continuous ☐Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 25 Pa. Code §129.100.] (a) As per 40 CFR §60.565(a)(3), the permittee shall keep an up-to-date, readily-accessible record of the following information measured during each flare performance test, and shal...	The following records are available in the performance test (5/17/2017): All visible emission readings, heat content determinations, flow rate measurements, and exit velocity determinations; continuous records of the pilot flame and records of all periods of operations during which the pilot flame is absent. Control device was operating continuously during the performance test. Records associated with the facility car seal program and flare flame instrumentation are maintained and retained in accordance with applicable requirements. Changes such as production capacity, feedstock type, or catalyst	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			type, or of any replacement, removal or addition of product recovery equipment, are documented within the facility's Management of Change records. Performance test results are maintained in the facility environmental files	
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511] (b) As per 40 CFR §60.565(k), the permittee shall submit to the Department semiannual reports, due by March 1 and September 1 each year, of the following recorded information. (a) All periods recorded under...	Facility has submitted semiannual reports required under this condition.	☒Continuous ☐Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.560] (Applicability and designation of affected facilities.)	Section D - VII. Additional Requirements	Emergency vent streams, as defined in 40 CFR §60.561, are exempt from the requirements of 40 CFR 60.562-1(a)(2) as per 40 CFR §60.560(h).	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103A - PLANT 1 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).] (a) The total Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No. 1 shall be less than 37.10 tons per year on a 12-month rolling sum. (b) Particulate Matter (PM/PM10) emissions f...	Facility has a leak detection and repair program (work practice) to limit fugitive emissions. VOC emissions for the 103A sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 37.1 ton VOC and 7.1 ton PM 12 month rolling sum emission limit.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	The Volatile Organic Compounds (VOC) emissions from the fugitive emission sources of Plant 1 shall not exceed 19.60 tons per year on a twelve (12) month rolling basis.	Facility has a leak detection and repair program (work practice) to limit fugitive emissions. VOC emissions for the 103A sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 19.6 ton 12 month rolling sum emission limit.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES [25 Pa. Code §129.99]	Section D - I. Restrictions - Emission Restriction(s)	The total volatile organic compounds (VOC) emissions from Plant No. 1 sources (fugitive sources, silo sources and manufacturing sources) shall be limited to 10 lb/hr and 240 lb/day, each calculated as a 12-month rolling average.	VOC emissions for the Plant No. 1 sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling average is determined and	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Alternative RACT proposal and petition for alternative compliance schedule.)			compared against the 10 lb/hr and 240 lb/day emission limits.	
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.485] (Test methods and procedures.)	Section D - II. Testing Requirements	[Additional authority for this permit condition is derived from 40 CFR §60.562-2(d) and 25 Pa. Code §129.71.] (a) In conducting the performance tests required in 40 CFR §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR part 60 or other metho...	There were no performance tests required under 40 CFR 60.8 for this source during this compliance review period; thus this requirement is not amenable to certification during this compliance review period. The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the background level. All potential leak interfaces are traversed as close to	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. There were no samples collected during the current compliance period and thus, imposes no	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			obligations during the current compliance review period.	
103A - PLANT 1 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.511 and 129.99.] (a) The permittee shall monitor the polypropylene production on a monthly and on a 12-month rolling basis (b) Monitoring of components shall be conducted in accordance with 40 CFR Part 60...	Polypropylene production is monitored monthly. Facility has a leak detection and repair program (work practice) to limit fugitive emissions. 12-month rolling summation of VOC emissions are kept on file.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-2] (Standards: Pumps in light liquid service.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b), except as provided in 40 CFR §60.482-1(c) and (f) and...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b) and shall comply with 40 CFR §60.482-7(b) through (e), except as provided in ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	☐Continuous ☒Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Sources §40 CFR 60.482-7] (Standards: Valves in gas/vapor service and in light liquid service.)			Upon reviewing LDAR records it appears that nine components in Plant 1 did not have the monthly follow up monitoring in May after first found to be leaking in April. It should be noted that Plant 1 monitoring in the second quarter typically occurs in May, however this monitoring occurred in April in an attempt to manage staffing limitations due to the COVID-19 pandemic. All leaks were repaired within 15 calendar days or placed on delay of repair.	
103A - PLANT 1 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is from 25 Pa. Code Section 129.100.] The permittee shall keep records of (a) polypropylene production monthly and as a 12-month rolling sum; (b) (i) VOC emissions monthly and as a 12-month rolling sum. (ii) VOC emissions in lb/hr and in lb/da...	Polypropylene production is monitored monthly. The lb/hr, lb/day, and 12-month rolling summation of VOC emissions are kept on file.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.486] (Recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.] (a)(1) The permittee shall comply with the recordkeeping requirements of 40 CFR §60.486. (2) The permittee may comply with the recordkeeping requirements for the sources in one record...	This condition imposes no additional requirements than those conditions elsewhere in this Section. Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program Facility has work practices and procedures in place, including marked-up P&IDs showing equipment in VOC service, as well as equipment not in VOC service.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.487] (Reporting requirements.)	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.] (a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 CFR §60.486: (1) Process unit identification. (2) For each month duri...	Facility submitted semiannual reports as required by this condition This is a historical requirement and imposes no specific requirements during the current period. There were no performance tests conducted during the compliance review period.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1] (Standards: General.)		(a) The permittee shall demonstrate compliance with the requirements of 40 CFR §§60.482-1 through 60.482-10 or §60.480(e) for all equipment. (b) Compliance with 40 CFR §§60.482-1 to...	of the facility LDAR Program. (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification. Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.	
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-10] (Standards: Closed vent systems and control devices.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Closed vent systems and control devices must comply with the respective provisions specified in 40 CFR § 60.482-10. (b) As per 40 CFR §60.482-10(f), except as provided in 40 CFR §...	Except as reported and submitted in this compliance certification or previous semi-annual deviation reports required by this permit, the flare is operated and maintained in compliance with 40 CFR 60.18. Flare is part of the operator surveillance program and is inspected and maintained as part of plant turnaround work practices. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency.	
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-3] (Compressors.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR §60.482-1...	Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either equipped with a barrier fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device. The AC compressors are operated with the barrier fluid at a pressure greater than the compressor stuffing box pressure. The barrier fluid systems are in heavy liquid service (mineral oil). The barrier fluid systems are equipped with a sensor (low oil level) that will detect failure of the seal system and/or the barrier fluid system.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			The barrier fluid systems are equipped with alarms to indicate failure of the seal system and/or the barrier fluid system. The criterion used to indicate failure of the seal system is a low oil level alarm. (f) Statement of law that impose no compliance obligations and are thus not amenable to certification Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. The (2) Sulzer compressors (vent recovery) are closed system and vent to the flare and are therefore exempt from the requirements of paragraphs (a) and (b) of this condition. The facility did not exempt any compressors based on this condition during the compliance review period.	

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4] (Standards: Pressure relief devices in gas/vapor service.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 5 calendar days or placed on delay of repair.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5] (Standards: Sampling connection systems.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-5(c). (b) E...	Sampling connection systems are equipped with a closed purge system. The closed purge system is designed to capture and transport the purged fluid to a control device. The facility did not exempt any sampling systems based on this condition during the compliance review period.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-6(d) and (e).	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Sources §40 CFR 60.482-6] (Standards: Open-ended valves or lines.)		(2...		
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-8] (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 15 calendar days or placed on delay of repair.	☒Continuous ☐Intermittent
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-9] (Standards: Delay of repair.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this e...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. (b) Statement of law that impose no compliance obligations and are thus not amenable to certification	☒Continuous ☐Intermittent

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			Facility has not chosen to utilize this exemption for repair during this compliance review period.	
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-2] (Standards: Equipment leaks of VOC.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2 and 25 Pa. Code §§127.512(h) and 129.71.] (a) As per 40 CFR §60.562-2(a), the permittee shall comply with the requirements specified in 40 CFR §§60.482-1 through 60.482-10. (b) As per 40 CFR §60.562-2(d), the per...	This is a historical requirement and imposes no specific requirements during the current period. LDAR program was instituted at startup. The facility adheres to LDAR work practice for recordkeeping and reporting consistent with 40 CFR 60.485, 60.486, and 60.487.	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).] (a) The combined Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No.2 shall not exceed 24.30 tons per year on a twelve (12) month rolling basis. (b) The combined Particulate Matt...	VOC and PM emissions for the 103B sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 24.3 ton and 7.1 ton per 12 month rolling sum emission limit.	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary	Section D - II. Testing Requirements	[Additional authority for this permit condition is derived from 40 CFR §60.562-2(d) and 25 Pa. Code §129.71.] (a) In conducting the performance tests required in 40 CFR §60.8, the permittee shall use as reference methods and	There were no performance tests required under 40 CFR 60.8 for this source during this compliance review period; thus this requirement is not amenable to	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Sources §40 CFR 60.485] (Test methods and procedures.)		procedures the test methods in appendix A of 40 CFR part 60 or other metho...	certification during this compliance review period. The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the background level. All potential leak interfaces are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. For equipment that is added, engineering judgment is used to	

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. There were no samples collected during the current compliance period and thus, imposes no obligations during the current compliance review period.	
103B - PLANT 2 FUGITIVE SOURCES [25 Pa. Code §127.441]	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511.] (a) The permittee shall monitor the polypropylene production on a monthly and on a 12-month rolling basis	Polypropylene production is monitored monthly. Facility has a leak detection and repair program (work practice) to limit fugitive emissions. 12-month rolling summation of VOC emissions are kept on file.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Operating permit terms and conditions.)		(b) Monitoring of components shall be conducted in accordance with 40 CFR Part 60 Subpart VV....		
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-2] (Standards: Pumps in light liquid service.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b), except as provided in 40 CFR §60.482-1(c) and (f) and...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-7] (Standards: Valves in gas/vapor service and in light liquid service.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b) and shall comply with 40 CFR §60.482-7(b) through (e), except as provided in ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 15 calendar days or placed on delay of repair. (e) Statement of law that imposes no compliance obligations and is thus not amenable to certification.	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES	Section D - IV. Recordkeeping Requirements	The permittee shall keep records of (a) polypropylene production monthly and as a 12-month rolling sum;	Polypropylene production is monitored monthly.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.441] (Operating permit terms and conditions.)		(b) VOC emissions monthly and as a 12-month rolling sum. (c) The LDAR component monitoring.	12-month rolling summation of VOC emissions are kept on file.	
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.486] (Recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.] (a)(1) The permittee shall comply with the recordkeeping requirements of 40 CFR §60.486. (2) The permittee may comply with the recordkeeping requirements for the sources in one record...	This condition imposes no additional requirements than those conditions elsewhere in this Section. Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program Facility has work practices and procedures in place, including marked-up P&IDs showing equipment in VOC service, as well as equipment not in VOC service. Statement of law that impose no compliance obligations and are thus not amenable to certification during this compliance review period	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.]	Facility submitted semiannual reports as required by this condition This is a historical requirement and imposes	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Performance for New Stationary Sources §40 CFR 60.487] (Reporting requirements.)		(a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 CFR §60.486: (1) Process unit identification. (2) For each month duri...	no specific requirements during the current period. There were no performance tests conducted during the compliance review period.	
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1] (Standards: General.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) The permittee shall demonstrate compliance with the requirements of 40 CFR §§60.482-1 through 60.482-10 or §60.480(e) for all equipment. (b) Compliance with 40 CFR §§60.482-1 to...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. (b) Statement of law that imposes no compliance obligations and is thus not amenable to certification. Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-10]	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Closed vent systems and control devices must comply with the respective provisions specified in 40 CFR § 60.482-10. (b) As per 40 CFR §60.482-10(f), except as provided in 40 CFR §...	Except as reported and submitted in this compliance certification or previous semi-annual deviation reports required by this permit, the flare is operated and maintained in compliance with 40 CFR 60.18. Flare is part of the operator surveillance program and is inspected and maintained as part of	☒Continuous ☐Intermittent

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Standards: Closed vent systems and control devices.)			plant turnaround work practices. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it. All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency.	
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-3] (Compressors.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR §60.482-1...	Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either equipped with a barrier fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device. The AC compressors are operated with the barrier	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			fluid at a pressure greater than the compressor stuffing box pressure. The barrier fluid systems are in heavy liquid service (mineral oil). The barrier fluid systems are equipped with a sensor (low oil level) that will detect failure of the seal system and/or the barrier fluid system. The barrier fluid systems are equipped with alarms to indicate failure of the seal system and/or the barrier fluid system. The criterion used to indicate failure of the seal system is a low oil level alarm. (f) Statement of law that impose no compliance obligations and are thus not amenable to certification Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. The (2) Sulzer compressors (vent recovery) are closed	

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			system and vent to the flare and are therefore exempt from the requirements of paragraphs (a) and (b) of this condition. The facility did not exempt any compressors based on this condition during the compliance review period.	
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4] (Standards: Pressure relief devices in gas/vapor service.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 5 calendar days or placed on delay of repair.	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5]	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-5(c). (b) E...	Sampling connection systems are equipped with a closed purge system. The closed purge system is designed to capture and transport the purged fluid to a control device. The facility did not exempt any sampling systems based on this condition	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Standards: Sampling connection systems.)			during the compliance review period.	
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-6] (Standards: Open-ended valves or lines.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-6(d) and (e). (2...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-8] (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. (b) Statement of law that impose no compliance obligations and are thus not amenable to certification Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 15	☒Continuous ☐Intermittent

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			calendar days or placed on delay of repair.	
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-9] (Standards: Delay of repair.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this e...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. (b) Statement of law that impose no compliance obligations and are thus not amenable to certification Facility has not chosen to utilize this exemption for repair during this compliance review period.	☒Continuous ☐Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-2] (Standards: Equipment leaks of VOC.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2 and 25 Pa. Code §§127.512(h) and 129.71.] (a) As per 40 CFR §60.562-2(a), the permittee shall comply with the requirements specified in 40 CFR §§60.482-1 through 60.482-10. (b) As per 40 CFR §60.562-2(d), the per...	This is a historical requirement and imposes no specific requirements during the current period. LDAR program was instituted at startup. Facility has chosen not to elect this option during the current compliance period. Facility has chosen not to apply for a determination of equivalency during the current compliance period. The facility adheres to LDAR work practice for recordkeeping and reporting consistent with	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			40 CFR 60.486 and 60.487.	
105 - MAINTENANCE PARTS WASHER [25 Pa. Code §129.63] (Degreasing operations)	Section D - I. Restrictions - Emission Restriction(s)	(a) The permittee shall only use a 5% solution of Armakleen 4 in 1 cleaner, or equivalent cleaning solution, having 5% or lower VOC content. (b) If the permittee uses a cleaning solution containing greater than 5% VOC content, all the applicable requirements of 25 Pa. Code Section 129.63 shall be f...	Facility maintains MSDS's for the material used in this equipment which demonstrates the adherence to the VOC content requirements. Facility uses a liquid that contains less than 5% VOCs to comply with these requirements	☒Continuous ☐Intermittent
105 - MAINTENANCE PARTS WASHER [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	The permittee shall maintain a record of the cleaner used in the Parts Washer to include the name of the supplier, the VOC content and the vapor pressure at 68F, available on a Safety Data Sheet or similar documentation.	This information has been provided by the solvent supplier. Facility maintains MSDS's for the material used in this equipment which demonstrates the adherence to the vapor pressure and VOC content requirements. Facility uses a liquid that contains less than 5% VOCs to comply with these requirements	☒Continuous ☐Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	[Additional authority of this permit is also derived from 25 Pa. Code §129.99.] (a) As per 40 CFR §60.562-1(a) and (d), vent stream emissions from this source shall be directed to Sunoco Flare (Source ID C100) that shall be operated in compliance with the requirements specified in 40 CFR §60.18 at ...	Source emissions were directed to this control device during this period as evidenced by facility instrumentation. Braskem has confirmed that the SXL flare was operating in accordance with these requirements during this	☐Continuous ☒Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Sources §40 CFR 60.562-1] (Standards: Process emissions.)			reporting period other than events listed in this report. Although Braskem does not own or operate the flare associated with these sources, according to Energy Transfer Partners (ETP), on 5/7/2020 a shutdown of facility boilers occurred. This shutdown resulted in visible emissions at the West Warm Flare greater than five minutes in a two consecutive hour period. According to Energy Transfer Partners (ETP), on 6/10/2020, the measured BTU's at the West Warm Flare dropped below 300 BTU/SCF for two hours. This event appears to be attributed to high nitrogen levels in the flare header.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.485]	Section D - II. Testing Requirements	[Additional authority for this permit condition is derived from 40 CFR §60.562-2(d) and 25 Pa. Code §129.71.] (a) In conducting the performance tests required in 40 CFR §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR part 60 or other metho...	There were no performance tests required under 40 CFR 60.8 during this compliance review period; thus this requirement is not amenable to certification during this compliance review period. The facility uses a contractor to comply with	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Test methods and procedures.)			the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the background level. All potential leak interfaces are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a	

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program. There were no samples collected during the current compliance period and thus, imposes no obligations during the current compliance review period.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code §127.511.] (a) The permittee shall monitor the polypropylene production on a monthly and on a 12-month rolling basis. (b) Monitoring of components shall be conducted in accordance with 40 CFR Part 60 Subpart VV. (c) ...	Polypropylene production is monitored monthly. Facility has a leak detection and repair program (work practice) to limit fugitive emissions. 12-month rolling summation of VOC emissions are kept on file.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-2] (Standards: Pumps in light liquid service.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b), except as provided in 40 CFR §60.482-1(c) and (f) and...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. Upon reviewing LDAR records it was discovered that one pump located in the cavern process area (P-7A) did not appear to have a record of monthly Method 21 LDAR monitoring inspections between January and April. It should be noted that this pump was out of hydrocarbon service, therefore not subject to monthly monitoring, for several months in 2019. It should also be noted that throughout this period weekly visual pump inspections were completed and no leaks were identified through these routine measures. Facility is not claiming an exemption under this condition (d), thus this is not amenable to certification during this compliance review period.	☐Continuous ☒Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-7] (Standards: Valves in gas/vapor service and in light liquid service.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b) and shall comply with 40 CFR §60.482-7(b) through (e), except as provided in ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. Upon reviewing LDAR records it appears that the quarterly monitoring of 24 LDAR valve components associated with a pump in the Splitter process area (P-62B) did not occur in the first quarter of 2020. These valves were designated as out of service during this period therefore not triggering the LDAR database to require the routine monitoring to be completed. These valves were initially taken out of service concurrently with the associated pump (P-62B) in late 2019. These components were inadvertently left in the out of service designation when the pump returned to service on 2/24/2020. All leaks were repaired within 15 calendar days or placed on delay of repair. (e) Statement of law that imposes no compliance	☐Continuous ☒Intermittent

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			obligations and is thus not amenable to certification. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511] The permittee shall keep the following records. (a) the polypropylene production on a monthly and on a 12-month rolling basis. (b) LDAR component monitoring (c) the VOC emissions on a monthly and on a 12-m...	Polypropylene production is monitored monthly. 12-month rolling summation of VOC emissions are kept on file.	☒Continuous ☐Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.]	This condition imposes no additional requirements than those conditions elsewhere in this Section.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.486] (Recordkeeping requirements.)		(a)(1) The permittee shall comply with the recordkeeping requirements of 40 CFR §60.486. (2) The permittee may comply with the recordkeeping requirements for the sources in one record...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program Facility has work practices and procedures in place, including marked-up P&IDs showing equipment in VOC service, as well as equipment not in VOC service. Statement of law that impose no compliance obligations and are thus not amenable to certification during this compliance review period	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Additional authority of this permit is also derived from 25 Pa. Code §129.100.] (a) As per 40 CFR §60.565(b)(2), the permittee shall keep the following records for vent system containing valves that could divert the emission stream away from the flare: (1) All periods when flow is indicated if fl...	Braskem America, Inc. has chosen to comply with the car seal option. A monthly car seal inspection program is in place. Changes such as production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of product recovery equipment, are documented within the facility's Management of Change records. Performance test results	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			are maintained in the facility environmental files.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.487] (Reporting requirements.)	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.] (a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 CFR §60.486: (1) Process unit identification. (2) For each month duri...	Facility submitted semiannual reports as required by this condition This is a historical requirement and imposes no specific requirements during the current period. There were no performance tests conducted during the compliance review period.	☒Continuous ☐Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - V. Reporting Requirements	The permittee shall submit to DEP semiannual reports of all periods recorded under 40 CFR §60.565(b) when the vent stream has been diverted from the flare.	Braskem has submitted the applicable information in the semi-annual reports. No vent streams were diverted from the flare in this reporting period.	☒Continuous ☐Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1] (Standards: General.)		(a) The permittee shall demonstrate compliance with the requirements of 40 CFR §§60.482-1 through 60.482-10 or §60.480(e) for all equipment. (b) Compliance with 40 CFR §§60.482-1 to...	of the facility LDAR Program. (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification. Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-10] (Standards: Closed vent systems and control devices.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Closed vent systems and control devices must comply with the respective provisions specified in 40 CFR § 60.482-10. (b) As per 40 CFR §60.482-10(f), except as provided in 40 CFR §...	Except as reported and submitted in ETP's compliance certification or previous semi-annual deviation reports, the ETP flare is operated and maintained in compliance with 40 CFR 60.18. Although Braskem does not own or operate the flare associated with these sources, according to Energy Transfer Partners (ETP), on 5/7/2020 a shutdown of facility boilers occurred. This shutdown resulted in visible emissions at the West Warm Flare greater than five minutes in a two consecutive hour period. According to Energy Transfer Partners (ETP), on 6/10/2020, the measured BTU's at the	☐Continuous ☒Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			West Warm Flare dropped below 300 BTU/SCF for two hours. This event appears to be attributed to high nitrogen levels in the flare header. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-3] (Compressors.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR §60.482-1...	Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either equipped with a barrier fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device. (f) Statement of law that impose no compliance obligations and are thus not amenable to certification	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. The facility did not exempt any compressors based on this condition during the compliance review period.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4] (Standards: Pressure relief devices in gas/vapor service.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 5 calendar days or placed on delay of repair.	☒Continuous ☐Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5]	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-5(c). (b) E...	Sampling connection systems are equipped with a closed purge system. The closed purge system is designed to capture and transport the purged fluid to a control device. The facility did not exempt any sampling systems based on this condition	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Standards: Sampling connection systems.)			during the compliance review period.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-6] (Standards: Open-ended valves or lines.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-6(d) and (e). (2...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	☒Continuous ☐Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-8] (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 15 calendar days or placed on delay of repair.	☒Continuous ☐Intermittent

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VII. Additional Requirements	The source consists the following equipment and associated vent emissions: Two (2) splitters and associated pre-treatment and post-treatment equipment Cavern #4 Three (3) propylene dryers (V-54A, V54-B, and V-54C)	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	☒Continuous ☐Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-9] (Standards: Delay of repair.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this e...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. (b) Statement of law that impose no compliance obligations and are thus not amenable to certification Facility has not chosen to utilize this exemption for repair during this compliance review period.	☒Continuous ☐Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2 and 25 Pa. Code §§127.512(h) and 129.71.] (a) As per 40 CFR §60.562-2(a), the permittee shall comply with the requirements specified in 40 CFR §§60.482-1 through 60.482-10.	This is a historical requirement and imposes no specific requirements during the current period. LDAR program was instituted at startup. Facility has chosen not to elect this option during the current compliance period.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Sources §40 CFR 60.562-2] (Standards: Equipment leaks of VOC.)		(b) As per 40 CFR §60.562-2(d), the per...	Facility has chosen not to apply for a determination of equivalency during the current compliance period. The facility adheres to LDAR work practice for recordkeeping and reporting consistent with 40 CFR 60.486 and 60.487.	
107 - PROPYLENE UNLOADING RACK [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	When the loading of rail cars with propylene occurs at this source, the air emissions shall be routed to a flare that meets the requirements of 40 CFR §60.18.	Source emissions were directed to this control device during this period as evidenced by facility instrumentation. Braskem has confirmed that the SXL flare was operating in accordance with these requirements during this reporting period other than events listed in this report. Although Braskem does not own or operate the flare associated with these sources, according to Energy Transfer Partners (ETP), on 5/7/2020 a shutdown of facility boilers occurred. This shutdown resulted in visible emissions at the West Warm Flare greater than five minutes in a two consecutive hour period. According to Energy Transfer Partners (ETP),	☐Continuous ☒Intermittent

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			on 6/10/2020, the measured BTU's at the West Warm Flare dropped below 300 BTU/SCF for two hours. This event appears to be attributed to high nitrogen levels in the flare header.	
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-1] (Standards: Process emissions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	[Additional authority of this permit is also derived from 25 Pa. Code §129.99.] (a) As per 40 CFR §60.562-1(a) and (d), vent stream emissions from this source shall be directed to Sunoco Flare (Source ID C100) that shall be operated in compliance with the requirements specified in 40 CFR §60.18 at ...	Source emissions were directed to this control device during this period as evidenced by facility instrumentation. Braskem has confirmed that the SXL flare was operating in accordance with these requirements during this reporting period other than events listed in this report. Although Braskem does not own or operate the flare associated with these sources, according to Energy Transfer Partners (ETP), on 5/7/2020 a shutdown of facility boilers occurred. This shutdown resulted in visible emissions at the West Warm Flare greater than five minutes in a two consecutive hour period. According to Energy Transfer Partners (ETP), on 6/10/2020, the measured BTU's at the	☐Continuous ☒Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			West Warm Flare dropped below 300 BTU/SCF for two hours. This event appears to be attributed to high nitrogen levels in the flare header. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare.	
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.485] (Test methods and procedures.)	Section D - II. Testing Requirements	[Additional authority for this permit condition is derived from 40 CFR §60.562-2(d) and 25 Pa. Code §129.71.] (a) In conducting the performance tests required in 40 CFR §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR part 60 or other metho...	There were no performance tests required under 40 CFR 60.8 during this compliance review period; thus this requirement is not amenable to certification during this compliance review period. The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	☒Continuous ☐Intermittent

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Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			this requirement. The contractor follows Method 21 to determine the background level. All potential leak interfaces are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			service, it is added to the facility's LDAR program. There were no samples collected during the current compliance period and thus, imposes no obligations during the current compliance review period.	
107 - PROPYLENE UNLOADING RACK [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	The permittee shall monitor and record the amount of material loaded and unloaded each month.	The amount of materials loaded and unloaded are tracked in a facility tracking spreadsheet.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	(a) The permittee shall monitor each component in accordance 40 CFR Part 60 Subpart VV. (b) Fugitive VOC emissions shall be calculated using procedures and criteria approved by the Department. (c) VOC emissions from this source shall be calculated using mass balance and engineering estimates appro...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. Production and emission data are tracked monthly and on a 12 month rolling sum in accordance with department approved methodologies.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
New Stationary Sources §40 CFR 60.482-2] (Standards: Pumps in light liquid service.)		§60.485(b), except as provided in 40 CFR §60.482-1(c) and (f) and...	of the facility LDAR Program Facility is not claiming an exemption under this condition (d), thus this is not amenable to certification during this compliance review period.	
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-7] (Standards: Valves in gas/vapor service and in light liquid service.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b) and shall comply with 40 CFR §60.482-7(b) through (e), except as provided in ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. All leaks were repaired within 15 calendar days or placed on delay of repair. (e) Statement of laws that imposes no compliance obligations and are thus	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			not amenable to certification.	
107 - PROPYLENE UNLOADING RACK [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	The permittee shall keep the following records: a. Number of loadings and unloadings on a monthly basis b. Amount of loaded and unloaded propane/propylene mixture on a monthly basis c. The emissions from the loading and unloading operations on a monthly basis and 12-month rolling sum. d. LDAR compo...	The amount of materials loaded and unloaded are tracked in a facility tracking spreadsheet. VOC emissions for the 107 source is calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined. Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.486] (Recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.] (a)(1) The permittee shall comply with the recordkeeping requirements of 40 CFR §60.486. (2) The permittee may comply with the recordkeeping requirements for the sources in one record...	This condition imposes no additional requirements than those conditions elsewhere in this Section. Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program Facility has work practices and procedures in place, including marked-up P&IDs showing equipment in VOC service, as well as	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			equipment not in VOC service. (h) Statement of laws that imposes no compliance obligations and are thus not amenable to certification during this compliance review period.	
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Additional authority of this permit is also derived from 25 Pa. Code §129.100.] (a) As per 40 CFR §60.565(b)(2), the permittee shall keep the following records for vent system containing valves that could divert the emission stream away from the flare: (1) All periods when flow is indicated if fl...	Braskem America, Inc. has chosen to comply with the car seal option. A monthly car seal inspection program is in place. Changes such as production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of product recovery equipment, are documented within the facility's Management of Change records. Performance test results are maintained in the facility environmental files.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.487]	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.] (a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 CFR §60.486:	Facility submitted semiannual reports as required by this condition This is a historical requirement and imposes no specific requirements during the current period.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Reporting requirements.)		(1) Process unit identification. (2) For each month duri...	There were no performance tests conducted during the compliance review period.	
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - V. Reporting Requirements	The permittee shall submit to DEP semiannual reports of all periods recorded under 40 CFR §60.565(b) when the vent stream has been diverted from the flare.	Braskem has submitted the applicable information in the semi-annual reports. No vent streams were diverted from the flare in this reporting period.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1] (Standards: General.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) The permittee shall demonstrate compliance with the requirements of 40 CFR §§60.482-1 through 60.482-10 or §60.480(e) for all equipment. (b) Compliance with 40 CFR §§60.482-1 to...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification. Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Except as reported and submitted in Sunoco's compliance certification or previous semi-annual	☐Continuous ☒Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-10] (Standards: Closed vent systems and control devices.)		(a) Closed vent systems and control devices must comply with the respective provisions specified in 40 CFR § 60.482-10. (b) As per 40 CFR §60.482-10(f), except as provided in 40 CFR §...	deviation reports, the Sunoco flare is operated and maintained in compliance with 40 CFR 60.18. Although Braskem does not own or operate the flare associated with these sources, according to Energy Transfer Partners (ETP), on 5/7/2020 a shutdown of facility boilers occurred. This shutdown resulted in visible emissions at the West Warm Flare greater than five minutes in a two consecutive hour period. According to Energy Transfer Partners (ETP), on 6/10/2020, the measured BTU's at the West Warm Flare dropped below 300 BTU/SCF for two hours. This event appears to be attributed to high nitrogen levels in the flare header. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			vent system is in continuous operations when emissions may be vented through it.	
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-3] (Compressors.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR §60.482-1...	Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either equipped with a barrier fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device. (f) Statement of law that impose no compliance obligations and are thus not amenable to certification Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. The facility did not exempt any compressors based on this condition during the compliance review period.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Facility has work practices and procedures in place, including VOC	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4] (Standards: Pressure relief devices in gas/vapor service.)		(a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than...	monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 5 calendar days or placed on delay of repair.	
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5] (Standards: Sampling connection systems.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-5(c). (b) E...	Sampling connection systems are equipped with a closed purge system. The closed purge system is designed to capture and transport the purged fluid to a control device. The facility did not exempt any sampling systems based on this condition during the compliance review period.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-6] (Standards: Open-ended valves or lines.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-6(d) and (e). (2...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-8] (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors.)	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 15 calendar days or placed on delay of repair.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VII. Additional Requirements	This source consists of compressors, pumps, loading racks, product storage, knockout pots, transfer lines, and associated equipment for purchased polymer grade propylene and purchased refinery grade propylene.	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	☒Continuous ☐Intermittent
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-9]	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this e...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. (b) Statement of law that impose no compliance obligations and are thus	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Standards: Delay of repair.)			not amenable to certification Facility has not chosen to utilize this exemption for repair during this compliance review period.	
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-2] (Standards: Equipment leaks of VOC.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2 and 25 Pa. Code §§127.512(h) and 129.71.] (a) As per 40 CFR §60.562-2(a), the permittee shall comply with the requirements specified in 40 CFR §§60.482-1 through 60.482-10. (b) As per 40 CFR §60.562-2(d), the per...	This is a historical requirement and imposes no specific requirements during the current period. LDAR program was instituted at startup. Facility has chosen not to elect this option during the current compliance period. Facility has chosen not to apply for a determination of equivalency during the current compliance period. The facility adheres to LDAR work practice for recordkeeping and reporting consistent with 40 CFR 60.486 and 60.487.	☒Continuous ☐Intermittent
108 - FIRE WATER PUMP ENGINES [25 Pa. Code §123.21] (General)	Section D - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.	Use of ultra-low sulfur diesel fuel at the facility ensures compliance with the emission limit.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640] (How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?)	Section D - I. Restrictions - Operating Hours Restriction(s)	The permittee must operate the emergency stationary RICE according to the requirements specified in the latest version of 40 CFR §63.6640(f) in effect. If the permittee does not operate the engine according to the requirements of the latest version of 40 CFR Section 63.6640(f), the engine will not...	The facility tracks operating hours of each engine to confirm the uses are within guidelines.	☒Continuous ☐Intermittent
108 - FIRE WATER PUMP ENGINES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	The permittee shall monitor and record the operating hours each time the engines are operated.	The facility tracks operating hours of each engine to confirm the uses are within guidelines.	☒Continuous ☐Intermittent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625] (What are my monitoring, installation, operation, and	Section D - III. Monitoring Requirements	The permittee must install a non-resettable hour meter, if one is not already installed.	Facility performs routine checks on engines and records operating hours.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
maintenance requirements?)				
108 - FIRE WATER PUMP ENGINES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	The permittee shall keep the following records each time the engines are operated: (a) The date (b) The reason(s) the engine was operated (c) Hours operated	The facility tracks operating hours of each engine to confirm the uses are within guidelines.	☒Continuous ☐Intermittent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655] (What records must I keep?)	Section D - IV. Recordkeeping Requirements	[Additional authority of this permit condition is also derived from 25 Pa. Code §129.100.] The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the stationary RICE was operated and maintained according to owner's maintenance plan.	The facility documents any maintenance performed to ensure the engines are following manufacturer's recommendations. During the week of 12/21/2020 the weekly fire pump maintenance inspection does not appear to have been completed in accordance with manufacturer's recommendations.	☐Continuous ☒Intermittent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6660] (In what form and how long must I keep my records?)	Section D - IV. Recordkeeping Requirements	(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). (b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (c) You...	The facility maintains necessary operating and maintenance records.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
108 - FIRE WATER PUMP ENGINES [25 Pa. Code §129.97] (Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.)	Section D - VI. Work Practice Standards	The permittee shall maintenane and operate the source in accordance with manufacturers specifications.	The facility documents any maintenance performed to ensure the engines are following manufacturer's recommendations. During the week of 12/21/2020 the weekly fire pump maintenance inspection does not appear to have been completed in accordance with manufacturer's recommendations.	☐Continuous ☒Intermittent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603] (What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?)	Section D - VI. Work Practice Standards	The permittee must comply with the following requirements as specified in Item 4 of Table 2d to 40 CFR 63 Subpart ZZZZ: (a) Change oil and filter every 500 hours of operation or annually, whichever comes first; (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes firs...	Routine preventative maintenance is scheduled through the facility's maintenance tracking system.	☒Continuous ☐Intermittent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for	Section D - VI. Work Practice Standards	(a) The permittee must be in compliance with the requirements in this subpart that apply to you at all times.	The facility uses established tracking spreadsheets to document operating hours and a maintenance scheduling	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Source Categories §40 CFR 63.6605] (What are my general requirements for complying with this subpart?)		(b) At all times the permittee must operate and maintain the engines in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of w...	system to confirm that preventative maintenance is performed.	
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625] (What are my monitoring, installation, operation, and maintenance requirements?)	Section D - VI. Work Practice Standards	(a) The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air poll...	The facility uses established tracking spreadsheets to document operating hours and a maintenance scheduling system to confirm that preventative maintenance is performed.	☒Continuous ☐Intermittent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640] (How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?)	Section D - VI. Work Practice Standards	The permittee must demonstrate continuous compliance with the requirements in Item 4 of Table 2d to 40 CFR 63 Subpart ZZZZ according to the following methods as specified in item 9 of Table 6 to 40 CFR 63 Subpart ZZZZ. (a) Operating and maintaining the stationary RICE according to the manufacturer...	The facility documents any maintenance performed to ensure the engines are following manufacturer's recommendations. During the week of 12/21/2020 the weekly fire pump maintenance inspection does not appear to have been completed in accordance with manufacturer's recommendations.	☐Continuous ☒Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
C02 - FLARE SYSTEM (STEAM-ASSISTED) [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).] The permittee shall (a) monitor continuously the heat content of the flare gas using a gas chromatography (GC) analyzer or Department approved device (b) monitor continuously the velocity of the gas ...	The facility measures flare BTU value using a flare gas analyzer. Flare exit velocity is measured using a dedicated flare flow meter.	☒Continuous ☐Intermittent
C02 - FLARE SYSTEM (STEAM-ASSISTED) [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	(1) The permittee shall maintain daily records of : (a) the readings of the heat content (b) the readings of the exit velocity (c) the calculations of the net heating value and the exit velocity, on a three (3) hour rolling average (2) At least 90% of each quarter's data shall be available at all ...	Facility records are maintained for the net heating value, exit velocity, and data availability.	☒Continuous ☐Intermittent
C02 - FLARE SYSTEM (STEAM-ASSISTED) [25 Pa. Code §127.441]	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived fom 25 Pa. Code § 127.512(h).] (a) The permitee shall notify the Department within two hours during normal working hours of any malfunction of the flare which is expected to last longer than two hours.	Facility has work practices and procedures in place in accordance with applicable regulatory requirements and as specified by individual terms and conditions of this Permit. These practices include a	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Operating permit terms and conditions.)		(b) The permittee shall submit ...	process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process.	
C02 - FLARE SYSTEM (STEAM-ASSISTED) [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VI. Work Practice Standards	The flare shall be operated with no emissions of malodorous air contaminants detectable beyond the plant's property in conformance with 25 Pa. Code Section 123.31	To prevent the detection of malodors outside of the property, the facility has work practices in place, in accordance with applicable regulatory requirements and as specified by individual permit terms and conditions below. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections", the facility's total event reporting process, and the hydrocarbon Leak Detection and Repair program. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
C02 - FLARE SYSTEM (STEAM-ASSISTED) [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VI. Work Practice Standards	[Additional authority of this permit condition is also derived from 25 Pa. Code §129.97(c)(6).] The permittee shall (a) operate and maintain all devices according to manufacturer's specifications and/or good operating practices. (b) calibrate the GC analyzer and the gas flow meter, according to ...	Facility has system in place to maintain the flare analyzer and flow meter in accordance with good engineering practices. Calibrations of this equipment take place on a monthly basis.	☒Continuous ☐Intermittent
C02 - FLARE SYSTEM (STEAM-ASSISTED) [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).] The flare system is for the control of Volatile Organic Compound (VOC) emissions from Plant 1 and Plant 2 manufacturing sources, except the typical atmospheric venting - PSV lifts, etc.	Statement of law that impose no compliance obligations and are thus not amenable to certification.	☒Continuous ☐Intermittent