Appendix U-1: List of Unregulated Emissions Units and/or Activities.

Millennium Specialty Chemicals **Permit No.:** 0310039-012-AV
Facility ID No.: 0310039

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither 'regulated emissions units' nor 'insignificant emissions units.

E.U. ID No. **Brief Description of Emissions Units and/or Activity**

032
- Fugitive Emissions from leaks – piping, flanges (valves, pumps and other equipment components), shaft seals (pumps and agitators), product sampling, loading and unloading.
- Fugitive Emissions from the wastewater treatment system – collection and treatment prior to POTW discharge
- Storage tanks formerly subject to the recordkeeping requirements of 40 CFR 60 Subpart Kb [1,2]

All Tanks are identified as follows:

Item	Equipment ID No.	Equipment Description	Item	Equipment ID No.	Equipment Description
1	1000-TK10	246-24 A,B	23	1000-TK26	246-37
2	1000-TK11	246-19 A,B	24	1000-TK27	246-14
3	1000-TK4	246-22 A,B	25	1000-TK28	246-15
4	1000-TK5	246-17	26	1000-TK29	246-13 A,B
5	1000-TK6	246-18	27	1000-TK30	246-36
6	1000-TK7	246-16	28	1000-TK530	246-11
7	1000-TK8	246-21	29	1000-TK31	248-11
8	1000-TK9	246-23 A,B	30	1000-TK32	248-12
9	1000-TK12	246-2 A,B	31	1000-TK43	294-1
10	1000-TK13	246-3 A,B	32	1000-TK44	294-2
11	1000-TK14	246-4 A,B	33	1000-TK61	62-50
12	1000-TK15	246-24	34	1000-TK62	62-51
13	1000-TK16	246-25	35	1000-TK67	62-68
14	1000-TK17	246-1	36	1000-TK68	62-69
15	1000-TK18	246-10	37	1000-TK69	62-70
16	1000-TK19	246-9	38	1000-TK70	62-71
17	1000-TK20	246-11 A,B	39	1000-TK88	62-41
18	1000-TK21	246-5 A,B,C	40	1000-TK	62-42
18	1000-TK22	246-6 A,B	41	1000-TK100	62-88
20	1000-TK23	246-7 A,B	42	1000-TK101	62-81
21	1000-TK24	246-8 A,B	43	1000-TK102	62-93
22	1000-TK25	246-12	44	1000-TK103	62-84

Item	Equipment ID No.	Equipment Description	Item	Equipment ID No.	Equipment Description
45	1000-TK104	62-10	96	1000-TK171	293-6
46	1000-TK105	62-82	97	1000-TK172	293-26
47	1000-TK106	62-83	98	1000-TK173	293-28
48	1000-TK92	62-94	99	1000-TK174	293-1
49	1000-TK93	62-95	100	1000-TK194	94-1
50	1000-TK94	62-9	101	1000-TK195	94-112
51	1000-TK95	62-84	102	1000-TK196	94-2
52	1000-TK96	62-90	103	1000-TK197	94-3
53	1000-TK97	62-86	104	1000-TK216	247-5
54	1000-TK98	62-85	105	1000-TK217	247-4
55	1000-TK99	62-87	106	1000-TK218	247-3
56	NA	62-89	107	1000-TK219	252-1
57	NA	62-55	108	1000-TK220	252-10
58	1000-TK122	234-5 A,B	109	1000-TK221	252-2
59	1000-TK124	236-1	110	1000-TK222	252-3
60	1000-TK126	237-1	111	1000-TK223	252-4
61	1000-TK127	238-7	112	1000-TK224	252-5
62	1000-TK128	238-3	113	1000-TK225	252-6
63	1000-TK129	238-1	114	1000-TK226	252-7
64	1000-TK130	238-2	115	1000-TK227	252-8
65	1000-TK138	236-5	116	1000-TK228	252-9
66	1000-TK139	236-8	117	1000-TK231	238-5
67	1000-TK140	237-2	118	1000-TK232	238-6
68	1000-TK141	246-39	119	1000-TK236	Diesel fuel
69	1000-TK142	246-40	120	1000-TK237	Gasoline
70	1000-TK143	246-2	121	1000-TK241	24-2
71	1000-TK146	88-16	122	1000-TK242	24-3
72	1000-TK147	88-1	123	1000-TK243	24-1
73	1000-TK148	88-4	124	1000-TK246	99-11
74	1000-TK149	88-14	125	1000-TK247	99-9
75	1000-TK150	88-3	126	1000-TK248	99-19
76	1000-TK151	88-6	127	1000-TK249	99-20
77	1000-TK152	88-7	128	1000-TK250	99-12
78	1000-TK153	88-5	129	1000-TK251	99-7
79	1000-TK154	88-13	130	1000-TK252	99-2
80	1000-TK155	88-8	131	1000-TK253	99-3
81	1000-TK156	88-9	132	1000-TK254	99-4
82	1000-TK157	88-2	133	1000-TK255	99-5
83	1000-TK158	88-15	134	1000-TK256	99-6
84	1000-TK159	88-10	135	1000-TK257	99-8
85	1000-TK160	88-11	136	1000-TK258	99-1
86	1000-TK161	293-4	137	1000-TK259	99-14
87	1000-TK162	293-5	138	1000-TK260	99-13
88	1000-TK163	293-14	139	1000-TK261	99-16
89	1000-TK164	293-3	140	1000-TK262	99-21
90	1000-TK165	293-15	141	1000-TK263	99-23
91	1000-TK166	293-2	142	1000-TK264	99-22

Item	Equipment ID No.	Equipment Description	Item	Equipment ID No.	Equipment Description
92	1000-TK167	293-7	143	1000-TK265	99-18
93	1000-TK168	293-8	144	1000-TK266	99-40
94	1000-TK169	293-13	145	1000-TK275	235-4
95	1000-TK170	293-9	146	1000-TK277	247-7
147	1000-TK278	235-4	197	1000-TK361	625-10
148	1000-TK279	247-7	198	1000-TK362	625-11
149	1000-TK280	247-1	199	1000-TK363	625-13
150	1000-TK282	247-6	200	1000-TK364	625-5
151	1000-TK283	247-2	201	1000-TK365	625-12
152	1000-TK284	247-8	202	1000-TK366	625-6
153	1000-TK285	248-3	203	1000-TK367	625-7
154	1000-TK286	248-4	204	1000-TK368	625-8
155	1000-TK529	248-5	205	1000-TK329	132-15
156	1000-TK536	248-6	206	1000-TK332	132-18
157	1000-TK537	248-10	207	1000-TK333	132-19
158	1000-TK310	248-13	208	1000-TK377	18-1
159	1000-TK311	248-14	209	1000-TK378	155-1 A,B
160	1000-TK312	540-1	210	1000-TK379	155-3 A,B
161	1000-TK313	540-2	211	1000-TK380	155-5
162	1000-TK314	540-3	212	1000-TK381	155-6
163	1000-TK516	540-4	213	1000-TK382	405-14
164	1000-TK323	540-5	214	1000-TK383	405-15
165	1000-TK324	540-6	215	1000-TK384	405-16
166	1000-TK325	132-1	216	1000-TK385	405-17
167	1000-TK326	132-10	217	1000-TK386	405-18
168	1000-TK327	132-11	218	1000-TK523	405-19
169	1000-TK328	132-12	219	1000-TK535	405-20
170	1000-TK330	132-13	220	1000-TK388	460-10
171	1000-TK331	132-14	221	1000-TK389	460-11
172	1000-TK334	132-16	222	1000-TK390	415-2
173	1000-TK335	132-17	223	1000-TK391	460-9
174	1000-TK336	132-2	224	1000-TK373	18-2
175	1000-TK337	132-20	225	1000-TK393	480-9
176	1000-TK338	132-3	226	1000-TK394	480-8
177	1000-TK339	132-4	227	1000-TK395	480-6
178	1000-TK340	132-5	228	1000-TK396	480-7
179	1000-TK341	132-6	229	1000-TK397	480-4
180	1000-TK342	132-7	197	1000-TK361	625-10
181	1000-TK532	132-8	198	1000-TK362	625-11
182	1000-TK533	132-9	199	1000-TK363	625-13
183	1000-TK343	132-22	200	1000-TK364	625-5
184	1000-TK344	132-21	201	1000-TK365	625-12
185	1000-TK345	155-4	202	1000-TK366	625-6
186	1000-TK346	155-7	203	1000-TK367	625-7
187	1000-TK350	155-8	204	1000-TK368	625-8
188	1000-TK351	155-9	205	1000-TK329	132-15
189	1000-TK352	403-6	206	1000-TK332	132-18

Item	Equipment ID No.	Equipment Description	Item	Equipment ID No.	Equipment Description
190	1000-TK354	403-13	207	1000-TK333	132-19
191	1000-TK355	403-14	208	1000-TK377	18-1
192	1000-TK356	409-1	209	1000-TK378	155-1 A,B
193	1000-TK357	410-1	210	1000-TK379	155-3 A,B
194	1000-TK358	625-9	211	1000-TK380	155-5
195	1000-TK359	625-2	212	1000-TK381	155-6
196	1000-TK360	625-1	213	1000-TK382	405-14
214	1000-TK383	405-15	253	1000-TK424	157-1
215	1000-TK384	405-16	254	1000-TK425	157-3
216	1000-TK385	405-17	255	1000-TK426	157-4
217	1000-TK386	405-18	256	1000-TK427	157-5
218	1000-TK523	405-19	257	1000-TK428	157-6
219	1000-TK535	405-20	258	1000-TK429	157-2
220	1000-TK388	460-10	259	1000-TK430	157-9
221	1000-TK389	460-11	260	1000-TK438	146-1
222	1000-TK390	415-2	261	1000-TK439	146-2
223	1000-TK391	460-9	262	1000-TK455	147-6
224	1000-TK373	18-2	263	1000-TK456	147-7
225	1000-TK393	480-9	264	NA	149-1
226	1000-TK394	480-8	265	NA	149-2
227	1000-TK395	480-6	266	NA	149-3
228	1000-TK396	480-7	267	NA	149-4
229	1000-TK397	480-4	268	1000-TK458	251-4
230	1000-TK399	480-12	269	1000-TK459	251-5
231	1000-TK400	480-13	270	1000-TK460	251-6
232	1000-TK524	480-14	271	1000-TK461	251-7
233	1000-TK403	148-10	272	1000-TK462	251-8
234	1000-TK404	148-11	273	1000-TK463	251-9
235	1000-TK405	148-17	274	1000-TK464	251-10
236	1000-TK406	148-1	275	1000-TK465	251-3
237	1000-TK407	148-2	276	1000-TK466	251-2
238	1000-TK408	148-6	277	1000-TK467	251-1
239	1000-TK409	148-7	278	1000-TK481	139-1
240	1000-TK410	148-5	279	1000-TK482	139-2
241	1000-TK411	148-15	280	1000-TK507	147-8
242	1000-TK412	148-16	281	1000-TK508	147-9
243	1000-TK413	148-4	282	1000-TK509	147-4
244	1000-TK414	148-12	283	1000-TK510	147-1
245	1000-TK415	148-13	284	1000-TK511	147-2
246	1000-TK416	148-3	285	1000-TK512	147-3
247	1000-TK417	148-8	286	1000-TK514	147-5
248	1000-TK418	148-18	287	1000-	DMS-1
249	1000-TK419	148-19			
250	1000-TK421	148-14			
251	1000-TK422	157-7			
252	1000-TK423	157-8			

- Columns identified as follows:

Item	Equipment ID No.	Equipment Description	Item	Equipment ID No.	Equipment Description
1	1000-COLM5	1 COLUMN	7	1000-COLM42	7 COLUMN
2	1000-COLM6	2 COLUMN	8	1000-COLM43	8 COLUMN
3	1000-COLC3	3 COLUMN	9	1000-COLM28	9 COLUMN
4	1000-COLM27	48" COLUMN	10	1000-COLM45	AA COLUMN
5	1000-COLM26	52" COLUMN	11	1000-COLM46	AC COLUMN
6	1000-COLC6	6 COLUMN	12	1000-COLM47	AD COLUMN
13	1000-COLM48	AF COLUMN	22	1000-COLM23	N COLUMN
14	1000-COLM14	D COLUMN	23	1000-COLM24	O COLUMN
15	1000-22-COLDB	DB COLUMN	24	1000-COLM25	P COLUMN
16	1000-22-COLDM	DM COLUMN	25	1000-COLM38	PA COLUMN
17	1000-COLM15	E COLUMN	26	1000-COLM39	PB COLUMN
18	1000-COLM16	F COLUMN	27	1000-COLM40	PC COLUMN
19	1000-COLM17	G COLUMN	28	1000-COLM41	PK COLUMN
20	1000-30-EVAP16	LH COLUMN	29	1000-COLM18	R COLUMN
21	1000-COLM22	M COLUMN	30	1000-COLM19	S COLUMN
22	1000-COLM23	N COLUMN	31	1000-COLM20	T COLUMN
19	1000-COLM17	G COLUMN	32	1000-COLM21	U COLUMN
20	1000-30-EVAP16	LH COLUMN	33	1000-COLM49	V COLUMN
21	1000-COLM22	M COLUMN	34	1000-COLM50	W COLUMN

- Reactors identified as follows:

Item	Equipment ID No.	Equipment Description	Item	Equipment ID No.	Equipment Description
1	1000-V27	10M Reactor	7	1000-TK179	B-4 Blender B124
2	1000-9-RX12M	12M Reactor	8	1000-TK180	B-5 Blender B124
3	1000-9-RX06M	6M Reactor	9	1000-TK181	B-6 Blender B124
4	1000-TK176	B-1 Blender B124	10	1000-TK182	B-7 Blender B124
5	1000-TK177	B-2 Blender B124	11	1000-TK204	Blend Tank F
6	1000-TK178	B-3 Blender B124	12	1000-TK205	Blend Tank N-1
13	1000-TK206	Blend Tank N-2	34	1000-COLM37	Column C Hydroxy
14	1000-TK207	Blend Tank N-3	35	1000-COLM37	Column D Hydroxy
15	1000-TK208	Blend Tank V	36	1000-7-RX XC	Crystallizer Coolants
16	1000-TK209	Blend Tank W	37	1000-RX6	Crystallizer CR-100
17	1000-TK210	Blend Tank Y	38	1000-RX7	Crystallizer CR-200
18	1000-TK211	Blend Tank Z	39	1000-RX10	EG REACTOR-B132
19	1000-TK499	Blend Tank 10 –VW M3	40	1000-RX11	EJ Reactor-B132
20	1000-TK500	Blend Tank 11 –VW M4	41	1000-RX34	EK REACTOR - B132
21	1000-TK501	Blend Tank 12 –VW M5	42	1000-RX35	EL Reactor - B132
22	1000-TK502	Blend Tank 13 –VW M6	43	1000-RX9	HC Autoclave Reactor
23	1000-TK503	Blend Tank 14-VW M7	44	1000-19-TKMM	Mixmaster TK 235.5
24	1000-TK504	Blend Tank 15-VW M8	45	1000-22-RXPC	Para-Cymene Unit
25	1000-TK497	Blend Tank 8 – VW M1	46	1000-TK369	PF Blending Tank

Item	Equipment ID No.	Equipment Description	Item	Equipment ID No.	Equipment Description
26	1000-TK498	Blend Tank 9 – VW M2	47	1000-8-POK1	Pine Oil Kettle 1
27	1000-COLM29	Carbon Unit A-G	48	1000-8-POK10	Pine Oil Kettle 10
28	1000-RX12	CITRAL 2 Reactor	49	1000-8-POK11	Pine Oil Kettle 11
29	1000-RX13	CITRAL 3 Reactor	50	1000-8-POK2	Pine Oil Kettle 2
30	1000-RX14	CITRAL 4 Reactor	51	1000-8-POK3	Pine Oil Kettle 3
31	1000-RX15	CITRAL 5 Reactor	52	1000-8-POK4	Pine Oil Kettle 4
32	1000-COLM37	Column A Hydroxy	53	1000-8-POK5	Pine Oil Kettle 5
33	1000-COLM37	Column B Hydroxy	54	1000-8-POK6	Pine Oil Kettle 6
55	1000-8-POK7	Pine Oil Kettle 7	66	1000-RX30	R-7 Reactor
56	1000-8-POK8	Pine Oil Kettle 8	67	1000-30-RXR09	R-9 Reactor
57	1000-8-POK9	Pine Oil Kettle 9	68	1000-7-TKE3	SEO Blender 150 G SS
58	1000-TK370	PR Blending Tank	69	1000-7-TKE1	SEO Blender 2000 G
59	1000-27-PYRO6	Pyrolysis 6	70	1000-7-TKE2	SEO Blender 500 G
60	1000-27-PYRO7	Pyrolysis 7	71	1000-TK442	T-2 Product Tank
61	1000-RX26	R-1 Reactor	72	1000-TK450	T-4 Tank
62	1000-RX27	R-2 Reactor	73	1000-14-RX30	V-30 Reactor
63	1000-RX29	R-3 Reactor	74	1000-RX3	V-32 Reactor
64	1000-RX1	R301 Vessel	75	1000-5-R33	V-33 Reactor
65	1000-RX2	R302 Vessel	76	1000-RX5	V-75 Reactor

[1] Effective October 15, 2003, EPA exempted from Subpart Kb recordkeeping requirements and Subpart Kb the following storage vessels:

- Capacity <75 m^3,
- Capacity between 75 m^3 and 151 m^3 storing liquid with vapor pressure <15 kPa,
- Capacity equal to or >151 m^3 storing liquid with vapor pressure < 3.5 kPa.

[2] Effective October 15, 2003, EPA exempted process tanks from Subpart Kb