



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



Title V Operating Permit

Permit No.: O-0015-17-V (R1)

Plant ID: 0015

Effective Date: 5/30/2017

Expiration Date: 5/31/2022

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Owner: LLFlex, LLC
Source: LLFlex, LLC Louisville Laminating Plant
1225 W. Burnett Ave.
Louisville, Kentucky 40210

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than six (6) months prior to the expiration date.

Application No.: See Table

Application Received: See Table

Permit Writer: Aaron DeWitt

Administratively complete: 08/01/2016

Date of Public Notice: 03/05/2017; 04/13/2017

Date of Proposed Permit: 03/05/2017; 04/13/2017

A handwritten signature in blue ink that reads "Paul G. Auld".

Air Pollution Control Officer
January 22, 2018

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Title V Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	148-97-TV	09/28/2001	12/10/2000	Initial	Entire Permit	Initial Permit Issuance
R1	148-97-TV (R1)	11/05/2002	N/A	Renewal	U-2/35	Administrative change to correct a typo
R2	148-97-TV (R2)	12/15/2011	10/29/2011	Renewal	Entire Permit	Significant Changes; Name and Responsible Official Change; Correct the applicable boiler regulation from 6.07 to 7.06; Incorporate CAM Plan
R3	148-97-TV (R3)	03/20/2012	02/17/2012	Admin	Cover Page	Ownership/Name Change; see Administrative Change Document for list of corrections.
R4	148-97-TV (R4)	09/21/2015	N/A	Admin	U-2 E-10, E-10a, E-8, E-8a, and C-2. Added plantwide section.	Incorporate Construction Permit C-0015-1001-15-V; add coating station to Laminator #10, add solvent coating to Laminator #14, and install new catalytic oxidizer for Laminator #14.
N/A	O-0015-17-V	05/30/2017	03/05/2017; 04/13/2017	Renewal	U-1, E-14, E-16 & E-16a	Boiler #2 (E-14) permanently disabled and stack removed. Boiler E-14 was removed by 7/26/2016. Thermal Oxidizer (C-1) was disabled by 2/3/17. E-16 & E-16a added.
R1	O-0015-17-V	01/22/2018	N/A	Admin	U1/U2	Administrative change to include SIP Bubble limit and other changes from construction permit 103-74-C(R2)

Construction Permit History since Last Title V Permit Renewal

Permit No.	Effective Date	Description
75-88-C	6/30/1988	Above ground storage tanks, equipped with submerged fill pipes
381-92-C	6/22/1992	One (1) Kirk & Blum cyclone type S, #127F5 (Regulation 6.09), equipped with an economy baler for collection of scrap trims from one (1) slitter (Regulation 6.09) and one (1) slitter (Regulation 7.08). This permit VOIDS Permit 113-74.
102-93-C	2/11/1993	One (1) Koger/Air cyclone model #3-3354-70 with associated scrap baler to collect scrap trimmings from five (5) slitters.
121-93-C	3/2/1993	Laminators #6 and #10, Inta-Roto, Inc. model # GM-1000 and Schmutz Mfg. model # 045-0003 respectively, each equipped with a rotogravure printing (or coating) station.
430-05-C	4/30/2007	One (1) twenty gallon aqueous parts washer by Crystal Clean, model number 2702.
103-74-C (R1)	1/20/2012	Laminators #6, #7, #8, #9, #10, #11, & #14, and Coater #15 each equipped with rotogravure printing (or coating) stations and a drying oven. Each Laminator also has a glue station. The rotogravure printing stations have the ability to apply water-based and solvent-based inks and coatings.
107-74-C (R1)	1/20/2012	Laminator #12, Inta-Roto Inc., Model # GM-2000-M-201, equipped with a rotogravure printing (or coating) station and a glue station. Two electric batch "cookers" for coatings. A Laquer mixing room containing three submerged-fill arms for filling drums with solvent one mixer, two floor vents and one ceiling hood.
577-74-C (R1)	1/20/2012	Construction of Thermal Oxidizer, Inta-Roto Inc., Model No. 7 HFP-GOL-P
34912-12-C	7/3/2012	Replacement of the existing Thermal Oxidizer with a TANN TR-1292 12,000 scfm Regenerative Thermal Oxidizer in Emission Unit U1 to control Emission Point E1.
C-0015-1001-15-V	7/23/2015	Modification of Inta-Roto Inc. GM-1000 Laminator #14 to use solvent-based coatings and water-based coating. A MEGTEC Systems Magnum 14,000 catalytic oxidizer will be installed on the exhaust from Laminator #14 system. Modification of Laminator #10 by adding a second Cerutti 28R-38R coating station to the system as well as adding a second oven with a 0.8 MMBtu/hr burner.
103-74-C(R2)	12/19/2017	Added VOC SIP bubble limits to laminators #6, #7, #8, #9, #10, #11 & #14, and Coater #15.

Application Documents

Document Number	Date Received	Description
77724	6/10/2016	Title V Permit Renewal Pre-application Meeting Summary
78549	7/26/2016	Permit renewal application
78674	8/1/2016	“Administratively complete” verification letter from APCD
79618	9/27/2016	District request for more information
79629	9/27/2016	LLFlex response to request for information about on-site cooling towers
80200	10/27/2016	District request for more information
80215	10/27/2016	LLFlex response to request for more information on Boiler #1 initial tune-up date
81080	12/26/2016	LLFlex response to control device removal
81138	1/6/2017	LLFlex request for comment deadline extension, and APCD response
81290	1/13/2017	APCD response to request for thermal oxidizer language deadline
81373	1/20/2017	Company informal comments on draft renewal permit
81502	1/30/2017	District request for site visit
81744	2/7/2017	LLFlex follow-up letter confirming removal of C-1 and applicable regulations
81751	2/7/2017	100k application resubmitted clarifying regulations applied
81768	2/8/2017	Clarification of a comment on the pre-draft TV permit review
81771	2/8/2017	Clarification that parts washer is compliant with Regulation 6.18
82321	3/3/2017	District response to LLFlex informal comments
82325	3/3/2017	EPA Public Notice on LLFlex TV renewal
83295	4/4/2017	LLFlex Comments proposed draft Title V permit
83314	4/4/2017	District request for additional information
83315	4/4/2017	EPA notice of comments received
83394	4/10/2017	LLFlex response to District request for additional information, 4/4/2017
83428	4/11/2017	Response to comment document
85575	7/31/2017	LLFlex SIP bubble calculations
86646	8/30/2017	District letter to LLFlex informing of VOC SIP limit revision
86706	8/30/2017	LLFlex response and questions to SIP limit revision

Document Number	Date Received	Description
86705	8/31/2017	District response to LLFlex questions of plantwide limits to avoid PSD/NSR
87516	9/26/2017	District submission of 103-74-C(R2) & SofB for company comment
87672	9/29/2017	LLFlex request for meeting to discuss draft construction permit (103-74-C(R2))and SIP revisions
87926	10/10/2017	Draft construction permit (103-74-C(R2)) and SIP revision meeting summary and follow-up
88292	10/23/2017	LLFlex draft construction permit (103-74-C(R2)) comments
89103	11/16/2017	30 day public comment period on revised construction permit 103-74-C(R2)

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

Title V of the Clean Air Act Amendments of 1990 (the Act) required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are: (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Louisville Metro Air Pollution Control District (LMAPCD or APCD) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations."

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit General Conditions define requirements that are generally applicable to all Title V companies under the jurisdiction of LMAPCD. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the General Conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The General Conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The owner or operator's Title V permit may include a current table of "insignificant activities."

Insignificant activities are defined in District Regulation 2.16 section 1.23, as of the date the permit was proposed for review by U.S. EPA, Region 4.

Insignificant activities identified in District Regulation 1.02, section 1.38, and Appendix A may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.

Insignificant activities identified in District Regulation 1.02, section 1.38, and Appendix A shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State, and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. [Regulation 2.16, sections 4.1.3, 4.1.13.1, and 4.1.13.7]
2. **Compliance Certification** - The owner or operator shall certify, annually, or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification (Form 9400-O) directly to the EPA and to the District, as set forth in Regulation 2.16, section 4.3.5.4, at the following addresses:

*US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960*

*Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137*

This certification must be postmarked by 15 April of the year following the year for which the certification is being submitted, or other such due date as required by another applicable regulation.

3. **Compliance Schedule** - The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, they shall,

upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations if the conditions in Regulation 2.16 are met. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency;
 - ii. The permitted facility was at the time being properly operated;
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit; and
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. [Regulation 2.16, sections 4.7.1 through 4.7.4]

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08, section 12.3. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. [Regulation 2.08, section 12.2.4]

7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.

8. **Enforceability Requirements** - Except for the conditions that are specifically designated as District-Only Enforceable Conditions, all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. [Regulation 2.16, sections 4.2.1 and 4.2.2]

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the

permitted activity in order to maintain compliance with the conditions of this permit.

- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. [Regulation 2.16, sections 4.1.13.2 and 4.1.13.3]
10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
 11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. [Regulation 2.16, section 4.1.13.6]

If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA at the address shown in General Condition 35.b. [Regulation 2.07, section 10.2]
 12. **Insignificant Activities** - The owner or operator shall:
 - a. Notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. [Regulation 2.16, section 5]
 - b. Submit a current list of insignificant activities by April 15 of each year with the annual compliance certification, including an identification of the additions and removals of insignificant activities that occurred during the preceding year. [Regulation 2.16, section 4.3.5.3.6]
 13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours: [Regulation 2.16, section 4.3.2]
 - a. Enter the premises to inspect any emissions-related activity or records required in this permit.
 - b. Have access to and copy records required by this permit.
 - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
 - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.
 14. **Monitoring and Related Record Keeping and Reporting Requirement** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month. The owner or operator shall submit all required monitoring reports at least once every six months,

unless more frequent reporting is required by an applicable requirement. The reporting period shall be 1 January through 30 June and 1 July through 31 December of each calendar year. All reports shall be sent to the District at the address shown in paragraph 2 of these General Conditions and must be postmarked by the 60th day following the end of each reporting period, unless specified elsewhere in this permit. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All semi-annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, section 5. [Regulation 2.16, section 4.1.5]
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, section 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16,

- sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. [Regulation 2.16, section 4.1.16]
 22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
 23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and Permit renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
 24. **Permit Termination and Revocation by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1 through 5.11.6. For purposes of section 5.11.1, substantial or unresolved noncompliance includes, but is not limited to:
 - a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment;
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District;
 - c. Knowingly making any false statement in any permit application;
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
 25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
 26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
 27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
 28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
 29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
 30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
 31. **Risk Management Plan (112(r))** - For each process subject to section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.

- 32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. [Regulation 2.16, section 4.1.12]
- 33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
- 34. **Startups, Shutdowns, and Upset Conditions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
- 35. **Submittal of Reports, Data, Notifications, and Applications**
 - a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.3, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.12 shall be submitted to:

***Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137***
 - b. Documents that are specifically required to be submitted to EPA, as set forth in Regulation 2.16 sections 3.3 and 5.8.5 shall be mailed to EPA at:

***US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104***
- 36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

Regulation	Title
1.01	General Provisions
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions

Regulation	Title
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
6.29	Standard of Performance for Graphic Arts Facilities Using Rotogravure or Flexographic Printing
7.01	General Provisions (New Affected Facilities)
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards
7.06	Standards of Performance for New Indirect Heat Exchangers
7.08	Standards of Performance for New Process Operations
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds

District Only Enforceable:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees (Emission Fee, Permit Fees and Permit Renewal Procedures)
5.00	Definitions
5.01	General Provisions
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:
- a. Any facility having any refrigeration equipment that normally contains fifty (50) pounds of refrigerant or more must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added, according to 40 CFR 82.166;
 - b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
 - c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;
 - d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
 - e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
 - f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;
 - g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40 CFR 82 Subpart A, Production and Consumption Controls. [Regulation 2.16, section 4.1.5]

Emission Unit Plantwide

Facility Description:

Manufacturer of flexible packaging laminates for healthcare, pharmaceutical, food, dairy, household and personal care, tobacco and industrial. Combining specialized aluminum foils, steel, films, paper stock, resins, sealants, adhesives and 10-color rotogravure printing capability, LLFLex manufactures custom lid stock, pouch stock, cable armoring, and sterilizable laminates requiring specific barrier and sealant performance.

Plantwide Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.05	Prevention of Significant Deterioration of Air Quality	1

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

Plantwide Specific Conditions

S1. Standards [Regulation 2.16 Section 4.1.1]

a. TAC

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels whether specifically established by modeling or determined by the District to be *de minimis*.¹
[Regulations 5.00 and 5.21]
- ii. When submitting an application for construction of any new or modified process/process equipment, the owner or operator shall also submit a STAR EA Demonstration for all Category 1 through Category 4 TACs emitted. [Regulation 5.21, section 4.22.1]
- iii. For any conditions outside the environmental acceptability analysis, including if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis*, the owner or operator shall verify and document the environmental acceptability of the revised emissions, at the time of the change. Prior approval by the District is not required for a change pursuant to Regulation 5.21, section 4.22.3 if the requirements of 4.23.1 through 4.23.4 are met. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. [Regulation 5.21, Section 4]
 - 1) This includes, but is not limited to, control device upset conditions.
- iv. If the TAC does not have an established BAC or *de minimis* value, the owner or operator shall calculate and report these values. The form, located in Attachment D - Determination of Benchmark Ambient Concentration (BAC), may be used for determining BAC and *de minimis* values. [Regulation 5.20, section 3 and 4]

¹ LLFlex submitted the TAC Environmental Acceptability Demonstration to the District in March 2006, March 2008 and March 2012. The District reviewed the EA Demonstrations submitted by the source. Environmental Acceptability of emissions of all TACs, including a determination that emissions of all TACs are *de minimis* has been demonstrated for each “New or modified process or process equipment” and each “Existing process or process equipment” located at the stationary source. Emission Unit U1/U2 process equipment TAC emissions are *de minimis* pursuant to Regulation 5.21, Section 2.1 (MSDS/SDS Trace TAC). Emission Unit U3 process equipment TAC emissions are *de minimis* based on an uncontrolled potential to emit (PTE) pursuant to Regulation 5.21, Section 4.2.2. Emission Unit U4 process equipment TAC emissions are *de minimis* pursuant to Regulation 5.21, Section 2.7 (natural gas combustion). TAC emissions from Insignificant Activities (as defined in Regulation 2.16) are *de minimis* pursuant to Regulation 5.21, Section 2.3. Because all TAC emissions from all processes and process equipment have been demonstrated to be *de minimis*, Tier 3 or Tier 4 modeling was not required to demonstrate environmental acceptability for this source.

b. VOC

- i. The owner or operator shall not allow plantwide VOC emissions to equal or exceed 250 tons per 12 consecutive months.² [Regulation 2.05]

S2. Monitoring and Record Keeping [Regulation 2.16 Section 4.1.9.1 and 4.1.9.2]

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. TAC

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS/SDS, analysis of emissions, and/or modeling results.
- ii. If there is a change in a process or process equipment, including a new TAC being emitted or the content of a TAC in a raw material increases above *de minimis*, the owner or operator shall verify and document the environmental acceptability of the revised emissions, at the time of the change.

b. VOC

- i. The owner or operator shall, monthly, calculate and record the monthly and 12-consecutive month plantwide VOC emissions.

S3. Reporting [Regulation 2.16 Section 4.1.1]

The owner or operator shall report the following information, as required by General Condition 14:

a. TAC

- i. Any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration. This includes, but is not limited to, control device upset conditions.
- ii. If there is a change in a process or process equipment, including a new TAC being emitted or the content of a TAC in a raw material increases above *de minimis*, the re-evaluated EA demonstration shall be submitted to the District within 6 months after the change.

² The plantwide 250 tpy VOC limit is a PSD avoidance limit.

b. **VOC**

- i. For the 250 tpy plantwide VOC limit:
- 1) The monthly and 12-consecutive month plantwide VOC emissions;
 - 2) Identification of all periods of exceedances of the plantwide VOC limit including the quantity of excess emissions;
 - 3) Reason for excess emissions; and
 - 4) Description of corrective action taken to prevent future exceedances.

Emission Unit U1/U2: Laminators and dry ovens**U1/U2 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4 and 5
6.29	Standard of Performance for Existing Graphic Arts Facilities Using Rotogravure and Flexography	1, 2, 3.1.4.2 and 3.2
40 CFR 52.920	Approval and Promulgation of Implementation Plans - Kentucky	63 FR 1929, 1/13/1998
40 CFR 63 Subpart A	General Provisions	63.1 through 63.16
40 CFR 63 Subpart KK	National Emission Standards for the Printing and Publishing Industry	63.820, 821, 825, 829 and 830

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1, 3.95 and 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U1/U2 Equipment:

Emission Unit	Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Install Date
U1	Component of Emission Unit U2 Printing Line Affected Facilities Subject to District Regulation 6.29	One (1) Lacquer mixing room ³ containing three (3) submerged-fill arms for filling drums with solvent, one (1) mixer and one (1) soak tank to support <i>Printing Line</i> operations in Emission Unit U2.	6.29	N/A	S-20	1956
U1	Component of Emission Unit U2 Printing Line Affected Facilities Subject to District Regulation 6.29	One (1) Gravure Impression Cylinder Washer ³ to support <i>Printing Line</i> operations in Emission Unit U2.	6.29	N/A	N/A	1956
U1	E-13B	Storage of coatings in portable tote tanks, (~350 gallons each, ~50 on site) ³	6.29	N/A	N/A	N/A
U2	E-1	Laminator #12 ⁴ [Inta-Roto Inc., Model # GM-2000-M-201]	STAR ⁵ : 6.29; 40 CFR 63 Subpart KK	N/A ⁶	S-1 (new)	1970
U2	E-1a	Oven #12 [7.50 MMBtu/hr] ⁷		N/A		1970
U2	E-2	Laminator #6 [Inta-Roto Inc., Model # GM-1000]	STAR; 40 CFR 52.920; 40 CFR 63	N/A	S-2	1956
U2	E-3	Laminator #7 [Schmutz Mfg, Model # 2768]			S-3	1956

³ Equipment is covered under Regulation 6.29, Section 1.8. This equipment is utilized in the operation of Emission Unit U2 *Printing Line*. Affiliated operations such as mixing or dissolving of ink or coating ingredients prior to application; ink or coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; cleaning of ink or coating lines and line parts; handling and storage of inks, coatings and solvents; and conveyance and treatment of wastewater are not part of the product and packaging rotogravure or wide-web flexographic printing affected source subject to Regulation under 40 CFR 63 Subpart KK. These affected sources (Lacquer Mixing Room, Rotogravure Impression Cylinder Washer and storage of coatings in portable totes) are only subject to District Regulation 6.29.

⁴ Laminator #12 was not included in the SIP Revision Application (Federal Register, May 16, 1990 and January 13, 1998, 40 CFR Part 52, Subpart S, 52.920)

⁵ STAR denotes District Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23

⁶ Thermal Oxidizer (C-1) was shutdown as of 2/3/17.

⁷ The associated ovens for each laminator are covered under Regulation 6.29, Section 1.8 as part of the *Printing Line*, but are not subject to the VOC coating standards in Section 3.

Emission Unit	Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Install Date
U2	E-4	Laminator #8 [Miesel Press Co]	Subpart KK		S-4, S-5, S-6	1961
U2	E-5	Laminator #9 Coating Station #1 [Miesel Press Co]			S-7, S-8, S-9	1961
U2	E-16	Laminator #9 Coating Station #2 [Miesel Press Co.]				1961
U2	E-6	Laminator #10 Coating Station #1 [Schmutz Mfg, Model # 2769]			S-10	1971
U2	E-10	Laminator #10 Coating Station #2 [Cerutti, Model # 28R-38R]			S-16	1971
U2	E-7	Laminator #11 [Anaconda & Fisher Klosterman, Model # MUCT-609-48-(60)]			S-11	1967
U2	E-2a	Oven #6 [4.00 MMBtu/hr] ⁸	STAR; 6.29; 40 CFR 63 Subpart KK	N/A	S-2	1956
U2	E-3a	Oven #7 [3.60 MMBtu/hr] ⁸			S-3	1956
U2	E-4a	Oven #8 [5.40 MMBtu/hr] ⁸			S-4, S-5, S-6	1961
U2	E-5a	#9 Oven #1 [3.60 MMBtu/hr] ⁸			S-7, S-8, S-9	1961
U2	E-16a	#9 Oven #2 [1.8 MMBtu/hr] ⁸				1961
U2	E-6a	#10 Oven #1 [3.60 MMBtu/hr] ⁸			S-10	1971
U2	E-10a	#10 Oven #2 [0.8 MMBtu/hr] ⁸			S-16	1971
U2	E-7a	Oven #11 [3.60 MMBtu/hr] ⁸			S-11	1967
U2	E-8	Laminator #14 [Inta-Roto Inc., Model # GM-1000]	STAR; 40 CFR 52.920; 40 CFR 63 Subpart KK	C-2	S-12	1971
U2	E-8a	Oven #14 [3.60 MMBtu/hr] ⁸	STAR; 6.29; 40 CFR 63 Subpart KK			1971

⁸ The associated ovens for each laminator are covered under Regulation 6.29, Section 1.8 as part of the Printing Line, but are not subject to the VOC coating standards in Section 3.

Emission Unit	Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Install Date
U2	E-9	Coater #15 [Waldron, Model # K4479] ³	40 CFR 52.920	N/A	S-13, S-14, S-15	1956
U2	E-9a	Oven #15 [8.00 MMBtu/hr]	N/A			1956

U1/U2 Control Devices:

Control ID	Description	Control Efficiency	Performance Indicator	Stack ID
C-2	Catalytic Oxidizer [TEC Systems, Model Magnum 14000] Installed April 2016	>65%	550°F operating temperature	S-12

U1/U2 Specific Conditions

S1. Standards [Regulation 2.16, section 4.1.1]

a. HAP (40 CFR 63 Subpart KK)

- i. Each product and packaging rotogravure printing affected source shall limit organic HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.^{9 & 10} [40 CFR §63.825(b)(4)] [See U1/U2 Comment 1]

b. TAC

- i. See Emission Unit Plantwide.^{11 & 12}

c. VOC

- i. The owner or operator of emission point E-1 (Laminator 12) shall not cause or allow the emissions of VOC from any affected facility unless at least one of the following requirements is met:¹³ [Regulation 6.29, section 3.1]
 - 1) The volatile fraction of all inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 25% VOC by volume, [section 3.1.1]
 - 2) The non-volatile fraction, minus water and exempt solvents, of all inks and coatings, as applied to the substrate, used on the affected facility shall be at least 60% by volume, [section 3.1.2]

⁹ *HAP applied* (as defined in 40 CFR §63.822) means the organic HAP content of all inks, coatings, varnishes, adhesives, primers, solvent, and other materials applied to a substrate by a packaging rotogravure printing affected source.

¹⁰ In a letter dated January 9, 2001, the source submitted their Notification of Compliance Status to the District and proposed to follow the compliance option listed in 40 CFR 63.825(b)(4).

¹¹ LMAPCD approved the STAR EA Compliance Demonstration for Category 1 and 2 TACs on October 6, 2008. All processes were below the de minimis levels for all Category 1 and 2 TACs by MSDS/SDS, Trivial and Insignificant Activities and natural gas combustion. Therefore, there are no additional permitting or compliance plan requirements.

¹² The TAC emissions from the combustion of natural gas are “de minimis emissions” pursuant to District Regulation 5.21, Section 2.7. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include other TAC emissions from a process or process equipment which are not the products of the combustion of natural gas.

¹³ Emission points E-2, E-3, E-4, E-5, E-16, E-6, E-10, E-7, E-8 & E-9 are covered by a source-specific State Implementation Plan Revision. The printing/coating machines are treated as one affected facility with a pound per day and ton per year VOC emission limit. The source must comply with District Regulation 6.29, section 3 material composition limits for emission point E-1.

- 3) All inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 0.5 pound of VOC per pound of solids, or [section 3.1.3]
 - 4) The VOC emissions shall not exceed 35% by weight of the VOC net input into the affected facility for packaging rotogravure printing [section 3.1.4.2].
- ii. Compliance with the requirements of Regulation 6.29, section 3.1 shall be based upon the inks and coatings, as applied, used on Emission point E-1 during a calendar-day averaging period. [Regulation 6.29, section 3.2]
 - iii. The owner or operator shall operate and maintain the control device (C-2) at all times emission point E-8 (Laminator 14) applies solvent borne coatings, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards.¹⁴ [Regulation 1.05, section 5]
 - iv. The owner or operator shall not allow Laminators #6, #7, #8, #9, #10, #11& #14, and Coater #15 combined to emit more than 266.2 tons/year. (This includes VOC emissions from all solvent-borne, water-borne and high solids coatings/inks on both VOC and non-VOC operating days.) [40 CFR 52.920] (63 FR 1929, 1/13/1998) [See U1/U2 Comments 3, 4, 5 & 6]
 - v. The owner or operator shall not allow Laminator #6, #7, #8, #9, #10, #11, #14, and Coater #15 combined to emit more than 1,458 pounds per VOC Operating Day. (This included VOC emissions from all solvent-borne, water-borne and high solids coatings/inks on both VOC and non-VOC operating days.) [40 CFR 52.920] [63 FR 1929, 1/13/1998] [See U1/U2 Comments 3, 4, 5 & 6]
 - vi. The owner or operator shall not allow Laminators #6, #7, #8, #9, #10, #11& #14, and Coater #15 combined to exceed 365 VOC operating days per year. [40 CFR 52.920] [63 FR 1929, 1/13/1998]
 - 1) A VOC operating day shall be defined as a day in which a solvent-borne coating/ink is run on a machine within the bubble or a day in which greater than 100 pounds of VOC are emitted within the bubble from water-borne or high solids coatings/inks. [See U1/U2 Comments 3, 4, 5 & 6]
 - vii. See Emission Unit Plantwide.

¹⁴ The capture and control performance test was conducted on July 25, 2017 and the minimum catalyst bed inlet temperature of 600°F demonstrated a total destruction efficiency of 98.1%.

S2. Monitoring and Record Keeping [Regulation 2.16, sections 4.1.9.1 and 4.1.9.2]

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. HAP [40 CFR 63 Subpart KK]

- i. The owner or operator of each product and packaging rotogravure printing affected source shall demonstrate compliance with the standards listed in 40 CFR 63 Subpart KK following the proposed procedure: Demonstrate that the monthly average as-applied organic HAP content, H_L , of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by Equation 6 from 40 CFR 63 Subpart KK.

[40 CFR §63.825(b)(4)]

[See U1/U2 Comment 1]

- ii. Each owner or operator of an affected source subject to this subpart shall maintain, on a monthly basis, the records of all measurements needed to demonstrate compliance with this standard, such as material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report. [40 CFR §63.829(b)(1)]

b. TAC

- i. See Emission Unit Plantwide.

c. VOC

- i. The owner or operator of an affected facility subject to this regulation shall maintain records of operations for the approved averaging period for the most recent five-year period. The records shall be made available to the District, the Cabinet, and the EPA upon request. The records shall include, but not be limited to, the following: [Regulation 6.29, section 6.1]

- 1) The regulation and section number applicable to the affected facility for which the records are being maintained, [Regulation 6.29, section 6.1.1]

- 2) The application method and substrate type (metal, plastic, paper, etc.), [Regulation 6.29, section 6.1.2]

- 3) Include the amount and type of each ink, coating, and solvent used at each point of application, including exempt compounds, during the averaging period. The District shall approve a written request for the usage record to reflect a period longer than the compliance averaging period if the material usage is prorated for each compliance averaging period by using a measurable indicator that is determined by the District to be directly and proportionally

- related to material usage, such as linear feet or area of substrate printed, [Regulation 6.29, section 6.1.3]
- 4) The VOC content as applied in each ink, coating, and solvent, and [Regulation 6.29, section 6.1.4]
 - 5) The date for each application of each ink, coating, and solvent. [Regulation 6.29, section 6.1.5]
- ii. Uncontrolled VOC emissions shall be calculated according to the following methodology unless another method is approved in writing by the District:
- $$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)} \\ \text{or} \\ \text{VOC (lb)} = \text{Coating used (gal)} \times \text{VOC content (lb/gal)}$$
- iii. Controlled VOC emissions shall be calculated according to the following methodology unless another method is approved in writing by the District:
- $$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)} \times \\ [100 - (\text{Capture Efficiency (\%)} \times \text{Destruction Efficiency (\%)})] \\ \text{or} \\ \text{VOC (lb)} = \text{Coating used (gal)} \times \text{VOC content (lb/gal)} \times \\ [100 - (\text{Capture Efficiency (\%)} \times \text{Destruction Efficiency (\%)})]$$
- iv. The owner or operator shall maintain daily records of the catalyst bed inlet temperature (C-2) when Laminator #14 is using solvent based coatings. The inlet temperature shall be monitored continuously (i.e., at least every 15 minutes), and the temperature recorded at least every 15 minutes (minimum of four equally-spaced readings per hour). The three-hour average inlet temperature shall be calculated as the average of the readings (except that an average need only be calculated if readings occur below the specified temperature level).
- v. The owner or operator shall, monthly, calculate and record the VOC emissions from the affected facilities subject to the Source-Specific SIP VOC Bubble Limit and the rolling 12 month total VOC emissions.
- vi. The owner or operator shall, daily, record which laminators were in operation.
- vii. The owner or operator shall, monthly, calculate and record the average lb/day VOC emissions for all affected facilities subject to the Source-Specific SIP VOC Bubble Limit based on actual operating days for each affected facility and the VOC material throughput.

- viii. The owner or operator shall either:
- 1) Record each day as a VOC Operating Day and keep a record of this determination;
 - or
 - 2) Determine the number of non-VOC Operating Days by maintaining records that show either:
 - (a) Solvent based coatings were not run on that day, or
 - (b) Less than 100 lbs of VOCs are emitted within the bubble from water-borne or high solids coatings/inks on that day.
- ix. See Emission Unit Plantwide.

S3. **Reporting** [Regulation 2.16, section 4.1.9.3]

The owner or operator shall report the following information, as required by General Condition 14:

- a. **HAP** [40 CFR 63 Subpart KK]
- i. A summary report of operating parameters exceedances as required by 40 CFR §63.10(e)(3); including the following: [40 CFR §63.830(b)(6)]
 - 1) Exceedances of the standards in 40 CFR §63.825. [40 CFR §63.830(b)(6)(i)]
 - 2) The number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 §63.823(b), including actions taken to correct a malfunction. [40 CFR §63.830(b)(6)(v)]
- b. **TAC**
- i. See Emission Unit Plantwide.

c. **VOC**

- i. Identification and description of any deviation of a permit term or condition specified in this permit.
- ii. Identification of all periods of exceedances during the reporting period. Exceedance is defined as any departure from an established control device (C-2) performance indicator range (i.e., the minimum catalyst bed inlet temperature is less than 550°F for a 3 hour average).
- iii. Identification of all periods when the VOC emissions exceeded 35% by weight of the VOC net input into the affected facility.
- iv. If the plantwide VOC emission limit of less than 250 tons per 12 consecutive month period is exceeded, then the owner or operator shall report: For the 266.2 tpy Bubble VOC limit:
 - 1) The monthly and rolling 12 month VOC emissions;
 - 2) Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
 - 3) Reason for excess emissions; and
 - 4) Description of corrective action taken to prevent future exceedances.
- v. For the 1,458 lb/day Bubble VOC limit:
 - 1) Identification of all periods of exceedances of the lb/day VOC limit including the quantity of excess emissions;
 - 2) Reason for excess emissions; and
 - 3) Description of corrective action taken to prevent future exceedances.
- vi. For the 365 day/yr Bubble VOC limit:
 - 1) Identification of the calendar year in which the VOC Operating Days exceeded 365;
 - 2) Reason for excess emissions; and
 - 3) Description of corrective action taken to prevent future exceedances.
- vii. See Emission Unit Plantwide.

S4. **Testing** [Regulation 2.16, section 4.3.1]

a. **General Testing Requirements:**

- i. The owner or operator shall use the most recent District accepted performance test results to demonstrate compliance with the emission limits and in the annual emission inventory reporting.
 - ii. Testing must be completed by the date required in Construction Permit C-0015-1001-15.
 - iii. If performance testing is not completed by the required date, then the company shall calculate emissions using expired test result data or methods such as EPA approved emission factors and guidance documents such as EIIP and AP-42 or other methods upon written approval by the District, whichever results in the greater (more conservative) emissions.
- b. **VOC**
- i. Specific Test Requirements:
 - 1) The owner or operator shall perform an EPA Reference Method 25 or 25A performance test on the inlet and outlet of Control Device ID C-2. The test shall be performed at 90% or higher of maximum capacity, or allowable/permitted capacity, or at a level of capacity which results in the greatest emissions and is representative of the operations. Failure to perform the test, at maximum capacity, allowable/permitted capacity, or at a level of capacity which resulted in the greatest emissions, may necessitate a re-test or necessitate a revision of the allowable/permitted capacity of the process equipment depending upon the difference between the testing results and the limit.
 - 2) The owner or operator shall perform a capture efficiency test for the catalytic oxidizer using EPA guidelines. In lieu of performing a capture efficiency test, the owner or operator may submit a reasonable estimate of capture efficiency with thorough justification subject to written approval by the District.
 - 3) The owner or operator shall submit written compliance test plan (protocol) for the control efficiency and capture efficiency. They shall include the EPA test methods that will be used for stack testing, the process operating parameters (e.g., press production rate, identification of raw materials applied during testing, etc.) that will be monitored during the stack test, and the control device operating parameters (e.g., minimum combustion chamber temperature, volumetric air flow rate, etc.) that will be monitored during the performance test. The compliance test plans shall be furnished to the District at least 30 days prior to the actual date of the performance test. Attached to the permit is a Protocol Checklist

for a Performance Test with the information to be submitted in the protocol.

- 4) The stack tests shall include sampling of the inlet and outlet gas streams of the catalytic oxidizer to determine the control efficiency for VOC. The stack test shall verify the minimum inlet combustion temperature necessary to achieve the required 65% destruction efficiency.
- 5) The owner or operator shall provide the District at least 10 days prior notice of any performance test to afford the District the opportunity to have an observer present.
- 6) The owner or operator shall furnish the District with a written report of the results of the performance test within 60 days following the actual date of the performance test. The stack test report shall include, at a minimum, the inlet and outlet lb/hr VOC emissions, VOC destruction and capture efficiencies, Federal Test Methods used during testing, volumetric air flow rate, volumetric flow sampling location (location traverse points), stack diameter, %O₂, and % moisture.

U1/U2 Comments

1. In a letter dated January 9, 2001, the source submitted their Notification of Compliance Status to the District and proposed to follow the compliance option listed in 40 CFR §63.825(b)(4). To demonstrate compliance with §63.825(b)(4), Equation 6 to 40 CFR 63 Subpart KK is used:

$$H_L = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j}$$

C_{hi} = the organic HAP content of ink or other solids-containing material, i, expressed as a weight-fraction, kg/kg.

C_{hj} = the organic HAP content of solvent j, expressed as a weight-fraction, kg/kg.

H_L = the monthly average, as-applied, organic HAP content of all solids-containing materials applied at less than 0.04 kg organic HAP per kg of material applied, kg/kg.

M_i = the mass of ink or other material, i, applied in a month, kg.

M_j = the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied in a month, kg.

p = the number of different inks, coatings, varnishes, adhesives, primers, and other materials applied in a month.

q = the number of different solvents, thinners, reducers, diluents, or other non-solids-containing materials applied in a month.

2. The glue used in the glue stations has 0% VOC; therefore Regulation 6.24 does not apply.
3. Pursuant to 40 CFR 64.2(b)(1)(iv), Emission limitation or standards or other applicable requirements that apply solely under an emissions trading program approved or promulgated by the Administrator under the Act that allows for trading emissions with a source or between sources is exempt. Therefore, compliance assurance monitoring (CAM) provisions are not applicable to the Source-Specific VOC Bubble Limit.
4. The USEPA's emission trading policy statement (ETPS) requires a net emissions reduction of 20% from the lowest of actual, SIP allowable or RACT allowable emissions determined over an established baseline period. The plant has prepared and submitted a State Implementation Plan Revision application (SIP Revision, December 1988, revised April 1989) to address the requirements of the ETPS. The conditions and provisions of the emission bubble as described in the SIP Revision application shall be the applicable regulation.
5. Affected facilities within the established bubble include seven (7) rotogravure printing/coating machines (Laminator #6, #7, #8, #9, #10, #11 and #14) and one coating machine (Coater #15); these affected facilities shall be treated as one affected facility combined under a bubble when determining compliance with the Source-specific SIP VOC Bubble Limit.
6. Coater #16 has been permanently shut down and removed from the stationary source, therefore permit 111-74 (referenced in Table 1 of 40 CFR 52.920) is not included as an incorporated permit being modified through this permitting action.

Emission Unit U3: Storage Vessels**U3 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4 and 5
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1 through 5, 7 and 8

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1, 3.95 and 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U3 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Install Date
E-11	Tank #3, One (1) 1,000 gallon VOC storage vessel [Printing solvents tank]	STAR & 7.12	N/A	N/A	1988
E-12	Tank #2, One (1) 2,000 gallon VOC storage vessel [Printing solvents tank]			N/A	1988
E-13	Tank #1, One (1) 1,000 gallon VOC storage vessel [Printing solvents tank]			N/A	1988
E-13A	Tank #4, One (1) 10,000 gallon VOC storage vessel [Water-based coatings tank]			N/A	1988

U3 Control Devices:

There are no control devices or stacks associated with Emission Unit U2. Tanks #1, #2, and #3 are each equipped with a submerged fill pipe. Tank #4 is equipped with a 4 inch conservation vent but does not have a submerged fill pipe.

U3 Specific Conditions**S1. Standards** [Regulation 2.16, section 4.1.1]**a. TAC**

- i. See Emission Unit Plantwide.¹⁵

b. VOC

- i. The owner or operator shall not store materials with an “as stored” True vapor pressure greater than or equal to 1.5 psia in Emission Points E-11, E-12, E-13 and E-13A, unless the tank is equipped with a permanent submerged fill pipe. [Regulation 7.12, section 3]
- ii. See Emission Unit Plantwide.

S2. Monitoring and Record Keeping [Regulation 2.16, sections 4.1.9.1 and 4.1.9.2]

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. TAC

- i. See Emission Unit Plantwide.

b. VOC

- i. The owner or operator of the storage vessels shall maintain records of the material stored in Emission Point E-13A (Tank #4). If the contents of the storage vessel are changed a record shall be made of the new contents, including the true vapor pressure (determined using the average monthly storage temperature and typical Reid vapor pressure of the contained liquid or from typical available data on the liquid) of the new material, and the date of the change in order to demonstrate compliance with Regulation 7.12, section 5.2.
- ii. The owner or operator shall keep a record that shows if the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.

iii. See Emission Unit Plantwide.

S3. Reporting [Regulation 2.16, section 4.1.9.3]

The owner or operator shall report the following information, as required by General Condition 14:

a. **TAC**

i. See Emission Unit Plantwide.

b. **VOC**

i. The owner or operator shall submit notification to the District if any materials that are stored in Emission Point E-13A (Tank #4) exceed the vapor pressure limit of 1.5 psia determined by using the average monthly storage temperature and typical Reid vapor pressure of the contained liquid or from typical available data on the contained liquid.

ii. See Emission Unit Plantwide.

U3 Comments

1. The Federal Regulation, 40 CFR 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, was amended by EPA on October 15, 2003. The amendment excluded storage vessels that contain a liquid with a maximum true vapor pressure below 3.5 kilopascals (26.2 mm Hg). Due to the tank sizes, they are not subject to 40 CFR 60 Subpart Kb.
2. The glue room contains one storage tank (8,000 gallons) and three mixing day tanks (500 gallons). The glue currently stored in this tank has 0.00% VOC by weight, therefore Regulation 7.12 does not apply. If the source wants to store glue which contains VOC in the storage tank then a permit application must be submitted to the District and Regulation 7.12 conditions will be applied. Additionally, the mixing day tanks will be evaluated to determine the appropriate VOC regulation applicability.

Emission Unit U4: Heating Boiler

U4 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.06	Standards of Performance for New Indirect Heat Exchangers	1 through 5
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	63.7495, 7500, 7515, 7530, 7545, 7550 & 7555

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1, 3.95 and 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U4 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Install Date
E-15	One (1) natural gas-fired boiler (Boiler #1, East). Make Whirlpower, model #301-L-400. Heat input 16.737 MMBtu/hr, rated output 13.400 MMBtu/hr	STAR, 7.06, 40 CFR 63 Subpart DDDDD	N/A	S-19	1974

U4 Control Devices:

There are no control devices associated with Emission Unit U4.

U4 Specific Conditions**S1. Standards** [Regulation 2.16, section 4.1.1]**a. HAP**

- i. For Emission Point E-15, the owner or operator shall comply with all applicable emission limitations, work practice standards, and operating limits in 40 CFR 63 Subpart DDDDD. [40 CFR Part 63 Subpart DDDDD] [See attachment B]

b. Opacity

- i. The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity.¹⁶ [Regulation 7.06, section 4.2]

c. PM

- i. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.42 pounds per million BTU actual total heat input.¹⁷ [Regulation 7.06, Section 4.1.4]

d. SO₂

- i. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 1.0 pounds per million BTU actual total heat input for combustion of gaseous fuels.¹⁷ [Regulation 7.06, section 5.1.1]

e. TAC

- i. See Emission Unit Plantwide.¹⁸

¹⁶ It has been determined that using a natural gas fired boiler should inherently meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.

¹⁷ A one-time PM and SO₂ compliance demonstration has been performed for the boiler, using AP-42 emission factors and combusting natural gas, and the pounds per million BTU emission standards cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements for this boiler with respect to PM and SO₂ emission limits.

¹⁸ The TAC emissions from the combustion of natural gas are “de minimis” emissions pursuant to District Regulations 5.21, Section 2.7. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include other TAC emissions from a process or process equipment which are not the products of the combustion of natural gas.

S2. Monitoring and Record Keeping [Regulation 2.16, sections 4.1.9.1 and 4.1.9.2]

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. HAP

- i. See Attachment B.

b. Opacity

- i. There are no monitoring or record keeping requirements for Opacity compliance.

c. PM

- i. There are no monitoring or record keeping requirements for PM compliance.

d. SO₂

- i. There are no monitoring or record keeping requirements for SO₂ compliance.

e. TAC

- i. See Emission Unit Plantwide.

S3. Reporting [Regulation 2.16, section 4.1.9.3]

The owner or operator shall report the following information, as required by General Condition 14:

a. HAP

- i. See Attachment B.

- b. **Opacity**
 - i. There are no compliance reporting requirements for this equipment.
- c. **PM**
 - i. There are no compliance reporting requirements for this equipment.
- d. **SO₂**
 - i. There are no compliance reporting requirements for this equipment.
- e. **TAC**
 - i. See Emission Unit Plantwide.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-Permit Documents

<u>Document</u>	<u>Date</u>
SIP Revision, approved and published in the Federal Register, 40 CFR Part 52, Subpart S, 52.920	16 May 1990 and 13 January 1998
1.18 Rule Effectiveness Plan	20 September 1994
1.18 Rule Effectiveness Plan (Revised)	30 January 1995
Rule Effectiveness Improvement Measures	27 April 1995

Alternative Operating Scenario

Laminator #14 will use control device C-2 (Catalytic Oxidizer) only when running solvent-based inks and coatings. The control device is used to meet District Regulation 6.29 emission standards. Control of VOC emissions is only necessary when running solvent-based inks to meet District Regulation 6.29 emission standards.

LLFlex intends to operate Laminator #14 without exhausting to the catalytic oxidizer (C-2) when exempt inks and coatings are being used. The date, yards run, output width, output laydown rate (pounds of coatings used per specified area), and coating used will be recorded when exempt inks and coatings are being used.

Insignificant Activities

Equipment	Quan.	PTE (tpy)	Regulation Basis
Internal combustion engines (forklifts)	4	0.14 NO _x	Regulation 1.02, Appendix A
Maintenance shop brazing, soldering or welding equipment	2	0.02 PM	Regulation 1.02, Appendix A
Woodworking, not including conveying, hogging or burning of sawdust (see IA1)	1	0.03 PM	Regulation 1.02, Appendix A; See Note 7
Emergency relief vents and ventilating systems (not otherwise regulated)	3	N/A	Regulation 1.02, Appendix A
Laboratory ventilating	1	0.03 VOC	Regulation 1.02, Appendix A
Dust or particulate collectors that vent directly indoors in work space (See IA1)	3	0.03 PM	Regulation 1.02, Appendix A; See Note 7
Cold solvent parts cleaners equipped with a functional secondary reservoir (See IA2)	1	0.01 VOC	Regulation 1.02, Appendix A; See Note 7
Process scrap conveying systems (See IA1)	2	4.15 PM	Regulation 2.16, section 1.23.1.2 ; See Note 7
Shot blast cabinet (See IA1)	1	4.68 PM	Regulation 2.16, section 1.23.1.2 ; See Note 7

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.
- 3) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16 section 4.3.5.3.6.
- 6) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) to be reported on the annual emission inventory.

- 7) The District has determined pursuant to Regulation 2.16 section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Emission Unit IA1: Particulate Emission Points¹⁹**IA1 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1 through 4

IA1 Equipment:

Emission Point	Description	Applicable Regulation	Control ID
E-17	One (1) woodshop	7.08	N/A
E-18	Three (3) dust collectors	7.08	N/A
E-19	Two (2) process scrap conveying systems	7.08	N/A
E-20	One (1) shot blast cabinet	7.08	IAC-20

IA1 Control Devices:

Control ID	Description	Control Efficiency	Performance Indicator	Stack ID
IAC-20	Shot blast cabinet filters	90%	VE Survey	N/A

¹⁹ No TACs emitted from this equipment.

IA1 Specific Conditions

S1. **Standards** [Regulation 2.16, section 4.1]

a. **Opacity**

- i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

b. **PM**

- i. The owner or operator shall not allow PM emissions to exceed 2.87 lb/hr from E-17 based on actual operating hours in a calendar day.²⁰ [Regulation 7.08, section 3.1.2]
- ii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr from E-18 through E-20 based on actual operating hours in a calendar day.²⁰ [Regulation 7.08, section 3.1.2]

S2. **Monitoring and Record Keeping** [Regulation 2.16, section 4.1.9.1 & 4.1.9.2]

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **Opacity**

- i. The owner or operator shall, monthly, conduct a one-minute visible emissions survey, of the emission points (E-17, E-18, E-19, and E-20). No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission

²⁰ A one-time compliance demonstration was performed for PM and the standard cannot be exceeded uncontrolled.

survey needs to be performed and a negative declaration shall be entered in the record.

b. **PM**

- i. There is no monitoring and record keeping requirement for this pollutant.

S3. **Reporting** [Regulation 2.16, section 4.1.9.3]

The owner or operator shall report the following information, as required by General Condition 14:

a. **Opacity**

- i. Any deviation from the requirement to perform monthly visible emission surveys or Method 9 determinations;
- ii. Any deviation from the requirement to record the results of each VE survey and Method 9 determination performed;
- iii. The number, date, and time of each VE survey where visible emissions were observed, and the results of the Method 9 determination performed;
- iv. Identification of all periods of exceeding an opacity standard; and
- v. Description of any corrective action taken for each exceedance of the opacity standard.

b. **PM**

- i. There are no compliance reporting requirements for this equipment.

Emission Unit IA2: Parts Washer

IA2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1 through 4

IA2 Equipment:

Emission Point	Description	Applicable Regulation	Control ID	Stack ID	Installation Date
E-21	One (1) Parts washer with secondary reservoir (35 gallons) and a surface opening two inches in diameter that contains non-HAP/non-TAC solvent cleaner.	6.18	N/A	N/A	2003

IA2 Specific Conditions**S1. Standards** [Regulation 2.16, section 4.1.1]**a. VOC**

- i. The owner or operator of Emission Point E-21 shall install, maintain, and operate the control equipment as follows: [Regulation 6.18, section 4]
 - 1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. [Regulation 6.18, section 4.1.1]
 - 2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. [Regulation 6.18, section 4.1.2]
 - 3) A permanent, conspicuous label summarizing the operating requirements shall be installed on or near the cold cleaner. [Regulation 6.18, section 4.1.3]
 - 4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. [Regulation 6.18, section 4.1.4]
 - 5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. [Regulation 6.18, section 4.1.6]
 - 6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. [Regulation 6.18, section 4.1.8]
- ii. The owner or operator shall observe at all times the following operating requirements: [Regulation 6.18, section 4.2]
 - 1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device

- that allows pressure relief, but does not allow liquid solvent to drain from the container. [Regulation 6.18, section 4.2.1]
- 2) The solvent level in the cold cleaner shall not exceed the fill line. [Regulation 6.18, section 4.2.2]
 - 3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. [Regulation 6.18, section 4.2.3]
 - 4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. [Regulation 6.18, section 4.2.4]
 - 5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. [Regulation 6.18, section 4.2.5]
 - 6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. [Regulation 6.18, section 4.2.6]
 - 7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. [Regulation 6.18, section 4.2.7]
- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). [Regulation 6.18, section 4.3.2]
 - iv. See Emission Unit Plantwide.

S2. Monitoring and Record Keeping [Regulation 2.16, section 4.1.9.1 & 4.1.9.2]

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. VOC

- i. For Emission Point E-21:
 - 1) The owner or operator shall maintain records that include the following for each purchase: [Regulation 6.18, section 4.4.2]
 - (a) The name and address of the solvent supplier,
 - (b) The date of the purchase,
 - (c) The type of the solvent, and

- (d) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
- 2) All records required shall be retained for 5 years and made available to the District upon request. [Regulation 6.18, section 4.4.3]
 - ii. See Emission Unit Plantwide.

S3. Reporting [Regulation 2.16, section 4.1.9.3]

The owner or operator shall report the following information, as required by General Condition 14:

- a. **VOC**
 - i. For Emission Point E-21: There are no routine compliance reporting requirements for Regulation 6.18.
 - ii. See Emission Unit Plantwide.

Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests

Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc) or hours of operation of the equipment by the appropriate emission factor and accounting for any control devices unless otherwise approved in writing by the District.

Equipment	Emission Point	Pollutant	Emission Factor	Determination Method
Laminator #12 Laminator #6 Laminator #7 Laminator #8 Laminator #9-#1 Laminator #9-#2 Laminator #10-#1 Laminator #10-#2 Laminator #11 Laminator #14 Portable Totes	E-1 E-2 E-3 E-4 E-5 E-16 E-6 E-10 E-7 E-8 E-13B	VOC HAPs	MSDS/SDS content MSDS/SDS content	Mass balance calculation; see note 5 Mass balance calculation; see note 6
Boiler #1 Oven #12 Oven #6 Oven #7 Oven #8 #9 Oven #1 #9 Oven #2 #10 Oven #1 #10 Oven #2 Oven #11 Oven #14 Oven #15	E-15 E-1a E-2a E-3a E-4a E-5a E-16a E-6a E-10a E-7a E-8a E-9a	NOx SO ₂ PM VOC CO	100 lb/MMcf 0.6 lb/MMcf 7.6 lb/MMcf 5.5 lb/MMcf 84 lb/MMcf	AP-42 section 1.4, Table 1.4-1 through 1.4-4
Tank #3 Tank #2 Tank #1 Tank #4	E-11 E-12 E-13 E-13A	VOC	AP-42, Section 7.1	
Woodshop Various dust collectors	E-17 E-18	PM PM	1.89% of material removed PM ₁₀	Estimating Emissions from Generation and Combustion of 'Waste Wood', July 15, 1998
Process scrap conveying systems	E-19	PM	0.25% of PM of total tonnage processed	Source estimate
Shot blast cabinet	E-20	PM	See note 3	See note 3
Parts washer	E-21	VOC	MSDS/SDS content	Mass balance calculation

Control Devices			
ID	Description	Efficiency	Basis
C-2	Catalytic Oxidizer	>65%	Not yet Tested, no Certified Guarantee
IAC-20	Shot blast filters	90%	APCD default control efficiency

Note:

1. Options for control efficiency determination:
 - Option 1: Use District pre-approved control efficiency
 - Option 2: Submit a signature guarantee from the control device manufacture stating the control device efficiency
 - Option 3: Perform stack test.
2. Until the District receives a signature guarantee from the control device manufacturer stating the control device efficiency is higher (Option 2), or an approved stack test (Option 3), the pre-approved efficiency (Option 1) will be used in all calculations to demonstrate compliance with applicable standards and calculations for emission inventory.
3. PM/PM₁₀ actual emissions from the Shot blast cabinet equipment shall be calculated according to the following methodology unless another method is approved in writing by the District:

Uncontrolled

PM(ton) = (operating time, hr) (capacity, 165 lb abrasive/hr) (emission factor, 27 lb/ 1000 lb abrasive)/ (2000, lb/ton)

PM₁₀(ton) = (operating time, hr) (capacity, 165 lb abrasive/hr) (emission factor, 13 lb/ 1000 lb abrasive)/ (2000, lb/ton)

Controlled

PM(ton) = (operating time, hr) (capacity, 165 lb abrasive/hr) (emission factor, 27 lb/ 1000 lb abrasive) (1 – control efficiency, 90% for a filter)/ (2000, lb/ton)

PM₁₀(ton) = (operating time, hr) (capacity, 165 lb abrasive/hr) (emission factor, 13 lb/ 1000 lb abrasive) (1 – control efficiency, 90% for a filter)/ (2000, lb/ton)

“XX” is the maximum capacity of the blast equipment.

4. Uncontrolled VOC emissions shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)}$$

or

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{VOC content (lb/gal)}$$

Controlled VOC emissions shall be calculated according to the following methodology unless another method is approved in writing by the District:

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)} \times [100 - (\text{Capture Efficiency (\%)} \times \text{Destruction Efficiency (\%)})]$$

or

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{VOC content (lb/gal)} \times [100 - (\text{Capture Efficiency (\%)} \times \text{Destruction Efficiency (\%)})]$$

An example of a methodology to determine compliance is as follows unless another method is approved in writing by the District:

$$\frac{\text{Total Solvent Based Controlled VOC Emissions (lbs)}}{\text{VOC Net Input into the affected facility (lbs)}} \times 100\% < 35\%$$

5. In a letter dated January 9, 2001, the source submitted their Notification of Compliance Status to the District and proposed to follow the compliance option listed in 40 CFR §63.825(b)(4). To demonstrate compliance with §63.825(b)(4), Equation 6 of 40 CFR 63 Subpart KK is used:

$$H_L = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j}$$

C_{hi} = the organic HAP content of ink or other solids-containing material, i, expressed as a weight-fraction, kg/kg.

C_{hj} = the organic HAP content of solvent j, expressed as a weight-fraction, kg/kg.

H_L = the monthly average, as-applied, organic HAP content of all solids-containing materials applied at less than 0.04 kg organic HAP per kg of material applied, kg/kg.

M_i = the mass of ink or other material, i, applied in a month, kg.

M_j = the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied in a month, kg.

p = the number of different inks, coatings, varnishes, adhesives, primers, and other materials applied in a month.

q = the number of different solvents, thinners, reducers, diluents, or other non-solids-containing materials applied in a month.

**Attachment B - 40 CFR 63, Subpart DDDDD (MACT)
National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial,
Commercial, and Institutional Boilers and Process Heaters**

The owner or operator shall comply with the following requirements unless there are more current promulgated regulations:

Specific Conditions

S1. Standards [Regulation 2.16, section 4.1.1]

a. Compliance date [40 CFR 63.7495]

- i. If you have an existing boiler or process heater (Boiler #1)²¹, you must comply with the emission standards for all pollutants, except hydrogen chloride (HCl), in this subpart no later than January 31, 2016, except as provided in §63.6(i) (*Extension of compliance with emission standards*).²² & ²³ [40 CFR §63.7495(b)]
- ii. You must meet the notification requirements in §63.7545 according to the schedule in §63.7545 and in subpart A of this part. Some of the notifications must be submitted before you are required to comply with the emission limits and work practice standards in this subpart. [40 CFR §63.7495(d)]

b. Emission limitations, work practice standards, and operating limits
[40 CFR §63.7500]

- i. You must meet the requirements in paragraphs §63.7500(a)(1) through §63.7500(a)(3) of this section, except as provided in paragraphs §63.7500(b), through §63.7500(e) of this section. You must meet these requirements at all times the affected unit is operating, except as provided in paragraph §63.7500(f) of this section. [40 CFR §63.7500(a)]
 - 1) You must meet each emission limit and work practice standard in Table 3 to this subpart that applies to the boilers at this plant,

²¹ Boilers #1 (Emission Point E-15) is an existing source according to § 63.7490 the existing source is a *Unit designed to burn gas 1 fuels subcategory* (as defined in §63.7575) with a heat input greater than 10 MMBtu/hr subject only to the requirements of a one-time energy assessment (Table 3 to Subpart DDDDD) and annual boiler tune-ups (§63.7540(a)(10)). Pursuant to 40 CFR §63.7500(e), boilers and process heaters in the *units designed to burn gas 1 fuels subcategory* are not subject to the emission limits in Tables 1 and 2 or 11 through 13 to this subpart, or the operating limits in Table 4 to this subpart.

²² On April 18, 2016, LIFlex, LLC submitted the Initial Notification of Compliance for 40 CFR 63, Subpart DDDDD associated with the natural gas boiler #1. LIFlex did not complete the on-time energy assessment specified in Table 3 to Subpart DDDDD by the compliance date specified of January 31, 2016, in 40 CFR 63.

²³ On October 27, 2016, LIFlex, LLC responded to a request for more information. LIFlex completed the initial tune-up specified in Table 3 to Subpart DDDDD of boiler #1 on November 11, 2015.

except as provided under §63.7522 (*Use emission averaging to comply with this subpart*). The output-based emission limits, in units of pounds per million Btu of steam output, in Tables 1 or 2 to this subpart are an alternative applicable only to boilers and process heaters that generate steam. [40 CFR 63.7500(a)(1)]

Table 3 to Subpart DDDDD of Part 63 —Work Practice Standards

If your unit is ...	The owner or operator shall meet the following ...
3. A new or existing boiler or process heater <u>without a continuous oxygen trim system</u> and with heat input capacity of 10 million Btu per hour or greater <i>(Boiler #1)</i>	Conduct a tune-up of the boiler or process heater annually as specified in §63.7540. Units in either the Gas 1 or Metal Process Furnace subcategories will conduct this tune-up as a work practice for all regulated emissions under this subpart. Units in all other subcategories will conduct this tune-up as a work practice for dioxins/furans.
4. An existing boiler or process heater located at a major source facility, not including limited use units <i>(Boiler #1)</i>	Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table, satisfies the energy assessment requirement. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items a. to e. appropriate for the on-site technical hours listed in §63.7575: <ul style="list-style-type: none"> <li data-bbox="683 1094 1424 1136">a. A visual inspection of the boiler or process heater system. <li data-bbox="683 1142 1424 1278">b. An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints. <li data-bbox="683 1285 1424 1421">c. An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator. <li data-bbox="683 1428 1424 1541">d. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage. <li data-bbox="683 1547 1424 1654">e. A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified. <li data-bbox="683 1661 1424 1730">f. A list of cost-effective energy conservation measures that are within the facility's control. <li data-bbox="683 1736 1424 1806">g. A list of the energy savings potential of the energy conservation measures identified. <li data-bbox="683 1812 1424 1881">h. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the

If your unit is ...	The owner or operator shall meet the following ...
	time frame for recouping those investments.

2) At all times, you must operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR §63.7500(a)(3)]

ii. As provided in §63.6(g) (*Use of an alternative non-opacity emission standard*), EPA may approve use of an alternative to the work practice standards in this section. [40 CFR §63.7500(b)]

iii. These standards apply at all times the affected unit is operating, except during periods of startup and shutdown during which time the owner or operator shall comply only with Table 3 to this subpart. [40 CFR §63.7500(f)]

c. General requirements for complying with this subpart [40 CFR §63.7505]

i. You must be in compliance with the emission limits, work practice standards, and operating limits in this subpart. These limits apply to you at all times the affected unit is operating except for the periods noted in §63.7500(f). [40 CFR §63.7505(a)]

d. General Provisions [40 CFR §63.7565]

Table 10 to this subpart shows which parts of the General Provisions in §63.1 through §63.15 apply to you.

Table 10 to Subpart DDDDD of Part 63 —Applicability of General Provisions to Subpart DDDDD

Citation	Subject	Applies to subpart DDDDD
§63.1	Applicability	Yes.
§63.2	Definitions	Yes. Additional terms defined in §63.7575
§63.3	Units and Abbreviations	Yes.
§63.4	Prohibited Activities and Circumvention	Yes.

Citation	Subject	Applies to subpart DDDDD
§63.5	Preconstruction Review and Notification Requirements	Yes.
§63.6(a), (b)(1)-(b)(5), (b)(7), (c)	Compliance with Standards and Maintenance Requirements	Yes.
§63.6(e)(1)(i)	General duty to minimize emissions.	No. See §63.7500(a)(3) for the general duty requirement.
§63.6(e)(1)(ii)	Requirement to correct malfunctions as soon as practicable.	No.
§63.6(e)(3)	Startup, shutdown, and malfunction plan requirements.	No.
§63.6(f)(1)	Startup, shutdown, and malfunction exemptions for compliance with non-opacity emission standards.	No.
§63.6(f)(2) and (3)	Compliance with non-opacity emission standards.	Yes.
§63.6(g)	Use of alternative standards	Yes.
§63.6(h)(1)	Startup, shutdown, and malfunction exemptions to opacity standards.	No. See §63.7500(a).
§63.6(h)(2) to (h)(9)	Determining compliance with opacity emission standards	Yes.
§63.6(i)	Extension of compliance	Yes. Note: Facilities may also request extensions of compliance for the installation of combined heat and power, waste heat recovery, or gas pipeline or fuel feeding infrastructure as a means of complying with this subpart.
§63.6(j)	Presidential exemption.	Yes.
§63.7(a), (b), (c), and (d)	Performance Testing Requirements	Yes.
§63.7(e)(1)	Conditions for conducting performance tests	No. Subpart DDDDD specifies conditions for conducting performance tests at §63.7520(a) to (c).
§63.7(e)(2)-(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.
§63.8(a) and (b)	Applicability and Conduct of Monitoring	Yes.
§63.8(c)(1)	Operation and maintenance of CMS	Yes.
§63.8(c)(1)(i)	General duty to minimize	No. See §63.7500(a)(3).

Citation	Subject	Applies to subpart DDDDD
	emissions and CMS operation	
§63.8(c)(1)(ii)	Operation and maintenance of CMS	Yes.
§63.8(c)(1)(iii)	Startup, shutdown, and malfunction plans for CMS	No.
§63.8(c)(2) to (c)(9)	Operation and maintenance of CMS	Yes.
§63.8(d)(1) and (2)	Monitoring Requirements, Quality Control Program	Yes.
§63.8(d)(3)	Written procedures for CMS	Yes, except for the last sentence, which refers to a startup, shutdown, and malfunction plan. Startup, shutdown, and malfunction plans are not required.
§63.8(e)	Performance evaluation of a CMS	Yes.
§63.8(f)	Use of an alternative monitoring method.	Yes.
§63.8(g)	Reduction of monitoring data	Yes.
§63.9	Notification Requirements	Yes.
§63.10(a), (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	Yes.
§63.10(b)(2)(ii)	Recordkeeping of malfunctions	No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.
§63.10(b)(2)(iii)	Maintenance records	Yes.
§63.10(b)(2)(iv) and (v)	Actions taken to minimize emissions during startup, shutdown, or malfunction	No.
§63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§63.10(b)(3)	Recordkeeping requirements for applicability determinations	No.
§63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(10) and (11)	Recording nature and cause of malfunctions, and corrective actions	No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for

Citation	Subject	Applies to subpart DDDDD
		actions taken during malfunctions.
§63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(15)	Use of startup, shutdown, and malfunction plan	No.
§63.10(d)(1) and (2)	General reporting requirements	Yes.
§63.10(d)(3)	Reporting opacity or visible emission observation results	No.
§63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No. See §63.7550(c)(11) for malfunction reporting requirements.
§63.10(e)	Additional reporting requirements for sources with CMS	Yes.
§63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§63.11	Control Device Requirements	No.
§63.12	State Authority and Delegation	Yes.
§63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.
§63.1(a)(5),(a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9).	Reserved	No.

S2. Monitoring and Record Keeping [Regulation 2.16, sections 4.1.9.1 and 4.1.9.2]

a. Initial compliance requirements and by what date shall the owner or operator conduct them [40 CFR §63.7510]

- i. For existing affected sources (as defined in §63.7490), you must complete the initial compliance demonstration, as specified in paragraphs (a) through (d) of this section, no later than 180 days after the compliance date that is specified for your source in §63.7495 and according to the applicable provisions in §63.7(a)(2) as cited in Table 10 to this subpart, except as specified in paragraph (j) of this section. You must complete an initial tune-up by following the procedures described in §63.7540(a)(10)(i) through (vi) no later than the compliance date specified in §63.7495,

except as specified in paragraph (j) of this section. You must complete the one-time energy assessment specified in Table 3 to this subpart no later than the compliance date specified in §63.7495, except as specified in paragraph (j) of this section. [40 CFR 63.7510(e)]

b. Subsequent performance tests, fuel analyses, or tune-ups [40 CFR §63.7515]

- i. If you are required to meet an applicable tune-up work practice standard, You must conduct an annual, biennial, or 5-year performance tune-up according to §63.7540(a)(10), (11), or (12), respectively. Each annual tune-up specified in §63.7540(a)(10) must be no more than 13 months after the previous tune-up. Each biennial tune-up specified in §63.7540(a)(11) must be conducted no more than 25 months after the previous tune-up. Each 5-year tune-up specified in §63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed affected source (as defined in §63.7490), the first annual, biennial, or 5-year tune-up must be no later than 13 months, 25 months, or 61 months, respectively, after the initial startup of the new or reconstructed affected source. [40 CFR §63.7515(d)]
- ii. For affected sources (as defined in §63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, you must complete the subsequent compliance demonstration, if subject to the emission limits in Tables 1, 2, or 11 through 13 to this subpart, no later than 180 days after the re-start of the affected source and according to the applicable provisions in §63.7(a)(2) as cited in Table 10 to this subpart. You must complete a subsequent tune-up by following the procedures described in §63.7540(a)(10)(i) through (vi) and the schedule described in §63.7540(a)(13) for units that are not operating at the time of their scheduled tune-up. [40 CFR §63.7515(g)]

c. How does the owner or operator demonstrate initial compliance with the emission limitations, fuel specifications and work practice standards [40 CFR §63.7530]

- i. You must include with the Notification of Compliance Status a signed certification that the energy assessment was completed according to Table 3 to this subpart and is an accurate depiction of your facility at the time of the assessment. [40 CFR §63.7530(e)]
- ii. You must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in §63.7545(e). [40 CFR §63.7530(f)]

- d. **Records that are required to be kept** [40 CFR §63.7555]
- i. You must keep records according to paragraphs (a)(1) and (2) of this section. [40 CFR §63.7555(a)]
 - 1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that you submitted, according to the requirements in §63.10(b)(2)(xiv). [40 CFR §63.7555(a)(1)]
 - 2) Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii). [40 CFR §63.7555(a)(2)]
- e. **Form of the records and how long to keep the records** [40 CFR §63.7560]
- i. Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [40 CFR §63.7560(a)]
 - ii. 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. [40 CFR §63.7560(b)]
 - iii. You must keep each record on site, or they must be accessible from onsite (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records off site for the remaining 3 years. [40 CFR §63.7560(c)]

S3. **Reporting** [Regulation 2.16, section 4.1.9.3]

- a. **Notifications and the date to submit the notifications** [40 CFR §63.7545]
- i. You must submit to the Administrator all of the notifications in §63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified. [40 CFR 63.7545(a)]
 - ii. As specified in §63.9(b)(2), if you startup your affected source before January 31, 2013, you must submit an Initial Notification not later than 120 days after January 31, 2013. [40 CFR §63.7545(b)]
 - iii. As specified in §63.9(b)(4) and (5), if you startup your new or reconstructed affected source on or after January 31, 2013, you must submit an Initial Notification not later than 15 days after the actual date of startup of the affected source. [40 CFR §63.7545(c)]

- iv. If you are not required to conduct an initial compliance demonstration as specified in §63.7530(a), the Notification of Compliance Status must only contain the information specified in 40 CFR §63.7545(e)(1) and 40 CFR §63.7545(e)(8) and must be submitted within 60 days of the compliance date specified at 40 CFR §63.7495(b). [40 CFR §63.7545(e)]
- 1) A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by you or the EPA through a petition process to be a non-waste under §241.3 of this chapter, whether the fuel(s) were a secondary material within the meaning of §241.3 of this chapter, and justification for the selection of fuel(s) burned during the compliance demonstration. [40 CFR §63.7545(e)(1)]
 - 2) In addition to the information required in §63.9(h)(2), your notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official: [40 CFR §63.7545(e)(8)]
 - (a) “This facility complies with the required initial tune-up according to the procedures in §63.7540(a)(10)(i) through (vi).” [40 CFR §63.7545(e)(8)(i)]
 - (b) “This facility has had an energy assessment performed according to §63.7530(e).”[40 CFR §63.7545(e)(8)(ii)]
 - (c) Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: “No secondary materials that are solid waste were combusted in any affected unit.” [40 CFR §63.7545(e)(8)(iii)]
- v. If you have switched fuels or made a physical change to the boiler and the fuel switch or physical change resulted in the applicability of a different subcategory, you must provide notice of the date upon which you switched fuels or made the physical change within 30 days of the switch/change. The notification must identify: [40 CFR §63.7545(h)]
- 1) The name of the owner or operator of the affected source, as defined in §63.7490, the location of the source, the boiler(s) and

process heater(s) that have switched fuels, were physically changed, and the date of the notice. [40 CFR §63.7545(h)(1)]

- 2) The currently applicable subcategory under this subpart. [40 CFR §63.7545(h)(2)]
- 3) The date upon which the fuel switch or physical change occurred. [40 CFR §63.7545(h)(3)]

b. Reports and the date to submit the reports [CFR §63.7550]

- i. You must submit each report in Table 9 to this subpart that applies to you. [40 CFR §63.7550(a)]

Table 9 to Subpart DDDDD of Part 63 —Reporting Requirements

The owner or operator shall submit a(n)	The report must contain ...	The owner or operator shall submit the report ...
1. Compliance report	<p>a. Information required in §63.7550(c)(1) through (5); and</p> <p>b. If there are no deviations from any emission limitation (emission limit and operating limit) that applies to you and there are no deviations from the requirements for work practice standards in Table 3 to this subpart that apply to you, a statement that there were no deviations from the emission limitations and work practice standards during the reporting period. If there were no periods during which the CMSs, including continuous emissions monitoring system, continuous opacity monitoring system, and operating parameter monitoring systems, were out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which the CMSs were out-of-control during the reporting period; and</p> <p>c. If you have a deviation from any emission limitation (emission limit and operating limit) where you are not using a CMS to comply with that emission limit or operating limit, or a deviation from a work practice standard during the reporting period, the report must contain the information in §63.7550(d); and</p> <p>d. If there were periods during which the CMSs, including continuous emissions monitoring system, continuous opacity monitoring system, and operating parameter monitoring systems, were out-of-control as specified in §63.8(c)(7), or otherwise not operating, the report must contain the information in §63.7550(e)</p>	Semiannually, annually, biennially, or every 5 years according to the requirements in §63.7550(b).

- ii. Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report,

according to paragraph (h) of this section, by the date in Table 9 to this subpart and according to the requirements in paragraphs (b)(1) through (4) of this section. For units that are subject only to a requirement to conduct an annual, biennial, or 5-year tune-up according to §63.7540(a)(10), (11), or (12), respectively, and not subject to emission limits or operating limits, you may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through(4) of this section, instead of a semi-annual compliance report. [40 CFR §63.7550(b)]

- 1) The first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in §63.7495 and ending on July 31 or January 31, whichever date is the first date that occurs at least 180 days (or 1, 2, or 5 years, as applicable, if submitting an annual, biennial, or 5-year compliance report) after the compliance date that is specified for your source in §63.7495. [40 CFR §63.7550(b)(1)]
- 2) The first compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for each boiler or process heater in §63.7495. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than January 31. [40 CFR §63.7550(b)(2)]
- 3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31.²⁴ [40 CFR §63.7550(b)(3)]
- 4) Each subsequent compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than January 31. [40 CFR §63.7550(b)(4)]
- 5) For each affected source that is subject to permitting regulations pursuant to part 70 or par 71 of this chapter, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to

²⁴ The facility's natural-gas fired boiler is only subject to Annual Compliance Reporting requirements.

the dates the permitting authority has established in the permit instead of according to the dates in §63.7550(b)(1)-(4).
[40 CFR §63.7550(b)(5)]

- iii. A compliance report must contain the following information depending on how the facility chooses to comply with the limits set in this rule.
[40 CFR §63.7550(c)]
- iv. If the facility is subject to the requirements of a tune up they must submit a compliance report with the information in paragraphs §63.7550(c)(5)(i) through (iii) of this section, §63.7550(c)(5)(xiv) and (xvii) of this section, and paragraph §63.7550(c)(5)(iv) of this section for limited-use boiler or process heater. [40 CFR §63.7550(c)(1)]
 - 1) Company and Facility name and address.
[40 CFR §63.7550(c)(5)(i)]
 - 2) Process unit information, emissions limitations, and operating parameter limitations. [40 CFR §63.7550(c)(5)(ii)]
 - 3) Date of report and beginning and ending dates of the reporting period. [40 CFR §63.7550(c)(5)(iii)]
 - 4) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up according to §63.7540(a)(10), (11), or (12) respectively. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
[40 CFR §63.7550(c)(5)(xiv)]
 - 5) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [40 CFR §63.7550(c)(5)(xvii)]

Attachment C – Protocol Checklist for a Performance Test

A completed protocol should include the following information:

- 1. Facility name, location, and ID #;
- 2. Responsible Official and environmental contact names;
- 3. Permit numbers that are requiring the test to be conducted;
- 4. Test methods to be used (i.e. EPA Method 1, 2, 3, 4, and 5);
- 5. Alternative test methods or description of modifications to the test methods to be used;
- 6. Purpose of the test including equipment and pollutant to be tested; the purpose may be described in the permit that requires the test to be conducted or may be to show compliance with a federal regulation or emission standard;
- 7. Tentative test dates (These may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation.);
- 8. Maximum rated production capacity of the system;
- 9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate, based on limits);
- 10. Method to be used for determining rate of production during the performance test;
- 11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance;
- 12. Description of normal operation cycles;
- 13. Discussion of operating conditions that tend to cause worse case emissions; it is especially important to clarify this if worst case emissions do not come from the maximum production rate;
- 14. Process flow diagram;
- 15. The type and manufacturer of the control equipment, if any;
- 16. The control equipment (baghouse, scrubber, condenser, etc.) parameter to be monitored and recorded during the performance test. Note that this data will be used to ensure representative operation during subsequent operations. These parameters can include pressure drops, flow rates, pH, and temperature. The values achieved during the test may be required during subsequent operations to describe what pressure drops, etcetera, are indicative of good operating performance; and
- 17. How quality assurance and accuracy of the data will be maintained, including;
 - Sample identification and chain-of-custody procedures
 - If audit samples are required for this test method, audit sample provider and number of audit samples to be used
- 18. Pipe, duct, stack, or flue diameter to be tested;
- 19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet;
- 20. Determine number of traverse points to be tested for outlet and additionally for inlet if required using Appendix A-1 to 40 CFR Part 60;
 - Method 1 if stack diameter is >12"
 - Method 1a if stack diameter is greater than or equal to 4" and less than 12"
 - Alternate method of determination for <4"
 - If a sample location at least two stack or duct diameters downstream and half a diameter upstream from any flow disturbance is not available then an alternative procedure is available for determining the acceptability of a measurement location. This procedure described in Method 1, Section 11.5 allows for the determination of gas flow angles at the sampling points and comparison of the measured results with acceptability criteria.
- 21. The Stack Test Review fee shall be submitted with each stack test protocol.

Attachment D - Determination of Benchmark Ambient Concentration (BAC)

**Determination of
Benchmark Ambient Concentration (BAC)** Category _____
No. _____

TAC _____ **CAS No.** _____ - _____ - _____
_____ **Mol. Wt.** _____

BAC_C = _____ $\mu\text{g}/\text{m}^3$ **Annual** **BAC_{NC}** = _____ $\mu\text{g}/\text{m}^3$ **Averaging Period**
De Minimis _____ **lb/hour**; _____ **lb/**_____ ; _____ **lb/year**

I. Carcinogen Risk - BAC_C [Annual Averaging Period] Carcinogen **yes** **no**

1. IRIS no 10^{-6} risk = _____ $\mu\text{g}/\text{m}^3$ URE _____ $(\mu\text{g}/\text{m}^3)^{-1}$ ____-____-____
2. Cal no 10^{-6} risk = _____ $\mu\text{g}/\text{m}^3$ IUR _____ $(\mu\text{g}/\text{m}^3)^{-1}$ ____-____-____
3. MI no 10^{-6} risk = _____ $\mu\text{g}/\text{m}^3$ _____ -____-____
4. NTP Part A yes no Part B yes no
5. IARC Group 1 yes no Group 2A yes no Group 2B yes no
6. ATSDR no
7. Sec. 3.3.4 method _____ no 10^{-6} risk = _____ $\mu\text{g}/\text{m}^3$ ____-____-____
8. Default 0.0004 $\mu\text{g}/\text{m}^3$

II. Chronic Noncancer Risk - BAC_{NC} [Averaging Period as Specified]

1. IRIS no RfC = _____ $\mu\text{g}/\text{m}^3$ Annual ____-____-____
2. Cal no REL = _____ $\mu\text{g}/\text{m}^3$ Annual ____-____-____
3. IRIS¹ no RfD = _____ $\mu\text{g}/\text{kg}/\text{day} \otimes 70/20 =$ _____ $\mu\text{g}/\text{m}^3$ Annual ____-____-____
4. MI no ITSL = _____ $\mu\text{g}/\text{m}^3$ Averaging Period ____-____-____
5. TLV NIOSH _____ $\mu\text{g}/\text{m}^3 \otimes 0.01 =$ _____ $\mu\text{g}/\text{m}^3$ 8-Hr ____-____-____
6. RTECS¹ _____ = _____ $\mu\text{g}/\text{m}^3$ Annual
7. Default 0.04 $\mu\text{g}/\text{m}^3$ Annual

III. De Minimis

1. Carcinogen (BAC_C) _____ $\mu\text{g}/\text{m}^3 \otimes 0.54 =$ _____ **lb/hour**
(BAC_C) _____ $\mu\text{g}/\text{m}^3 \otimes 480 =$ _____ **lb/year**
2. Chronic Noncancer Risk _____ Averaging Period
(BAC_{NC}) _____ $\mu\text{g}/\text{m}^3 \otimes$ _____ = _____ **lb/hour**
(BAC_{NC}) _____ $\mu\text{g}/\text{m}^3 \otimes$ _____ = _____ **lb/**_____
_____ **lb/**_____ \otimes _____ = _____ **lb/year**

¹ To use data based upon an oral route of exposure, the District must make an affirmative determination that data are not available to indicate that oral-route to inhalation-route extrapolation is inappropriate.

Prepared by _____ -____-____