# ASHEVILLE-BUNCOMBE AIR QUALITY AGENCY AIR QUALITY PERMIT

Until such time as this permit expires or is modified or revoked, the below named Permittee is authorized to operate, as outlined in Part I, "Air Quality Title V Operation Permit," and to construct and operate, as outlined in Part II, "Air Quality Construction and Operation Permit," the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of the Asheville-Buncombe Air Quality Agency Air Quality Code (AB Air Quality Code) and is subject to all requirements therein.

Pursuant to AB Air Quality Code Chapter 17, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the Asheville-Buncombe Air Quality Agency and received an Air Quality Permit, except as provided in this permit.

Permittee: Day International, Inc.

dba Flint Group

**Facility ID:** 11-774

Facility Site Location: 25 Old Shoals Road

City, State, Zip: Arden, North Carolina 28704

Facility Mailing Address: 25 Old Shoals Road

City, State, Zip: Arden, North Carolina 28704

Permit Number: 11-774-22

Replaces Permit Number: 11-774-11F

Issue Date: March 8, 2022 Effective Date: April 1, 2022

Renewal Application Due Date: October 1, 2026
Expiration Date: April 1, 2027

Ashley J. Featherstone, Director

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# PART I - AIR QUALITY TITLE V OPERATION PERMIT

The Asheville-Buncombe Air Quality Agency (AB Air Quality), the United States Environmental Protection Agency (EPA), and citizens as defined under the Federal Clean Air Act have the authority to enforce the terms, conditions, and limitations contained in Part I of this permit unless otherwise specified.

Under AB Air Quality Code Chapter 17, the operation of emission source(s) and associated air pollution control device(s) listed in Part I of this permit is based on plans, specifications, operating parameters, and other information as submitted in the Air Quality Permit Application.

# SECTION 1 - PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S)

The following table contains a summary of all permitted emission sources and associated air pollution control devices:

Emission Source ID	Emission Source Description	Control Device ID	Control Device Description
ES-MIX-01	One (1) coating preparation process	CD-SRS-01	One (1) Vara Technologies carbon adsorption system
ES-SPDR-01	One (1) coating spreader	CD-SRS-01	One (1) Vara Technologies carbon adsorption system
ES-SPDR-02	One (1) coating spreader	CD-SRS-01	One (1) Vara Technologies carbon adsorption system
ES-SPDR-03	One (1) coating spreader	CD-SRS-01	One (1) Vara Technologies carbon adsorption system
ES-SPDR-04	One (1) coating spreader	CD-SRS-01	One (1) Vara Technologies carbon adsorption system
ES-SPDR-05	One (1) coating spreader	CD-SRS-02	One (1) M&W Mechanical carbon adsorption system
ES-SPDR-06	One (1) coating spreader	CD-SRS-02	One (1) M&W Mechanical carbon adsorption system
ES-SPDR-07	One (1) coating spreader	CD-SRS-02	One (1) M&W Mechanical carbon adsorption system
ES-SPDR-08	One (1) coating spreader	CD-SRS-02	One (1) M&W Mechanical carbon adsorption system
		CD-SRS-02	One (1) M&W Mechanical carbon adsorption system to be operated when applying toluene-based coatings
ES-SPDR-09	One (1) coating spreader	CD-TO-01	One (1) B&W MEGTEC Millennium- 1030-95 regenerative thermal oxidizer (RTO) to be operated when applying either toluene-based coatings or non- toluene solvent-based adhesives
		NA	A control device is not required to be operating when applying water-based coatings.

Emission Source ID	Emission Source Description	Control Device ID	Control Device Description
ES-SPDR-10	One (1) coating spreader	CD-SRS-01	One (1) Vara Technologies carbon adsorption system
ES-SPDR-11	One (1) coating spreader	CD-SRS-02	One (1) M&W Mechanical carbon adsorption system
ES-EXTR-01	One (1) Recovery Mixer	CD-SRS-01	One (1) Vara Technologies carbon adsorption system
ES-SLEV-01	One (1) lithographic printing sleeve manufacturing process	CD-SRS-02	One (1) M&W Mechanical carbon adsorption system
ES-SLEV-02	One (1) lithographic printing sleeve coating, grinding and sawing process	CD-10 and CD-13	Two (1) dusts collectors
ES-BRUSH-01	One (1) blankets brushing table	CD-12	One (1) dust collector
ES-RUMX-01	Two (2) Farrel rubber mills and two (2) granulators	CD-03	One (1) dust collector
ES-WWST-01	Two (2) solvent recovery wastewater air strippers	NA	
ES-BOIL-01	One (1) 32.659 million BTU per hour Cleaver Brooks natural gas - fired boiler	NA	NA
ES-BOIL-02	One (1) 28.47 million BTU per hour York-Shipley natural gas - fired boiler	NA	NA
ES-CURE-01, ES-CURE-02, ES-CURE-03, ES-CURE-04	Four (4) 1.5 MMBtu/hr natural gas-fired cure ovens <sup>1</sup>	NA	NA
ES-PACK-01	Vacuum exhaust in blankets <sup>1</sup>	NA	NA
ES- NEXPRESS	One (1) Nexpress ceramer sleeve coating process, including two (2) ring coaters, four (4) electric curing ovens, wet grinding, and polishing.	NA	NA
ES-GENR-01	One (1) natural gas-fired emergency-use generator with a rated output capacity of 5 kilowatts <sup>1</sup>	NA	NA

<sup>&</sup>lt;sup>1</sup> Because this source is subject to a MACT standard, it is being listed as a permitted source rather than an insignificant activity, so that requirements can be listed in the permit.

# **SECTION 2 - SPECIFIC CONDITIONS AND LIMITATIONS**

# 2.1 - Emission Source Specific Conditions and Limitations

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The emission source(s) and associated air pollution control device(s) listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

## A. Emission Source ID ES-MIX-01

The following table provides a summary of limits and standards for the emission source referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Volatile organic	Install, operate, and maintain cover on each piece of equipment and vent emissions to 95 percent efficient control device <sup>1</sup>	AB Air Quality Code 4.0524 (40 CFR Part 60, Subpart VVV)
compounds	Less than 250 tons VOC per consecutive 12-month period (see Subsection 2.2)	AB Air Quality Code 4.0530
Hazardous air pollutants	Multiple compliance options for coating and printing subcategory (see Subsection 2.2)	AB Air Quality Code 4.1111 (40 CFR Part 63, Subpart OOOO)
Toxic air pollutants	Local enforceable only: Emission point parameters (see Subsection 2.2)	AB Air Quality Code 17.0700

<sup>&</sup>lt;sup>1</sup>Alternative Operating Scenario: When utilizing waterborne coatings, ES-MIX-01 shall be operated according to 40 CFR 60.740(d)(2). The material balance method may be used for calculation. When utilizing solvent-based coatings, ES-MIX-01 shall be operated in accordance with the conditions outlined below.

## 1. AB AIR QUALITY CODE 4.0524 - NEW SOURCE PERFORMANCE STANDARDS

a. Emission Limitation/Standard [AB Air Quality Code 4.0524(a) & 17.0508(b)]
As specified in §60.742(b)(2) of 40 CFR Part 60, for the onsite coating preparation equipment,
Install, operate, and maintain a total enclosure around the coating operation and vent the captured
VOC emissions from the total enclosure to a control device that is at least 95 percent efficient
(alternative standard).

#### b. **Testing** [AB Air Quality Code 4.0524(a)]

If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.0524(a), §60.743(c) and §60.745 of 40 CFR Part 60, and General Condition JJ. If the results of this testing exceed the standard given in Section 2.1(A)(1)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV.

c. **Monitoring** [AB Air Quality Code 4.0524(a) & 17.0508(f)]

To assure compliance with the standard given in Section 2.1(A)(1)(a) above, the Permittee shall:

- As required by §60.744(c)(1), install, calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the concentration level of organic compounds in both the control device inlet and outlet gas streams;
- ii. As required by §60.744(i), record time periods of mixing operations when the emission control device is malfunctioning or not in use; and
- iii. As required by §60.744(j), record time periods of mixing operations when each monitoring

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device is malfunctioning or not in use.

The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV if this monitoring is not performed.

d. **Recordkeeping/Reporting** [AB Air Quality Code 4.0524(a) & 17.0508(f)] The Permittee shall maintain records (written or electronic format) and submit reports documenting:

- As required by §60.747(d)(2)(i), all periods of three consecutive adsorption cycles of all the individual adsorber vessels during which the average carbon adsorption system efficiency falls below 95 percent;
- ii. As required by §60.744(f)(1), all periods during actual mixing operations when a required monitoring device was malfunctioning or not operating; and
- iii. As required by §60.744(f)(2), all periods during actual mixing operations when the control device was malfunctioning or not operating.

The Permittee shall submit reports postmarked on or before January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. All instances of deviations from the requirements of this permit must be clearly identified.

# B. Emission Source ID ES-SPDR-01, ES-SPDR-02, ES-SPDR-03, ES-SPDR-04, ES-SPDR-05, ES-SPDR-06, ES-SPDR-07, ES-SPDR-08, ES-SPDR-09, ES-SPDR-10 and ES-SPDR-11

The following table provides a summary of limits and standards for the emission sources referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Volatile organic	Install, operate, and maintain total enclosure around coating operation and vent emissions to 95 percent efficient control device <sup>1</sup>	AB Air Quality Code 4.0524 (40 CFR Part 60, Subpart VVV)
compounds	Less than 250 tons VOC per consecutive 12-month period (see Subsection 2.2)	AB Air Quality Code 4.0530
Hazardous air pollutants	Multiple compliance options for coating and printing subcategory (see Subsection 2.2)	AB Air Quality Code 4.1111 (40 CFR Part 63, Subpart OOOO)
Toxic air pollutants	Local enforceable only: Emission point parameters (see Subsection 2.2)	AB Air Quality Code 17.0700

<sup>1</sup>Alternative Operating Scenario: When utilizing waterborne coatings, ES-SPDR-01 ES-SPDR-02, ES-SPDR-03, ES-SPDR-04, ES-SPDR-05, ES-SPDR-06, ES-SPDR-07, & ES-SPDR-08, ES-SPDR-09, ES-SPDR-10, & ES-SPDR-11 shall be operated according to 40 CFR 60.740(d)(2). The emissions from this operation shall be submitted to this Agency on an annual basis, no later than 30 days after the end of the calendar year. The material balance method may be used for calculation. When utilizing solvent-based coatings, the coating spreaders shall be operated in accordance with the conditions outlined below (ES-SPDR-09 will operate in accordance to the conditions below when utilizing toluene-based coatings).

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#### 1. AB AIR OUALITY CODE 4.0524 - NEW SOURCE PERFORMANCE STANDARDS

a. Emission Limitation/Standard [AB Air Quality Code 4.0524(a) & 17.0508(b)]

As specified in §60.742(b)(2) of 40 CFR Part 60, for the coating operation, the Permittee shall install, operate, and maintain a total enclosure around the coating operation and vent the captured VOC emissions from the total enclosure to a control device that is at least 95 percent efficient.

# b. **Testing** [AB Air Quality Code 4.0524(a)]

If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.0524(a), §60.743(b) and §60.745 of 40 CFR Part 60, and General Condition JJ. If the results of this testing exceed the standard given in Section 2.1(B)(1)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV.

c. **Monitoring** [AB Air Quality Code 4.0524(a) & 17.0508(f)]

To assure compliance with the standard given in Section 2.1(B)(1)(a) above, the Permittee shall:

- As required by §60.744(c)(1), install, calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the concentration level of organic compounds in both the control device inlet and outlet gas streams;
- ii. As required by §60.744(h), install, calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the differential pressure across the total enclosure;
- iii. As required by §60.744(i), record time periods of coating operations when the emission control device is malfunctioning or not in use; and
- iv. As required by §60.744(j), record time periods of coating operations when each monitoring device is malfunctioning or not in use.

The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV if this monitoring is not performed.

# d. Recordkeeping/Reporting [AB Air Quality 4.0524(a) & 17.0508(f)]

The Permittee shall maintain records (written or electronic format) and submit reports documenting:

- As required by §60.747(d)(2)(i), all periods of three consecutive adsorption cycles of all the individual adsorber vessels during which the average carbon adsorption system efficiency falls below 95 percent;
- ii. As an alternative to §60.747(d)(6), all three hour periods during which the pressure drop across the natural draft openings falls below 0.007 inches of water column. This alternative monitoring proposal was approved by the EPA on March 28, 2000. See U.S. EPA Applicability Index Control Number 0000080 for Subpart VVV;
- iii. As required by §60.744(f)(1), all periods during actual coating operations when a required monitoring device was malfunctioning or not operating; and
- iv. As required by §60.744(f)(2), all periods during actual coating operations when the control device was malfunctioning or not operating.

The Permittee shall submit reports postmarked on or before January 30 of each calendar year for

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the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. All instances of deviations from the requirements of this permit must be clearly identified.

## C. Emission Source ID ES-SPDR-09

When venting emissions to CD-TO-01 the source shall operate in accordance to the conditions below:

#### 1. AB AIR OUALITY CODE 4.0524 - NEW SOURCE PERFORMANCE STANDARDS

- a. Emission Limitation/Standard [AB Air Quality Code 4.0524(a) & 17.0508(b)]
  As specified in §60.742(b)(2) of 40 CFR Part 60, for the coating operation, the Permittee shall install, operate, and maintain a total enclosure around the coating operation and vent the captured VOC emissions from the total enclosure to a control device that is at least 95 percent efficient.
- b. <u>Testing</u> [AB Air Quality Code 4.0524(a)]
  - i. For the initial performance test that was performed for CD-TO-01, or any subsequent test, the average combustion temperature of the incinerator measured at least every 15 minutes and averaged over the period of the performance test shall be submitted with the results of the performance test, as specified in §60.747(a);
  - ii. Except for the testing requirement in Condition 2.2(A)(1)(b), no performance testing is required at this time. If additional performace testing is required in the future, these tests shall be performed in accordance with AB Air Quality Code 4.2614 "Determination of VOC Emission Control System Efficiency" and General Condition JJ.
- c. <u>Monitoring</u> [AB Air Quality Code 4.0524(a) & 17.0508(f)]
  To assure compliance with the standard given in Section 2.1(C)(1)(a) above, the Permittee shall comply with the following conditions:
  - i. A monitoring device that continuously indicates and records the combustion temperature of the incinerator shall be installed, calibrated, maintained, and operated, according to the manufacturer's specifications, as required by §60.744(a) and (e). The monitoring device shall have an accuracy within ±1 percent of the temperature being measured in Celsius degrees, and must be located such that representative values of the combustion temperature of the incinerator will be obtained. The combustion temperature of the incinerator shall be continuously measured and recorded during each performance test;
  - ii. As required by §60.744(h), install, calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the differential pressure across the total enclosure;
  - iii. As required by §60.744(i), record time periods of coating operations when the emission control device is malfunctioning or not in use; and
  - iv. As required by §60.744(j), record time periods of coating operations when each monitoring device is malfunctioning or not in use.

The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV if this monitoring is not performed.

d. Recordkeeping/Reporting [AB Air Quality 4.0524(a) & 17.0508(f)]
The Permittee shall maintain records (written or electronic format) and submit reports

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## documenting:

- i. When operating CD-TO-01, the Permittee shall maintain records and submit quarterly reports documenting all 3-hour periods (during actual coating operations) during which the average combustion temperature of the device is more than 28 Celsius degrees below the average combustion temperature of the device during the most recent performance test that demonstrated compliance, as specified in §60.747(d)(4);
- ii. As an alternative to §60.747(d)(6), all three hour periods during which the pressure drop across the natural draft openings falls below 0.007 inches of water column. This alternative monitoring proposal was approved by the EPA on March 28, 2000. See U.S. EPA Applicability Index Control Number 0000080 for Subpart VVV;
- iii. As required by §60.744(f)(1), all periods during actual coating operations when a required monitoring device was malfunctioning or not operating; and
- v. As required by §60.744(f)(2), all periods during actual coating operations when the control device was malfunctioning or not operating.
- vi. The Permittee shall submit reports postmarked on or before January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. All instances of deviations from the requirements of this permit must be clearly identified.

# D. Emission Source ID ES-SPDR-01, ES-SPDR-02, ES-SPDR-03, ES-SPDR-04, ES-SPDR-05, ES-SPDR-06, ES-SPDR-07, ES-SPDR-08, ES-SPDR-09, ES-SPDR-10, ES-SPDR-11, and ES-SLEV-01

If an existing total enclosure, as specified in 40 CFR Part 60, Subpart VVV, is modified, or if a new total enclosure is created, the Permittee shall operate in accordance with the conditions below:

# 1. AB AIR QUALITY CODE 4.0524 - NEW SOURCE PERFORMANCE STANDARDS

- a. **Testing** [AB Air Quality Code 4.0524(a)]
  - i. Conduct an initial performance test for each modified (or newly-created) total enclosure within 60 days after achieving the maximum production rate at which this source will be operated, but not later than 180 days after initial startup of these sources. The Permittee shall provide the Agency with a written report of the results of the performance test. Testing shall be performed in accordance with §60.743(b). If the results of this testing do not demonstrate compliance with §60.743(b), as specified below, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524;
  - ii. Demonstrate that a total enclosure is installed. The total enclosure shall either be approved by the Director of the Agency in accordance with the provisions of § 60.746, or meet the requirements in paragraphs (b)(1)(i) through (vi) of §60.742, as follows;
    - 1. The only openings in the enclosure are forced makeup air and exhaust ducts and natural draft openings such as those through which raw materials enter and exit the coating operation;
    - 2. Total area of all natural draft openings does not exceed 5 percent of the total surface area

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of the total enclosure's walls, floor, and ceiling;

- 3. All access doors and windows are closed during normal operation of the enclosed coating operation, except for brief, occasional openings to accommodate process equipment adjustments. If such openings are frequent, or if the access door or window remains open for a significant amount of time during the process operation, it shall be considered a natural draft opening. Access doors used routinely by workers to enter and exit the enclosed area shall be equipped with automatic closure devices;
- 4. Average inward face velocity (FV) across all natural draft openings is a minimum of 3,600 meters per hour;
- 5. The air passing through all natural draft openings flows into the enclosure continuously. If FV is less than or equal to 9,000 meters per hour, the continuous inward airflow shall be verified by continuous observation using smoke tubes, streamers, tracer gases, or other means approved by the Director of the Agency over the period that the volumetric flow rate tests required to determine FV are carried out. If FV is greater than 9,000 meters per hour, the direction of airflow through the natural draft openings shall be presumed to be inward at all times without verification;
- 6. All sources of emissions within the enclosure shall be a minimum of four equivalent diameters away from each natural draft opening.
- iii. As required by §60.744(h), install, calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the differential pressure across the total enclosure;
- iv. As required by §60.744(i), record time periods of coating operations when the emission control device is malfunctioning or not in use; and
- v. As required by §60.744(j), record time periods of coating operations when each monitoring device is malfunctioning or not in use.

The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV if this monitoring is not performed.

- b. **Recordkeeping/Reporting** [AB Air Quality 4.0524(a) & 17.0508(f)] The Permittee shall maintain records (written or electronic format) and submit reports documenting:
  - i. When operating CD-TO-01, the Permittee shall maintain records and submit quarterly reports documenting all 3-hour periods (during actual coating operations) during which the average combustion temperature of the device is more than 28 Celsius degrees below the average combustion temperature of the device during the most recent performance test that demonstrated compliance, as specified in §60.747(d)(4).;
  - ii. As an alternative to §60.747(d)(6), all three hour periods during which the pressure drop across the natural draft openings falls below 0.007 inches of water column. This alternative monitoring proposal was approved by the EPA on March 28, 2000. See U.S. EPA Applicability Index Control Number 0000080 for Subpart VVV;
  - iii. As required by §60.744(f)(1), all periods during actual coating operations when a required monitoring device was malfunctioning or not operating; and
  - vii. As required by §60.744(f)(2), all periods during actual coating operations when the control device was malfunctioning or not operating.

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The Permittee shall submit reports postmarked on or before January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. All instances of deviations from the requirements of this permit must be clearly identified.

# E. Emission Source ID ES-SLEV-01

The following table provides a summary of limits and standards for the emission sources referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Volatile organic compounds	Install, operate, and maintain total enclosure around coating operation and vent emissions to 95 percent efficient control device	AB Air Quality Code 4.0524 (40 CFR Part 60, Subpart VVV)
Compounds	Less than 250 tons VOC per consecutive 12-month period (see Subsection 2.2)	AB Air Quality Code 4.0530
Hazardous air pollutants	Multiple compliance options for coating and printing subcategory )	AB Air Quality Code 4.1111 (40 CFR Part 63, Subparts MMMM and PPPP)
Toxic air pollutants	Local enforceable only: Emission point parameters (see Subsection 2.2)	AB Air Quality Code 17.0700

#### 1. AB AIR QUALITY CODE 4.0524 - NEW SOURCE PERFORMANCE STANDARDS

a. Emission Limitation/Standard [AB Air Quality Code 4.0524(a) & 17.0508(b)]
 As specified in §60.742(b)(2) of 40 CFR Part 60, for the coating operation, the Permittee shall install, operate, and maintain a total enclosure around the coating operation and vent the captured VOC emissions from the total enclosure to a control device that is at least 95 percent efficient. [Note: The priming station of this emission source is not subject to 40 CFR Part 60, Subpart VVV, and as a result, may be relocated outside the total enclosure and exhausted to atmosphere.]

# b. **Testing** [AB Air Quality Code 4.0524(a)]

If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.0524(a), §60.743(b) and §60.745 of 40 CFR Part 60, and General Condition JJ. If the results of this testing exceed the standard given in Section 2.1(B)(1)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV.

c. Monitoring [AB Air Quality Code 4.0524(a) & 17.0508(f)]

To assure compliance with the standard given in Section 2.1(B)(1)(a) above, the Permittee shall:

- i. As required by §60.744(c)(1), install, calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the concentration level of organic compounds in both the control device inlet and outlet gas streams;
- ii. As required by §60.744(h), install, calibrate, maintain, and operate, according to the

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manufacturer's specifications, a monitoring device that continuously indicates and records the differential pressure across the total enclosure;

- iii. As required by §60.744(i), record time periods of coating operations when the emission control device is malfunctioning or not in use; and
- iv. As required by §60.744(j), record time periods of coating operations when each monitoring device is malfunctioning or not in use.

The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV if this monitoring is not performed.

# d. **Recordkeeping/Reporting** [AB Air Quality 4.0524(a) & 17.0508(f)]

The Permittee shall maintain records (written or electronic format) and submit reports documenting:

- i. As required by §60.747(d)(2)(i), all periods of three consecutive adsorption cycles of all the individual adsorber vessels during which the average carbon adsorption system efficiency falls below 95 percent;
- ii. As an alternative to §60.747(d)(6), all three hour periods during which the pressure drop across the natural draft openings falls below 0.007 inches of water column. This alternative monitoring proposal was approved by the EPA on March 28, 2000. See U.S. EPA Applicability Index Control Number 0000080 for Subpart VVV;
- iii. As required by §60.744(f)(1), all periods during actual coating operations when a required monitoring device was malfunctioning or not operating; and
- iv. As required by §60.744(f)(2), all periods during actual coating operations when the control device was malfunctioning or not operating.

The Permittee shall submit reports postmarked on or before January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. All instances of deviations from the requirements of this permit must be clearly identified.

#### 2. AB AIR OUALITY CODE 4.1111 - MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. <u>Emission Limitation/Standard</u> [AB Air Quality Code 4.1111(a) & 17.0508(b)] The lithographic printing sleeve manufacturing process shall comply with all requirements of WNCRQAQ Code 4.1111 and either 40 CFR Part 63, Subpart MMMM National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products when coating nickel base sleeves, or 40 CFR Part 63, Subpart PPPP National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products when coating fiberglass base sleeves. Per 63.3881(e)(2) and 63.4481(e)(2), compliance with these subparts is demonstrated by compliance with 40 CFR Part 63, Subpart OOOO, so long as the activities represented by Subpart OOOO comprise 90 percent or more of all facility-wide coating activities.
- b. Recordkeeping and Reporting [AB Air Quality Code 4.1111(a) &17.0508(f)]
  The Permittee shall keep records adequate to determine the predominant activity on an annual basis. The Permittee shall submit reports postmarked on or before January 30 of each calendar year for the preceding 12-month period documenting the predominant activity for the preceding calendar year.

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## F. Emission Source ID-NEXPRESS

The following table provides a summary of limits and standards for the emission source referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Volatile organic	Make estimates of projected annual VOC use and maintain records of actual VOC use	AB Air Quality Code 4.0524 (40 CFR Part 60, Subpart VVV)
compounds	Less than 250 tons VOC per consecutive 12-month period (see Subsection 2.2)	AB Air Quality Code 4.0530
Hazardous air pollutants	Multiple compliance options for coating and printing subcategory )	AB Air Quality Code 4.1111 (40 CFR Part 63, Subpart MMMM)
Toxic air pollutants	Local enforceable only: Emission point parameters (see Subsection 2.2)	AB Air Quality Code 17.0700

## 1. AB AIR QUALITY CODE 4.0524 - NEW SOURCE PERFORMANCE STANDARDS

- a. Monitoring [AB Air Quality Code 4.0524(a) & 17.0508(f)]
  As specified in §60.740(b)(2) of 40 CFR Part 60 for affected facilities for which the amount of VOC used is less than 95 megagrams per 12-month period, the Permittee shall:
  - i. As required by §60.744(b), make semiannual estimates of the projected annual amount of VOC to be used for the manufacture of polymeric coated substrate at the affected coating operations in that year; and
  - ii. As required by §60.744(b), maintain records of actual VOC use.

The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV if this monitoring is not performed.

#### 2. AB AIR QUALITY CODE 4.1111 - MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. Emission Limitation/Standard [AB Air Quality Code 4.1111(a) & 17.0508(b)]
  The Nexpress ceramer sleeve coating process shall comply with all requirements of WNCRQAQ Code 4.1111 and 40 CFR Part 63, Subpart MMMM National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. Per 63.3881(e)(2), compliance with this subpart is demonstrated by compliance with 40 CFR Part 63, Subpart OOOO, so long as the activities represented by Subpart OOOO comprise 90 percent or more of all facility-wide coating activities.
- b. Recordkeeping and Reporting [AB Air Quality Code 4.1111(a) &17.0508(f)]
  The Permittee shall keep records adequate to determine the predominant activity on an annual basis. The Permittee shall submit reports postmarked on or before January 30 of each calendar year for the preceding 12-month period documenting the predominant activity for the preceding calendar year.

# G. Emission Source ID ES-BOIL-01

The following table provides a summary of limits and standards for the emission source referenced above:

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Regulated Pollutant	Limits / Standards	Applicable Regulation
Particulate matter	0.38 pounds per million BTU heat input	AB Air Quality Code 4.0503
N/A	Recordkeeping and reporting requirements	AB Air Quality Code 4.0524 (40 CFR Part 60, Subpart Dc)
Sulfur dioxide	2.3 pounds per million BTU heat input	AB Air Quality Code 4.0516
Visible emissions	20 percent opacity	AB Air Quality Code 4.0521
Volatile organic compounds	Less than 250 tons VOC per consecutive 12-month period (see Subsection 2.2)	AB Air Quality Code 4.0530

# 1. AB AIR QUALITY CODE 4.0503 - PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

- a. <u>Emission Limitation/Standard</u> [AB Air Quality Code 4.0503(a) & 17.0508(b)] Emissions of particulate matter from this source shall not exceed 0.38 pounds per million Btu heat input.
- b. **Testing** [AB Air Quality Code 4.2609]

No testing is required at this time, however AB Air Quality reserves the right to require appropriate testing at a later date. If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.2609 and General Condition JJ. If the results of this testing are above the limit given in Section 2.1(E)(1)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0503.

c. <u>Monitoring/Recordkeeping/Reporting</u> [AB Air Quality Code 17.0508(f)] No monitoring/recordkeeping/reporting is required for particulate emissions from the combustion of natural gas, propane or No. 2 fuel oil in this source.

# 2. AB AIR QUALITY CODE 4.0524 - NEW SOURCE PERFORMANCE STANDARDS

- a. <u>Emission Limitation/Standard</u> [AB Air Quality Code 4.0524(a) & 17.0508(b)] In order to avoid requirements in 40 CFR Part 60, Subpart Dc for burning fuel oil, ES-BOIL-01 shall only burn natural gas.
- b. **Recordkeeping and Reporting** [AB Air Quality Code 4.0524(a) & 17.0508(f)]
  - i. In accordance with §60.48c(g), the facility shall record and maintain records of the amounts of fuel combusted during each month.
  - ii. In accordance with §60.48c(i), the facility shall maintain all records required under this section for a period of two years following the date of such record.
  - iii. The permittee shall provide written notification to the agency of any planned change in type of fuel use.

# 3. AB AIR QUALITY CODE 4.0516 - SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

a. **Emission Limitation/Standard** [AB Air Quality Code 4.0516 & 17.0508(b)]

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When combusting natural gas, emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

# b. **Testing** [AB Air Quality Code 4.2611]

No testing is required at this time; however, AB Air Quality reserves the right to require appropriate testing at a later date. If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.2611 and General Condition JJ. If the results of this testing are above the limit given in Section 2.1(F)(2)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0516

c. <u>Monitoring/Recordkeeping/Reporting</u> [AB Air Quality Code 17.0508(f)] No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the combustion of natural gas in this source.

## 4. AB AIR QUALITY CODE 4.0521 - CONTROL OF VISIBLE EMISSIONS

- a. Emission Limitation/Standard [AB Air Quality Code 4.0521(d) & 17.0508(b)]
  When combusting natural gas, visible emissions from this source shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.
- b. Testing [AB Air Quality Code 4.2610]

  No testing is required at this time; however, AB Air Quality reserves the right to require appropriate testing at a later date. If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.2610 and General Condition JJ. If the results of this testing are above the limit given in Section 2.1(F)(3)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0521.
- c. <u>Monitoring/Recordkeeping/Reporting</u> [AB Air Quality Code 17.0508(f)] No monitoring/recordkeeping/reporting is required for visible emissions from the combustion of natural gas in this source.

# H. Emission Source ID ES-BOIL-02

The following table provides a summary of limits and standards for the emission source referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Particulate matter	0.37 pounds per million BTU heat input	AB Air Quality Code 4.0503
Sulfur dioxide	2.3 pounds per million BTU heat input	AB Air Quality Code 4.0516
Visible emissions	20 percent opacity	AB Air Quality Code 4.0521
Volatile organic compounds	Less than 250 tons VOC per consecutive 12-month period (see Subsection 2.2)	AB Air Quality Code 4.0530

# 1. AB AIR QUALITY CODE 4.0503 - PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

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a. <u>Emission Limitation/Standard</u> [AB Air Quality Code 4.0503(a) & 17.0508(b)] Emissions of particulate matter from this source shall not exceed 0.37 pounds per million Btu heat input.

# b. **Testing** [AB Air Quality Code 4.2609]

No testing is required at this time; however, AB Air Quality reserves the right to require appropriate testing at a later date. If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.2609 and General Condition JJ. If the results of this testing are above the limit given in Section 2.1(F)(1)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0503.

Monitoring/Recordkeeping/Reporting [AB Air Quality Code 17.0508(f)]

No monitoring/recordkeeping/reporting is required for particulate emissions from the combustion of natural gas, propane, or No. 2 fuel oil in this source.

# 2. AB AIR QUALITY CODE 4.0516 - SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

a. <u>Emission Limitation/Standard</u> [AB Air Quality Code 4.0516 & 17.0508(b)] Emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

# b. **Testing** [AB Air Quality Code 4.2611]

No testing is required at this time; however, AB Air Quality reserves the right to require appropriate testing at a later date. If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.2611 and General Condition JJ. If the results of this testing are above the limit given in Section 2.1(F)(2)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0516.

c. <u>Monitoring/Recordkeeping/Reporting</u> [AB Air Quality Code 17.0508(f)] No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the combustion of natural gas, propane, or No. 2 fuel oil in this source.

# 3. AB AIR QUALITY CODE 4.0521 - CONTROL OF VISIBLE EMISSIONS

a. Emission Limitation/Standard [AB Air Quality Code 4.0521(d) & 17.0508(b)]
Visible emissions from this source shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

# b. **Testing** [AB Air Quality Code 4.2610]

No testing is required at this time; however, AB Air Quality reserves the right to require appropriate testing at a later date. If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.2610 and General Condition JJ. If the results of this testing are above the limit given in Section 2.1(F)(3)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0521.

c. <u>Monitoring/Recordkeeping/Reporting</u> [AB Air Quality Code 17.0508(f)] No monitoring/recordkeeping/reporting is required for visible emissions from the combustion of natural gas or No. 2 fuel oil in this source.

# I. Emission Source ID ES-SLEV-02, ES-BRUSH-01, and ES-RUMX-01

The following table provides a summary of limits and standards for the emission source referenced above:

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Regulated Pollutant	Limits / Standards	Applicable Regulation
Particulate matter	$E = 4.10(P)^{0.67}$ , where $E =$ allowable emission rate in pounds per hour and $P =$ process weight rate in tons per hour	AB Air Quality Code 4.0515
Visible emissions	20 percent opacity	AB Air Quality Code 4.0521

# 1. AB AIR QUALITY CODE 4.0515 - PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

# a. Emission Limitation/Standard [AB Air Quality Code 4.0515(a) & 17.0508(b)]

Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10(P)^{0.67}$$
 Where  $E =$  allowable emission rate in pounds per hour  $P =$  process weight in tons per hour.

# b. **Testing** [AB Air Quality Code 4.2609]

No testing is required at this time, however AB Air Quality reserves the right to require appropriate testing at a later date. If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.2609 and General Condition JJ. If the results of this testing are above the limit given in Section 2.1(G)(1)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0515.

# c. **Monitoring** [AB Air Quality Code 17.0508(f)]

Particulate matter emissions from these sources shall be controlled by the associated baghouses. To assure compliance with the limitation given in Section 2.1(G)(1)(a) above, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, at a minimum, the inspection and maintenance requirement shall include the following:

- A monthly visual inspection of the system ductwork and material collection unit for leaks;
   and
- ii. An annual (for each 12-month period following the initial inspection) visual inspection of the baghouses structural integrity.

The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0515 if the ductwork and baghouses are not inspected and maintained.

# d. **Recordkeeping** [AB Air Quality Code 17.0508(f)]

The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized AB Air Quality representative upon request. The logbook shall record the following:

- i. The date and time of each recorded action;
- ii. The results of each inspection;
- iii. The results of any maintenance performed on the baghouses; and
- iv. Variance from manufacturer's recommendations, if any, and corrections made.

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The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0515 if these records are not maintained.

# e. **Reporting** [AB Air Quality Code 17.0508(f)]

The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

Additionally, the Permittee shall submit the results of any maintenance performed on the baghouses within 30 days of a written request by AB Air Quality.

## 2. AB AIR QUALITY CODE 4.0521 - CONTROL OF VISIBLE EMISSIONS

a. Emission Limitation/Standard [AB Air Quality Code 4.0521(d) & 17.0508(b)]
Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

# b. **Testing** [AB Air Quality Code 4.2610]

No testing is required at this time, however AB Air Quality reserves the right to require appropriate testing at a later date. If emission testing is required, the testing shall be performed in accordance with AB Air Quality Code 4.2610 and General Condition JJ. If the results of this testing are above the limit given in Section 2.1(G)(2)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0521.

# c. **Monitoring** [AB Air Quality Code 17.0508(f)]

To assure compliance with the limitation given in Section 2.1(G)(2)(a) above, once per month the Permittee shall observe the emission points of these sources for any visible emissions above normal. The Permittee shall establish "normal" for these sources in the first 30 days following the effective date of the permit. If visible emissions from these sources are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with AB Air Quality Code 4.0521 or (b) demonstrate that the percent opacity from the emission points of these sources in accordance with AB Air Quality Code 4.0501(c)(8) are below the limit given in Section 2.1(G)(2)(a) above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with AB Air Quality Code 4.0521.

# d. **Recordkeeping** [AB Air Quality Code 17.0508(f)]

Records (written or electronic format) of the above monitoring shall be maintained onsite and made available to an authorized AB Air Quality representative upon request. The records shall include the following:

- i. The date and time of each recorded action;
- ii. The results of each observation and/or test noting the source with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
- iii. The results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0521 if these records are not maintained.

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# e. **Reporting** [AB Air Quality Code 17.0508(f)]

The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

# J. Emission Source ID ES-GENR-01

The following table provides a summary of limits and standards for the emission source referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Hazardous air pollutants	Work practice standards for natural gas firing	AB Air Quality Code 4.1111 (40 CFR Part 63, Subpart ZZZZ)

## 1. AB AIR QUALITY CODE 4.1111 - MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. <u>Emission Limitation/Standard</u> [AB Air Quality Code 4.1111 & 17.0508(b)]
  - The generator shall comply with all requirements of WNCRQAQ Code 4.1111 and 40 CFR Part 63, Subpart ZZZZ National Emission Standards for Reciprocating Internal Combustion Engines. By October 19, 2013, this generator shall be in compliance with the following operating limitations:
  - i. Change oil and filter every 500 hours or annually, whichever comes first.
  - ii. Inspect spark plugs every 1,000 hours or annually, whichever comes first.
  - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
  - iv. Operate and maintain the RICE and control device (if any) according to the manufacturer's emission related written instructions or maintenance plan developed by the Permittee.
  - v. Install non-resettable hour meter if one is not already installed.
  - vi. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitation apply.
  - vii. There is no time limit on the use in emergency situations.
  - viii. Maintenance checks and readiness testing is limited to 100 hours per year.
  - ix. Operation during non-emergency situations is limited to 50 hours per year and counts toward the 100 hours per year for maintenance checks and readiness testing. The non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may operate for a maximum of 15 hours per year as part of a demand response program, but only as provided by 40 CFR 63.6640(f)(1)(iii).
  - x. Exceptions: If the emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the above schedule, or if performing the work practice on the above schedule would otherwise pose an

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unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Any failure to perform the work practice on the schedule required must be reported along with the Federal, State or local law under which the risk was deemed unacceptable. As an option, an oil analysis program as described in 40 CFR 63.6625(j) may be utilized in order to extend the specified oil change requirement. The EPA Administrator may be petitioned pursuant to the requirements of 40 CFR 63.6(g) to implement alternative work practices.

b. **Recordkeeping** [AB Air Quality Code 4.1111 & 17.0508(f)]

The following records must be maintained:

- i. Oil and filter change dates and corresponding hour on the hour meter, including data associated with the oil analysis program, if applicable;
- ii. Inspection and replacement dates for air cleaners, hoses, and belts;
- iii. Records of other emission-related repairs and maintenance performed; and
- iv. The hours of operation of the engine that is recorded through the nonresettable hour meter. The Permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

Each record must be kept readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

# 2.2 - Multiple Emission Source Specific Conditions and Limitations

A. Emission Source ID ES-MIX-01, ES-SPDR-01, ES-SPDR-02, ES-SPDR-03, ES-SPDR-04, ES-SPDR-05, ES-SPDR-06, ES-SPDR-07, ES-SPDR-08, ES-SPDR-09, ES-SPDR-10, ES-SPDR-11, ES-EXTR-01, ES-SLEV-01, ES-WWST-01, ES-BOIL-01, and ES-BOIL-02

The following table provides a summary of limits and standards for the emission sources referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Volatile organic compounds	Less than 250 tons VOC per consecutive 12-month period	AB Air Quality Code 4.0530

# 1. AB AIR QUALITY CODE 4.0530 - PREVENTION OF SIGNIFICANT DETERIORATION

- a. <u>Emission Limitation/Standard</u> [AB Air Quality Code 4.0530(g) & 17.0508(b)] In order to preclude applicability of AB Air Quality Code 4.0530(g) for major sources and major modifications, these sources shall discharge into the atmosphere less than 250 tons of volatile organic compounds per consecutive 12-month period.
- b. <u>Testing</u> [AB Air Quality 4.2614]
   Performance testing of the VOC destruction efficiency of CD-TO-01 shall be performed once

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every five years from the date of the previous performance test. The test shall be performed in accordance with AB Air Quality Code 4.0524(a), §60.743(b) and §60.745 of 40 CFR Part 60, and General Condition JJ. If the results of this testing exceed the standard given in Section 2.1(C)(1)(a) above, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0524 and 40 CFR Part 60, Subpart VVV.

c. **Monitoring** [AB Air Quality 4.0614 & 17.0508(f)]

Permanent total enclosures subject to 40 CFR 60.742(b)(2) will meet the following requirements:

- iv. Sensors located along the perimeter of the enclosures shall monitor differential pressure between outside and inside the enclosure. Sensors will measure a range of 0.0 to 0.1 inches water column and have an accuracy of 0.25 percent of full scale;
- v. Feedback from the sensors shall be collected and logged on a computer. Differential pressure readings from each sensor shall be logged every 15 seconds. An average of the six readings shall be taken every 15 seconds, and an accumulative average shall be calculated and logged over a running 3-hour period;
- vi. Based on general ventilation standards, a differential pressure of 0.007 inches water column shall equate to a minimum air velocity of 200 feet per minute into the total enclosure;
- viii. If the 3-hour average drops to 0.0075 inches water column, the monitoring system will provide an audible and visual alarm. At such times, the cause for the alarm shall be investigated, and corrective action shall be taken as needed;
- ix. Differential pressure sensors shall be calibrated semiannually;
- x. Preventive maintenance and calibration tasks for the total enclosure sensors shall be scheduled and documented using a computerized maintenance management system.
- d. <u>Monitoring</u> [AB Air Quality 4.0614 & 17.0508(f)] For the Carbon Adsorptions System (CD-SRS-01 and CD-SRS-02)
  - i. Continuous emission monitoring (CEM) analyzers shall monitor inlet and outlet VOC concentration in parts per million (ppm). The inlet sample shall be taken from a common inlet duct after all process exhaust connections, but before the solvent recovery system inlet.
    - inlet duct after all process exhaust connections, but before the solvent recovery system inlet. The outlet sample shall be taken from the common exhaust stack from each system.
  - ii. Every 15 seconds, an inlet and outlet ppm reading shall be taken and logged on a computer. An efficiency calculation shall be made for each 15 second reading and logged on this same computer. Every hour, the 15 second efficiency readings shall be averaged and logged on the computer. The efficiency readings shall also be averaged over the time it takes to complete 3 adsorption cycles for each carbon vessel, and a running average 3 cycle efficiency shall be calculated throughout each month. This rolling three-cycle average shall be the critical indicator for monitoring overall system efficiency for the two solvent recovery systems.
  - iii. The target efficiency will be 97 percent or better for each of the two solvent recovery systems. The computer monitoring system shall provide an audible and visual alarm if the system efficiency drops to this target efficiency. At such times, the cause for the alarm shall be investigated, and corrective action shall be taken as needed.
  - iv. The following key parameters shall also be monitored and on a computer: adsorption vessel inlet and outlet valve positions; steam valve position, flow rate (lbs/hour), and duration; and carbon bed temperature throughout the adsorption cycle.
  - v. Adsorption cycle times and steam flow rates shall be based on a combination of solvent

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loading and system manufacturer's recommendations. The computer monitoring system shall provide an audible and visual alarm if a component malfunction were to occur. At such times, the cause for the drop in efficiency shall be investigated, and corrective action shall be taken as needed.

- vi. The CEM analyzers shall be calibrated quarterly by facility personnel and annually by a certified outside technician.
- vii. Preventive maintenance and calibration tasks for the solvent recovery/carbon adsorption system shall be scheduled and documented using a computerized maintenance management system. Preventive maintenance frequencies shall be based on manufacturer's recommendations and the facility's equipment history.
- e. <u>Monitoring</u> [AB Air Quality 4.0614 & 17.0508(f)] For the Regenerative Thermal Oxidizer (CD-TO-01):
  - Temperature sensors shall monitor combustion chamber temperature during operation. The
    initial destruction test will determine the control device efficiency and the corresponding
    destruction test average combustion chamber temperature that will be required to maintain
    that efficiency.
  - ii. The target efficiency will be 98 percent or better. To ensure the target efficiency is being met, the combustion chamber temperature shall be logged on a computer every five minutes and used to calculate instantaneous and three hour average destruction efficiency. Audible and visual alarms will provide feedback if the instantaneous combustion chamber temperature falls 50 degrees Fahrenheit below the destruction test average combustion chamber temperature for a period of 15 minutes. Additionally, an audible and visual alarm will provide feedback if the 3-hour average combustion temperature drops below the destruction test average combustion chamber temperature.
  - iii. The following key parameters shall also be monitored on a computer: RTO damper positions and exhaust stack temperature. The computer monitoring system shall provide an audible and visual alarm if a component malfunction were to occur. At such times, the cause for the alarm shall be investigated, and corrective action shall be taken as needed.
  - iv. Preventive maintenance and calibration tasks for the RTO shall be scheduled and documented using a computerized maintenance management system. RTO preventative maintenance shall follow manufacturer's recommendations based on operating hours. RTO maintenance would include, but not limited to, testing of burner safety interlocks, visual inspection of combustion chamber and heat transfer media, lubrication of the main fan, calibration of temperature sensors, and inspection of control dampers.
- f. Facility-wide Emissions [AB Air Quality 17.0508(f)]

If the total monthly VOC emissions exceed 18.75 tons, or the total monthly toluene emissions exceed 12 tons, investigation and corrective action shall be taken as needed.

# g. **Recordkeeping** [AB Air Quality 17.0508(f)]

To assure compliance with the limitation given in Section 2.2(A)(1)(a) above, the Permittee shall calculate VOC emissions monthly as the sum of each consecutive 12-month period. Calculations and the total amount of VOC emissions shall be recorded monthly in a logbook (written or electronic format). If the required monitoring is not conducted or the records are not maintained, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0530. Additionally, the Permittee shall be deemed in noncompliance with AB Air Quality Code 4.0530 if the VOC emissions exceed the limitation given in Section 2.2(A)(1)(a) above.

h. **Recordkeeping** [AB Air Quality Code 17.0508(f)]

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For the permanent total enclosures, carbon adsorption system, and the RTO, the Permittee shall maintain the following information on-site for a period of at least five years:

- i. Inspection records;
- ii. Pressure, VOC, and temperature readings;
- iii. Preventative maintenance records; and
- iv. Records of any corrective actions taken for an exceedance of a target value.
- i. **Reporting** [AB Air Quality Code 17.0508(f)]

The Permittee shall submit a report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. The quarterly report shall include the following additional information:

- i. VOC emissions calculated monthly as the sum of each consecutive 12-month period for the air emission sources listed under this permit, including insignificant activities;
- ii. Number, duration, cause (including unknown, if applicable) of any exceedance of a target value and the corrective action taken; and
- iii. Number, duration, and cause (including unknown, if applicable) of any RTO temperature recorder or data logger downtime incidents.
- B. Emission Source ID ES-MIX-01, ES-SPDR-01, ES-SPDR-02, ES-SPDR-03, ES-SPDR-04, ES-SPDR-05, ES-SPDR-06, ES-SPDR-07, ES-SPDR-08, ES-SPDR-9, ES-SPDR-10, ES-SPDR-11, ES-EXTR-01, ES-WWST-01, ES-CURE-01, ES-CURE-02, ES-CURE-03, ES-CURE-04, ES-PACK-01, ES-SLEV-01<sup>1</sup>, and ES-NEXPRESS<sup>1</sup>

The following table provides a summary of limits and standards for the emission sources referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Hazardous air pollutants	Multiple compliance options for coating and printing subcategory	AB Air Quality Code 4.1111 (40 CFR Part 63, Subpart OOOO)

<sup>1</sup>ES-SLEV-01 and ES-NEXPRESS are subject to this subsection when compliance with 40 CFR Part 63, Subparts MMMM and PPPP is demonstrated by compliance with Subpart OOOO.

#### 1. AB AIR QUALITY CODE 4.1111 - MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

a. Emission Limitation/Standard [AB Air Quality Code 4.1111(a) & 17.0508(b)]
 The coating operations shall comply with all requirements of WNCRQAQ Code 4.1111 and 40 CFR Part 63, Subpart OOOO - National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles. Emissions of organic HAP from the coating operations shall meet one of the applicable emission limits in Table 1 of the subpart, including:

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- i. Reduce organic HAP emissions to the atmosphere by achieving at least a 97 percent organic HAP overall control efficiency; or
- ii. Limit organic HAP emissions to the atmosphere to no more than 0.12 kg of organic HAP per kg of solids applied.
- b. **Monitoring** [AB Air Quality Code 4.1111 & 17.0508(f)]

The Permittee's proposed compliance strategy, as described in the letter to the Agency dated February 16, 2009, is considered an alternative method because a mass flow meter is not used to determine exactly how much toluene is captured by the carbon beds. On June 3, 2009, the Agency submitted a formal request to EPA for approval of the proposed compliance strategy. Until such time that the EPA responds otherwise, the Permittee shall continue to monitor HAP usage and emissions according to the proposed compliance strategy.

- c. <u>Recordkeeping</u> [AB Air Quality Code 4.1111 & 17.0508(f)]
   Until such time that the EPA responds otherwise, the Permittee shall continue to keep records of HAP usage and emissions according to the proposed compliance strategy.
- d. Reporting [AB Air Quality Code 4.1111(a) &17.0508(f)]
  The Permittee shall submit reports postmarked on or before January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. The reports will

year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. The reports will document the rolling 12-month average organic HAP control efficiency or emission rate corresponding to the limit selected in Section 2.2.B.1.a above for each month in the reporting period. All instances of deviations from the requirements of this permit must be clearly identified.

# C. Emission Source ID ES-BOIL-01, ES-BOIL-02

The following table provides a summary of limits and standards for the emission sources referenced above:

Regulated Pollutant	Limits / Standards	Applicable Regulation
Hazardous air pollutants	Work practice standards for natural gas	AB Air Quality Code 4.1109

# 1. AB AIR QUALITY CODE 4. 1111 - MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT - 40 CFR PART 63 SUBPART DDDDD)

a. <u>Applicability</u> [AB Air Quality Code 4.1111(a) & 17.0508(b)]

For the existing source(s) designed to burn gas 1 fuels with a heat input capacity equal to or greater than 10 million Btu per hour, the Permittee shall comply with all applicable provision

greater than 10 million Btu per hour, the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in AB Air Quality Code 4.1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" and Subpart A "General Provisions."

- b. <u>Definitions and Nomenclature</u> [AB Air Quality Code 4.1111 & 17.0508(f)] For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.7575 shall apply.
- c. <u>40 CFR Part 63 Subpart A General Provisions</u> [AB Air Quality Code 4.1111 & 17.0508(f)] The Permittee shall comply with the requirements of 40 CFR 63 Subpart A General Provisions

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according to the applicability of Subpart A to such sources as identified in Table 10 to 40 CFR Part 63, Subpart DDDDD.

# d. Notifications [AB Air Quality Code 4.1111 & 17.0508(f)]

The Permittee shall submit a Notification of Compliance Status. The notification must be signed by a responsible official and sent before the close of business on the 60th day following the completion of the initial tune up and one time energy assessment (whichever is later). The notification shall contain the following:

- i. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, and description of the fuel(s) burned.
- ii. The following certification(s) of compliance, as applicable:
  - 1. This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR 63 Subpart DDDDD at the site according to the procedures in.40 CFR 63.7540(a)(10)(i) through (vi); and
  - 2. This facility has had an energy assessment performed according to 40 CFR 63.7530(e) and is an accurate depiction of the facility at the time of the assessment, or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended.
- e. General Compliance Requirements [AB Air Quality Code 4.1111 & 17.0508(f)] The Permittee shall be in compliance with the work practice standards in this subpart. These standards apply at all times the affected unit is operating.
- f. Work Practice Standards [AB Air Quality Code 4.1111 & 17.0508(f)]
  The Permittee shall conduct a tune-up of the source(s) annually as specified below:
  - i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled or unscheduled unit shutdown;
  - ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available:
  - iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
  - iv. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOX requirement to which the unit is subject;
  - v. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer;
  - vi. Each annual tune-up shall be conducted no more than 13 months after the previous tune-up;
  - vii. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup;

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- viii. At all times, you must operate and maintain any affected source, 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.
- ix. The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.1111 if the requirements in Section 2.2 C.1.g are not met.
- g. Energy Assessment Requirements [AB Air Quality Code 4.1111 & 17.0508(f)]
  The Permittee shall have a one-time energy assessment performed by a qualified energy assessor.
  The energy assessment must address the requirements in 40 CFR 63 Subpart DDDDD, Table 3,

The energy assessment must address the requirements in 40 CFR 63 Subpart DDDDD, Table 3, with the extent of the evaluation for items (a) to (e) in Table 3 appropriate for the on-site technical hours listed in §63.7575: [§63.7500(a)(1), Table 3]

- i. The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.1111 if these requirements are not met.
- h. **Recordkeeping Requirements** [AB Air Quality Code 4.1111 & 17.0508(f)] The Permittee shall keep the following:
  - i. A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status, or semiannual compliance report that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
  - ii. Maintain on-site and submit, if requested by the Administrator, an annual report containing the information in paragraphs (1) through (3) below:
    - 1. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the source;
    - 2. A description of any corrective actions taken as a part of the combustion adjustment This facility has had an energy assessment performed according to 40 CFR 63.7530(e)" [i.e., Section 2.1 E.5.h.] and is an accurate depiction of the facility at the time of the assessment, or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended; and
    - 3. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
  - iii. The associated records for Sections 2.2 C.1.e through g.
  - iv. The Permittee shall
    - 1. Maintain records in a form suitable and readily available for expeditious review;
    - 2. Keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record; and
    - 3. Keep each record on site for at least 2 years after the date of each occurrence,

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measurement, maintenance, corrective action, report, or record. The Permittee can keep the records offsite for the remaining 3 years.

v. The Permittee shall be deemed in noncompliance with AB Air Quality Code 4.1111 if records are not maintained as described in Sections 2.2.C.1.d through h.

# i. Reporting Requirements [AB Air Quality Code 4.1111 & 17.0508(f)] Pursuant to 40 CFR 63.7550(b), the Permittee shall submit compliance reports to the AB Air Quality on an annual basis. The Permittee shall submit the compliance report postmarked on or before January 30 of each calendar year for the preceding 12-month period.

- i. This report must also be submitted electronically via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/).) You must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, you may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (http://www.epa.gov/ttn/chief/cedri/index.html), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §63.13. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.
- ii. The compliance report must contain the following information:
  - 1. Company name and address;
  - 2. Process unit information, emissions limitations, and operating parameter limitations;
  - 3. Date of report and beginning and ending dates of the reporting period;
  - 4. The total operating time during the reporting period;
  - 5. If there are no deviations from the requirements of the work practice requirements in Section 2.2.C.1.f above, a statement that there were no deviations from the work practice standards during the reporting period; and
  - 6. Include the date of the most recent tune-up for each unit required according to Section 2.2.C.1.f. Include the date of the most recent burner inspection if it was not done as scheduled and was delayed until the next scheduled or unscheduled unit shutdown
- iii. For deviations from a work practice standard during the reporting period, the report must contain the following information:
  - 1. A description of the deviation and which emission limit or operating limit from which you deviated; and
  - 2. Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken.
- iv. Permittee shall be deemed in noncompliance with AB Air Quality Code 4.1111 if records are not maintained as described in Sections 2.2.C.1.h.i through iii.

# D. Facility Wide

The following table provides a summary of limits and standards for the emission sources referenced above:

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Regulated Pollutant Limits / Standards		Applicable Regulation
Odorous emissions	Local enforceable only: Odorous emissions must be controlled	AB Air Quality Code 4.1806
Toxic air pollutants	Local enforceable only: Emission point parameters	AB Air Quality Code 17.0700

# 1. AB AIR QUALITY CODE 4.1806 - CONTROL AND PROHIBITION OF ODOROUS EMISSIONS (LOCAL-ENFORCEABLE ONLY)

a. <u>Emission Limitation/Standard</u> [AB Air Quality Code 4.1806(e) & 17.0508(b)]

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

# 2. AB AIR QUALITY CODE 17.0700 - TOXIC AIR POLLUTANT PROCEDURES (LOCAL-ENFORCEABLE ONLY)

Pursuant to AB Air Quality Code 17.0700 and 4.1100, an application for a toxic air pollutant compliance demonstration has been submitted and approved. The compliance demonstration is detailed in the tables below. Upon written request from AB Air Quality, the Permittee shall verify compliance with the parameters used in the air dispersion modeling demonstration. Before modifying these parameters, the Permittee must demonstrate compliance with AB Air Quality Code 4.1100.

		Compliance Demonstration Method	
Evaluated Toxic Air Pollutant	CAS No.	Actual Emission Rate Below Toxics Permitting Emission Rate (TPER)?	Air Dispersion Modeling Conducted?
Methyl Ethyl Ketone (MEK)	78-93-3	No	Yes
Toluene	108-88-3	No	Yes

For reference, the air dispersion modeling parameters follow:

Parameter	Point Sources		
1 at affecter	CD-SRS-01 Stack	CD-SRS-02 Stack	ES-WWST-01 Stack
Distance to Property Line (m)	102.9	102.9	102.9
Stack Height (m)	7.62	10.0	8.75
Temperature (°K)	324.8	324.8	293
Exit Velocity (m/s)	13.41	17.13	0.24
Diameter (m)	1.68	1.524	0.61
MEK (lb/hr)			2.0
Toluene (lb/hr)	55.0	55.0	2.0

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Donomoton	Volume Source	
Parameter	Fugitives from Building	
Distance to Property Line (m)	30.8	
Release Height (m)	3.81	
Initial Lateral Dimension (m)	27.8	
Initial Vertical Dimension (m)	3.54	
MEK (lb/hr)	38.0	
Toluene (lb/hr)	36.5	

Note: The air dispersion modeling analysis represented above was performed for Permit No. 11-774-06. The toxics evaluation conducted by the AB Air Quality found the facility did not emit MEK in excess of the toxics permitting emission rates listed in AB Air Quality Code 17.0711. A netting exercise conducted by the AB Air Quality in accordance with AB Air Quality Code 17.0700 found that no net increase in toluene would occur from the modification for ES-SPDR-10 (Permit No. 11-774-06B). The replacement of two spinning lathes with a knife coater resulted in an increase in potential emissions of one toxic air pollutant, toluene. The facility-wide toluene emission rate used in the modeling analysis represented in Part I, Section 2.2.D.3 was 112 pounds per hour. The potential (controlled) facility-wide toluene emission rate for the additional processes added since the original air dispersion modeling performed in 2006 is lower than the modeled emission rate and no further analysis is necessary.

# **SECTION 3 - GENERAL CONDITIONS AND LIMITATIONS**

This section describes terms and conditions applicable to this Title V facility. All references to the "permit" in this section apply only to Part I of the permit.

# A. General Provisions [NCGS 143-215 and AB Air Quality Code 17.0508(i)(16)]

- 1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in AB Air Quality Code Chapters 4 and 17.
- 2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by AB Air Quality.
- 3. This permit is not a waiver of or approval of any other permits that may be required for other aspects of the facility which are not addressed in this permit.
- 4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of local laws or rules, unless specifically authorized by an order from AB Air Quality.
- 5. Except as identified as local-only requirements in this permit, all terms and conditions contained herein shall be enforceable by AB Air Quality, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.

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6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by AB Air Quality, unless the source is exempted by rule. AB Air Quality may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

# B. Permit Availability [AB Air Quality Code 17.0507(k) and 17.0508 (i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of AB Air Quality upon request.

# C. Severability Clause [AB Air Quality Code 17.0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

D. **Submissions** [AB Air Quality Code 17.0507(e) and 17.0508(i)(16)]

Except as otherwise specified herein, one copy of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to AB Air Quality.

# E. **Duty to Comply** [AB Air Quality Code 17.0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as local-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

# F. <u>Circumvention</u> - LOCAL ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

## G. Permit Modifications

- Administrative Permit Amendments [AB Air Quality Code 17.0514]
   The Permittee shall submit an application for an administrative permit amendment in accordance with AB Air Quality Code 17.0514.
- 2. Transfer of Ownership or Operation [AB Air Quality Code 17.0524 and 17.0505] The Permittee shall submit an application for an ownership change in accordance with AB Air Quality Code 17.0524 and 17.0505.
- 3. Minor Permit Modifications [AB Air Quality Code 17.0515]

  The Permittee shall submit an application for a minor permit modification in accordance with AB Air Quality Code 17.0515.
- 4. Significant Permit Modifications [AB Air Quality Code 17.0516]

  The Permittee shall submit an application for a significant permit modification in accordance with AB Air Quality Code 17.0516.
- 5. Reopening for Cause [AB Air Quality Code 17.0517]

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The Permittee shall submit an application for reopening for cause in accordance with AB Air Quality Code 17.0517.

# H. Changes Not Requiring Permit Modifications

1. Reporting Requirements

Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the AB Air Quality:

- a. Changes in the information submitted in the application;
- b. Changes that modify equipment or processes; or
- c. Changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the AB Air Quality to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

- 2. Section 502(b)(10) Changes [AB Air Quality Code 17.0523(a)]
  - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
  - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
    - i. The changes are not a modification under Title I of the Federal Clean Air Act;
    - ii. The changes do not cause the allowable emissions under the permit to be exceeded;
    - iii. The Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
    - iv. The Permittee shall attach the notice to the relevant permit.
  - c. The written notification shall include:
    - i. A description of the change;
    - ii. The date on which the change will occur;
    - iii. Any change in emissions; and
    - iv. Any permit term or condition that is no longer applicable as a result of the change.
  - d. Section 502(b)(10) changes shall be made in the permit the next time the permit is revised or renewed, whichever comes first.
- 3. Off Permit Changes [AB Air Quality Code 17.0523(b)]

The Permittee may make changes in the operation or emissions without revising the permit if:

a. The change affects only insignificant activities and the activities remain insignificant after the change; or

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- b. The change is not covered under any applicable requirement.
- 4. Emissions Trading [AB Air Quality Code 17.0523(c)]
  To the extent that emissions trading is allowed under AB Air Quality Code Chapter 4, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to AB Air Quality Code 17.0523(c).

# I.A <u>Reporting Requirements for Excess Emissions and Permit Deviations</u> [AB Air Quality Code 4.0535(f) and 17.0508(f)(2)]

- 1. "Excess Emissions" means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Chapter 4; or by a permit condition; or that exceeds an emission limit established in a permit issued under AB Air Quality Code 17.0700. (Note: Definitions of excess emissions under 4.1110 and 4.1111 shall apply where defined by rule.)
- 2. If a source is required to report excess emissions under NSPS (AB Air Quality Code 4.0524), NESHAPs (AB Air Quality Code 4.1110 or 4.1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
- 3. If the source is not subject to NSPS (AB Air Quality Code 4.0524), NESHAPs (AB Air Quality Code 4.1110 or 4.1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with AB Air Quality Code 4.0535 as follows:
  - a. Pursuant to AB Air Quality Code 4.0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
    - i. Notify the Director of any such occurrence by 9:00 a.m. Eastern Time of the Agency's next business day of becoming aware of the occurrence and provide:
      - Name and location of the facility;
      - Nature and cause of the malfunction or breakdown;
      - Time when the malfunction or breakdown is first observed;
      - Expected duration; and
      - Estimated rate of emissions;
    - ii. Notify the Director immediately when corrective measures have been accomplished; and
    - iii. Submit to the Director within 15 days a written report as described in AB Air Quality Code 4.0535(f)(3);

# I.B Reporting Requirements for Permit Deviations

- 1. "Permit Deviations" for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.
- 2. Pursuant to AB Air Quality Code 17.0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) quarterly by notifying the Director of all other deviations from permit requirements not covered under AB Air Quality Code 4.0535. A written report shall be submitted within two business days to the Director and shall include the probable cause of such

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deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

# I.C Other Requirements under AB Air Quality Code 4.0535

The Permittee shall comply with all other applicable requirements contained in AB Air Quality Code 4.0535(c) as follows:

- 1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in AB Air Quality Code 4.0535(c)(1) through (7).
- 2. AB Air Quality Code 4.0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

# J. **Emergency Provisions** [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

- An emergency means any situation arising from sudden and reasonably unforeseeable events
  beyond the control of the facility, including acts of God, which situation requires immediate
  corrective action to restore normal operation, and that causes the facility to exceed a technologybased emission limitation under the permit, due to unavoidable increases in emissions attributable
  to the emergency. An emergency shall not include noncompliance to the extent caused by
  improperly designed equipment, lack of preventive maintenance, careless or improper operation,
  or operator error.
- 2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (3) below are met.
- 3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
  - a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and
  - d. The Permittee submitted notice of the emergency to AB Air Quality within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- 4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

# K. Permit Renewal [AB Air Quality Code 17.0508(e) and 17.0513(b)]

This permit is issued for a fixed term of five years for facilities subject to Title IV requirements and for a term not to exceed five years in the case of all other facilities. This permit shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete renewal

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application is submitted at least six months before the date of permit expiration. If the Permittee or applicant has complied with AB Air Quality Code 17.0512(b)(1), this permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of this permit shall remain in effect until the renewal permit has been issued or denied.

L. <u>Need to Halt or Reduce Activity Not a Defense</u> [AB Air Quality Code 17.0508(i)(4)] It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

# M. <u>Duty to Provide Information (submittal of information)</u> [AB Air Quality Code 17.0508(i)(9)]

- 1. The Permittee shall furnish to AB Air Quality, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
- The Permittee shall furnish AB Air Quality copies of records required to be kept by the permit
  when such copies are requested by the Director. For information claimed to be confidential, the
  Permittee may furnish such records directly to the EPA upon request along with a claim of
  confidentiality.

# N. **<u>Duty to Supplement</u>** [AB Air Quality Code 17.0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to AB Air Quality. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. Retention of Records [AB Air Quality Code 17.0508(f) and 17.0508(l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to an authorized AB Air Quality representative for inspection upon request.

## P. Compliance Certification [AB Air Quality Code 17.0508(n)]

The Permittee shall submit to AB Air Quality and the EPA (Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta, GA 30303) postmarked on or before **January 30** a compliance certification (for the preceding calendar year) by a responsible official with all terms and conditions in the permit (including emissions limitations, standards, or work practices) except for conditions identified as being Local-enforceable only. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

- 1. The identification of each term or condition of the permit that is the basis of the certification;
- 2. The compliance status (with the terms and conditions of the permit for the period covered by the certification);
- 3. Whether compliance was continuous or intermittent;
- 4. The method(s) used for determining the compliance status of the source during the certification period;
- 5. Each deviation and take it into account in the compliance certification; and

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6. As possible exceptions to compliance, any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (CAM) occurred.

## Q. Certification by Responsible Official [AB Air Quality Code 17.0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

# R. Permit Shield for Applicable Requirements [AB Air Quality Code 17.0512]

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance. However, issuance of this permit provides no shield from the Clean Air Act, or regulations promulgated there under, including state regulations, pertaining to requirements of New Source Performance Standards or major or minor new source preconstruction review requirements, which EPA is currently alleging or may allege in the future as having been violated by the Permittee. The permit may be subject to reopening to include a compliance plan and schedule addressing any judicial or administrative order establishing new applicable requirements arising out of past or ongoing noncompliance with those provisions for any affected emission units.

## 2. A permit shield shall not alter or affect:

- a. The power of the Director under AB Air Quality Code 1.0102(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
- b. The liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
- c. The applicable requirements under Title IV; or
- d. The ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
- 3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under AB Air Quality Code 17.0523.
- 4. A permit shield does not extend to minor permit modifications made under AB Air Quality Code 17.0515.
- S. <u>Termination, Modification, and Revocation of the Permit</u> [AB Air Quality Code 17.0519] The Director may terminate, modify, or revoke and reissue this permit if:
  - 1. The information contained in the application or presented in support thereof is determined to be incorrect:
  - 2. The conditions under which the permit or permit renewal was granted have changed;
  - 3. Violations of conditions contained in the permit have occurred;
  - 4. The EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
  - 5. The Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

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# T. **Insignificant Activities** [AB Air Quality Code 17.0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized AB Air Quality representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

# U. **Property Rights** [AB Air Quality Code 17.0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

# V. **Inspection and Entry** [AB Air Quality Code 17.0508(1) and 1.0104(d)]

- 1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow AB Air Quality, or an authorized representative, to perform the following:
  - a. Enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
  - b. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
  - c. Inspect, at reasonable times and using reasonable safety practices, any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - d. Sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of AB Air Quality who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his or her official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

# W. Annual Fee Payment [AB Air Quality Code 17.0508(i)(10)]

- 1. The Permittee shall pay all fees in accordance with AB Air Quality Code 17.0200.
- 2. Payment of fees may be by check or money order made payable to the Asheville-Buncombe Air Quality Agency. Annual permit fee payments shall refer to the permit number.
- 3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under AB Air Quality Code 17.0519.

# X. Annual Emission Inventory Requirements [AB Air Quality Code 17.0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in AB Air Quality Code 17.0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such forms as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

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# Y. Confidential Information [AB Air Quality Code 17.0107 and 17.0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to AB Air Quality Code 17.0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with AB Air Quality Code 17.0107.

# Z. Construction and Operation Permits [AB Air Quality Code 17.0100 and 17.0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source that is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of AB Air Quality Code 17.0100 and 17.0300.

# AA. <u>Standard Application Form and Required Information</u> [AB Air Quality Code 17.0505 and 17.0507]

The Permittee shall submit applications and required information in accordance with the provisions of AB Air Quality Code 17.0505 and 17.0507.

# BB. Financial Responsibility and Compliance History [AB Air Quality Code 17.0507(d)(3)]

AB Air Quality may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

# CC. <u>Refrigerant Requirements (Stratospheric Ozone and Climate Protection)</u> [AB Air Quality Code 17.0501(e)]

- If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82, Subpart A, Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.
- 2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device, except as provided in 40 CFR Part 82, Subpart F.
- 3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

## DD. Prevention of Accidental Releases - Section 112(r) [AB Air Quality Code 17.0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

# EE. <u>Prevention of Accidental Releases "General Duty" Clause - Section 112(r)(1)</u> - FEDERAL ENFORCEABLE ONLY

Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

# FF. <u>Title IV Allowances</u> [AB Air Quality Code 17.0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

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# GG. Air Pollution Emergency Episode [AB Air Quality Code 4.0300]

Should the Director declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in AB Air Quality Code 4.0300.

# HH. **Registration of Air Pollution Sources** [AB Air Quality Code 4.0202(b)]

The Director may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with AB Air Quality Code 4.0202(b).

# II. Ambient Air Quality Standards [AB Air Quality Code 4.0501(c)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in AB Air Quality Code 4.0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

- JJ. General Emissions Testing and Reporting Requirements [AB Air Quality Code 17.0508(i)(16)] Emission compliance testing shall be by the procedures of WNCRAQA Code 4.2600, except as may be otherwise required in WNCRAQA Code 4.0524, 4.0912, 4.1110, 4.1111, or 4.1415. If emissions testing is required by this permit or WNCRAQA or if the Permittee submits emissions testing to WNCRAQA to demonstrate compliance, the Permittee shall perform such testing in accordance with WNCRAQA Code 4.2600 and follow the procedures outlined below.
  - 1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
  - 2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
  - 3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
  - 4. One copy of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator:
    - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
      - i. Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the

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specified method is inappropriate for the source being tested.

- ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.
- iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in this Section if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
- b. The Director may authorize the WNCRAQA to conduct independent tests of any source subject to a rule in this Subchapter to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the WNCRAQA using the appropriate testing procedures described in WNCRAQA Code 4.2600 has precedence over all other tests;

# KK. Reopening for Cause [AB Air Quality Code 17.0517]

- 1. A permit shall be reopened and revised under the following circumstances:
  - a. Additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
  - b. Additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
  - c. The Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. The Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to AB Air Quality Code 17.0513(c).
- 3. Except for the local enforceable only portion of the permit, the procedures set out in AB Air Quality Code 17.0507, 17.0521, or 17.0522 shall be followed to reissue the permit. If the local enforceable only portion of the permit is reopened, the procedures in AB Air Quality Code 17.0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
- 4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
- 5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.
- LL. Reporting Requirements for Non-Operating Equipment [AB Air Quality Code 17.0508(i)(16)]

  The Permittee shall maintain a record of operation for permitted equipment, noting whenever the equipment is taken from and placed into operation. When permitted equipment is not in operation, the requirements for testing, monitoring, and recordkeeping are suspended until operation resumes.

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# MM. <u>Fugitive Dust Control Requirement</u> [AB Air Quality Code 4.0540] - LOCAL ENFORCEABLE ONLY

As required by AB Air Quality Code 4.0540 " Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in WNCRAQA Code 4.0540(g).

"Fugitive dust emissions" means particulate matter that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas, stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads)..

# NN. Specific Permit Modifications [AB Air Quality Code 17.0501 and 17.0523]

- 1. For modifications made pursuant to AB Air Quality Code 17.0501(c)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
- 2. For modifications made pursuant to AB Air Quality Code 17.0501(d)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
- 3. For modifications made pursuant to 502(b)(10), in accordance with AB Air Quality Code 17.0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA Region 4 Air Planning Branch, 61 Forsyth St., Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:
  - a. A description of the change at the facility;
  - b. The date on which the change will occur;
  - c. Any change in emissions; and
  - d. Any permit term or condition that is no longer applicable as a result of the change.

In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of FOR the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

# OO. Third Party Participation and EPA Review [AB Air Quality Code 17.0521, 17.0522 and 17.0525(7)]

For permits modifications subject to 45-day review by the federal Environmental Protection Agency (EPA), EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 2Q .0518 begins at the end of the 45-day EPA review period.

# ATTACHMENT 1

# List of Insignificant Activities Under AB Air Quality Code 17.0503(8)

Emission Source ID	<b>Emission Source Description</b>	Control Device ID	Control Device Description
ES-PRINT-02	Printing blanket process dust collectors	NA	Six (6) dust collectors vented indoors
ES-TANK-32	One (1) 4,000-gallon aboveground storage tank storing toluene	NA	NA
ES-TANK-34	One (1) 4,000-gallon aboveground storage tank storing ethanol	NA	NA
ES-METBAK	One (1) metal cutting, cleaning, molding, edge grinding, and sealing operation, including one (1) electric oven and flat presses	NA	NA
ES-TECH-01	One (1) knife coater	NA	NA
ES-TANK-31	One (1) 20,000-gallon aboveground storage tank storing toluene	NA	NA
ES-COOL	Four (4) cooling towers	NA	NA
ES-RUMX-02	One (1) dry rubber compound additives process	NA	NA

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## **ATTACHMENT 2**

# LIST OF ACRONYMS

AOS Alternate Operating Scenario
BACT Best Available Control Technology

**BTU** British Thermal Unit

CAM Compliance Assurance Monitoring
CEMS Continuous Emission Monitoring System
COMS Continuous Opacity Monitoring System

**CFR** Code of Federal Regulations

CAA Clean Air Act

**EPA** Environmental Protection Agency

FR Federal Register

**GACT** Generally Available Control Technology

**HAP** Hazardous Air Pollutant

MACT Maximum Achievable Control Technology

NCGS North Carolina General Statutes

**NESHAPs** National Emission Standards for Hazardous Air Pollutants

**NO**<sub>X</sub> Nitrogen Oxides

**NSPS** New Source Performance Standard

**PM** Particulate Matter

PM<sub>10</sub> Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers

or Less

PM<sub>2.5</sub> Particulate Matter with Nominal Aerodynamic Diameter of 2.5

Micrometers or Less

**POS** Primary Operating Scenario

PSD Prevention of Significant Deterioration
SIC Standard Industrial Classification

**SIP** State Implementation Plan

SO<sub>2</sub> Sulfur Dioxide TPY Tons Per Year

**VOC** Volatile Organic Compound

**AB Air Quality** Asheville-Buncombe Air Quality Agency